

For attention: Mr M Kingon
South African Revenue Service
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3 October 2022

Dear Sir,

RESPONSE TO SARS PROPOSAL TO REPLACE TELEPHONIC SERVICES BY PROVIDING ADDITIONAL ONLINE CAPABILITIES

BACKGROUND

1. This submission relates to the communication received from SARS received on 10 August 2022 regarding the intention to replace telephonic services for Tax Practitioners by providing additional online capabilities. SARS requested stakeholders to provide inputs into the process to incorporate them when implementing this service enhancement.
2. In response to the request SAIBA devised a survey to be sent out to our members. The objective of the survey was to gauge the level of concern regarding the withdrawal of the call center and to get inputs into the list of functionalities which are not adequately addressed on the online SARS system.
3. Our submission is informed by the survey responses. The detailed findings are represented below with our recommendations.

SUMMARY OF THE SURVEY RESULTS

4. In total 915 SAIBA members responded to our survey with 77% of these members having more than 2 years of experience as tax practitioner.

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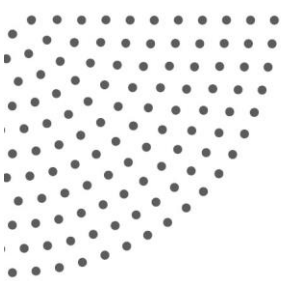
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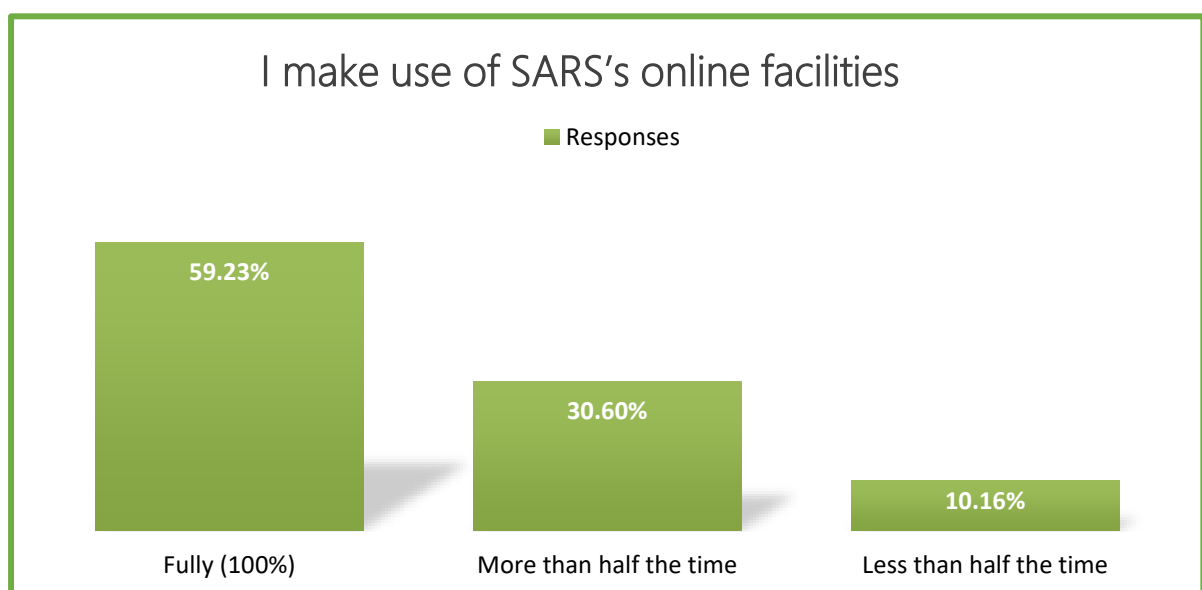
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5. As depicted in Figure 1, all respondents admitted using the existing online facilities various extent. Almost 60% of respondents are fully utilising the online assistance with 30% about half the time.
6. The use of the call center is still widespread. Majority of respondents, 73% admitted to phone SARS at least once a week. Further 10% claimed to call SARS several times a day.

Figure 1. The extent to which survey respondents use SARS online facilities



7. Figure 2. shows the extent to which calling SARS address the needs of the tax practitioners. Only 24% of respondents stated that they generally receive the necessary assistance. The following reasons were quoted for the dissatisfaction with the call center:
 - Call center takes a long time to get through to an agent
 - Calls are dropped after long wait
 - Agents are not always able to assist
 - Unavailability of dates for telephonic appointments
 - Call back system does not always work, missed calls are not registered and followed up.

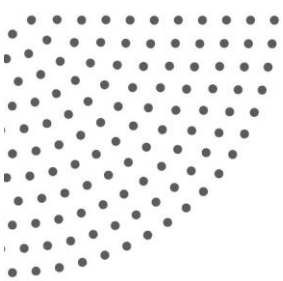
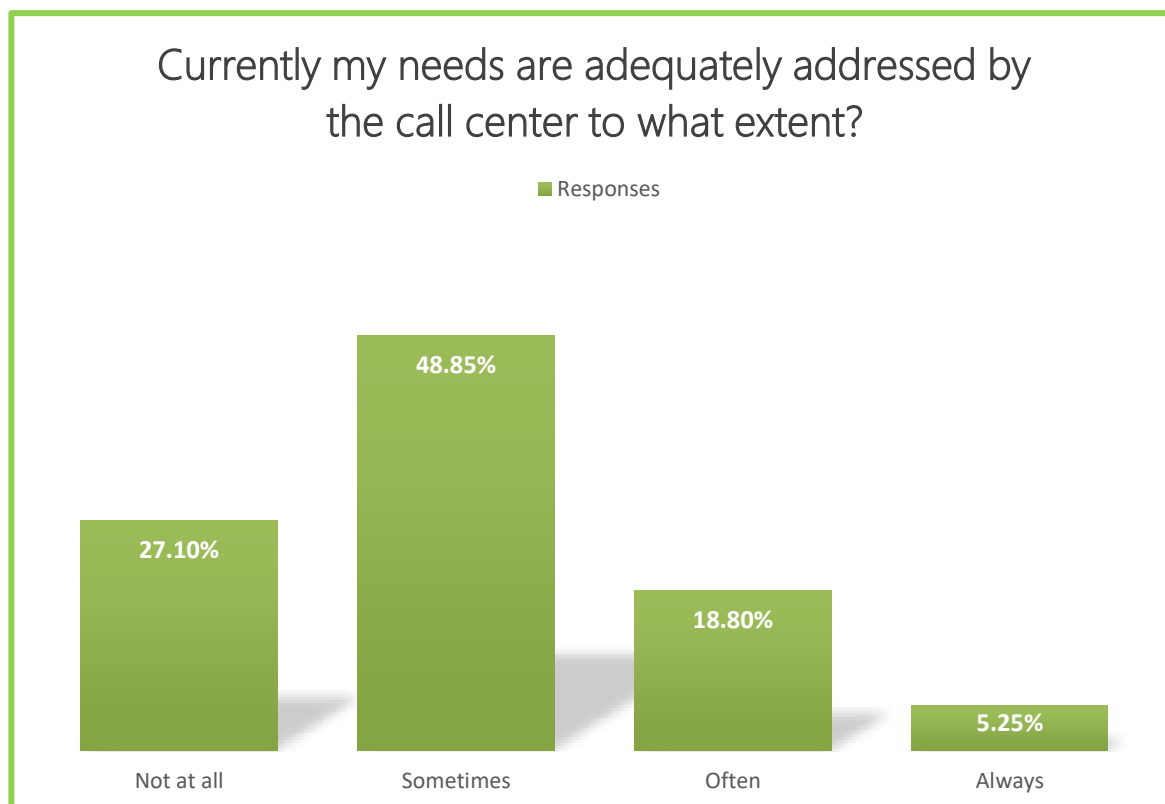


Figure 2. The extent to which survey respondents' needs are addressed by the call center



8. Opinions on whether online help functions will be the best way forward were split. Figure 3. below shows that over 40% of the respondents believe that there call centers should remain as it is. At the same time 35% of members acknowledged that a well-designed and maintained online functions can provide a most cost-effective way forward.
9. Tax practitioner find the current online system often challenging, with the most prevalent issues being:
 - The electronic SARS correspondence does not always present clear and easy to understand solution to a problem
 - No online functionalities available to escalate unresolved matters, this can only be done through a call center agent
 - Not everyone is able to use online facilities. Working on e-filing and with the SARS online guidance requires more than basic knowledge of computers.

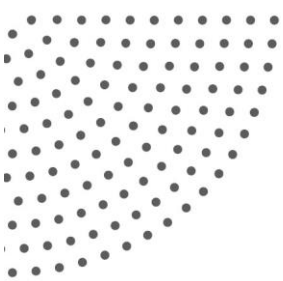
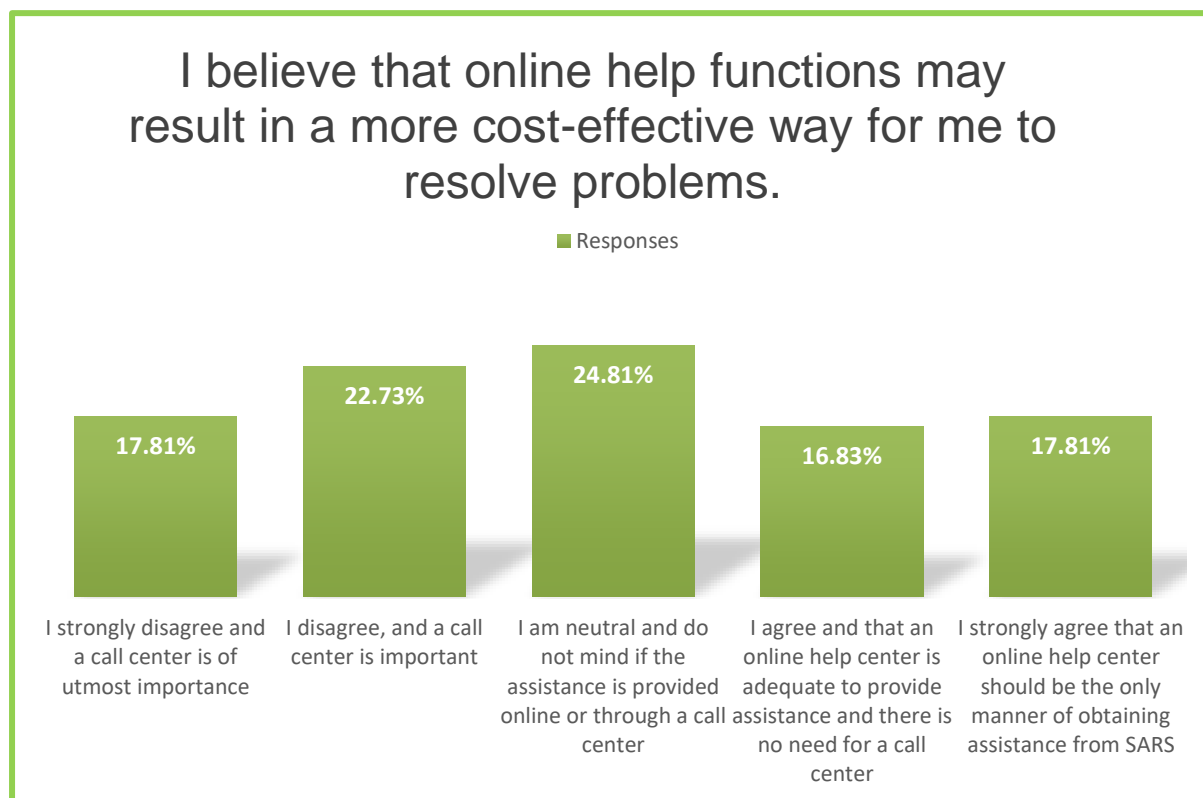


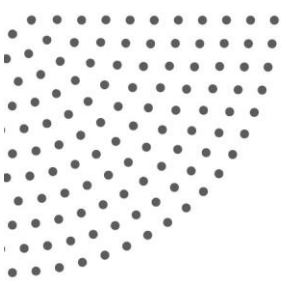
Figure 3. The extent to which online help functions may be more cost effective



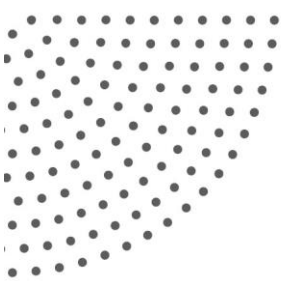
10. Certain functions that can only be addressed through the call center, including turnover tax submissions, de-registrations, and donations tax submissions amongst others.

OUR PROPOSALS

11. The proposals below are based on our understanding that discontinuing the tax practitioner contact center does not for now include closing the virtual appointments and branch appointments for tax practitioners. In line with this we believe that priority should be on strengthening the online functions. Suggested improvements to online mechanisms are listed below.
12. Online guidance should be organized and presented in a user-friendly manner. Pre-populated help menu items could be used to narrow down search responses to the relevant parts of the document.
13. As it is not possible to cover all possible scenarios in guidance documents, we propose that an option to submit an online query / request for a call-back should remain available for tax practitioners. Guidance, wherever possible, should address more the 'how to do it' aspect and not only 'what needs to be done' with practical examples and step by step approach.



14. Consideration should be given to expand online services to include areas which are currently not provided.
15. It would be beneficial to introduce a function such as a TP Dashboard for tax practitioners to facilitate online interaction with SARS. The TP dashboard should be accessible when a tax practitioner logs into his or her e-filing profile.
16. The TP Dashboard would enable tax practitioners to access the status of taxpayers linked to their profile. Ideally, the TP Dashboard should enable tax practitioners to:
 - Track progress and show the status of applications / submissions at each point
 - Be used to raise objections and queries
 - Enable tax practitioners to have multiple cases open per client
 - Make provision for maintaining a personal touch – i.e., name of person allocated to deal with the case.
17. For ease of use the following should be considered:
 - Timeout period should be extended for the dashboard and documents
 - Information for applications / submissions should pull automatically from the RAV form
 - Authentication of TP on the dashboard for security reasons
 - File size to upload should be up to 20 MB.
18. The dashboard should list clients that link to the tax practitioner TP profile, and include the following tabs:
 - Application = Active Case numbers that is currently with SARS to resolve
 - Products (TP Respond) = Matters resolved with in SARS with a tab to accept the outcome or not
 - Registered client type (Cases Complete tab) = Should be cases that were resolved. Completed cases can be archived after 30 days.
19. Details to be considered under the Applications tab for active cases:
 - Client Name
 - Entity Registration Number and Tax Number
 - Type of Case
 - Case Number
 - Has the case been assigned to agent
 - Notes from TP to Agent
 - Notes from Agent to TP
 - Status.



20. Proposed functionalities and tabs for the TB Dashboard are included in the Table below.

Table: Proposed functionalities on the TP Dashboard

Dashboard tabs / blocks	Description
New bookings	Once selected it gives a layout similarly to booking of appointments. It should prepopulate information from RAV
Estate Queries	Tab for queries relating to estates to generate case numbers
Documents upload	There also must be tab for upload of documents to assign agent if you cannot find the correct link on the booking system (i.e., clients ID number changes)
Audits / Refunds	Client refunds due Selected for audit Agent assigned to the case Documents need to be uploaded For finalized audits with refunds show when banking details need to be updated.

21. SAIBA welcomes the opportunity to respond this initiative of SARS in efforts to improve service delivery. We hope that our recommendations will find your attention. Please contact us for further information or detail.

Your Sincerely,

Eszter Rapanos
SAIBA Technical Manager