



HM Revenue
& Customs

Policy paper

Budget 2026 — Overview of tax legislation and rates (OOTLAR)

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Contents

Introduction

Chapter 1 — Finance Bill 2026-27

Chapter 2 — Measures announced at Budget 2026 but not in Finance Bill 2026-27

Table 1 — Measures in this document without a corresponding announcement in the Budget report



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Introduction

This document sets out the detail of each tax policy measure announced at Budget 2026 and of previously announced measures that will be included in Finance Bill 2026-27. It is intended for tax practitioners and others with an interest in tax policy changes, especially those who will be involved in consultations both on the policy and on draft legislation.

All measures listed below are applicable UK wide unless specified otherwise.

The information in the document is set out as follows:

Chapter 1 contains details of all the measures that are included in Finance Bill 2026-27.

Chapter 2 contains details of measures which are part of Budget 2026 but are not in Finance Bill 2026-27.

Table 1 lists measures in this document without a corresponding announcement in Budget 2026.

Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>) provides tables of tax rates and allowances for the tax year 2026 to 2027 and the tax year 2027 to 2028.

Annex B (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-b-impact-assessments-in-tax-information-and-impact-notes?cachebust=1793178990>) provides a guide to the impact assessments set out in tax information and impact notes.

Chapter 1 — Finance Bill 2026-27

Personal Tax

1.1 Income Tax: Savings Income Tax Rates for tax year 2027-2028

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the rates of income tax applicable to savings income. From 2027 to 2028, the savings basic rate will be 24%, the savings higher rate will be 44%, and the savings additional rate will be 49%.

The changes will take effect from 6 April 2027. These rates apply across the UK.

1.2 Income Tax: Property rates for tax year 2027-28

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the rates of income tax applicable to property income. From 2027 to 2028, the property basic rate will be 24%, the property higher rate will be 44%, and the property additional rate will be 49%.

These rates will apply across England, Wales and Northern Ireland. The government has provided the devolved governments of Scotland and Wales with the ability to set property income rates in line with their current Income Tax powers.

The changes will take effect from 6 April 2027.

1.3 Income Tax charge for tax year 2027-28 and Rates of income tax for tax year 2027-28

As announced at Budget 2026, the government will legislate in Finance Bill 2026-27 to set the charge for income tax and the corresponding rates for tax year 2027 to 2028.

Finance Bill 2026-27 will set:

- the main rates for 2027 to 2028, which will apply to non-savings, non-property and non-dividend income of taxpayers in England, Wales, and Northern Ireland
- the default rates for 2027 to 2028, which will apply to non-savings, non-property and non-dividend income of taxpayers who are not subject to the main rates of Income Tax, Welsh rates of income tax or the Scottish rates of Income Tax

Income tax rates and rate limits for Scottish taxpayers are set by the Scottish Parliament. The UK rates are reduced by 10p in £1 for Welsh taxpayers, and the Welsh rates of income tax are set by the Senedd and added to the UK rates.

1.4 Pension Tax Allowance

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to implement the Pension Tax Allowance.

The Pension Tax Allowance ensures pensioners whose total income is up to the value of the full new State Pension do not have the administrative burden of paying small amounts of income tax via Simple Assessment. It is available in tax years 2027 to 2028, 2028 to 2029 and 2029 to 2030.

The value of the Pension Tax Allowance is calculated by applying the basic rate of income tax (20%) to the difference between the full new State Pension and the Personal Allowance. For individuals with total income above the value of the full new State Pension, the Pension Tax Allowance will be withdrawn at a rate of £1 for every £3 of income above this level.

The changes will take effect from 6 April 2027.

1.5 Trading Allowance Increase

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the Trading Allowance from £1,000 to £3,000. The allowance provides relief for trading and miscellaneous income and simplifies the system for those individuals who choose to use the relief, where the allowances cover all their relevant income before expenses, as they will no longer have to declare or pay tax on this income. The trading income reporting threshold for Self Assessment will also be increased to £3,000. These changes will take effect from 6 April 2027.

1.6 Changes to Employee Share Schemes

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make changes to the Company Share Option Plan (CSOP) and Enterprise Management Incentives (EMI) schemes.

- The CSOP individual option limit will be increased to £120,000.
- The interaction between the CSOP and EMI individual options limits will be removed.
- The CSOP exercise period will be extended to 15 years.
- The period for certain tax-advantaged and non-tax advantaged shares and share options reserved by third parties to be excepted from the disguised remuneration rules will also be extended to 15 years.
- The exception for Employee Ownership Trusts (EOTs) in the EMI rules will be extended to companies arranging to become controlled by an EOT.
- The EMI exercise window following disqualifying events will be extended to 180 days.

The changes will take effect from 6 April 2027.

1.7 Enterprise Management Incentives: Changes to the process to notify a grant of options

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to remove the requirement for a company to submit a separate notification of a grant of EMI option to HMRC. Instead, a company will be required to notify such a grant through the end-of-year return.

The changes will take effect for options granted on or after 6 April 2027.

1.8 Legislation to Define the Tax Treatment of Image Rights Payments

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to clarify that image rights payments related to an employment are treated as taxable employment income.

These payments will be subject to Income Tax and National Insurance Contributions (NICs).

The changes will take effect from 6 April 2028 rather than 6 April 2027 as previously announced.

1.9 Social Security Benefits: Clarification of income tax treatment

The government will introduce legislation in Finance Bill 2026-27 to clarify the basis of taxation for some social security benefits. This will ensure that the relevant social security benefits are taxed on the accruals basis. The legislation will also remove or update references to obsolete and renamed benefits in Income Tax (Earnings and Pensions) Act 2003.

The legislation will take effect from 6 April 2027.

1.10 Income Tax: Certificate of sponsorship fee and immigration skills charge

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to exempt from income tax an employer's payment of a fee for a certificate of sponsorship or an immigration skills charge, which employers are required to pay when sponsoring a worker under the Skilled Worker route. The changes will apply to payments made on or after 28 October 2026.

1.11 Deduction of Income Tax at Source: informant rewards paid by HMRC

As announced at Autumn Budget 2024, the government will introduce legislation in Finance Bill 2026-27 requiring HMRC to deduct income tax at the additional rate from rewards paid to informants under the Strengthened Reward Scheme. Any further tax or repayment due will be reconciled in the usual way. The change will take effect from the date of Royal Assent to Finance Bill 2026-27.

The previously published tax information and impact note for this measure provides more information: [Withholding of tax for rewards received under the Strengthened Reward Scheme - GOV.UK](https://www.gov.uk/government/publications/withholding-of-income-tax-for-rewards-under-the-strengthened-reward-scheme)

<https://www.gov.uk/government/publications/withholding-of-income-tax-for-rewards->

1.12 Consequential Amendments arising from Changes to Savings and Property Rates of Income Tax

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make amendments following the changes to the savings rates of Income Tax and the introduction of the property rates of income tax that were announced in Budget 2025. The amendments will ensure that the rules on insurers' reporting, tax treated as paid on gains from certain foreign life insurance policies, deduction at source, and the Transfer of Assets Abroad legislation operate as intended from 6 April 2027.

1.13 Department for Energy Security and Net Zero (DESNZ) Electricity Bill Discount Scheme

As announced at Budget 2026, the government will legislate in Finance Bill 2026-27 to exempt payments made under the DESNZ Electricity Bill Discount Scheme from income tax, with retrospective effect from 6 April 2026.

1.14 Cancelled Shifts: Technical Update

As announced at Budget 2025, statutory payments provided for cancelled, moved, or curtailed shifts are taxable as employment income.

The government will introduce legislation in Finance Bill 2026-27 to ensure that statutory payments made to agency workers for cancelled, moved or curtailed shifts are also covered by existing tax legislation.

The changes will take effect from 6 April 2027.

1.15 Statutory Neonatal Care Pay (repeal of duplicate legislation)

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to remove legislation introduced by HMRC, which duplicated earlier legislation introduced by the then Department for Business and Trade, confirming that Statutory Neonatal Care Pay is a taxable benefit. This measure will remove HMRC's legislation and treat it as never having had effect.

1.16 HMRC Definition of Terminal Illness for Pensions Access

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to allow a serious ill-health lump sum to be paid where the pension scheme member can be reasonably expected to live for less than a year. This will apply to uncrystallised rights regardless of whether the member has reached the age of 75 (so whether it is taxable or not).

The measure will also amend the definition of a registered medical practitioner. This will allow a medical practitioner based outside the UK to provide medical evidence of a terminal diagnosis if the scheme member is living in the country where the practitioner practises medicine.

The change will take effect from the date of Royal Assent to Finance Bill 2026-27.

1.17 Collecting Tax Due on Excess Lump Sum Death Benefits

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to provide HMRC with a practical, standalone process for assessing and collecting tax due on lump sum death benefits. Where a member who died before age 75's available lump sum and death benefit allowance is exceeded, the excess will no longer be treated as pension income of individual beneficiaries. Instead, a tax charge will be raised against those beneficiaries on their portion of the excess by reference to their marginal rate of income tax for the year the lump sum was paid.

The measure will make consequential amendments to preserve the same income tax relief following this change where the benefit is subject to both inheritance tax and income tax, and will ensure that any refund of inheritance tax is brought into charge appropriately.

The measure will also make further, minor technical amendments governing the calculation of transitional disregards following the abolition of the lifetime allowance.

There are a number of differing effective dates for this measure. The measure will have retrospective effect for relevant lump sum death benefits paid on or after 6 April 2024. Transitional provisions will apply the same approach to relevant payments made in the 2023 to 2024 tax year. Consequential changes concerning the interaction with Inheritance Tax will apply in relation to deaths occurring on or after 6 April 2027. Amendments to the lifetime allowance disregards will also have effect from 6 April 2024.

1.18 Tax Treatment of Pension and Lump Sum Death Benefits Under the Two-Year Rule

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to remove the two-year rule for pension and lump sum death benefits.

This will mean that tax-free pension and lump sum death benefits will no longer become taxable solely because they are paid more than two years after the pension scheme administrator first knew, or could reasonably have been expected to know, of the member's death. The change will apply both where a payment would otherwise be taxable as pension income of the recipient and where it would otherwise be subject to the special lump sum death benefits charge. The measure will have effect in relation to payments made on or after 28 October 2026.

1.19 Defined Benefit Pensions: Surplus Extraction Tax Regime

As announced at Autumn Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to enable defined benefit occupational pension schemes to make direct payments of surplus assets to members,

where permitted by scheme rules and subject to trustee discretion. These authorised member surplus payments will be taxed as pension income where specified conditions are met, including requirements relating to the scheme's funding position and the member having reached Normal Minimum Pension Age or, where applicable, their protected pension age. The legislation will include safeguards to prevent avoidance. The change will take effect from 6 April 2027.

1.20 National Savings and Investment Tracing Issue

As announced on 19 May 2026, the government will introduce legislation to prevent estates affected by the National Savings & Investments (NS&I) tracing error in respect of bereavement claims from facing disproportionate administrative burdens. The announcement confirmed that a full inheritance tax exemption would be introduced for holdings of the remediation population affected by the tracing error, and an income tax easement would be introduced for personal representatives in respect of interest accrued before death or during the administration period. The Finance Bill 2026-27 measure will provide a regulation-making power to enable the detail of the intended reliefs to be delivered through secondary legislation. Regulations may have retrospective effect, provided that they do not increase a person's liability to tax.

1.21 Withholding Tax Exemption for Scottish Government Bonds

The government will introduce legislation in Finance Bill 2026-27 to provide an exemption from the duty to deduct sums representing income tax from interest paid on Scottish Government bonds, the issuance of which is subject to Treasury approval. The exemption will apply to any interest paid on or after 28 October 2026

1.22 High Value Council Tax Surcharge

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to establish the High Value Council Tax Surcharge which will be an additional charge on residential properties worth £2m or more. Changes will take effect from April 2028.

1.23 Reforming the Cultural Gift Scheme

As announced at Tax Update 2025, the government will introduce legislation in Finance Bill 2026-27 to allow jointly owned property to be donated under the Cultural Gift Scheme and the relief to be calculated by reference to a donor's beneficial entitlement to that property. The measure will also allow donors one opportunity within the five-year limit period to amend their remaining tax credit allocation. These changes will take effect from 6 April 2027.

1.24 The Introduction of Mandatory Payrolling of Benefits in Kind from April 2027

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to require employers to report and payroll most benefits in kind and taxable expenses through Real Time Information (RTI).

For company cars and vans, car and van fuel and medical benefits the changes will take effect from 6 April 2027. All other benefits in kind, with the exception of employment-related loans and employer-provided living accommodation, will take effect from 6 April 2028.

1.25 Taxation of Company Cars: The appropriate percentage for tax years 2030 to 2031

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to set Company Car Tax rates for the tax year 2030 to 2031.

Appropriate percentages for zero emission vehicles will increase by 1 percentage point in the tax year 2030 to 2031.

Appropriate percentages for all other vehicle bands will increase by 1 percentage point per year in the tax year 2030 to 2031, to a maximum appropriate percentage of 40%.

1.26 Inheritance Tax: Preventing Unintended Deductions for Liabilities in Trust Arrangements

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend the inheritance tax rules on liabilities and trust property. The legislation will provide a statutory rule for taking liabilities properly incurred by trustees into account when valuing settled property for inheritance tax purposes, align their treatment with personal liabilities and extend existing debt deduction restrictions and anti-avoidance rules to ensure that certain liabilities funded using value originating from a beneficiary's own estate cannot reduce inheritance tax charges. The measure will have effect for deaths and other chargeable events occurring on or after 28 October 2026.

1.27 Inheritance Tax: Minor technical amendment(s) to extension of Inheritance Tax to pensions from April 2027

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to allow a prospective personal representative to direct pension scheme administrators to pay the inheritance tax due to HMRC when certain conditions are met.

Most unused pension funds and pension death benefits will be brought within the value of a person's estate for inheritance tax purposes from 6 April 2027. This was legislated for in Finance Act 2026.

The government will also introduce legislation allowing those administering an estate to decide whether notional pension property included in the 'general' component of the estate or as a separate component for the purposes of calculating the reduced rate of inheritance tax when part of the estate is left to charity.

The changes will take effect from 6 April 2027. There is no tax information and impact note for this measure, the changes made here do not affect the impacting published in the 2025 tax information and impact note published here: Inheritance Tax — unused pension funds and death benefits - GOV.UK (<https://www.gov.uk/government/publications/inheritance-tax-unused-pension-funds-and-death-benefits/inheritance-tax-unused-pension-funds-and-death-benefits>) .

1.28 Exit Charges for Temporarily Migrating Trusts

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to provide an administrative easement to the Capital Gains Tax 'exit charge' that otherwise applies when a trust ceases to be resident in the United Kingdom. An exit charge will not apply when a trust becomes UK resident because one of its trustees moved to the UK; and it ceases to be UK resident later that year or the following year. This will take effect from 28 October 2026.

1.29 Capital Gains: Gains of offshore companies attributed to UK residents etc : protected cell companies

As announced at Budget 2026 the government will introduce legislation in Finance Bill 2026-27 to amend the capital gains participator rules for non-resident close companies, to ensure that they apply to protected cell companies. These changes will take effect from 28 October 2026.

1.30 Capital Sums in Return for Surrender of Rights

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend the capital gains legislation to provide that a capital sum received under a contract for loss of right under that contract is in scope. This will take effect from 28 October 2026.

1.31 Capital Gains Tax: Late filing penalties for returns for disposals of UK land

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make changes to the late filing penalties regime that applies where a person fails to submit a UK property disposal return reporting a residential property disposal within the statutory deadline. This will stop those penalties continuing to accrue where that person later reports the disposal on their Self-Assessment return.

This change will take effect from 28 October 2026.

1.32 Capital Gains Tax: Introduction of a new relief for founders

As announced at Budget 2026, the government is introducing a new Capital Gains Tax (CGT) Founders' Relief. This measure launches a technical consultation on the relief and is being published alongside the Summary of Responses to the Call for Evidence on tax support for entrepreneurs.

The relief will support founders and early investors who have made a significant long-term contribution to the creation and development of the

UK's most high-growth and innovative companies. The relief will provide a lower rate of CGT, for qualifying disposals of shares or securities, on or after 6 April 2027.

The consultation seeks views on the practical application of the relief and will close on 30 November 2026. The government will then introduce legislation through amendments to Finance Bill 2026-27 so that Founders' Relief can take effect for qualifying disposals made on or after 6 April 2027.

1.33 Capital Gains Tax: Business Asset Disposal Relief lifetime limit reduction

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-2027 reducing the lifetime limit of how much Business Asset Disposal Relief (BADR) an individual can claim from £1,000,000 to £500,000 for BADR qualifying disposals made on or after 6 April 2027.

There are special provisions that apply to contracts entered into before 6 April 2027 that have not been completed, and for certain share reorganisations and exchanges of securities not completed, before 6 April 2027.

1.34 Capital Gains Tax Relief for Gifts of Business Assets

As announced at Budget 2025, the government will introduce legislation in the Finance Bill 2026-27 to modernise the formula that restricts gift holdover relief on the disposal of qualifying shares or securities, to include assets within the intangible fixed assets regime or that qualify for the substantial shareholding exemption. This will take effect from 6 April 2027.

1.35 Tax Treatment of Stablecoins

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to treat eligible stablecoins more like money for tax purposes. These changes will amend tax rules for individuals, trustees and companies, and extend the application of withholding tax. These changes will take effect from April 2027,

1.36 Changes to Venture Capital Schemes

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to fix minor technical issues affecting the operation of the Seed Enterprise Investment Scheme (SEIS), Enterprise Investment Scheme (EIS) and Venture Capital Trust (VCT) rules.

The amendment to the VCT relief withdrawal rules will take effect for relevant disposals of shares issued on or after 6 April 2026, and the rest of the changes will take effect from 6 April 2027.

The government will also engage stakeholders on improving Advance Assurance and enhancing transparency of fees, alongside clearer HMRC guidance and greater compliance activity on fee arrangements that divert investment away from qualifying companies.

Corporate Tax

1.37 Increase in Rate of Banking Surcharge for Temporary Period

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to temporarily increase the rate of the Corporation Tax surcharge on banking companies to 6%, for 15 months.

The changes will apply from 1 January 2027 to 31 March 2028.

1.38 Financial Year 2028 Charge and Rate of Corporation Tax

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to set the charge for Corporation Tax as it does every year, and to maintain the main rate at 25% and the small profits rate at 19%, for the financial year beginning 1 April 2028.

1.39 Corporation Tax: Foreign permanent establishment (PE) exemption

As announced on 21 May 2026, the government will introduce legislation in Finance Bill 2026-27 to make the foreign permanent establishment (PE) exemption regime mandatory. The changes will take effect for Corporation Tax accounting periods beginning on or after 1 January 2027.

1.40 Pillar 2: Side-by-Side Package and Further Amendments

As announced on 13 July 2026 and confirmed at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend Multinational Top-up Tax and Domestic Top-up Tax. The amendments implement the OECD's Side-by-Side package and make further technical amendments to ensure the rules work effectively.

The Side-by-Side package will take effect for accounting periods beginning on or after 1 January 2026. Most of the technical amendments in this measure will take effect for accounting periods beginning on or after 31 December 2026, although will be permitted to take effect from an earlier date by taxpayer election. Certain other technical amendments will apply for accounting periods beginning on or after 31 December 2023 or 31 December 2024.

1.41 Advance Tax Certainty Service: Threshold Reduction

Following the launch of the Advance Tax Certainty Service in July 2026, the government will introduce legislation in Finance Bill 2026-27 to lower the entry threshold for qualifying projects from £1 billion to £300 million. In addition, the government will:

- Amend the procedure for further changes to the definition of 'qualifying investment projects' from the draft affirmative Statutory Instrument to the negative procedure.

- Amend the penalty provision at section 270, Finance Act 2026 so that in respect of a failure to provide information a penalty will only be charged where it relates to a clearance that has been issued. The other penalty provisions have not been changed.

The changes relating to the threshold level and penalty rules will take effect on 4 November 2026. Changes relating to the power will take effect from 1 April 2027. The service will be kept under review with a view to developing it further in the future.

1.42 Capital Allowances: Reduce the main rate writing-down allowance and increase the main rate first-year allowance

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the main rate first-year allowance to 50% for expenditure incurred on or after 1 January 2027 and to reduce the main rate writing-down allowance to 12%, to take effect from 1 April 2027 for Corporation Tax and 6 April 2027 for Income Tax.

1.43 Corporate Interest Restriction: Interaction with Creative Reliefs

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make technical amendments to Corporate Interest Restriction (CIR). From 1 January 2027, the calculation of taxable earnings for CIR will exclude Audio-Visual Expenditure Credits and Video Games Expenditure Credits.

1.44 Investment Life Insurance Contracts

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make it explicit that the existing exemption from Corporation Tax for companies receiving payouts under Investment Life Insurance Contracts is only available when the contract is held otherwise than for the purposes of a trade the company carries on.

This will take effect for accounting periods on or after 1 January 2027.

1.45 Oil and Gas Revenue Levy (OGRL)

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to establish the Oil and Gas Revenue Levy (OGRL), a new, permanent additional 35% levy on exceptional oil and gas revenues arising during periods of unusually high prices.

The OGRL will apply to exceptional oil or gas revenues arising on or after the day immediately following the cessation of the Energy Profits Levy (EPL), which will be 1 April 2030 or an earlier date if the Energy Security Investment Mechanism (ESIM) is triggered.

1.46 Exploration or Exploitation Rights

As announced in July 2026, the government will introduce legislation in Finance Bill 2026-27 to explicitly treat exploration and exploitation rights in relation to activities undertaken in the UK or on the UK Continental Shelf as

immovable property. The changes will take effect for accounting periods beginning on or after 13 July 2026 for Corporation Tax and for profits arising from 6 April 2027 for Income Tax.

1.47 Research and Development (R&D) Tax Reliefs: Improving the Customer Experience

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to remove the requirement to submit a Claim Notification Form for R&D claims made on or after 1 April 2027, and will simplify and rationalise the information required in the Additional Information Form for companies that claim R&D tax relief from autumn 2027.

1.48 Cryptoasset Loans and Liquidity Pools

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 for cryptoasset loans and liquidity pools. Certain transfers by individuals and trustees into and out of qualifying arrangements will be on a 'no gain no loss' basis until an economic disposal. The change will take effect from 6 April 2027.

1.49 Company Directors Disqualification Act 1986: Disqualification Following Breach of HMRC Securities Legislation

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to enable a court, following conviction for a qualifying offence under HMRC securities legislation, to consider disqualifying an individual from acting as a company director for up to five years. The measure will apply to qualifying tax security offences committed on or after 1 April 2027.

Indirect Tax

1.50 Machine Games Duty: Increasing the rate on higher stake machines from 1 April 2027

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the rate of Machine Games Duty (MGD) for higher stakes machines from 20% to 25%. Legislation will amend the stake and prize thresholds used to determine the MGD rate chargeable on gaming machines. Under the revised thresholds, gaming machines with a maximum charge to play of more than £1 or a maximum prize of more than £100 will become subject to the higher rate of MGD at 25%, instead of the standard rate of 20%.

The changes will take effect from 1 April 2027.

1.51 Remote Gaming Duty: Amending the legislation relating to freeplays, prizes and tournaments

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to put beyond doubt the tax treatment of freeplays, prizes and tournaments for Remote Gaming Duty (RGD). This measure will amend the RGD legislation applying to freeplays (which will now be referred to as restricted plays), prizes and tournaments. It will set out how restricted plays won from the use of another restricted play are excluded for the purposes of RGD calculations.

The measure will also amend the legislation determining when participation in a tournament is treated as playing a game of chance. In addition, it will revise the definition of a prize, including the treatment of prizes awarded under the rules of a game and certain payments made following the interruption or termination of a game.

The changes will take effect from 1 April 2027.

1.52 VAT: Deposit Return Scheme

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to simplify the administration of the Deposit Return scheme, which will introduce refundable deposits on single-use drinks containers. The requirement for individual producers to account for VAT on unreturned deposits will be removed, instead this will be done by the Deposit Management Organisation (DMO). This will take effect when the scheme launches in October 2027.

1.53 VAT126 Powers & Safeguards

As announced at Budget 2026, the government will introduce legislation in the Finance Bill 2026-27 to enable the future introduction of powers and safeguards for VAT126 claims. These are non-business VAT refund claims made by non-VAT registered bodies, including local authorities and similar bodies, specified museums and galleries, academies, certain types of charities, and other bodies specified by Treasury Order. The enabling power will take effect from the date of Royal Assent to Finance Bill 2026-27, after which secondary legislation enabled by the power may be made.

1.54 VAT in the Digital Age: Pillar 3

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-2027 to amend Schedule 9ZA to the VAT Act 1994 in respect of distance sales of goods to consumers in Northern Ireland from the EU. The changes will take effect from 1 January 2027.

1.55 VAT Online Marketplace Liability (OMPL) extension

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-2027 to extend VAT online marketplace liability rules to UK businesses. Online marketplaces will be responsible for collecting VAT on sales by UK VAT registered businesses and any other UK business with a minimum annual sales threshold per platform of £90,000. The rules will not apply to non-business (i.e. personal) sales, second-hand goods, or business-to-business transactions. The changes will come into effect from

October 2027. Some aspects of this measure will then be implemented via secondary legislation in 2027, including setting the annual sales threshold per platform and the implementation date.

The government published a consultation on extending VAT online marketplace liability to combat non-compliance in June 2026. A summary of consultation responses has been published.

1.56 Repeal of Item 5 of Group 7 of Schedule 9 to the VAT Act 1994

As announced at Budget 2026, the government will amend Group 7 of Schedule 9 to the Value Added Tax Act 1994 in Finance Bill 2026-27 to restore the VAT treatment of a deputy for a medical practitioner to its previously intended position. The government will remove the VAT exemption under Item 5 for a supply of a deputy for a person registered in the register of medical practitioners. Deputising services will remain in scope of the medical exemption where they are primarily providing medical care.

The change will take effect from 1 May 2027. From this date, a supply of a deputy for a medical practitioner will be subject to the standard rate of VAT.

1.57 VAT Zero Rate on Donated Medicines

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to introduce a VAT zero rate for medicines provided free of charge for a qualifying purpose. The measure will apply to medicines supplied for NHS treatment, including through the Early Access to Medicines Scheme and other early access arrangements, and in connection with clinical trials or receiving continued treatment following a clinical trial.

This will take effect from 23 June 2026.

1.58 E-Invoicing Requirements

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to enable HMRC to make regulations requiring VAT invoices to be issued and received in a prescribed electronic format. The government has published an implementation roadmap, which sets out the further details about e-invoicing and a timeline setting out when it will share further information and publish guidance. The changes will take effect from April 2029.

Building on the government's commitment to explore Digital Reporting alongside mandatory e-invoicing, a consultation will be launched at Budget 2026 and will run until 20 January 2027. This will gather evidence from businesses, software providers and other stakeholders to inform future policy development and technical exploration.

1.59 VAT Reform of the Reverse Charge for B2B Supplies of Services from Overseas

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to restrict the VAT reverse charge for supplies of services from overseas, so that it only applies if the receiving UK business is VAT registered. This change means that where a UK business is not VAT registered, the overseas supplier will be required to charge and account for UK VAT. This follows a call for evidence on VAT and the sharing economy, which HMRC published in December 2020. HMRC published the summary of responses in July 2021. The change will take effect from April 2027.

1.60 VAT Amendments Consequential on Abolition of NHS England

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to make consequential amendments to Schedule 8 to the Value Added Tax Act 1994 following the abolition of NHS England and the transfer of its relevant functions to the Department of Health and Social Care. The amendments will maintain the existing VAT treatment where appropriate and remove references to NHS England that will no longer be required.

The changes will take effect from a future date specified by HM Treasury in regulations.

1.61 Removing Stamp Duty Land Tax on rent under assured tenancies

As announced on 22 April 2026, the government will introduce legislation in Finance Bill 2026-27 to remove Stamp Duty Land Tax (SDLT) on the rent element of assured tenancies and remove the requirement to file SDLT returns solely because rent is payable under an assured tenancy.

The changes took effect from 1 May 2026.

1.62 Stamp Duty Land Tax: Group Relief

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend the Stamp Duty Land Tax Group Relief rules, so that a winding up of a vendor does not prevent the relief from being clawed back within the usual three-year period if the purchasing company later leaves the group. The change will take effect from 29 October 2026.

1.63 Local Government Pension Scheme: Relief for Stamp Duty Land Tax

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend the Stamp Duty Land Tax (SDLT) rules so that acquisitions of land and property made by Local Government Pension Scheme (LGPS) asset pool companies from LGPS member funds are subject to SDLT relief.

The changes will apply to transactions with an effective date on or after 28 October 2026 and before 1 April 2032.

1.64 Modernisation of the Stamp Taxes on Shares Framework

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to introduce the Securities Transfer Tax from late 2027. The Securities Transfer Tax will replace Stamp Duty and Stamp Duty Reserve Tax. The legislation will come into force in late 2027 via a commencement order.

1.65 International Student Levy (ISL)

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to establish the International Student Levy (ISL). The ISL is a levy on higher education providers charged at a rate of £925 per student per year of study. All providers will be given an allowance for the first 220 international students per year, for whom they will not pay the charge. The ISL will apply in respect of international students registered with a higher education provider on or after 1 August 2028, being the start of the 2028-29 academic year.

The Impact Analysis for this measure provides more information

1.66 Vaping Products Duty: Compliance Powers

Following the commencement of Vaping Products Duty (VPD) on 1 October 2026, the government will introduce legislation in Finance Bill 2026-27 to correct VPD legislation and enable HMRC officers to seize any article involved in the illicit manufacture of vaping products. It will also provide a power for HMRC to 'deem' that suspected vaping products were imported or manufactured after VPD's introduction on 1 October 2026, unless there is evidence to the contrary, thus placing the onus on businesses to prove that their vaping products are not in scope of the duty. This will strengthen HMRC's ability to enforce VPD.

The amendment for the seizure of articles involved in the illicit manufacture of vaping products for offences that occur on or after 4 November 2026 will take effect on 1 January 2027. The amendment for the deeming provision will take effect on 4 November 2026.

1.67 Soft Drinks Industry Levy (SDIL) Uprating

As announced at Autumn Budget 2024, the government will legislate in Finance Bill 2026-27 to increase the rates of the Soft Drinks Industry Levy. The changes will take effect from 1 April 2027.

The increase is the total of:

- An increase in line with the Office for Budget Responsibility's forecast of the Consumer Price Index (CPI) Inflation
- 10 and 13 pence per 10 litres for the lower and higher rates respectively (one fifth of the 27% increase which reflects CPI between 2018 and 2024)

From 1 April 2027, for chargeable soft drinks containing:

- at least 5 grams of total sugar per 100 millilitres but less than 8 grams of total sugar per 100 millilitres, the rate will be £2.25 per 10 litres;
- 8 grams or more of total sugar per 100 millilitres, the rate will be £3.01 per 10 litres.

The tax information and impact note for this measure published at Autumn Budget 2024 provides more information: [Soft Drinks Industry Levy uprating - GOV.UK](https://www.gov.uk/government/publications/increasing-the-rates-of-the-soft-drinks-industry-levy/soft-drinks-industry-levy-uprating) (<https://www.gov.uk/government/publications/increasing-the-rates-of-the-soft-drinks-industry-levy/soft-drinks-industry-levy-uprating>)

1.68 Changes to the Soft Drinks Industry Levy

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to make changes to the Soft Drinks Industry Levy. The threshold at which soft drinks with added sugar are liable to the levy will be lowered from 5g to 4.5g total sugars per 100ml. In addition, the existing exemptions for milk-based drinks and milk substitute drinks with added sugar will be removed. A 'lactose allowance' will be introduced to account for naturally occurring sugars in milk. The changes will take effect from 1 January 2028.

The legislation will also remove the requirement for soft drinks producers who produce more than 1 million litres of liable soft drinks per year to register for the levy. This change will only affect producers that do not package or import soft drinks as they will have no liability to pay the levy. This change will take effect from 1 April 2027.

1.69 Alcohol Duty Uprating

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase Alcohol Duty rates on alcoholic products in line with Retail Prices Index (RPI) inflation. The government will also increase the relative value of Small Producer Relief by making the discount taper for alcoholic products below 3.5% ABV more generous and increasing the marginal discounts for products 3.5% ABV and above. The simplified rates in the Travellers' Allowances Order 1994 will be amended in line with the alcohol duty rate increases.

These measures will take effect from 1 February 2027.

Alcohol duty rates and allowances are set out in [OOTLAR Annex A](https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142) (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

1.70 Penalty Reform for Alcohol Duty

As announced at Legislation Day 2026, the government will introduce legislation in Finance Bill 2026-27 to introduce HMRC's reformed late submission and late payment penalties, known as Penalty Reform, for Alcohol Duty returns. The measure brings Alcohol Duty into HMRC's

reformed late submission and late payment penalty regime, aligning it with the approach already in place for VAT and Income Tax Self-Assessment. This is expected to take effect from Spring 2027 by appointed day order.

1.71 Air Passenger Duty: Rates for 2028 to 2029

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase Air Passenger Duty (APD) rates for 2028 to 2029. APD rates will increase in line with the Retail Prices Index (RPI), rounded to the nearest penny. The change will take effect from 1 April 2028.

APD rates are set out in OOTLAR Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

1.72 Air Passenger Duty: Extension of the Higher Rate

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to extend the scope of the higher rate of Air Passenger Duty (APD) to all private jets of 5.7 tonnes or more. This change will take effect from 1 April 2027.

1.73 Carbon Border Adjustment Mechanism (CBAM): Scope amendment

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to correct a minor error in Finance Act 2026. This will add commodity code 7202 29 (other ferro-silicon) to the existing ferro-silicon exceptions from scope from 1 January 2027.

A Tax Information and Impact Note was published on 9 September 2026: Carbon Border Adjustment Mechanism - GOV.UK (<https://www.gov.uk/government/publications/introduction-of-carbon-border-adjustment-mechanism/carbon-border-adjustment-mechanism>)

1.74 Climate Change Levy Rates for 2028 to 2029

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to freeze the main rate of Climate Change Levy (CCL) for electricity at its 2027 to 2028 level. The main rate of CCL on liquefied petroleum gas (LPG) will also remain frozen. The main rate of CCL on gas and solid fuels will be uprated in line with the Retail Prices Index (RPI).

The reduced rates of CCL under the Climate Change Agreement scheme will remain at the same fixed percentages of the main rates.

These changes will take effect from 1 April 2028.

1.75 Aggregates Levy Rate for 2027 to 2028

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the rate of Aggregates Levy in line with the Retail Prices Index (RPI).

The change will come into force from 1 April 2027.

Aggregate Levy rate is set out in OOTLAR Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

1.76 Electric Vehicle Excise Duty (eVED)

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to implement Electric Vehicle Excise Duty (eVED) from 1 April 2028.

eVED will apply to Battery Electric Vehicles (BEVs), Plug In Hybrid Electric Vehicles (PHEVs) and Hydrogen Fuel Cell Electric Vehicles (HFCEVs). The rates of tax will be 3 pence per mile for BEVs and HFCEVs and 1.5 pence per mile for PHEVs. The rate will be uprated in 2029 to 2030, and in future years, in line with the Consumer Prices Index (CPI), to ensure that the tax maintains its real-terms value.

For the purposes of renewing their eVED alongside their VED and to calculate how much eVED to pay, drivers will provide an odometer (mileage) reading from their car and estimate their mileage for the forthcoming tax period (typically a year).

The tax information and impact note for this measure provides more information: [Electric Vehicle Excise Duty \(eVED\) - GOV.UK](https://www.gov.uk/government/publications/electric-vehicle-excise-duty-eved/electric-vehicle-excise-duty-eved) (<https://www.gov.uk/government/publications/electric-vehicle-excise-duty-eved/electric-vehicle-excise-duty-eved>).

1.77 Deeming of Private Hire Vehicle Operators (PHVOs)

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to change the VAT treatment of supplies of passenger transport services by taxi or private hire vehicle when supplied through an agent, so that the services will be deemed to be made by the agent and not the driver. This means that the private hire vehicle operator will have to charge VAT on the full value of the fare. The deeming will only apply to businesses whose annual fare turnover exceeds a specified threshold. The government will consult, in due course, on the level of this threshold, with £50 million annual fare turnover the lead option. The consultation will also support final policy design and implementation.

The change will take effect from 2 January 2028.

1.78 Vehicle Excise Duty (VED) Rates for Cars, Vans and Motorcycles for 2027 to 2028

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to uprate VED rates for cars, vans and motorcycles in line with the Retail Prices Index (RPI) for 2027 to 2028. This will take effect from 1 April 2027.

VED rates are set out in OOTLAR Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

1.79 Vehicle Excise Duty (VED) for Heavy Goods Vehicles (HGVs) and the HGV levy

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to uprate VED for Heavy Goods Vehicles (HGVs) in line with the Retail Prices Index (RPI) for 2027 to 2028. This will take effect from 1 April 2027.

The government will also uprate the HGV levy in line with the Retail Prices Index (RPI) for 2027 to 2028. This will take effect from 1 April 2027.

HGV VED and HGV Levy rates are set out in OOTLAR Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

1.80 Vehicle Excise Duty (VED) Exemption for Search and Rescue Vehicles

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to exempt eligible vehicles used for SAR activities from Vehicle Excise Duty (VED). The changes will take effect from 1 April 2027.

The tax information and impact note for this measure provides more information: Exemption for search and rescue vehicles from Vehicle Excise Duty (VED) (<https://www.gov.uk/government/publications/vehicle-excise-duty-ved-exemption-for-search-and-rescue-vehicles/exemption-for-search-and-rescue-vehicles-from-vehicle-excise-duty-ved>).

1.81 Vehicle Excise Duty (VED) Support for Heavy Goods Vehicles

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 so that where the reduced HGV rate is obtained for more than 12 months, any excess benefit may be recoverable from the vehicle keeper as a civil debt. This change will take effect from 28 October 2026.

1.82 Value Added Tax (VAT) and Climate Change Levy on Electric Vehicle Charging Deemed not to be for Domestic Use

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to clarify that electricity supplied through publicly accessible electric vehicle charging points is standard rated for VAT. It also specifies that publicly accessible electric vehicle charging points are not considered a domestic use for the purpose of Climate Change Levy. The changes will take effect from 1 November 2026.

1.83 Landfill Tax Increase in Rates from 1 April 2027

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase Landfill Tax rates for 2027 to 2028.

The standard rate of Landfill Tax will increase in line with the Retail Prices Index (RPI), rounded to the nearest 5 pence. The lower rate of Landfill Tax will increase by the cash amount of the increase to the standard rate.

The change will take effect from 1 April 2027.

Landfill Tax rates are set out in [OOTLAR Annex A \(https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142\)](https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142).

1.84 Landfill Tax: Removal of the exemption for stabilisers added to dredged material sent to landfill

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to remove the Landfill Tax exemption for materials added to dredged material as stabilisers before disposal. As a result of this change, only the dredged material itself will be exempt from Landfill Tax.

The change will take effect from 1 April 2027.

The tax information and impact note for this measure was published at L Day and has now been updated.

1.85 Plastic Packaging Tax Rate for 2027 to 2028

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to increase the rate of Plastic Packaging Tax (PPT) in line with the Consumer Prices Index (CPI). This change will take effect from 1 April 2027.

PPT rate is set out in [OOTLAR Annex A \(https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142\)](https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142).

Tax Administration and Other Measures

1.86 Individual Savings Account Manager Compliance

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to strengthen the compliance framework for Individual Savings Account (ISA) managers. The legislation will enable regulations to provide for the suspension of ISA managers and for new penalties and appeal rights, including points-based penalties for failures to submit

required ISA reports and returns. The new powers will take effect from 6 April 2028.

1.87 Modernising the Correction of Errors

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 requiring taxpayers to correct inaccurate tax returns and documents. This will include a general obligation on taxpayers to correct inaccuracies when they are identified, and a new power enabling HMRC to issue a Customer Correction Notice where it has reason to suspect an inaccuracy. Customer Correction Notices will require taxpayers to check their tax affairs and either correct the inaccuracy or explain why no correction is needed. The changes will take effect from 1 April 2028.

1.88 Child Benefit Overpayments and HICBC

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to offset Child Benefit overpayments against High Income Child Benefit Charge (HICBC) payments made in relation to that overpayment. This measure will have effect on and after the date of Royal Assent to Finance Bill 2026-27 and have retrospective effect from HICBC's introduction in January 2013.

1.89 Reforming Civil Tax Information and Inspection powers (Schedule 36 FA08) and Modernising the Definitions about Computer Records (s114 FA08)

As announced at Tax Update Day 2026, the government will introduce legislation in Finance Bill 2026-27 to modernise HMRC's civil information and inspection powers and provisions relating to computer records under Schedule 36 and Section 114 to the Finance Act 2008.

For Schedule 36, this includes reforms to the rules for issuing information notices relating to deceased taxpayers, expanding the scope of the Financial Institution Notice (FIN) to include cryptoasset service providers, removing the statutory FIN reporting requirement, streamlining the identification notice process and updating the relevant information that can be requested.

For Section 114, it ensures HMRC's information powers operate effectively in a modern, digital tax system.

The changes will take effect from the date of Royal Assent to Finance Bill 2026-27.

1.90 Deliberate Defaulters: Publishing enhanced detail

As announced at Budget 2025, the government will introduce legislation in Finance Bill 2026-27 to increase the amount of information it will publish about deliberate tax defaulters.

This measure will amend Finance Act 2009 to expand the amount of information HMRC can publish about the deliberate non-compliance that led

to publication of an individual or business' details under that framework. It will also add a new section which will allow HMRC to publish details of Personal Liability Notices, issued when a company's liability to a penalty for deliberate non-compliance is transferred to its Company Officer. The change will take effect from the date of Royal Assent to Finance Bill 2026-27.

1.91 Transfers in Case of Statutory Reorganisations Involving Public Bodies

As announced at Budget 2026 the government will introduce legislation in Finance Bill 2026-27 to create a general power to allow the Treasury to neutralise any tax consequences of a reorganisation of public sector bodies. The change will take effect from the date of Royal Assent to Finance Bill 2026-27.

1.92 Reforming the Customs Treatment of Low-Value Imports (LVI) into the United Kingdom

As announced at Tax Update Day 2026, the government will introduce legislation in Finance Bill 2026-27 to reform the customs treatment of low-value imports and implement the reforms by October 2028, six months earlier than previously announced. These reforms are intended to support fair competition, improving compliance by bringing the customs treatment of LVI imports closer to that of goods imported as freight.

1.93 Excise: Wrongdoing Penalties

As announced at Budget 2026, the government will legislate in Finance Bill 2026-27 to introduce a targeted civil penalty for deliberate conduct intended to evade UK excise duty before an excise duty point arises. The amendments will have effect from the date of Royal Assent to Finance Bill 2026-27.

1.94 Validation of Fees Charged in Connection with Certificates of Origin

As announced at Budget 2026, the government will legislate in the Finance Bill 2026-27 to validate fees charged in connection with the issuing of Certificates of Origin. The measure confirms the legal basis for fees covered by the legislation. The legislation will take effect from Royal Assent and apply to any fees charged at any time before 1 March 2027.

1.95 Power to Dispose of Things Seized as Liable to Forfeiture

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to amend Schedule 3 to the Customs and Excise Management Act 1979. The measure will provide HMRC with a power to dispose of seized goods before condemnation where their continued storage or handling would involve unreasonable expense or would be impracticable.

1.96 Amending Leasing Anti-Avoidance Legislation S228G, Capital Allowance Act 2001

As announced at Budget 2026, the government will introduce legislation in Finance Bill 2026-27 to expand the statutory definition of a finance lease, when specifically applied to lease and leaseback arrangements. This will restore the policy's application to the relevant lessees, whether they have a finance lease or a relevant right-of-use lease. The changes will take effect from 28 October 2026.

1.97 Policy Maintenance Package to Tackle Promoters of Tax Avoidance

As announced at Tax Update Day 2026, the government will introduce legislation in Finance Bill 2026-27 to amend legislation aimed at tackling promoters of tax avoidance. This includes changes to the Promoters of Tax Avoidance Schemes regime and a typographical amendment to section 209(6)(a) of the Finance Act 2026. The package will take effect from the date of Royal Assent to Finance Bill 2026-27.

Chapter 2 — Measures announced at Budget 2026 but not in Finance Bill 2026-27

Personal Tax

2.1 National Insurance Contributions (NICs) Rates, Limits and Thresholds

The government will use the September Consumer Prices Index (CPI) figure of 3.5% as the basis for uprating the Class 1 Lower Earnings Limit (LEL) and Class 2 Small Profits Threshold (SPT) for the 2027 to 2028 tax year. The LEL will be £6,916 per annum (£133 per week) and the SPT will be £7,355 per annum.

The September CPI figure will also be used as the basis for uprating the voluntary Class 2 and Class 3 NICs rates for the 2027 to 2028 tax year. The main Class 2 rate will be £3.80 per week, and the Class 3 rate will be £19.05 per week.

The remaining National Insurance limits and thresholds will, as previously announced, be maintained at 2026 to 2027 levels until the 2030 to 2031 tax year.

The government will legislate for this measure through affirmative secondary legislation in early 2027 as part of the annual setting of National

Insurance contributions rates, limits and thresholds, as is standard practice.

Personal Tax rates are set out in OOTLAR Annex A (<https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142>).

2.2 Help to Save Reform

As announced at Autumn Budget 2026, the reformed Help to Save scheme will be introduced in Spring 2028. The scheme will be delivered through a multi-provider model, enabling banks, building societies and credit unions to offer accounts directly to eligible customers. Under this model, Help to Save accounts will be available from a wider range of savings providers, including some with an established high-street presence. The government continues to welcome engagement from potential providers interested in offering the scheme.

2.3 First Time Buyer ISA

As announced at Budget 2026, the government will introduce a new First Time Buyer ISA. The product will replace the Lifetime ISA for new savers. It will provide a 25% government bonus on the final account balance up to a maximum of £20,000, paid on withdrawal, towards a purchase of a first home worth up to £450,000. Existing Lifetime ISA holders will be able to continue contributing to and using their accounts under the current rules.

The government will introduce primary and secondary legislation before the products launch in April 2029.

2.4 Reduce Lifetime ISA withdrawal charge for properties over the property price cap

As announced at Budget 2026, to support first time buyers to get on the property ladder, from 29 October the government will reduce the Lifetime ISA withdrawal charge for purchases of properties above the Lifetime ISA property cap from 25% to 20%. The charge for other unauthorised withdrawals will remain at 25%. This change will be made by secondary legislation to be laid before parliament on 28 October 2026.

2.5 Retaining the Cash ISA limit at £20,000 and developing a new ISA incentive

As announced at Budget 2026, the government will retain the cash ISA limit at £20,000 for all savers over 18 years old from April 2027. The government will work with industry to explore a new ISA incentive for people investing in a Stocks and Shares ISA for the first time. The detailed design will be developed with industry.

This change will be made by secondary legislation to be laid before parliament in November 2026.

2.6 Annual Up-rating of the Van Benefit Charge for 2027-2028 and the Car and Van Fuel Benefit Charges for 2027-2028

As announced at Budget 2026, the government will increase the van benefit charge and the car and van fuel benefit charges in line with the September Consumer Prices Index (CPI).

The following new rates will come into effect from 6 April 2027:

- the van benefit charge will be £30,200 in tax year 2027 to 2028
- the van fuel benefit charge will be £825 in tax year 2027 to 2028
- the car fuel benefit charge multiplier will be £4,310 in tax year 2027 to 2028

The government will introduce legislation by statutory instrument later this year to uprate these charges ahead of the tax year 2027 to 2028.

2.7 Approved Mileage Allowance Payments (AMAPs) and Self-Employed Simplified Mileage Rates

As announced on 27 October, the government will increase the Approved Mileage Allowance Payments (AMAPs) and Simplified Mileage Rates for business mileage above 10,000 miles from 25 pence to 35 pence per mile.

The changes will take effect from 6 April 2027 and will also apply to the corresponding National Insurance Contributions disregard for Relevant Motoring Expenditure (RME).

The government will introduce legislation by statutory instrument later in the year to uprate these charges ahead of the tax year 2027 to 2028.

2.8 Reform of Benchmark Scale Rates and Overseas Scale Rates

As announced at Budget 2026, the government will reform and simplify Benchmark Scale Rates (BSR) and Overseas Scale Rates (OSR) which are used by employers to reimburse their employees for domestic and overseas travel and subsistence expenses, without the need to check receipts.

BSR will be modernised to better reflect current subsistence costs. The new rates will be £20 for periods of travel over 5-hours, £60 for over 10-hours and £75 for over 24-hours.

The OSR will be simplified replacing the 200+- destination-specific OSRs with a simplified tiered approach that links to the updated BSR.

The government will introduce the necessary secondary legislation before its implementation from 6 April 2028.

Ahead of publication, HMRC will continue to engage with interested stakeholders to finalise the appropriate OSR on a destination-by-destination basis and the associated guidance.

2.9 Reforming how Taxpayers Claim for Employment Expenses

As announced at Budget 2026, the government will remove the £2,500 Income Tax Self Assessment expenses threshold from April 2028, allowing more taxpayers to claim tax relief on non-reimbursed employment expenses through PAYE.

This change will simplify the process for taxpayers by removing the need to enter Self Assessment solely to claim employment expenses, and ensure more tax relief claims are subject to evidence before relief is issued. This will make it easier for HMRC to administer claims and help to ensure tax relief goes to those who are entitled to it.

The government will keep under review whether there is a case for mandating the use of the PAYE route for taxpayers solely claiming employment expenses.

2.10 Guided Retirement and Retirement Collective Money Purchase (CMP)

As announced at Budget 2026, the government will introduce legislation in a future Finance Bill to support consolidation of Defined Contribution (DC) pensions and the introduction of Guided Retirement and Retirement-only Collective DC (RCDC) schemes. Legislation will amend the conditions in which an individual may keep their pension age or lump sum protection following a transfer of their pension rights between pension schemes. The legislation will also enable individuals who start receiving a pension under a RCDC scheme to convert that pension to a drawdown pension within a set period, if the RCDC scheme chooses to provide that option. Other legislative changes will be made to ensure the benefit payment rules can operate as intended for RCDC schemes and to allow transfers from drawdown funds to RCDC schemes.

2.11 Treatment of Welsh Foundation Apprenticeships in Child Benefit

The government no longer treats Welsh Foundation Apprenticeships as approved training for the purpose of determining Child Benefit entitlement in respect of a young person aged 16-19. This aligns treatment of such apprenticeships with existing legislation. This change took effect from 9 September 2026.

Corporate Tax

2.12 Corporate Tax Simplification for Business Investment

As announced at Budget 2026, the government is publishing a consultation, Corporate Tax Simplification for Business Investment, which identifies areas of the Corporate Tax system where targeted simplification could improve certainty and support investment, growth and competitiveness. The consultation sets out potential areas for reform and identifies opportunities

to simplify aspects of the Corporate Tax regime while maintaining its effectiveness and integrity. The government will work with stakeholders over the next year to develop and prioritise reforms.

2.13 Corporation Tax revenue recognition deferral for gas network operators

Corporation Tax revenue recognition for gas companies: As announced at Budget 2026, the government will legislate in Finance Bill 2027-28 to spread certain Corporation Tax impacts of changes to revenue recognition requirements for qualifying gas distribution activities evenly over five years. Spreading the tax impact over this period will help smooth out any resulting financial impacts.

The measure will apply to qualifying revenues which would be passed on to consumers, where these were previously deferred and now recognised as a result of changes to accounting standards and brought into account for Corporation Tax. The transitional amount, which would otherwise be taxable in 2026-27, will be spread over five years from 2026-27. The precise tax outcomes and qualifying transitional amount will be set out in due course. This will not reduce the overall Corporation Tax due.

2.14 Reform of Advance Corporation Tax (ACT) regime

As announced at Budget 2026, the government will introduce legislation in a future Finance Bill to repeal the remaining Advance Corporation Tax (ACT) regime with effect from 1 April 2031. All remaining unrelieved surplus ACT balances will be extinguished when the regime ends. Further details are set out in the government's response to the Advance Corporation Tax Reform consultation, published at Budget 2026[LINK].

2.15 Modernising the Distributions Framework

As announced at Budget 2026, the government has published a summary of responses to the consultation on modernising the distributions framework: Modernising the taxation of distributions and repayments of capital from companies - GOV.UK (<https://www.gov.uk/government/consultations/modernising-the-distributions-framework/modernising-the-taxation-of-distributions-and-repayments-of-capital-from-companies--2>) which was published at Tax Update 2026.

The government is proceeding with the proposals, with some changes to the policy design informed by stakeholder feedback. Further engagement will focus on the technical detail, and draft legislation will be published in 2027 for technical consultation.

The changes will take effect from April 2028.

2.16 Sovereign Tax Status Regime

As announced at Budget 2026, the government has published a consultation and will introduce legislation in a future Finance Bill for foreign sovereigns investing in the UK.

This will legislate a new sovereign tax status available for states, heads of state and emanations of states, while bringing certain income and gains into direct tax (Corporation Tax, Income Tax and Capital Gains Tax). Investment management activities undertaken by sovereign investment offices and gains arising to State-operated Overseas Pension Funds will be exempted from tax.

Sovereigns will keep qualifying institutional investor status for the Real Estate Investment Trust (REIT), Qualifying Asset Holding Company, Long-Term Asset Fund and most collective investment vehicle regimes.

Sovereigns will get bespoke access to a REIT structure which will enable them to hold a controlling interest in a REIT through a UK company while benefiting from a 15% tax rate on property income distributions.

Transitional provisions will include rebasing for certain assets and a time-limited Stamp Duty Land Tax relief for restructuring of certain existing property holdings, which will apply ahead of the reforms taking effect.

The government will publish draft legislation for technical consultation.

The reforms will take effect from 1 January 2029.

2.17 Annual Tax on Enveloped Dwellings (ATED): Annual chargeable amounts

As announced at Budget 2026, the ATED annual charges will rise by 3.5% from 1 April 2027 in line with the September 2026 Consumer Prices Index (CPI).

ATED 2027 to 2028 charges are set out in [Annex A \(https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142\)](https://draft-origin.publishing.service.gov.uk/government/publications/budget-2026-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances?cachebust=1792573142).

Indirect Tax

2.18 Fuel Duty Rates

As announced at Budget 2026, the government will introduce legislation to extend the temporary 5 pence per litre (ppl) cut in the main rates of fuel duty (originally introduced at Spring Statement 2022) from 1 January 2027 until 30 June 2027. In addition, the legislation will extend the further 3.7 ppl cut to the rebated rates for gas oil (red diesel), biodiesel, bioblend and kerosene for excepted machines other than for heating, until 30 June 2027. This legislation will take effect from 1 January 2027. The government will also introduce legislation to increase fuel duty rates in line with Retail Prices Index (RPI) inflation from 1 July 2027.

On 1 July 2027, fuel duty rates will return to the levels that applied before the 5 ppl temporary cut was introduced in March 2022, and will be uprated in line with the Retail Prices Index (RPI).

2.19 Machine Games Duty: Changing who is liable for the duty

As announced at Budget 2026, the government will introduce legislation in a future Finance Bill to make machine suppliers liable for Machine Games Duty on supplier-owned machines operated under profit-share arrangements. Premises licence holders, permit holders and pub tenants will remain liable where they own the machine outright or use it under a fixed rental or lease arrangement and control the takings. The government is consulting on the implementation of this change until 20 January 2027.

The change will take effect from 1 April 2028.

2.20 Extending the Temporary 0% VAT rate for Domestic Electricity

As announced at Budget 2026, the government will extend the temporary VAT zero rate for domestic electricity supplies until 30 June 2027. A 0% rate of VAT will continue to apply to qualifying electricity supplies that would otherwise be subject to the reduced rate of 5% from 1 April 2027. The government will lay secondary legislation before Parliament in early 2027 to extend this temporary zero rate of VAT.

2.21 Temporary reduced rate of VAT on family activities (Great British Summer Savings)

As announced on 21 May 2026, a temporary reduced rate of VAT of 5% applied to children's meals, children's and family admission to cinemas and theatres, and admissions to qualifying family attractions between 25 June and 1 September 2026. The measure reduced VAT from the standard rate of 20% to 5% on eligible supplies during the school summer holiday period as part of the Great British Summer Savings package.

2.22 Energy-Saving Materials (ESM) VAT relief

As announced at Budget 2026, the government will lay secondary legislation before Parliament to include heat batteries within the VAT relief for energy-saving materials when installed in residential accommodation or charity buildings in the UK. This change will take effect from 1 April 2027. As announced when the temporary zero rate was introduced in 2022, the rate of VAT relief for energy-saving materials will revert to 5 per cent from 1 April 2027.

2.23 Vehicle Excise Duty Support for Heavy Goods Vehicles (Reduced Rate)

As announced on 20 May 2026, the government has provided a 12-month reduced £1 annual rate of Vehicle Excise Duty (VED) for certain HGVs. This was legislated in the summer through the Taxation (Energy and Vehicles) Act 2026 and applies from 1 July 2026 to 30 June 2027.

The tax information and impact note for this measure provides more information: [Temporary Vehicle Excise Duty rates for heavy goods vehicles \(https://www.gov.uk/government/publications/12-month-vehicle-excise-duty-ved-holiday-for-heavy-goods-vehicles-hgvs/temporary-vehicle-excise-duty-rates-for-heavy-goods-vehicles\)](https://www.gov.uk/government/publications/12-month-vehicle-excise-duty-ved-holiday-for-heavy-goods-vehicles-hgvs/temporary-vehicle-excise-duty-rates-for-heavy-goods-vehicles).

2.24 VAT: Zero Rate for Land Sold to a Relevant Housing Association

As announced at Budget 2026, the government will lay secondary legislation before Parliament in early 2027 to bring into effect a new zero rate of VAT on the sale of land to registered social housing providers (relevant Housing Associations). This change will take effect from 1 April 2027.

A consultation was announced at Budget 2025 and the summary of responses to the consultation is being published at Budget 2026. [LINK to be added when published.]

2.25 Review of the VAT treatment of travel services including the Tour Operators' Margin Scheme

As announced at Budget 2026, the government has published a call for evidence for the review on the VAT treatment of travel services, including the Tour Operators' Margin Scheme (TOMS).

It seeks views on whether TOMS remains fit for purpose and should be retained, reformed, simplified, made optional, partly withdrawn or removed.

The government is also reviewing the treatment of travel services outside of the TOMS that are enjoyed in the UK but supplied by tour operators based outside the UK.

The evidence will inform proposals to simplify VAT administration, support fair taxation and reduce distortions in the VAT system.

The call for evidence runs from 28 October 2026 to 31 January 2027.[LINK]

2.26 Plastic Packaging Tax: Mechanically recycled plastic certification consultation and summary of responses

As announced at Budget 2026, the government has published a summary of responses to the May 2026 consultation on potential certification for mechanically recycled plastic packaging for the purposes of Plastic Packaging Tax (PPT). This confirms that the government will introduce mandatory certification for businesses claiming an exemption from PPT on the basis it meets the 30% recycled plastic threshold. This change will take effect from 1 April 2030.

2.27 Landfill Communities Fund Value for 2027 to 2028

As announced at Budget 2026, the government will increase the cap on the amount of tax credit claimable by landfill operators in respect of contributions made to the Landfill Communities Fund against their Landfill

Tax liability. The cap will increase from 5.3% to 8.3% of their Landfill Tax liability, providing an estimated fund value of £25.3m for 2027 to 2028. The government will legislate for this measure through secondary legislation. This change will come into force from 1 April 2027.

2.28 Carbon Border Adjustment Mechanism (CBAM): Sectoral scope expansion to refinery products

As announced at Budget 2026, the government intends to expand the scope of the Carbon Border Adjustment Mechanism (CBAM) to include refinery products, subject to consultation on feasibility and impacts. The consultation opened on 28 October 2026 and will close on 20 January 2027. The government will consider responses before bringing forward any legislation required to implement the change.

2.29 Gaming Duty: Gross Gaming Yield Bands

As announced at Budget 2026, the government will freeze the gross gaming yield bandings used to determine the rate of Gaming Duty from 1 April 2027 to 31 March 2028.

2.30 Nicotine Approval Scheme

As announced in April 2025, the government will consult on the design of a Nicotine Approval Scheme (NAS) to introduce controls on the supply of high-strength nicotine from 1 April 2028. The consultation has been published alongside Budget 2026 and will run for 12 weeks until 20 January 2027, inviting respondents to share views on technical details of the scheme including threshold, exemptions and enforcement options.

Tax Administration and Other Measures

2.31 More Timely Payments for Self Assessment

As announced at Budget 2026, the government will require Income Tax Self Assessment taxpayers who make Payments on Account to make more regular in year payments towards their final tax bill from April 2029.

Payments will be automated, with eligible taxpayers able to choose to pay through PAYE. The government consulted on the approach to more timely payment in Income Tax Self Assessment and is publishing a Summary of Responses alongside Budget 2026. The government will continue to work with taxpayers and stakeholders on detailed design and implementation.

2.32 Requiring Direct Debit arrangements for VAT and PAYE return liabilities

As announced at Budget 2026, the government will require taxpayers to set up a Direct Debit instruction for VAT and PAYE return liabilities from April 2029, subject to defined exceptions. Businesses will continue to be able to use other payment methods to pay their liability before a specified cut-off date. The Direct Debit instruction will be used to collect any unpaid

balances. Legislation will be introduced at a future Finance Bill. The government has published its response to the consultation alongside this announcement.

2.33 Clamping Down on Till Fraud

As announced at Budget 2026, the government will introduce mandatory software standards for Electronic Point of Sale and Mobile Point of Sale systems to tackle Electronic Sales Suppression (ESS) or 'till fraud'. The government has published its Summary of Responses to the consultation on ESS, which was launched on 23 June 2026. HMRC will undertake further technical engagement with industry and publish a technical consultation in summer 2027, setting out detailed implementation proposals. The government intends to legislate in a future Finance Bill. The implementation date will be determined following further policy development and consultation.

2.34 Addressing Persistent Non-Compliance by a Small Minority of Larger Businesses

As announced at Budget 2026, the government will review its approach to addressing persistent non-compliance and egregious behaviour by a small minority of larger businesses. This review will consider the effectiveness of the existing framework for managing larger business compliance, including the Special Measures regime and other tools available to HMRC, to ensure they remain fit for purpose. The government will engage with stakeholders next year as it considers any future changes.

2.35 Removing the Financial Incentives of Tax Avoidance

As announced at Budget 2026, the government will shortly publish a consultation on a package of measures to tackle the promotion and use of tax avoidance, including:

- new powers to tackle serious and serial users of tax avoidance schemes.
- changes to enable earlier recovery of promoters' and certain individuals' liabilities.
- changes to further strengthen HMRC's existing Promoters of Tax Avoidance Schemes regime.

2.36 MTD for Income Tax: Penalty Easement April 2027

As announced at Budget 2026, the government will not apply late submission penalty points to quarterly updates for the 2027-28 tax year for Income Tax Self-Assessment taxpayers required to join MTD in April 2027. Customers will still need to send their quarterly updates before they are able to submit their tax return.

2.37 MTD for Income Tax: Exemptions

As announced at Budget 2026, the government will exempt the following groups from MTD for Income Tax until further notice: those eligible for qualifying care relief, non-UK resident foreign entertainers and sportspeople

and expected non-resident customers. Secondary legislation will be introduced before April 2027.

As the government set out previously, some customers for whom HMRC cannot provide a digital service will not be required to use MTD for Income Tax - this will include a small number of insolvent customers who are not currently able to sign up.

2.38 Summary of Responses to the Call for Evidence on Business Systems Integration

As announced at Budget 2026, the government has published a summary of responses to the business systems integration call for evidence carried out in 2026. The government will work with industry to test practical ways to improve integrations between business systems and support voluntary adoption. This intends to reduce administration burdens for businesses and improve record-keeping accuracy.

2.39 Call for Evidence: Modernising the Administration of Corporation Tax

As announced at Budget 2026, the government is publishing a Call for Evidence on the future administration of Corporation Tax. It seeks views on how to better support companies to report and pay the right amount of tax first time, while exploring opportunities for more integrated information flows, proportionate administrative requirements and better use of data. It also explores how advances in automation and artificial intelligence could support a modernised Corporation Tax administration system and what lessons can be learned from companies already using these technologies. This follows a commitment made in HMRC's Transformation Roadmap, published in July 2025.

2.40 Modernising and Standardising Corporation Tax (CT) submissions

As announced at Budget 2026, the government is publishing a summary of responses to the consultation on Modernising and Standardising Corporation Tax Submissions published on 10 March 2026, which closed on 2 June 2026. The government will proceed with prescribing Corporation Tax computations on a longer and more flexible implementation timetable. The government will also introduce mandatory online filing of amended Company Tax Returns from 1 April 2028 by directions. Enforcement arrangements for prescribed computations will not be implemented at this time.

2.41 Summary of Responses to Tax Treatment of Predevelopment Costs Consultation

As announced at Budget 2026, the government has published a summary of responses to the consultation on the tax treatment of predevelopment costs and will work with stakeholders to explore what improvements can be made to HMRC guidance to provide greater clarity on the application of the existing capital allowances rules.

2.42 Offshore Penalty Reform Consultation

As announced at Budget 2026, the government will publish a consultation later this year on reform to the offshore penalties framework. Any legislation will be introduced in a future Finance Bill following consultation responses.

2.43 Improving Stewardship Through Better Quality Software Intermediation

As announced at Budget 2026, the government will introduce a package of measures to improve HMRC's oversight of software intermediaries and strengthen requirements for software providers seeking to integrate with HMRC systems. The measures for software providers include: a registration process, strengthened standards including for software products, and proportionate enforcement for addressing breaches of HMRC's software standards and Terms of Use. HMRC will engage with the software industry as the detailed arrangements are developed.

2.44 Company Payments to Participators: Modernising the reporting framework

The government is publishing a summary of responses to the consultation on company payments to participators launched in March 2026, which closed in June 2026.

The government will not implement the new reporting requirements at this time. HMRC will continue to work with stakeholders on the concerns raised in the consultation to ensure customers can access the best information to help them meet their tax obligations.

2.45 Direct Recovery of Lower Value Tax Debts

As announced at Budget 2026, the government is publishing a summary of responses to the Tackling lower value tax debts consultation. The government will introduce legislation in a future Finance Bill to enable HMRC to recover established lower value tax debts through regular deductions from bank accounts where customers repeatedly fail to engage with HMRC. The changes are expected to take effect from 2029-30.

Table 1 — Measures in this document without a corresponding announcement in the Budget report

Paragraph Number	Measure Title
1.9	Social Security Benefits: Clarification of income tax treatment
1.11	Deduction of Income Tax at Source: informant rewards paid by HMRC
1.12	Consequential Amendments arising from Changes to Savings and Property Rates of Income Tax
1.14	Cancelled Shifts: Technical Update
1.19	Defined Benefit Pensions - Surplus Extraction tax regime
1.24	The Introduction of Mandatory Payrolling of Benefits in Kind from April 2027
1.35	Tax Treatment of Stablecoins
1.39	Corporation Tax: Foreign permanent establishment (PE) exemption
1.40	Pillar 2: Side-by-Side Package and Further Amendments
1.45	Oil and Gas Revenue Levy (OGRL)
1.46	Exploration or Exploitation Rights
1.48	Cryptoasset Loans and Liquidity Pools
1.49	Company Directors Disqualification Act 1986: Disqualification Following Breach of HMRC Securities Legislation
1.52	VAT: Deposit Return Scheme
1.67	Soft Drinks Industry Levy (SDIL) Uprating
1.70	Penalty Reform for Alcohol Duty
1.72	Air Passenger Duty - Extension of the higher rate
1.75	Aggregates Levy Tax Rate
1.76	Electric Vehicle Excise Duty (eVED)

Paragraph Number	Measure Title
1.84	Landfill Tax: Removal of the exemption for stabilisers added to dredged material sent to landfill
1.96	Amending Leasing Anti-Avoidance Legislation S228G, Capital Allowance Act 2001



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