TAX INSPECTORS WITHOUT BORDERS

Effective use of automatic exchange of information programmes



What is Tax Inspectors Without Borders?

Launched in 2015 at the third Financing for Development Conference in Addis Ababa, Tax Inspectors Without Borders (TIWB) is a joint initiative of the Organisation for Economic Co-operation and Development (OECD) and the United Nations Development Programme (UNDP) designed to support developing countries in building tax audit capacity. It is a unique approach to capacity building that embeds expert tax auditors in developing country tax administrations to provide practical, hands-on assistance on actual tax audits.

The initiative underpins the OECD/G20 Base Erosion and Profit Shifting (BEPS) Actions as part of a broad international effort to strengthen developing countries' ability to effectively tax multinational enterprises.

Interested host administrations can request TIWB assistance by completing an online Assistance Request Form on the TIWB Portal.

Effective use of Automatic Exchange of Information

Many countries are facing challenges in using and interpreting data that has been received under Automatic Exchange of Information (AEOI) arrangements. This is reflected in a growing number of requests for assistance on how best to use this data to increase revenues, support compliance and identify where tax leakages are caused by tax avoidance and tax evasion, including possible tax crimes. The TIWB model is thus being extended to support the effective use of AEOI in developing countries and jurisdictions.

A TIWB-AEOI programme has the objective of transferring knowledge and analytical skills to tax officials in developing countries through a real time, "learning by doing" approach.

To realise the full benefits of AEOI, the information received must be used to support tax administrations' compliance activities.

TIWB-AEOI programmes complement the capacity building programme of the OECD-hosted Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) on effective use of CRS data providing practical, handson assistance to developing countries in order to best exploit the information they are receiving.

Accordingly, the TIWB effective use of AEOI test phase was launched in November 2019 during the Global Forum's 10th Anniversary Meeting. TIWB-AEOI programmes will add a crucial 6th stage to the full range of Global Forum assistance on AEOI implementation.





How does it work?

Interested host administrations can request TIWB-AEOI assistance by completing an online Assistance Request Form which allows the TIWB Secretariat to match an appropriate expert from its network of partner administrations or the TIWB roster of experts.

TIWB-AEOI programmes are flexible and tailored to a country's specific needs. This may include treatment of CRS data, including searching and filtering data received, as well as integrating with other third party data sources and automated crosschecking. Use of CRS Data: data analytics, risk assessments, compliance interventions, notifications to taxpayers, and tax assessments may also be covered.

It should be noted that TIWB experts are not a substitute for local staff nor deployed to carry out investigative work where no host administration personnel are involved. TIWB-AEOI programmes generally involve periodic assistance, composed of several one- or two-week onsite missions over a span of 18 to 24 months, including additional remote assistance when required.



Global Forum 10th anniversary in November 2019, when the TIWB-AEOI module was launched.

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Confidentiality

TIWB experts are directly involved in activities of the host administration, which in most cases require them to have access to confidential tax information relating to individual taxpayers. This position raises issues of confidentiality and conflict of interest that must be addressed in the programme's terms of reference and will be managed wherever possible prior to, during and upon completion of each TIWB programme.

Options for dealing with confidentiality issues may include removing taxpayer-specific identifying information from case documents under examination or by signing a confidentiality agreement between the host administration and the TIWB expert.

Roster Experts taking on TIWB-AEOI assignments are expected to have:

- $\sqrt{}$ Substantial experience in working on legislation and/or policy design related to AEOI;
- $\sqrt{}$ Experience in drafting administrative papers related to the exchange of information or AEOI;
- $\sqrt{}$ Proven experience in providing assistance, guidance and/or training to tax/ other investigative agency officials is desirable; and
- $\sqrt{}$ Experience in providing training to tax officials.

Partner administrations

As demand for TIWB-AEOI programmes increases, new partner administrations are sought to deploy their currently serving officials having the necessary skills and linguistic capacities to implement TIWB programmes.

Funding

The TIWB Secretariat secures funding for all or part of the TIWB programme costs with the support of its network of partner administrations and/or donors. Programme funding can be further complemented by the OECD and UNDP.

On the basis of impact from an initial round of programme implementation, subsequent programme cost-sharing should be considered.