

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	White Paper on Legislative Proposals Relating to the Welsh Tax Acts
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	India Hitchen, Tax Maintenance Bill Policy Lead (Welsh Revenue Authority) and the broader Tax Maintenance Bill team.
Department:	Welsh Government Welsh Revenue Authority
Head of Division/SRO (name):	David Matthews, Strategy & Capability Director (Welsh Revenue Authority)
Cabinet Secretary/Minister responsible:	Mark Drakeford, Cabinet Secretary for Finance and Welsh Language
Start Date:	September 2025

CONTENTS

Section 1. What action is the Welsh Government considering and why?	3
Section 8. Conclusion.....	10
Section 9. Declaration	13
FULL IMPACT ASSESSMENTS	14
Children's Rights Impact Assessment	14

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

The White Paper, published alongside this Integrated Impact Assessment (IIA), sets out proposals to ensure the Welsh Tax Acts remain fit for purpose, deliver the outcomes intended by Senedd Cymru, and enable the Welsh Revenue Authority (WRA) to collect devolved taxes as efficiently and effectively as possible.

Background

In April 2018, the WRA began to collect and manage two Welsh devolved taxes on behalf of Welsh Government: Land Transaction Tax (LTT)¹ and Landfill Disposals Tax (LDT)². These taxes replaced UK Stamp Duty Land Tax and UK Landfill Tax respectively in Wales.

The amendments outlined in this consultation are drawn from seven years' operational experience in collecting and managing devolved taxes, feedback from industry, representatives, and in response to relevant UK government legislative changes. The technical changes are intended to clarify, enhance and future-proof the Welsh Tax Acts to enable the WRA to continue to collect taxes as effectively as possible. The WRA's operational experience over this period has also highlighted a number of areas where aspects of its internal governance structure or the powers it uses to carry out its functions are in need of updating.

The White Paper proposes that new legislation be introduced – a first 'tax maintenance bill' – which will comprise a series of unrelated amendments to the Welsh Tax Acts³:

- Tax Collection and Management (Wales) Act 2016 ('TCMA')
- Landfill Disposals Tax (Wales) Act 2017 ('LDTA')
- Land Transaction Tax and Anti-avoidance of Devolved Taxes (Wales) Act 2017 ('LTTA')

The intended next step after the consultation has concluded is to take forward a 'tax maintenance bill', which will comprise a series of unrelated amendments to the Welsh Tax Acts³ to be made through the introduction of primary legislation. These changes should ensure that the Welsh Tax Acts deliver the outcomes intended by Senedd Cymru. The proposals should also enable taxpayers and their advisers to clearly understand their obligations, and that the WRA can collect taxes as effectively as possible. Whilst this is a matter for the next Welsh Government, the current Welsh Government wishes to put its successor in the position to take forward the first tax maintenance bill of its kind.

¹ <https://www.gov.wales/land-transaction-tax-introduction>

² <https://www.gov.wales/landfill-disposals-tax-introduction>

³ The Welsh Tax Acts include the [Tax Collection and Management \(Wales\) Act 2016](#), the [Land Transaction Tax and Anti-avoidance of Devolved Taxes \(Wales\) Act 2017](#) and the [Landfill Disposals Tax \(Wales\) Act 2017](#).

The Welsh Revenue Authority

The WRA is a non-ministerial department of Welsh Government. As Welsh Government's tax administration body, it develops and delivers services for people to register, calculate and pay tax in Wales. The revenue raised provides funding for Welsh communities and public services, like schools and the NHS. The WRA is also now responsible for collecting and managing the visitor levy on behalf of Welsh principal councils and will operate the register of visitor accommodation providers across Wales.

The WRA's overall purpose is to design and deliver Welsh national revenue services and to lead the better use of Welsh taxpayer data for Wales. The WRA's strategic objectives, set out in the Corporate Plan⁴ are to:

- make it easy to do the right thing
- be fair and consistent in the way we deliver our services
- be a sustainable and future focused organisation

The changes put forward in the White Paper aim to enable the WRA to achieve its strategic objectives.

Summary of proposed reforms

The White Paper includes a chapter outlining the policy context for the proposed reforms and asks

As summarised, the White Paper sets out the following proposals –

WRA Governance

Non-executive membership of WRA committees:

- A proposal to amend the Tax Collection and Management (Wales) Act 2016 ('TCMA') to clarify which committees or sub-committees require non-executive membership.
- A proposal that non-members of WRA (i.e. WRA staff who are not Board members) can vote in committees of which they are members (according to the Terms of Reference) other than the Audit, Risk and Assurance Committee (ARAC) and the Remuneration Committee (RC).

WRA Tax Powers

Information sharing powers:

- A proposal to amend section 18(1) TCMA to introduce two new legislatively permitted disclosures to allow WRA to disclose information to principal councils and Welsh Government, for the purposes of their functions.

⁴ <https://www.gov.wales/welsh-revenue-authority-corporate-plan-2025-2028>

Sharing protected taxpayer information relating to the visitor levy with principal councils for the purposes of WRA functions:

- A proposal to amend TCMA to lift the restriction on the disclosure of protected taxpayer information relating to visitor levy to principal councils.

Withholding payments during an enquiry:

- A proposal to give WRA a power to withhold repayments whilst undertaking an enquiry for the purposes of LTT and LDT. A proposal to insert a regulation making power to extend these provisions to visitor levy, should the need arise.

Claims for overpayment relief:

- A proposal to amend TCMA to provide clarity that to reject a claim under s67 TCMA that WRA need not open an enquiry.

Information notices to check whether a relief has been withdrawn:

- A proposal to amend TCMA to include a provision to allow the WRA to issue an information notice to allow the WRA to gather information to check whether the conditions for the withdrawal of a relief have been met.

Power of inspection:

- A proposal to amend TCMA to allow the WRA to carry out inspections without seeking tribunal or taxpayer approval using similar rules to the Finance Act 2008.

Power to amend fixed penalty notices:

- A proposal to insert a regulation making power to enable Welsh Ministers to amend the TCMA fixed penalties. This would allow Welsh Ministers to increase or decrease fixed penalty amounts.

Increasing late payment interest:

- A proposal to utilise existing powers at section 163 TCMA to increase the interest rate charged by the WRA on late payment interest to 4%+ BoE base rate, to match HMRC's interest rate.

Recalculating interest amounts following an amendment:

- A proposal to amend provisions at section 157 TCMA to ensure that any interest payable reflects the amount of WRA-collected tax and related penalties that are due.

Tax Changes

Taxable disposals:

- A proposal to amend the LDTA using the same definition of landfill cell as used in the Scottish Landfill Tax (Prescribed Landfill Site Activities) Amendment Order 2022.

Group relief and consideration provided from outside the group:

- A proposal to amend LTТА 2017 to provide an exhaustive list of when consideration is being provided from outside the group will not result in the withdrawal of the relief, unless the transaction is part of a scheme to save LTT.

A to A+B Transaction:

- A proposal to amend LTТА to add a new provision clarifying that in an A to A+B transaction A is not to be treated as a buyer.

Reflecting leasehold reform in LTТА:

- A proposal to make an amendment to make it clear that the higher residential rates will not apply where the transaction is one to which the leasehold enfranchisement relief applies.

Nominees and leases:

- A proposal to amend the LTТА to ensure that the availability of reliefs is not restricted by the current look-through rules for leases involving nominees and bare trustees, so that the buyer and seller are beneficial, rather than legal, owners.

LTТА application to the Crown:

- A proposal to amend the legislation at section 187A(1) TCMA to include the correct reference and ensure that the Crown's rights of appeal against information notices are provided.

The White Paper concludes with questions on the effect of the proposals on the Welsh language and inviting comments on related issues not addressed in the White Paper.

Impact

This IIA relates to draft proposals that do not include legislation during this Senedd term, although, as indicated in the White Paper, may lead to future legislative developments. We will reflect on the evidence submitted to the White Paper consultation and consider how to assess the impact of the proposals in more detail by updating this IIA.

Generally, the proposals will have significant positive impacts, in line with Welsh Government's five core tax principles. Proposals aim to -

- Improve clarity and efficiency in tax collection, ensuring correct payments and reducing avoidance. Alongside this, we propose amendments to inspection powers and repayments to help protect revenue integrity.
- Support the implementation of the visitor levy and enable better data sharing for policy development. This change aligns with broader goals like sustainability and economic fairness.
- Supporting the delivery of public services in Wales by enabling the sharing of WRA-collected data with Welsh Government and local government partners.
- Clarify governance structures and tax rules (e.g. group relief, nominee leases, landfill disposals), reducing ambiguity and administrative burden for both WRA and taxpayers.
- Invite stakeholder feedback during the consultation period, which forms a core part of the Welsh Way of Doing Tax ("WWoDT"). This approach ensures that considerations around tax policy and delivery in Wales are embedded from the outset into planning and development.
- Contribute directly to the Wellbeing of Future Generations (Wales) Act 2015 goal of creating a more equal Wales. Proposals aim to ensure fairness in tax treatment (e.g. leasehold reform, interest recalculations), promoting transparency, consistency, and equitable access to reliefs.

Long term

The proposals in the White Paper reflect long-term trends like digitalisation and greater fiscal devolution, including the visitor levy, which are shaping how the tax system in Wales operates. These trends are likely to influence how effective and relevant the proposed changes to the Welsh Tax Acts will be. The proposals also respond to changes to UK government legislation that may have an impact on devolved taxes. Key challenges include keeping the legislation clear, accessible and consistent, while protecting taxpayer information, all of which ensures that WRA can operate efficiently.

At the same time, there are opportunities to improve tax compliance, strengthen collaboration between public bodies, and future-proof the devolved tax system in Wales to better support Welsh Government priorities. The proposals aim to address these issues by clarifying governance arrangements, enabling safe and purposeful data sharing, and aligning tax administration with changing policy needs, including those identified by feedback from industry and representatives.

Prevention

The proposals in the White Paper primarily treat symptoms – such as inefficiencies, gaps or uncertainties in current legislation - but they also begin to address underlying causes by strengthening governance arrangements, improving transparency, and aligning tax powers with broader policy goals, which aims to improve certainty and enable the WRA to deliver its functions more effectively.

Negative impacts, where identified, can be minimised by embedding safeguards in data sharing arrangements and maintaining clear governance boundaries, as examples. Ongoing stakeholder engagement and continued assessment of impacts will be key to ensuring the proposals support long-term sustainability and social cohesion.

Integration

The proposals in the White Paper contribute to wider public policy agendas by strengthening the legal and operational framework for devolved tax administration in Wales. Enhanced data-sharing powers, as proposed in the White Paper, also enable better coordination across public bodies, supporting informed policy design and decision-making particularly in areas like housing, planning and tourism. Better data-sharing will also support the delivery of existing principal council functions, including non-domestic rate and council tax.

The proposals in the White Paper have been developed in line with the Welsh Government's five core tax principles and the Well-being of Future Generations Act 2015. The consultation process itself is a step towards integration, inviting input from stakeholders to ensure proposals support a more prosperous, equal, and cohesive Wales.

Collaboration

Partners with a shared interest in this proposal include the WRA, Welsh Government, principal councils, and stakeholders affected by devolved taxes such as taxpayers, industry representatives, and professional bodies. These groups have a direct role in shaping, administering, or complying with the Welsh Tax Acts.

Their involvement is reflected through operational feedback and participation in the current consultation process. The WRA has contributed its experience from administering devolved taxes since 2018, identifying areas for improvement. Stakeholders are invited to contribute through consultation responses to the White Paper, helping to refine the proposals and ensure they are practical, fair, and aligned with broader goals of the sector and Welsh Government.

Involvement

Section 5 of The Well-being of Future Generations (Wales) Act 2015 indicates that a public body must take account of the importance of involving people who reflect the diversity of the population of Wales in making decisions that interest or impact them.

People affected by the proposal—such as taxpayers, industry representatives and professional bodies—have been involved through ongoing engagement with the WRA and Welsh Government. Their feedback, gathered from operational experience since 2018, has helped identify areas where the legislation needs clarification or improvement. Their involvement in delivery will continue through the consultation process, implementation planning, and ongoing collaboration with the WRA.

Costs and Savings

While the proposed changes to the Welsh Tax Acts may involve some costs, these are expected to be absorbed within existing budgets, as many of the amendments are technical clarifications or governance improvements based on current practice. Over time,

savings will be achieved through more efficient tax administration, fewer errors and disputes, and improved compliance. By clarifying legislation and strengthening data-sharing powers, WRA will be better equipped to operate effectively, reduce administrative burdens, and support more informed public policy decisions.

As there are no proposals for legislation during this Senedd term, a Regulatory Impact Assessment is not required at this stage of policy development. Any future proposals for legislation be subject to a full Regulatory Impact Assessment, to ensure the cost and benefit assessment of any options.

Mechanism

While there are no legislative proposals planned for this Senedd term, the current proposals may lead to legislation in the future. Any future legislative proposals will be accompanied by a full Regulatory Impact Assessment.

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

People most likely to be affected by the proposals—such as taxpayers, principal councils, industry representatives, and professional bodies—have been engaged through a combination of ongoing dialogue and targeted engagement. The WRA, drawing on its experience of administering devolved taxes since 2018, has played a key role in identifying areas for improvement, including drawing on feedback from professional bodies and representatives through existing and ongoing engagement. These contributions have helped shape the proposals to ensure they are practical, fair, and responsive to the needs of communities across Wales.

While the proposals are primarily technical in nature, careful consideration is being given to their potential impact on people with protected characteristics under the Equality Act 2010. Equality impact assessments are being developed to inform the process and will continue to evolve as feedback is received. The consultation is open to all, allowing a broad range of voices to contribute to the development of the proposals.

All consultation materials will be available in both Welsh and English. The proposals will also be assessed for their potential impact on the Welsh language to ensure compliance with the Welsh Language (Wales) Measure 2011.

Although the proposals are not expected to have a direct impact on children, the principles of the Well-being of Future Generations (Wales) Act 2015 have guided the approach, ensuring that long-term impacts on future generations are considered. The consultation process provides an opportunity for children's representatives and advocacy groups to contribute their views, if proposals are identified as having a direct or indirect impact.

8.2 What are the most significant impacts, positive and negative?

The proposals in the White Paper to develop legislation during the next Senedd term to make changes to the Welsh Tax Acts should have a positive impact on many aspects of Welsh society.

The most significant impacts include:

- Demonstrating a commitment to clarity and efficiency in tax collection, ensuring correct payments are received and reducing avoidance. Proposed amendments to inspection powers and repayments will help further protect revenue integrity.
- Supporting the implementation of wider policy initiatives, including the visitor levy, alongside the development of better data sharing practices that actively supports policy development.
- Clarifying governance structures to maintain good governance ensure that protected taxpayer information remains protected.
- Clarifying tax rules thereby reducing ambiguity and administrative burden for both WRA and taxpayers.

- Delivering on Welsh Government commitments, as set out in the Welsh Way of Doing Tax (“WWoDT”). This approach ensures that tax policy and delivery considerations are embedded from the outset into planning and development, reflecting Wales’s values of fairness, transparency, and long-term sustainability.

Themes emerging from the WRA’s operational experience to date, and stakeholder engagement since 2018, highlight the importance of fairness, clarity, and long-term sustainability in the administration of Welsh Taxes, which align closely with the seven well-being goals—particularly a prosperous, resilient, and more equal Wales—and support the Welsh Government’s well-being objectives around prevention, collaboration, and integration. Economically, the proposals aim to reduce administrative burdens and improve compliance with the devolved tax system in Wales, contributing to a more resilient and prosperous Wales.

Compared to current Welsh Government action, these proposals build on existing frameworks and operational experience, refining the system to better serve the long-term interests of Wales and its people.

We are early in the policy development of proposed reforms and therefore are limited in our ability to assess the full potential impact of the White Paper at this stage. We have outlined the potential impact of the White Paper and acknowledge where it is not possible to fully assess the impact at this early stage of policy development. We will continue to assess the impact of these proposals in more detail as the policy develops.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

The proposals set out in the White Paper contribute to the seven well-being goals prescribed in section 4 of the Well-being of Future Generations (Wales) Act 2015:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The proposed changes to the Welsh Tax Acts aim to strengthen the legal and operational framework for tax administration in Wales. By embedding clarity and consistency into tax legislation, the proposals aim to promote a more prosperous Wales through improved compliance and reduced administrative burdens. This enables WRA to operate more efficiently. The proposals also support a more resilient Wales by enabling better data-sharing across public bodies, which in turn facilitates more informed decision-making in areas like housing, planning and tourism.

The proposed changes to the Welsh Tax Acts also aim to support the implementation of the visitor levy, which itself contributes to multiple well-being goals. The visitor levy aims to empower principal councils to manage tourism in a way that supports local economies, protects cultural heritage, and reduces pressure on natural resources. This aligns with goals for a vibrant culture and thriving Welsh language, a globally responsible Wales, and cohesive communities. The Levy also provides a new revenue stream that can be reinvested in infrastructure and services, supporting economic development and environmental sustainability.

To strengthen its contribution to specific well-being goals—particularly a prosperous, resilient, and more equal Wales—the Welsh Government can take further action by embedding inclusive engagement and accessibility into all stages of policy development. This includes continuing to involve people with protected characteristics under the Equality Act 2010 and Welsh speakers in consultation and implementation processes. Equality and Welsh language impact assessments will be maintained and updated to ensure that the proposals remain responsive to the needs of diverse communities. All materials will be provided bilingually, and engagement with Welsh language organisations will help promote inclusion.

To ensure the proposals avoid or mitigate negative impacts, safeguards will be embedded throughout their implementation. The consultation process is specifically designed to highlight unforeseen consequences through stakeholder feedback, enabling early identification and response. As new impacts emerge, this IIA will be continuously refined to reflect updated evidence, ensuring the proposals remain aligned with the Welsh Government's well-being objectives.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Following the publication of the White Paper, we will engage in a 12-week consultation period. We will continue to identify stakeholders potentially impacted by the proposals and hold consultation events to ensure all views have been considered. All responses to the consultation will be analysed and used to develop proposals further.

Further policy proposals will be subject to a revised, more detailed Integrated Impact Assessment.

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director: David Matthews

Department: Welsh Revenue Authority

Date: 3 November 2025

FULL IMPACT ASSESSMENTS

CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

This impact assessment assesses the impact of the proposals on children and young people up to the age of 18.

As outlined in Part 1 of this IIA, the proposed amendments in the White Paper are based on seven years of WRA operational experience, industry feedback, and UK legislative changes. They aim to clarify, modernise, and future-proof the Welsh Tax Acts to support effective tax collection and improve internal governance.

Summary of proposed reforms

The White Paper includes a chapter outlining the policy context for the proposed reforms and asks

As summarised, the White Paper sets out the following proposals –

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A to A+B Transaction:

- A proposal to amend LTTA to add a new provision clarifying that in an A to A+B transaction A is not to be treated as a buyer.

Reflecting leasehold reform in LTTA:

- A proposal to make an amendment to make it clear that the higher residential rates will not apply where the transaction is one to which the leasehold enfranchisement relief applies.

Nominees and leases:

- A proposal to amend the LTTA to ensure that the availability of reliefs is not restricted by the current look-through rules for leases involving nominees and bare trustees, so that the buyer and seller are beneficial, rather than legal, owners.

LTТА application to the Crown:

- A proposal to amend the legislation at section 187A(1) TCMA to include the correct reference and ensure that the Crown's rights of appeal against information notices are provided.

The White Paper concludes with questions on the effect of the proposals on the Welsh language and inviting comments on related issues not addressed in the White Paper.

The White Paper recommends introducing a first 'tax maintenance bill'—a set of technical updates to the Welsh Tax Acts:

- Tax Collection and Management (Wales) Act 2016 (TCMA)
- Landfill Disposals Tax (Wales) Act 2017 (LDTA)
- Land Transaction Tax and Anti-avoidance of Devolved Taxes (Wales) Act 2017 (LTТА)

Following consultation, the next step is to introduce primary legislation to ensure the Acts deliver their intended outcomes, support taxpayer understanding, and maintain efficient administration.

We have conducted an initial draft Children's Rights Impact Assessment (CRIA) of the proposals set out in this consultation. While the proposals are primarily technical and administrative in nature, they have been assessed against the articles of the UN Convention on the Rights of the Child (UNCRC) and its Optional Protocols.

Through this assessment, we have identified a number of indirect impacts on children and young people. These relate particularly to how changes in tax administration, enforcement, and reliefs may affect:

- Household financial stability and housing affordability
- Environmental health and safety near landfill sites
- Public revenue available for services that support children's rights and wellbeing
- The operational capacity of organisations that deliver services to children

We will continue to refine the CRIA as part of the legislative development process, ensuring that any potential impacts on children are fully considered and that appropriate safeguards are built into the final proposals.

2. Gathering evidence and engaging with children and young people

At this stage, direct engagement with children and young people has not been undertaken, for the following reasons:

- The proposals are primarily technical and administrative, with no direct policy changes targeting children.
- The impacts identified are indirect and mediated through adult taxpayers, organisations, or environmental conditions.
- The consultation is focused on legislative mechanics rather than service design or delivery.

However, we recognise the importance of participatory engagement in shaping future policy. As part of the next phase of legislative development, we will look to draw on the following sources of evidence:

- We will continue to review relevant UNCRC guidance and General Comments, particularly those relating to Articles 3 (best interests), 16 (privacy), 24 (health), and 27 (standard of living).
- HMRC and WRA operational data: On taxpayer demographics, relief claims, penalties, and compliance behaviours, including cases involving family-run businesses and charities.
- StatsWales datasets: Including child poverty rates, housing tenure by household type, and proximity to landfill sites.
- Welsh Government Children and Young People Wellbeing Monitor: Provides data on housing, income, health, education, and environmental conditions affecting children.

3. Analysing the evidence and assessing the impact

The provisions are listed in summary form in Part 1 of this IIA. Further information on the proposed reforms can be found in the White Paper.

Overall, most proposals are administratively or fiscally focussed and are likely to have indirect effects on children and young people rather than direct ones.

- Protection of privacy (Article 16) when personal data is shared or inspected.
- Ensuring proposals respect the best interests of the child (Article 3) by avoiding measures that create or exacerbate household instability or service disruption.
- Safeguarding children's health and environment (Articles 6 and 24) where landfill, waste, or inspection powers are involved.
- Protecting an adequate standard of living (Article 27) by avoiding measures that disproportionately burden low-income families or charities that serve children.

The principal UNCRC impacts that recur across selected proposals are:

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 3 (best interests of the child) Article 4 (implementation of the convention) Article 16 (right to privacy)	X	X	<p>Information sharing provisions</p> <p>The White Paper proposes several changes to the way in which information that is acquired by the WRA, or an organisation to which WRA functions have been delegated, is used.</p> <p>The White Paper proposals aim to improve the sharing of data with public bodies, namely principal councils and Welsh Government; to support the public bodies in carrying out their own functions. This enables improved delivery to services that has the potential to indirectly benefit children and young people (Articles 3 & 4).</p> <p>Via the reforms, there is a small risk of the improper disclosure of children's and families' taxpayer information, if information is accessible beyond authorised persons (Article 16). However, mitigations, including existing protocols regarding the disclosure of identifiable taxpayer</p>

			information, prevail. Alongside the development of legislation, we will consider whether additional safeguards are necessary i.e. a published Data Protection Impact Assessment.
Article 4 (implementation of the convention)	X		<p>LTTA application to the Crown</p> <p>The White Paper includes proposals which clarify appeal rights with respect to Crown interests. Again, this supports the efficient collection of devolved tax revenue and provides legal certainty for taxpayers in Wales.</p> <p>We have not identified any realistic challenge to children and young people's rights. The effect of the proposal is technical and neutral.</p>
<p>Article 2 (non-discrimination)</p> <p>Article 4 (implementation of the convention)</p> <p>Article 27 (adequate standard of living)</p>	X		<p>Nominees and leases</p> <p>The White Paper proposes amendments to the LTTA to address inconsistencies in how leases involving nominees and bare trustees are treated for tax purposes. The proposals aim to ensure fairness by allowing legitimate transactions to benefit from reliefs.</p> <p>Although primarily a technical and commercial amendment, we have identified indirect impacts on children and young people. Restoring reliefs for legitimate leasing transactions can support housing providers and affordability, benefitting families with children (Article 27).</p>
<p>Article 3 (best interests of the child)</p> <p>Article 27 (adequate standard of living)</p>	X		<p>Reflecting leasehold reform in LTTA</p> <p>The White Paper proposes amendments to the LTTA, clarifying that higher residential rates do not apply to a transaction.</p>

			<p>The removal of unintended tax penalties may indirectly support family housing security and affordability, ultimately promoting children and young people's wellbeing. This proposal is likely to have a moderate indirect positive impact on children and young people by improving access to secure and affordable housing through collective enfranchisement.</p>
<p>Article 3 (best interests of the child)</p> <p>Article 27 (adequate standard of living)</p>	X		<p>A to A+B transaction</p> <p>The White Paper proposes to amend the LTTA to clarify that in an "A to A+B" transaction the original owner (A) is not to be treated as a buyer.</p> <p>Clarifying that A is not a buyer in an A to A+B transactions may reduce the tax burden on families formalising joint ownership, supporting housing stability for children and young people.</p>
<p>Article 2 (non-discrimination)</p> <p>Article 4 (implementation of the convention)</p>	X		<p>Group relief and consideration from outside the group</p> <p>The White Paper proposes to amend the LTTA to clarify when group relief should remain available, even if consideration for a property transfer is provided from outside the corporate group.</p> <p>This proposal is unlikely to have direct impacts on children and young people but may have moderate indirect benefits by protecting the financial stability of organisations that serve children and young people (when they are part of larger group structures) and ensuring fairness in tax treatment.</p>
<p>Article 3 (best interests of the child)</p> <p>Article 16 (privacy)</p>	X		<p>Powers of inspection</p> <p>The White Paper proposes to amend TCMA to allow the Welsh Revenue Authority to carry out unannounced</p>

Article 24 (health/environment)			<p>visits to business premises for the purposes of LDT without prior tribunal approval.</p> <p>Whilst this proposal does not directly target children or families, it may have indirect impacts on children and young people through its effects on environmental protection and public revenue. Faster inspections may help detect and prevent illegal or unsafe landfill activity, reducing pollution risks that can harm children's health, especially in communities near landfill sites.</p>
Article 4 (resources) Article 2 (non-discrimination)	X		<p>Information notices to check whether a relief has been withdrawn</p> <p>The White Paper proposes to amend the TCMA to allow the Welsh Revenue Authority to issue information notices for the purpose of verifying whether conditions for withdrawal of a relief have been met.</p> <p>This proposal is a targeted administrative reform. Whilst it does not directly impact children and young people, strengthening WRA's ability to verify relief eligibility promotes fairness and transparency.</p>
Article 3 (best interests of the child) Article 27 (adequate standard of living)	X		<p>Claims for overpayment relief</p> <p>This proposal clarifies that the Welsh Revenue Authority need not open a formal enquiry to reject a section 63 overpayment claim where WRA relied on section 67 to reject the claim.</p> <p>Quicker processing of rejected overpayment claims may reduce prolonged uncertainty for households that may rely on refunds for essential costs that support children.</p>

4. Communicating with Children and Young People

We will continue to consider how to engage with stakeholders following the publication of the White Paper and during the consultation period.

5. Monitoring and Review

We will consider the evidence submitted in response to the White Paper and consider any risks or issues identified. This will inform future policy direction post the consultation period.