

Appropriation Account 2024

Vote 10

Tax Appeals Commission

Introduction

As Accounting Officer for Vote 10, I am required each year to prepare the appropriation account for the Vote, and submit the account to the Comptroller and Auditor General for audit.

In accordance with this requirement, I have prepared the attached account of the amount expended in the year ended 31 December 2024 for the salaries and expenses of the Tax Appeals Commission.

The expenditure outturn is compared with the sums granted by Dáil Éireann under the Appropriation Act 2024, including the amount that could be used as appropriations-in-aid of expenditure for the year.

A surplus of €798,000 is liable for surrender to the Exchequer.

The statement of accounting policies and principles and notes 1 to 6 form part of the account.

Statement of accounting policies and principles

The standard accounting policies and principles for the production of appropriation accounts, as set out by the Department of Public Expenditure, National Development Plan Delivery and Reform in circular 20 of 2024 have been applied in the preparation of the account. This includes the application of a number of Central Government Accounting Standards (CGAS) brought into effect from 1 January 2024.

Depreciation

Depreciation of property, plant and equipment and amortisation of intangible assets are calculated and charged in accordance with CGAS 17 and CGAS 31 respectively.

The useful lives and associated rates of major classes of assets are as follows.

<i>Asset class</i>	<i>Useful life</i>	<i>Rate of depreciation/ amortisation</i>
Software licence	5 years	20%
Office equipment	5 years	20%
Acquired/developed software	10 years	10%

Statement on internal financial control

Responsibility for system of internal financial control

As Accounting Officer, I acknowledge my responsibility for ensuring that an effective system of internal financial control is maintained and operated by the Commission.

This responsibility is exercised in the context of the resources available to me and my other obligations as Chairperson.

Also, any system of internal financial control can provide only reasonable and not absolute assurance that assets are safeguarded, transactions authorised and properly recorded, and that material errors or irregularities are either prevented or would be detected in a timely manner. Maintaining the system of internal financial controls is a continuous process and the system and its effectiveness are kept under ongoing review.

Support services

Procedures in relation to the Commission's payment and accounting service that are administered by the Office of the Revenue Commissioners were set up in 2016 when the Commission was established. The service level agreement (SLA) between the Commission and the Office of the Revenue Commissioners setting out the responsibilities of the parties was reviewed and a revised SLA was agreed and signed on 12 February 2021. This agreement covers primarily accounts and finance.

With regards to the provision of human resources and payroll shared services, I note the assurance provided to the Revenue Commissioners by the Accounting Officer of the National Shared Services Office.

Financial control environment

A control environment comprising the following elements is in place.

- Financial responsibilities have been assigned at management level with corresponding accountability.
- Reporting arrangements have been established at all levels where responsibility for financial management has been assigned.
- Formal procedures have been established for reporting significant control failures and ensuring appropriate corrective action.
- There is an Audit Committee to advise me in discharging my responsibilities for the internal financial control system.
- Procedures for key business processes have been documented.
- There are systems in place to safeguard the assets.

Administrative controls and management reporting

A framework of administrative procedures and regular management reporting is in place, including segregation of duties and a system of delegation and accountability.

- There is an appropriate budgeting system with an annual budget which is kept under review by senior management.
- There are regular reviews by senior management of periodic and annual financial reports which indicate financial performance against forecasts.
- A risk management system operates within the Commission.
- There are systems aimed at ensuring the security of the ICT systems.

- There are appropriate capital investment control guidelines and formal project management disciplines.
- The Commission ensures that there is an appropriate focus on good practice in purchasing and that procedures are in place to ensure compliance with all relevant guidelines.

Internal audit

The Commission engages a firm of accountants to provide outsourced internal audit services. The internal auditor reports to me and independently to the Audit and Risk Committee who receive, review and approve a rolling three-year internal audit work plan in consultation with the Commission's management team.

In 2025, the internal auditor reported on the review of the effectiveness of internal financial controls in 2024, which provided reasonable assurance regarding the internal control environment in operation. The work of the internal audit function is informed by analysis of the risks to which the Commission is exposed and its annual internal audit plans, approved by me, are based on this analysis. These plans aim to cover the key controls on a rolling basis over a reasonable period.

The internal audit function is reviewed periodically by me. I have put procedures in place to ensure that the reports of the internal audit function are followed up.

Audit and Risk Committee

The Audit and Risk Committee provides independent assurance to the Commission on the adequacy and effectiveness of the organisation's internal control systems, control environment and control procedures. In addition, the Committee monitors the work of the internal audit function and pays careful attention to the Comptroller and Auditor General's report on the audit and subsequent management letter. The Committee, which is advisory rather than supervisory, provides an independent view of the financial reporting process, internal controls and audit functions of the Commission. The Committee also advises on and monitors the implementation of the Commission's risk management strategy. The Committee makes an important contribution to the effectiveness of the corporate governance function of the Commission.

Procurement

The Commission ensures that there is an appropriate focus on good procurement practice in the award of all contracts and that procedures are in place to ensure compliance with all relevant guidelines. Expenditure on goods, professional and other contracted services, amounted to a total of €0.537 million in 2024. No non-competitive contracts were entered into by the Commission during 2024 and, as required by circular 40/2002, a nil return was submitted to the Office of the Comptroller and Auditor General and to the Department of Public Expenditure, National Development Plan Delivery and Reform.

Risk and control framework

The Commission has implemented a risk management system which identifies and reports key risks and the management actions being taken to address and, to the extent possible, to mitigate those risks.

A risk register is in place which identifies the key risks facing the Commission and these have been identified, evaluated and graded according to their significance. The register is reviewed and updated by the Risk Review Board on a quarterly basis.

The outcome of these assessments is used to plan and allocate resources to ensure risks are managed to an acceptable level.

The risk register details the controls and actions needed to mitigate risks and responsibility for operation of controls assigned to specific staff.

Ongoing monitoring and review

Formal procedures have been established for monitoring control processes and control deficiencies are communicated to those responsible for taking corrective action and to management, in a timely way. I confirm that key risks and related controls have been identified and processes have been put in place to monitor the operation of those key controls and report any identified deficiencies.

Review of effectiveness

The Commission has procedures to monitor the effectiveness of its risk management and control procedures. The Commission's monitoring and review of the effectiveness of the system of internal financial control is informed by the work of the internal and external auditors and the senior management within the Commission responsible for the development and maintenance of the internal financial control framework.

Internal financial control issues

No weakness in internal financial control were identified in relation to 2024 that require disclosure in the appropriation account.

Marie-Claire Maney

Accounting Officer

Tax Appeals Commission

10 March 2025

Comptroller and Auditor General Report for presentation to Dáil Éireann

Vote 10 Tax Appeals Commission Opinion on the appropriation account

I have audited the appropriation account for Vote 10 Tax Appeals Commission for the year ended 31 December 2024 under section 3 of the Comptroller and Auditor General (Amendment) Act 1993.

In my opinion, the appropriation account

- properly presents the receipts and expenditure of Vote 10 Tax Appeals Commission for the year ended 31 December 2024, and
- has been prepared in the form prescribed by the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation.

Basis of opinion

I conducted my audit of the appropriation account in accordance with the International Standards on Auditing (ISAs) as promulgated by the International Organisation of Supreme Audit Institutions. My responsibilities under those standards are described in the appendix to this report. I am independent of the Tax Appeals Commission and have fulfilled my other ethical responsibilities in accordance with the standards.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Report on the statement on internal financial control, and on other matters

The Accounting Officer has presented a statement on internal financial control together with the appropriation account. My responsibilities to report in relation to the information in the statement, and on certain other matters upon which I report by exception, are described in the appendix to this report.

I have nothing to report in that regard.

Seamus McCarthy
Comptroller and Auditor General

25 June 2025

Appendix to the report of the Comptroller and Auditor General

Responsibilities of the Accounting Officer

The Accounting Officer is responsible for

- the preparation of the appropriation account in accordance with section 22 of the Exchequer and Audit Departments Act 1866
- ensuring the appropriation account complies with the requirements of the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation's *Public Financial Procedures*, and with other directions of the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation
- ensuring the regularity of transactions, and
- implementing such internal control as the Accounting Officer determines is necessary to enable the preparation of the appropriation account free from material misstatement, whether due to fraud or error.

Responsibilities of the Comptroller and Auditor General

I am required under section 3 of the Comptroller and Auditor General (Amendment) Act 1993 to audit the appropriation account and to report thereon to Dáil Éireann stating whether, in my opinion, the account properly presents the receipts and expenditure related to the vote.

My objective in carrying out the audit is to obtain reasonable assurance about whether the appropriation account is free from material misstatement due to fraud or error. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the appropriation account.

As part of an audit in accordance with the ISAs, I exercise professional judgment and maintain professional scepticism throughout the audit. In doing so,

- I identify and assess the risks of material misstatement of the appropriation account whether due to fraud or error; design and perform audit procedures responsive to those risks; and obtain audit evidence that is sufficient and appropriate to provide a basis for my opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- I obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the internal controls.
- I assess whether the accounting provisions of the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation's *Public Financial Procedures* have been complied with.

I communicate with the Accounting Officer regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identify during my audit.

I report by exception if, in my opinion,

- I have not received all the information and explanations I required for my audit, or
- the accounting records were not sufficient to permit the appropriation account to be readily and properly audited, or
- the appropriation account is not in agreement with the accounting records.

Appendix to the report of the Comptroller and Auditor General (continued)**Reporting on the statement on internal financial control**

My opinion on the appropriation account does not cover the Accounting Officer's statement on internal financial control, and I do not express any form of assurance conclusion thereon.

In connection with my audit of the appropriation account, I am required under the ISAs to read the statement on internal financial control and, in doing so, consider whether the information contained therein is materially inconsistent with the appropriation account or with knowledge obtained during the audit, or if it otherwise appears to be materially misstated. If, based on the work I have performed, I conclude that there is a material misstatement, I am required to report that fact.

Reporting on other matters

I seek to obtain evidence about the regularity of financial transactions in the course of audit. I am required to report under section 3 of the Comptroller and Auditor General (Amendment) Act 1993 if I identify any material instance where public money has not been applied for the purposes intended or where transactions did not conform to the authorities governing them.

I am also required under the 1993 Act to prepare, in each year, a report on such matters arising from my audits of the appropriation accounts as I consider appropriate. In such cases, the audit reports on the relevant appropriation accounts refer to the relevant chapter(s) in my annual *Report on the Accounts of the Public Services*.

Vote 10 Tax Appeals Commission

Appropriation Account 2024			
	2024		2023
	Estimate provision	Outturn	Outturn
	€000	€000	€000
Programme expenditure			
A Facilitation of hearing tax appeals	3,906	3,096	2,987
Gross expenditure	3,906	3,096	2,987
<i>Deduct</i>			
B Appropriations-in-aid	74	62	54
Net expenditure	3,832	3,034	2,933

Surplus

The surplus of the amount provided over the net amount applied is liable for surrender to the Exchequer.

	2024	2023
	€	€
Surplus to be surrendered	798,450	688,444

Marie-Claire Maney
Accounting Officer
Tax Appeals Commission

10 March 2025

Notes to the Appropriation Account

Note 1 Operating Cost Statement 2024

		2024	2023
	€000	€000	€000
Pay		2,559	2,365
Non pay		537	622
Gross expenditure		3,096	2,987
<i>Deduct</i>			
Appropriations-in-aid		62	54
Net expenditure		3,034	2,933
Changes in capital assets			
<i>Property, plant and equipment</i>			
<i>(note 2.1)</i>			
Purchases	(25)		
Depreciation	15		
Loss on disposals	2		
<i>Intangible assets (note 2.2)</i>			
Purchases	(84)		
Amortisation	65		
Loss on disposals	52		
		25	(322)
Changes in net current assets			
Increase in prepayments	(74)		
Increase in provisions	85		
Increase in accrued expenses	114		
		125	35
Direct expenditure		3,184	2,646
Expenditure borne elsewhere			
Net allied services expenditure (note 1.1)		678	634
Net programme cost		3,862	3,280

1.1 Net allied services expenditure

The net allied services expenditure amount is made up of the following amounts in relation to Vote 10 borne elsewhere.

		2024	2023
		€000	€000
Vote 9	Office of the Revenue Commissioners	29	20
Vote 13	Office of Public Works	606	579
Vote 43	Office of the Government Chief Information Officer	43	35
		678	634

Note 2 Statement of Financial Position as at 31 December 2024

	Note	2024 €000	2023 €000
Capital assets			
Property, plant and equipment	2.1	26	18
Intangible assets	2.2	550	583
		576	601
Current assets			
Bank and cash		355	315
Prepayments	2.3	122	48
		477	363
<i>Less</i>			
Current liabilities			
Provisions	2.4	85	—
Accrued expenses	2.5	140	26
Vote 9 Revenue Commissioners		342	280
Net Exchequer funding	2.6	13	35
		580	341
Net current (liabilities)/assets		(103)	22
Net assets		473	623
Represented by:			
State funding account	2.7	473	623

2.1 Property, plant and equipment

	Office and IT equipment €000	Furniture and fittings €000	Total €000
Cost or valuation ^a			
At 1 January 2024	139	7	146
Additions	25	—	25
Disposals	(25)	—	(25)
At 31 December 2024	139	7	146
Accumulated depreciation			
At 1 January 2024	124	4	128
Depreciation for the year	14	1	15
Depreciation on disposals	(23)	—	(23)
At 31 December 2024	115	5	120
Net assets			
At 31 December 2024	24	2	26
At 31 December 2023	15	3	18

Note ^a Cost or valuation includes some assets acquired for less than €10,000 prior to 1 January 2021.

2.2 Intangible assets

	Acquired and developed software €000	Total €000
Cost or valuation		
At 1 January 2024	681	681
Additions	84	84
Disposals	(125)	(125)
At 31 December 2024	640	640
Accumulated amortisation		
At 1 January 2024	98	98
Amortisation for the year	65	65
Amortisation on disposals	(73)	(73)
At 31 December 2024	90	90
Net assets		
At 31 December 2024	550	550
At 31 December 2023	583	583

2.3 Prepayments

at 31 December	2024	2023
	€000	€000
ICT services and support	94	30
Other administration expenses	28	18
	122	48

2.4 Provisions

at 31 December	Legal costs	Total
	€000	€000
Additional provision made	85	85

2.5 Accrued expenses

at 31 December	2024	2023
	€000	€000
Payroll related accruals (note 2.9)	123	—
ICT services and support	12	3
Administration expenses	5	23
	140	26

2.6 Net Exchequer funding

at 31 December	2024	2023
	€000	€000
Surplus to be surrendered	798	688
Exchequer grant undrawn	(785)	(653)
Net Exchequer funding	13	35

Represented by:

Debtors

Bank and cash	355	315
---------------	-----	-----

Creditors

Vote 9 Revenue Commissioners ^a	(342)	(280)
	13	35

Note ^a The figure of €342,000 is the total expenditure for December 2024 incurred by the Revenue Commissioners on behalf of the Tax Appeal Commissioners. This comprises

- pay costs of €215,028 less €5,755 in respect of additional superannuation contributions retained, and
- non-pay costs of €132,490.

2.7 State funding account

	Note	2024	2023
		€000	€000
Balance at 1 January		623	336
Disbursements from the Vote			
Estimate provision	Account	3,832	
Surplus to be surrendered	Account	(798)	
Net vote		3,034	2,933
Expenditure borne elsewhere	1.1	678	634
Net programme cost	1	(3,862)	(3,280)
Balance at 31 December		473	623

2.8 Commitments

Global commitments	2024	2023
at 31 December	€000	€000
Procurement of goods and services ^a	301	401
Total of legally enforceable commitments	301	401

Note ^a The 2023 comparative figure has been restated (from €358,000 reported previously) due to an error noted in the calculation of the commitments.

2.9 Impact of accounting policy changes in 2024

Nine new central government accounting standards (CGAS) were implemented with effect from 1 January 2024. The implementation had the following impact on the State funding balance.

	2024
	€000
Provisions ^a	(85)
Holiday accrual ^b	(47)
Payroll accrual ^b	(76)
	(208)

Note ^a CGAS 19 Provisions, Contingent Liabilities and Contingent Assets

^b CGAS 39A Employee Benefits Part A

Note 3 Vote Expenditure

Analysis of administration expenditure

All programme expenditure is classified as administration expenditure.

		2024		2023
		Estimate provision	Outturn	Outturn
		€000	€000	€000
i	Salaries, wages and allowances	3,190	2,559	2,365
ii	Travel and subsistence	6	—	—
iii	Training and development	36	19	6
iv	Operational services, supplies and sundry equipment	100	66	73
v	Digital capital investment and IT expenses	350	298	436
vi	Premises expenses	44	24	24
vii	Policy reviews, consultancy services and research	180	130	83
		3,906	3,096	2,987

Note ^a The analysis of non-pay administration subheads has been changed as part of the process to modernise the administrative subheads across voted accounts. The 2023 comparative figures have been amended to reflect the new structure.

Note 4 Receipts

4.1 Appropriations-in-aid

		2024		2023
		Estimate provision	Realised	Realised
		€000	€000	€000
1	Receipts from additional superannuation contributions on public service remuneration	73	62	53
2	Miscellaneous	1	—	1
		74	62	54

Note 5 Staffing and Remuneration

5.1 Employee numbers

Full time equivalents	2024	2023
Number of staff at year end	<u>33</u>	<u>33</u>

5.2 Pay

	2024	2023
	€000	€000
Pay	2,238	2,047
Higher, special or additional duties allowances	45	43
Overtime	36	53
Employer's PRSI	240	222
Total pay	<u>2,559</u>	<u>2,365</u>

5.3 Allowances and overtime payments

	Number of recipients	Recipients of €10,000 or more	Highest individual payment	
			2024 €	2023 €
Higher, special or additional duties allowances	8	2	13,739	15,991
Overtime	14	—	9,264	12,612
Extra remuneration in more than one category	7	3	16,643	18,326

5.4 Commission staffing by pay band

The number of Commission employees whose total employee benefits (including basic pay, allowances, overtime; excluding employer PRSI, employer pension costs) for the financial year fell between €20,000 and €59,999 and within each band of €10,000 from €60,000 upwards are as follows.

Pay bands (€)		Number of employees	
From	To	2024	2023
20,000	59,999	21	21
60,000	69,999	3	3
70,000	79,999	2	2
80,000	89,999	2	—
90,000	99,999	—	—
100,000	109,999	1	1
110,000	119,999	1	5
120,000	129,999	2	—
130,000	139,999	—	—
140,000	149,999	2	—
150,000	199,999	—	—
200,000	209,999	—	1
210,000	219,999	1	—

5.5 Remuneration and benefits of Accounting Officer

The Accounting Officer's remuneration and taxable benefits for the financial year was as follows.

	2024	2023
	€000	€000
Basic pay	211	201
	211	201

The value of retirement benefits earned in the period is not included above. The Accounting Officer is a member of post 1995 superannuation scheme for established civil servants and her entitlements in that regard do not extend beyond the standard terms of that pension scheme.

5.6 Performance awards

A total of €1,300 (2023: €1,300) was spent on staff suggestion schemes. There were 26 (2023: 26) individual awards of €50.

Note 6 Miscellaneous

6.1 Compensation and legal costs

Payments/costs paid by the Commission in the year

	Claims by		Total	Total
	employees	members of the public	2024	2023
Number of cases	—	5	5	2
	€000	€000	€000	€000
Commission's own legal costs	—	67	67	52
Payments by/on behalf of the Commission				
Compensation	—	—	—	—
Legal costs	—	—	—	—
Other costs	—	—	—	—
2024 Total	—	67	67	52
2023 Total	—	52	52	

Note At 31 December 2024, four judicial reviews are outstanding (2023: two cases)

Cumulative costs of cases completed in 2024

	Claims by		Total
	employees	members of the public	
Number of cases	—	1	1
	€000	€000	€000
Commission's own legal costs	—	27	27
Payments by/on behalf of the Commission			
Compensation	—	—	—
Legal costs	—	—	—
Other costs	—	—	—
Total	—	27	27