

Large Corporates Division Realignment, Current Structure & CCF

Large Corporates Division /
Irish Tax Institute
1 May 2019



LCD Previous Structure – Pre 1 May 2018

Assistant Secretary

Divisional Office

- 9 x Sectoral Corporate Districts
- 3 x AA/HWI Districts
- Pensions

Customer Service

- E-Audit, Customs & PREM Audit
- Multi Tax Audit
- Transfer Pricing Audit



LCD Previous Structure – From 1 May 2018

Assistant Secretary

Divisional Office

- **9 x Sectoral Corporate Districts**

Customer Service

- **E-Audit, Customs & PREM Audit**
- **Multi Tax Audit**
- **Transfer Pricing Audit**



Further Realignment Changes – October 2018

Assignment of circa 50 Staff to LCD in:

- Dublin
- Cork
- Limerick
- Galway

- ❖ Property, Construction & General Manufacturing (including IREFs)
- ❖ Alcohol, Tobacco & Multiples
- ❖ Natural Resources, Food & Leisure
- ❖ Financial Services (Banking)
- ❖ Financial Services (Insurance & Investment Funds)
- ❖ Information, Communications & Technology 1
- ❖ Information, Communications & Technology 2
- ❖ Motor, Oils & Transport
- ❖ Life Sciences (Biotechnology, Pharmaceutical & Medical Devices)

- ❖ Divisional Office
- ❖ Customer Service
- ❖ Multi Tax Audit
- ❖ e-Audit, Customs & PREM
- ❖ TP Audit

Functions moved to new Financial Services (Financing & Investment Funds) Branch:

- Section 110 Companies
- Aircraft Leasing
- Funds / IUs
- Certain “non-Bank” cases dealt with in FS (Banking)

Further Changes – 2019

- A second Transfer Pricing Audit Branch has been established, with Aidan O'Connor as Principal Officer.
- Maeve O'Malley - Principal Officer for Financial Services (Financing & Investment Funds) Branch
- Helen Caulfield - Principal Officer for Divisional Office and Multi Tax Audit Branch
- John Quigley - Principal Officer for Financial Services (Insurance) Branch

LCD – Current Structure

<u>BRANCH</u>	<u>Principal Officer</u>
Divisional Office	Helen Caulfield
Multi-Tax Audit	Helen Caulfield
Transfer Pricing Audit 1	Mary Giffney
Transfer Pricing Audit 2	Aidan O'Connor
Customer Service Branch	Emily Swift
E-Audit, Customs & PREM Audit	Allen Finnegan
Property, Construction & General Manufacturing	Eoin O'Domhnaill
Alcohol, Tobacco & Multiples	Emily Swift
Natural Resources, Food & Leisure	Margaret Lysaght
Financial Services (Banking)	Joan French
Financial Services (Insurance)	John Quigley
Information, Communications & Technology 1	Tom James
Information, Communications & Technology 2	Áine Gorman
Motor, Oils & Transport	Áine Blackwell
Life Sciences (Biotechnology, Pharmaceutical & Medical Devices)	John McNamara
Financial Services (Financing and Investment Funds)	Maeve O'Malley

Definition of LCD Case

1. Irish Turnover greater than €190 million on a Group basis or tax payments greater than €18m on a Group basis.
2. IDA supported companies with greater than 300 employees.

Additionally, the following special category cases/sectors regardless of size:

3. All financial institutions (except credit unions)
4. All securitization companies (Section 110 companies)
5. All stockbroking firms
6. All aircraft leasing companies
7. All insurance/reinsurance companies
8. All investment funds (including investment managers and service providers to the funds)
9. All REITs (Real Estate Investment Trusts)
10. All on-line betting companies

LCD Case Base

- No recent change to the definition of LCD Case.
- A recent review of the case base has been undertaken, with cases moving both to and from LCD – where they meet or no longer meet the relevant criteria.

Co-operative Compliance Framework

- Currently 111 groups have joined CCF.
- The initial Risk Review Meeting has taken place with the vast majority of these groups.
- Corporate Branches in LCD are considering what adjustments will be required for the second and subsequent meetings.
- Reduced level of compliance interventions.
- A streamlined process for approval of refund claims is in place.

Co-operative Compliance Framework

- Guidelines on the CCF have been agreed and issued to all LCD staff.
- To ensure clarity of procedure and consistency of treatment is applied to CCF Groups and non-CCF companies across LCD, a CCF Quality Assurance process has been put in place.
- A CCF Quality Assurance team will independently undertake quality assurance checks and will report to the Divisional Management Team on the findings. It is expected that the 1st QA review will be completed in 2019.