



Queensland  
**Revenue Office**

*Our Ref: 05142-2022*

25 November 2022

Dr Bruce Willett  
Chair RACGP Queensland and RACGP Vice-President

Email: [willett@yourgp.com.au](mailto:willett@yourgp.com.au)

## **Payroll tax for medical practices**

Dear Dr Willett

Thank you for meeting with me on 23 November 2022.

As discussed during our meeting, I would like to confirm again that the Queensland Revenue Office (QRO) is not specifically targeting medical practices in its compliance activities.

As discussed, I would also like to reiterate QRO's approach to administering the payroll tax legislation in relation to medical practices or any other industry is longstanding and has not recently changed.

Related to this, I would also like to advise that medical practices may be subject to a payroll tax audit as part of QRO's routine compliance activities, in the same way as any other industry.

I acknowledge from your representations that payroll tax implications may raise complexity and compliance concerns for medical practices. As we discussed, QRO is committed to assisting taxpayers identify and comply with their taxation obligations. To this end, I indicated QRO will provide greater guidance to the medical industry by publishing a public Revenue Ruling.


Revenue Rulings outline the Commissioner of State Revenue's (Commissioner) view on the interpretation and application of the legislation QRO administers, which in this case will involve the employer and contractor provisions of the payroll tax legislation as well as any other relevant issues such as the availability of any exemptions. I envisage this will assist medical practices in complying with their payroll tax obligations, while providing clarity around QRO's approach to compliance activities. QRO aims to publish the ruling by the end of this calendar year.

PO Box 15931 City East  
Queensland 4002 Australia  
**Telephone 1300 300 734**  
**Website** [www.qld.gov.au/qro](http://www.qld.gov.au/qro)  
ABN 90 856 020 239

As part of this process, QRO invites RACGP to provide QRO with details of any issues it has specifically encountered and/or other relevant details to inform drafting of the ruling. For example, details of common service and payment arrangements entered into with medical practitioners or other industry-specific issues. You may forward this material to Melinda Kross, Chief Revenue Counsel, at [melinda.kross@treasury.qld.gov.au](mailto:melinda.kross@treasury.qld.gov.au).

I look forward to meeting with you again on Tuesday 6 December 2022 to discuss and progress this issue further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Amy Rosanowski', enclosed in a thin black rectangular border.

Amy Rosanowski  
A/Commissioner of State Revenue