

## TALC AUDIT Sub-Committee Meeting Minutes

**Wednesday 11 June 2025 – 10.00**  
**Revenue Office Bishop's Square and MS Teams**

### Attendees:

Revenue:	Sarah Waters	Revenue
	Aaron Snoddy	Revenue
	Emma Murphy (Secretary)	Revenue
	John Fitzpatrick (Presenter)	Revenue
	Yvonne Quirke (Presenter)	Revenue
Practitioners:	Trish McCarvill (Chair)	Law Society
	Ruth Higgins	Law Society
	Gerry Higgins	CCAB-I
	Noreen Lehane	CCAB-I
	Ken Garvey	CCAB-I
	Aidan Lucey	Irish Tax Institute
	Sandra Brennan	Irish Tax Institute
	Jim Kelly	Irish Tax Institute
	Mary Healy	Irish Tax Institute
	Fergal Kenzie	Irish Tax Institute
	Tim Lynch	Irish Tax Institute
	Mark Ludlow	Irish Tax Institute
Apologies:	Miriam Scahill	Revenue
	Grainne McDermott	CCAB-I
	Gearóid O'Sullivan	CCAB-I

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### Item 1 – Minutes of meeting held on 12 March 2025

Trish McCarvill opened the meeting and thanked everyone for attending. Before addressing the first item on the agenda, she advised the committee of Brian Boyle's retirement from Revenue which occurred in April. She thanked him for his valuable contribution to the committee over the past number of years. This was echoed by all of the members.

It was noted that the minutes of the previous meeting had already been agreed and published.

### Item 2 – Matters arising from the previous meeting.

There were no matters arising from the previous meeting.

### Item 3 – Discussion with High Wealth and Financial Services Division (HW&FSD)

John Fitzpatrick (JF) and Yvonne Quirke (YQ) attended and presented on this item.

JF began the presentation by providing a general overview of the Division. Fiona Molloy is the Assistant Secretary with responsibility for HW&FSD. The division is comprised of 200 staff who are spread across 10 branches. Of the 200 staff, 85 are on the Financial Services side with the remaining 115 in high wealth and the divisional office.

JF then gave an overview of the Banking branch which is comprised of 1 Principal Officer and 6 Assistant Principal's. The Banking branch and Insurance branch look after all regulated banking entities or regulated insurance companies regardless of size, turnover etc which is different from other areas in LCD. In other branches the case base is dependent on certain criteria such as turnover etc. The Banking branch case base includes banks, stockbrokers, large treasury companies and Credit Unions. There is high participation in the Cooperative Compliance Framework among those who meet the criteria. The branch is currently focusing on compliance risks associated with the payment of dividends and the deduction of Deposit Interest Retention Tax (DIRT).

JF then moved onto the Insurance branch which is also comprised of 1 Principal Officer and 6 Assistant Principal's. This branch has the highest number of CCF cases within the division. Their current compliance focus is tax relief at source (TRS) in relation to health insurance premiums, and the health insurers levy.

The next branch that JF covered was the Investment Funds branch. This branch covers "section 110 companies", aircraft leasing and non-regulated funds. This branch does not have as many CCF cases as the first two branches and has a higher number of cases in their case base as they would have more stand-alone companies and not as many groups. Their current compliance focus is on the operation of PREM, section 60 Finance Act 2022 amendments relating to VAT exemption and the management of special investment funds.

Finally, JF spoke about the Pensions branch. This branch is structured differently and deals with all pension funds regardless of sector. At present, the focus is on the property element of pension funds together with reporting requirements.

JF then handed over to YQ. YQ began by explaining that there are 3 High Wealth Individuals (HWI) Branches and 2 National Anti-Avoidance Branches.

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YQ spoke firstly about the HWI Branches and outlined that they conduct all compliance activities for their case base which are carried out under the terms of Revenue's Compliance Intervention Framework (CIF). An individual moves into High Wealth when their net assets are €20m or over. In general, the divisional office handles the customer service contacts for their case base. The HWI case base is circa 4,800 taxpayers of which 1,800 are considered primary cases (individuals with net assets of €20 million or over) and 3,000 are considered secondary cases (this includes the spouses and children of the high wealth individual, and any trusts associated with the primary case). HWI take a risk-based approach to their compliance work and identify cases for intervention based on the level of risk. Examples of areas that the branches will generally examine include relief claims, loss claims, connected party transactions and significant transactions/events. They also work on targeted projects, for example, a recent project was carried out into the domicile levy. Their case base is reviewed annually. The first case base report is available on the revenue website.

YQ then moved onto the National Anti-Avoidance Branches, of which there are two. The first branch deals with legacy tax avoidance appeals. The second branch examines ongoing risk in relation to tax avoidance. This includes a focus on the abuse of reliefs, as well as general avoidance matters. Examples of areas being examined include company amalgamations by exchange of shares, schemes to avoid liability to tax under Schedule F and transfer of assets abroad. The branch liaises with the HWI branches as required and also provides support to other operational divisions in anti-avoidance matters.

The practitioners thanked them for their insightful presentations.

### Item 4 – Work Plan 2025

#### Compliance Intervention Framework Updates

A brief discussion was had surrounding the wording in the Code of Practice on the additional period (of up to 60 days) in which to make a qualifying disclosure. It was agreed that no changes should be made until the relevant stats were available to gauge any potential impact of the amendments. It may be included in forthcoming changes to the Code depending on results of the analysis.

A small number of issues were raised regarding the quality of compliance intervention letters. Revenue asked the practitioners to provide any samples of letters issued with inaccuracies so they could deal with the quality issues and follow up with the relevant areas.

#### PMOD Compliance

The practitioners provided feedback on a slide from a payroll conference that did not appear to be in line with the code. Revenue agreed to review and provide feedback to the author of the presentation.

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### Item 5 – AOB

1. CCAB-I made a request that Revenue refrain from issuing assessments (other than those impacted by the 4-year limit) over the Christmas holiday period as this creates difficulty in meeting the deadline for making an appeal. Revenue agreed to remind caseworkers to be mindful of the impact of the holiday period on this process.
2. An update was provided by Revenue from the Central Register of the Beneficial Ownership of Trusts (CRBOT) team. The team will be conducting outreach visits (outside of CIF) to those who are believed to act for trusts to raise awareness of trustee and presenter obligations with CRBOT registration. It was agreed that the update would be circulated after the meeting.
3. The practitioners raised the issue of Irish OSS queries from the perspective of how taxpayers can verify the validity of such requests from Revenue. Further details were requested from the practitioners in order to deal with this query.
4. The practitioners asked whether Revenue were carrying out a compliance project in relation to iXBRL returns? Revenue confirmed that there is no such project underway however iXBRL status is reviewed as part of any relevant risk appraisal. JF confirmed that iXBRL returns will be examined in all refund cases.
5. The practitioners raised concerns about the length of time taken to acknowledge an unprompted disclosure. In some cases, a significant period (e.g. 6 months) had passed before any contact was made with the taxpayer/agent. It was agreed that this was unsatisfactory, and Revenue requested additional details on the specific incidences to allow for appropriate follow up.

The chair then ended the meeting by thanking everybody for attending.

Action points arising from this meeting	Responsible	Deadline
Revenue to review payroll conference slides and to contact relevant area.	Revenue	As soon as possible
Practitioners to provide OSS issues and Revenue to follow up on them.	Everybody	As soon as possible
Practitioners to continue to provide Revenue with examples of any issues arising with the operation of the CIF including the provision of copies of any compliance interventions letters of concern.	Practitioners.	Ongoing

The date of the next meeting is September 17 2025.

Submitted for approval by Secretary

Approved by TALC Audit Sub-Committee