

Public Audit Committee
Wednesday 3 December 2025
32nd Meeting, 2025 (Session 6)

Fiscal sustainability and reform in Scotland

Introduction

1. At its meeting today, the Public Audit Committee will take evidence from the Auditor General for Scotland (AGS) on his report, [Fiscal Sustainability and Taxes](#) which was published on 13 November 2025.
2. The AGS has prepared a briefing paper on the key messages and recommendations from the report, which can be found at **Annexe A**. A copy of the report can be found at **Annexe B**.
3. The Committee will decide any further action it wishes to take following the evidence session today.

Clerks to the Committee
December 2025

Annexe A: Briefing paper by the Auditor General for Scotland

1. The Auditor General's report on financial sustainability and taxes was published on 13 November 2025. The report examines how the Scottish Government is using its devolved tax powers to support the sustainability of Scotland's public finances. It also assesses the opportunities, risks and challenges of using tax as a level to support fiscal sustainability and how the Scottish Government is managing these.
2. This audit builds on our previous work looking at the sustainability of Scotland's public finances, including our reports on The Scottish Government's workforce challenges, published in October 2023, and on Fiscal sustainability and reform in Scotland, published in November 2024.
3. Key messages we would draw to your attention are:
 - Devolved taxes have contributed positively to the Scottish Budget and are forecast to continue to do so. However, their impact is limited by weaker performance of the Scottish tax base compared to the rest of the UK.

Although devolved taxes have added around £4.1 billion to the Scottish Budget since 2015/16, the net benefit is significantly lower than the tax raised due to block grant adjustments and how this process accounts for the relatively weaker tax base performance in Scotland compared to the rest of the UK, mainly slower earnings and employment growth. The

Scottish Government has not been transparent enough about this difference. It has not set out a clear enough understanding of the factors underlying the relatively weaker tax base performance and to what extent it thinks these factors can be addressed or mitigated.

We have recommended that the Scottish Government should:

- clearly quantify the impact of relative tax base performance and explain the structural differences with the rest of the UK.
 - present both the gross tax raised and the net budget impact consistently in fiscal documents to improve transparency.
- Despite tax and economic growth being key pillars of the Scottish Government's overarching fiscal strategy, its approach to addressing the projected funding gap focuses on controlling public spending.

The Scottish Government is facing significant budget pressures, with the gap between its funding and spending for day-to-day activity expected to increase from £1 billion in 2026/27 to £2.6 billion in 2029/30. Tax and economic growth are key pillars of the Scottish Government's Medium-Term Financial Strategy (MTFS) and its Fiscal Sustainability Delivery Plan (FSDP). Devolved taxes are already expected to increasingly contribute to the size of the Scottish Budget over the next five years. This is included in the baseline projection of funding in the MTFS. The Scottish Government has not clearly set out to what extent tax will further contribute, beyond this baseline, to closing the remaining funding gap alongside public spending measures.

We have recommended that the Scottish Government should:

- Within the next MTFS, transparently set out the expected contribution of tax to fiscal sustainability, including the impact of policy choices and economic measures.
- The alignment of the Scottish Government's tax and economic strategies is not sufficiently detailed to support its fiscal sustainability strategy. Tax policy choices, such as freezing thresholds, mean economic growth is essential to increase revenues, yet the Government has not assessed how to improve Scotland's relative tax performance compared to the rest of the UK.

The Scottish Government has made tax policy choices, such as decisions not to introduce any new income tax bands or rates in the current parliamentary term. These choices mean that improving relative economic performance is crucial to grow tax revenues. The Scottish Government, in its MTFS and FSDP, states that increasing tax revenues through economic growth is a key pillar of its approach to closing the fiscal gap it faces. The FSDP draws on actions set out in the Scottish Government's National Strategy for Economic Transformation, but the alignment is not as developed as its needs to be. Greater clarity and prioritisation are needed of economic actions which will directly support growth of the Scottish tax base and earnings. It is unclear when, or if, the Scottish government expects improved relative economic growth to support tax revenues to contribute to addressing the forecast funding gap within the MTFS.

We have recommended that the Scottish Government should:

- Strengthen alignment between economic and tax strategies, identifying which interventions are expected to grow the tax base, over what timescale, and with what impact.
4. The report also notes that public understanding of devolved taxes is limited. Scottish Government research has found that around 50 per cent of respondents report poor understanding of Scottish taxes. The Scottish Government has a key role to play in improving public awareness and understanding of devolved taxes to support greater scrutiny of its plans. We have recommended that the Scottish Government provide clear, accessible information to improve public understanding of taxes and be clear on how it plans to assess the impact of its communication efforts.
 5. The report highlights the financial management risks associated with forecasting and reconciliation processes, and the uncertainty this brings. The Scottish budget uses tax revenue forecasts, which must be reconciled in future years once the actual amount of tax raised is confirmed. For Scottish Income Tax these reconciliations occur three years after the budget year and can be significant in size, leading to uncertainty over the impact of tax on Scottish public finances over the longer term. This requires careful financial planning. To date the Scottish Government's approach has focused only on the management of negative reconciliations. Setting out its strategy for reconciliations in the round, both positive and negative, would provide greater clarity on the Scottish Government's approach to managing this risk and support scrutiny.
 6. The audit found that data on behavioural change is improving but is currently underdeveloped. Understanding the potential behavioural responses of taxpayers and the impact of this on tax revenues is highly complex. While the Scottish Government and others, such as the Scottish Fiscal Commission, do carry out work to understand behavioural responses to policy choices, they acknowledge that the evidence base is limited. We note that the Scottish Government is seeking research partners to further develop understanding on tax policy behavioural change, and the report recommends that it continues efforts to develop the evidence base.
 7. Following the announcement of the UK Budget on 26 November 2025, the Scottish Government will need to understand and consider the implications for the 2026/27 Scottish Budget, which is due to be announced on 13 January 2026. In responding to UK Government policy changes, it is important that the Scottish Government understands the associated fiscal risks and is clear on the extent to which the choices it takes reflect its tax principles and overall fiscal strategy. Clear and consistent communication is critical to support public understanding and scrutiny of budget choices and fiscal plans. This report includes recommendations to support improved transparency in these important areas.

Financial sustainability and taxes



AUDITOR GENERAL 

Prepared by Audit Scotland
November 2025



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Accessibility

You can find out more and read this report using assistive technology on our website www.audit.scot/accessibility.

Audit team

The core audit team consisted of: Richard Robinson, Kirsty Ridd, James Troy and Thomas Charman, under the direction of Carole Grant.

Key facts



April 2015

Introduction of Land and Buildings Transaction Tax and Scottish Landfill Tax



April 2017

Introduction of Scottish Income Tax



£21,562m

Forecast amount of tax revenue raised through devolved taxes in 2025/26



32.3%

Proportion of the 2025/26 Scottish Budget funded through Scottish Income Tax



1.6%

Proportion of the 2025/26 Scottish Budget funded through Land and Buildings Transaction Tax



0.1%

Proportion of the 2025/26 Scottish Budget funded through Scottish Landfill Tax

Key messages

- 1 Devolved taxes are making a positive contribution to the Scottish Budget, but lower earnings and employment growth in Scotland compared to the rest of the UK are reducing their overall impact.** Altogether, the net benefit to Scottish Budgets since the introduction of devolved taxes in 2015/16 is around £4.1 billion. But this is significantly less than the additional tax raised over the same period. This trend is set to continue. For example, in 2025/26 alone, the Scottish Government expects to raise up to £1.7 billion from Scottish Income Tax through its policy choices, yet the Scottish Budget is only projected to benefit by £616 million. The Scottish Government has not been transparent enough about this difference, why it exists and how it arises through block grant adjustments. The relative performance of the tax base, such as growth in wages and employment, in Scotland compared to the rest of the UK is a main driver of these differences. The Scottish Government has not set out clearly enough how it plans to address this economic challenge in future years, and what this would do to support fiscal sustainability.
- 2 Despite tax and economic growth being key pillars of the Scottish Government's overarching fiscal strategy, its approach to addressing the projected funding gap focuses on controlling public spending. The Scottish Government has not been clear enough about the degree to which tax is expected to contribute.** The Scottish Government is facing significant budget pressures, with the gap between its funding and spending for day-to-day activity expected to increase from

£1 billion in 2026/27 to £2.6 billion in 2029/30. Its financial plans do not sufficiently address the fiscal risks arising from devolved taxes, including significant budget reconciliations, the impact of behavioural change and UK policy changes, and how it plans to manage these. Public understanding of devolved Scottish taxes is limited, and the Scottish Government has a key role to play in improving this to support greater scrutiny of its plans.

3 The alignment of the Scottish Government's tax and economic strategies is not sufficiently detailed to support its fiscal sustainability strategy. The Scottish Government has made tax policy choices, such as decisions not to introduce any new income tax bands or rates in the current parliamentary term. These choices mean that improving relative economic performance is crucial to grow tax revenues. But the Scottish Government has not done enough to assess to what degree differences in the performance of Scotland's tax base compared to the rest of the UK can be addressed. As such it is unclear when, or if, it expects taxes and improved relative economic growth to become a more active lever in delivering fiscal sustainability.

Recommendations

The Scottish Government should:

- Strengthen the alignment between its economic and tax strategies, setting out which economic interventions are specifically expected to help grow the Scottish tax base and tax revenues; over what time the Scottish Government expects these to have an impact; and the scale of impact that these actions are expected to deliver.
- Provide clear, accessible and transparent information to help improve public understanding of the Scottish tax system and set out how the impact of this will be assessed.
- Set out more clearly its strategy for the management of both positive and negative reconciliations to better support scrutiny of its approach to long-term budget management.

Within its next Medium-Term Financial Strategy:

- Set out more transparently the contribution it expects tax to make to closing the projected fiscal gap, taking account of tax policy choices and the impact of economic measures, and being clear what this means for public spending.

Within its planned tax strategy update, expected in early 2026:

- State clearly and quantify the impact of relative tax base performance on how taxes raised through policy choices in Scotland will impact the Scottish Budget. It should set out its understanding of what factors contribute to this, including the extent of any structural economic differences compared to the rest of the UK, and the extent to which these can be addressed.

In future Scottish Budgets and associated fiscal outputs:

- Present consistently the net impact on the Scottish Budget of tax policy choices, alongside the amount of tax expected to be raised, to support transparency and public understanding.

Introduction

Background

1. The Scotland Acts of 2012 and 2016 devolved significant new powers to the Scottish Parliament. These Acts resulted in the Scottish Parliament becoming responsible for raising a proportion of the funding it needs to support its spending plans. In devolving tax powers, it was recognised that this would require the Scottish Government to consider the connection between its economic and tax policy choices and be accountable for the impact of these on public finances.
2. The Scotland Act 2012 devolved responsibility for Stamp Duty Land Tax and Landfill Tax to Scotland. The Scottish Government's devolved replacements for these, Land and Buildings Transaction Tax and Scottish Landfill Tax, were introduced in 2015. Land and Buildings Transaction Tax is the tax paid when you buy property or land in Scotland. Scottish Landfill Tax applies to waste disposed of at landfill and is paid by operators of landfill sites.
3. The Scotland Act 2012 gave the Scottish Parliament the powers to set a different rate of income tax for **non-savings non-dividend income** in Scotland.¹ The Scotland Act 2016 extended these devolved powers, and the devolved Scottish Income Tax was introduced in 2017. The extended powers give the Scottish Parliament the ability to set the number of tax bands, the tax rates that apply to these bands, and the thresholds where bands begin and end. Key aspects of the income tax system remain reserved to the UK Government, including the personal allowance, which sets the rules and thresholds for money which can be earned before tax is applied.
4. The Scotland Acts also devolved responsibility for Aggregates Levy, Air Passenger Duty, and made provision for VAT Assignment.² Progress on implementing these has been slower than planned ([Exhibit 1, page 8](#)). This reflects a number of issues specific to each of the taxes and also the wider impact on Scottish Government priorities during the Covid-19 pandemic and the UK's exit from the European Union.



Non-savings non-dividend income

This relates mainly to income from a salary paid by an employer or from self-employment but also includes income from pensions and rental properties. It does not include income from savings or from dividends.

Exhibit 1.

Progress on implementing devolved taxes in Scotland has been slower than planned

Scotland Acts devolved taxes	Planned implementation date	Current status
VAT Assignment	1 April 2019 Transitional year 1 April 2020 Full implementation	No implementation date: To date there has been no agreement between the Scottish and UK governments on a way forward for the implementation of VAT Assignment.
Air Departure Tax	1 April 2018	No implementation date: The legislation for ADT was passed by the Scottish Parliament in 2017, but complications with keeping flights from the Highlands and Islands tax exempt have led to delays in implementation.
Scottish Aggregates Tax	No planned date published	Expected 1 April 2026: The Scottish and UK governments have agreed an approach for the corresponding block grant adjustment and are working to incorporate this into the regular block grant adjustment process.

Source: Audit Scotland, using information published by the Scottish Government

5. The implementation of the devolved assignment of VAT has faced significant challenges, mainly due to the complexities of reliably identifying Scottish VAT receipts, and there is still no clear plan for its introduction. If implemented, VAT assignment would be the second largest source of tax revenue for the Scottish Government, after Scottish Income Tax. Work was undertaken in 2018 between the Scottish Government, HMRC and HM Treasury to develop an appropriate methodology. Further consideration was given to this through the review of the Fiscal Framework in 2023. An agreement on the approach has not yet been reached. In July 2025, the Scottish Affairs Committee of the UK Parliament raised concerns over progress and called for clarity from both the UK and Scottish governments on whether continuing to pursue implementation is realistic.³

6. The Scottish Parliament has powers to introduce new devolved taxes, subject to approval from the UK Parliament. The Scottish Government introduced the Building Safety Levy (Scotland) Bill in the Scottish Parliament on 5 June 2025 and intends for the levy to come into force on 1 April 2027. The aim of the Bill is to seek a contribution from the housebuilding sector to support the funding of the Scottish Government's Cladding Remediation Programme, through charging a levy on the construction or conversions of residential properties. A similar tax is due to come into effect in England in autumn 2026.

7. While the implementation of a tax is inherently about applying an additional cost to an action or event, the aim of doing so is not always or solely about raising revenue. Taxes can be used to influence behaviour in support of wider policy objectives. For example, the key aim of the Scottish Landfill Tax is to support sustainability through disincentivising the disposal of waste to landfill and encourage recycling and reuse of materials instead.

8. We have reported previously on the powers devolved through the Scotland Acts 2012 and 2016, and the Scottish Government's management of this process. These reports are available on the [financial devolution pages of our website](#).

About this audit

9. Tax policy is a key part of the Scottish Government's approach to sustainable and affordable public services over the medium term, alongside managing public spending and growing the economy.

10. This audit focuses on taxes devolved through the Scotland Acts 2012 and 2016 and does not assess existing taxes controlled by the Scottish Government, such as Non-Domestic Rates, or local authority taxes, such as Council Tax. Scottish Income Tax and, to a lesser extent, Land and Buildings Transaction Tax, are the main revenue-raising devolved taxes. We focus mainly on these taxes in this report.

11. This audit sets out the impact of devolved taxes on fiscal sustainability to date. It explores the opportunities, risks and challenges of using tax as a lever to achieve fiscal sustainability and assesses how well the Scottish Government is managing these. It considers the following audit questions:

- What is the Scottish Government's current approach to tax?
- What has been the fiscal impact of tax devolution, and how does the Scottish Government intend to use its tax powers to meet its fiscal sustainability goals?
- What risks does the Scottish Government face in terms of devolved taxes?
- How well is the Scottish Government managing the risks and opportunities of tax as a lever for fiscal sustainability?

12. Our findings and recommendations are based on evidence gathered through reviewing documents, analysing data and interviews with Scottish Government officials.

13. This audit builds on our previous work looking at the sustainability of Scotland's public finances, including our reports on [The Scottish Government's workforce challenges](#), published in October 2023, and on [Fiscal sustainability and reform in Scotland](#), published in November 2024.

1. The impact of the Scottish Government's current approach to tax

Devolved taxes in Scotland have supported the Scottish fiscal position to date

14. In 2016, the Scottish Government and the UK Government agreed a Fiscal Framework, setting out how the new devolved tax and social security powers will operate. The framework was later reviewed and updated in 2023. The Scottish Government has used these fiscal powers to implement different tax policies in Scotland compared to the rest of the UK.

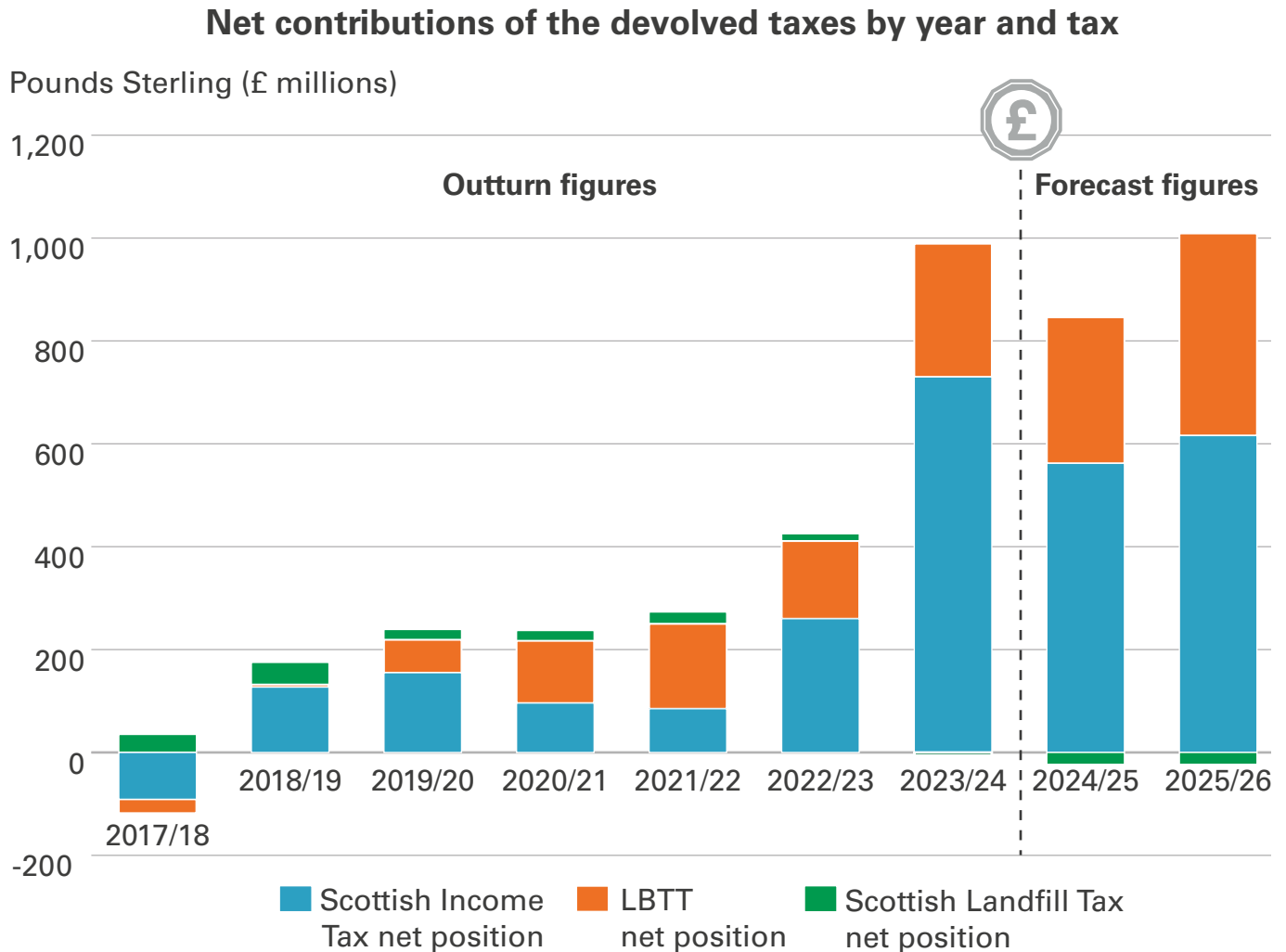
15. Where the Scottish Government's economic policies successfully grow the tax base in Scotland, such as by increasing wages or employment levels, the Scottish Budget will benefit through increased tax revenues. As such, the Scottish Government's economic strategies and tax policies both matter to the size of the Scottish Budget.

16. Since the introduction of devolved taxes in 2015/16, the Scottish Budget has benefited cumulatively by around £4.1 billion.⁴ [Exhibit 2 \(page 11\)](#) sets out the annual additional contribution to the Scottish Budget from each of the devolved taxes. The taxes that have most impacted the fiscal position are Scottish Income Tax and Land and Buildings Transaction Tax (LBTT). The impact on the Scottish Budget of these taxes is projected to increase markedly from 2023/24, when the Scottish Government diverged more significantly from UK tax policies than in previous years.

Exhibit 2.

Net impact of devolved taxes on the Scottish Budget

An overview of the contributions made by each devolved tax to the Scottish Budget.



Note: We set out context to the changes in revenue from Scottish Landfill Tax at [paragraph 47](#).

Source: [Scotland's Economic and Fiscal Forecasts, Scottish Fiscal Commission, December 2024](#), and [May 2025. Fiscal Framework Outturn Report, the Scottish Government, 2020, 2021, 2022 and 2023. Fiscal Update, Scottish Fiscal Commission, August 2024](#) and [August 2025](#)

The Scottish Government's tax policies relative to the rest of the UK are increasing the size of the Scottish Budget

17. Most of the Scottish Government's funding is determined by what the UK Government spends in areas that are devolved, which is calculated through the Barnett formula. The funding provided by the UK Government to the Scottish Government on this basis is called the block grant.

18. The additional tax powers devolved through the Scotland Acts 2012 and 2016 mean that revenue from some taxes now flow directly to the Scottish Government instead of the UK Government. To account for this, the block grant is adjusted to reflect that these revenues are now foregone by the UK Government. For tax, these block grant adjustments reduce the block grant by the amount it is estimated that the UK Government would have raised had devolution not occurred and Scottish tax revenues performed at the same rate as the rest of the UK. The amount of tax raised through the Scottish Government's devolved policies is then added to the block grant in its place.

19. If the block grant adjustment is less than the tax revenues added, the Scottish Budget benefits by the net difference. If the block grant adjustment is greater than the revenues added, the Scottish Government must manage the net reduction to the Scottish Budget ([Exhibit 3](#)).

Exhibit 3.

An illustration of how the Scottish Budget will increase or decrease depending upon how taxes in Scotland perform compared to the rest of the UK

Calculating the net impact on the Scottish Budget



Scenario 1

Net cost to the Scottish Budget

The block grant adjustment is larger than the amount of devolved revenue raised



The funding for the Scottish Budget will be reduced

Scenario 2

Net benefit to the Scottish Budget

The block grant adjustment is smaller than the amount of devolved revenue raised



The funding for the Scottish Budget will increase

20. The net amount added to, or deducted from, the Scottish Budget for tax depends on two main factors:

- The relative tax policy of Scotland compared to the rest of the UK (ie, whether tax is higher or lower). For example, if the Scottish Government has higher tax rates than the UK Government, they will raise more tax revenue than the UK Government would have raised under its tax policies.
- The relative performance of Scotland's tax base compared to the rest of the UK. For example, if wages and employment levels grow faster in Scotland than the rest of the UK, the tax revenue raised would grow faster than the block grant adjustment, and the Scottish Budget would benefit.

21. The Scottish Government has not changed Scottish Landfill Tax to diverge from the UK Government's rates and has matched changes made at a UK level. The Scottish Government has, however, made different tax choices for Scottish Income Tax and LBTT in Scotland.

Scottish Income Tax

22. Since the introduction of devolved Scottish Income Tax in 2017, the Scottish Government's income tax policy choices have diverged from arrangements in the rest of the UK.

23. From 2018/19, the Scottish Government introduced two new tax bands, a starter rate at 19 per cent and an intermediate rate at 21 per cent. The 2024/25 budget included a sixth band, an advanced rate at 45 per cent.

24. The thresholds of the different bands have also diverged. For example, the higher rate of tax in Scotland currently begins at £43,663, compared to £50,271 in the rest of the UK ([Exhibit 4, page 14](#)).

25. The Scottish Government's income tax approach seeks to deliver a **progressive** system as well as generating revenue to support public finances. The Scottish Government has committed to ensuring that more than half of Scottish taxpayers will pay less tax than they would in the rest of the UK. The relatively higher amount paid by taxpayers overall means that Scottish Income Tax policies generate higher levels of revenue compared to what would be raised if the Scottish Government had not diverged from UK Government income tax policy ([Exhibit 5, page 15](#)).



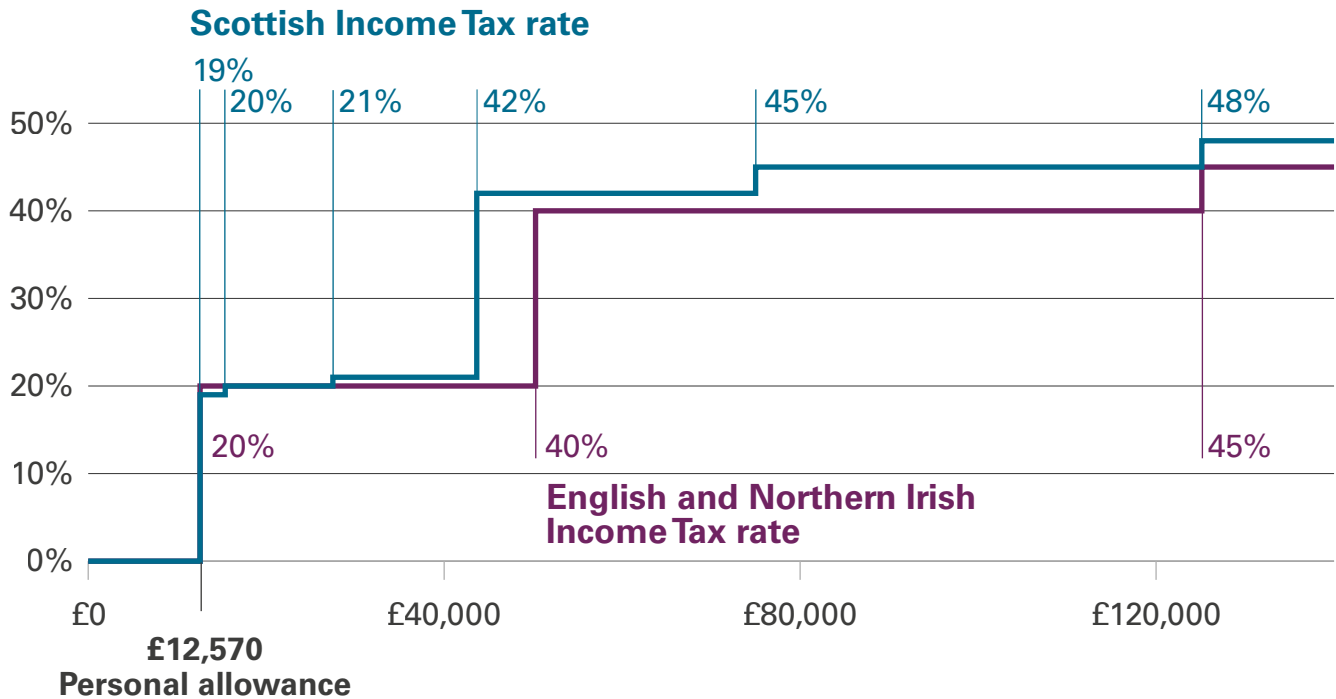
Progressive tax

A progressive tax system refers to one where the rate of tax paid increases as income increases. This means that people with higher incomes pay a higher proportion of their income in tax compared to those with lower incomes.

Exhibit 4.

Income tax rates and bands in Scotland and the rest of the UK

A comparison of the income tax rates and bands between Scotland and England and Northern Ireland for 2025/26.

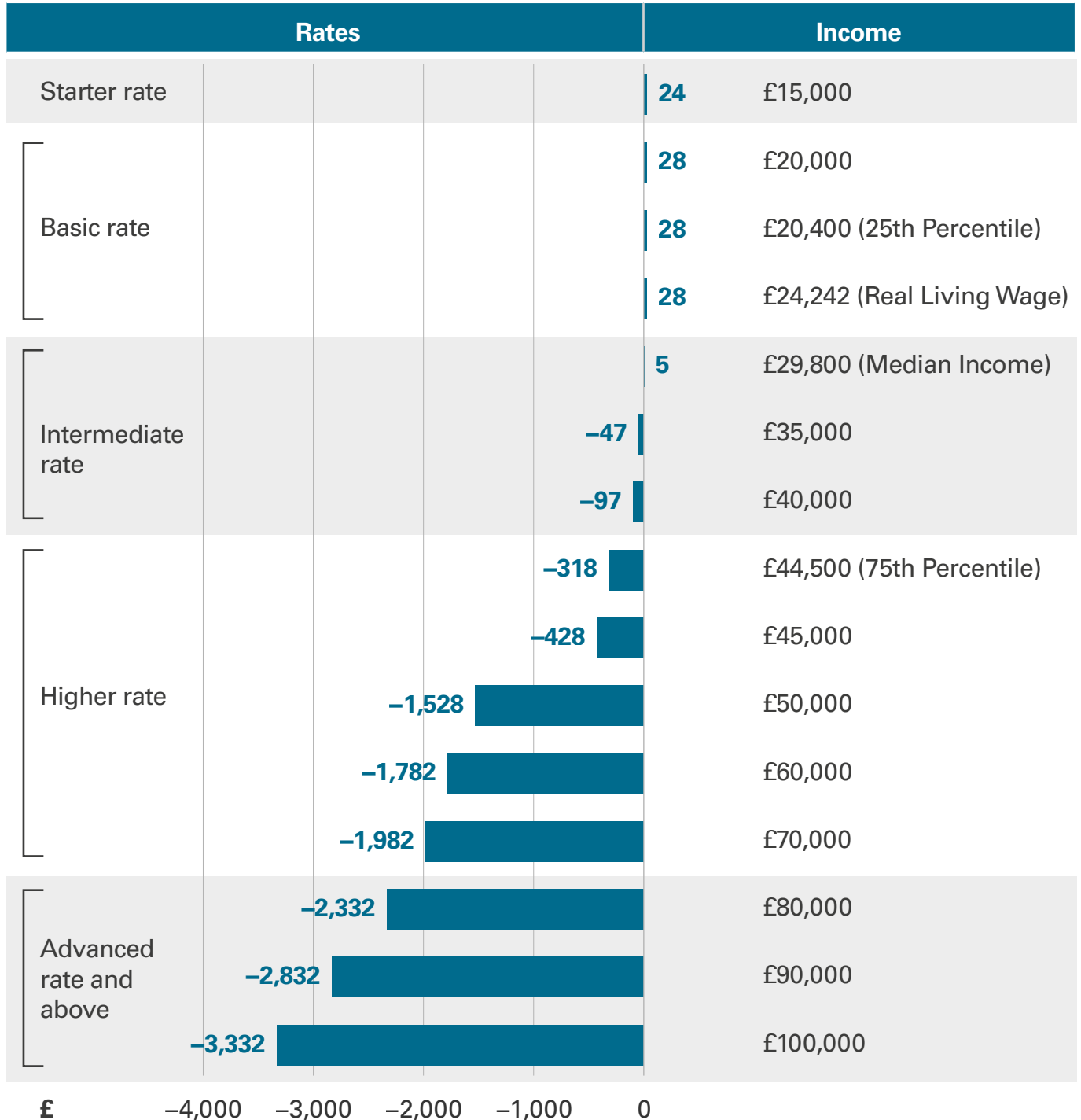


Note: Wales also has devolved income tax powers, and so the relevant comparison for budget purposes is against England and Northern Ireland only.

Sources: [UK Government, Income Tax in Scotland](#), [Income Tax rates and Personal Allowances](#)

Exhibit 5.

Impact on take home pay of 2025/26 Scottish Income Tax policy compared to UK tax policy



Note: The income percentiles used here are based on Scottish Fiscal Commission forecasts of the distribution of income in 2025/26.

Source: [Scottish Income Tax 2025 to 2026: factsheet, Scottish Government, December 2024](#)

26. The six-band structure has also supported tax receipts through increased **fiscal drag**. HMRC noted in its outturn publication report that fiscal drag has resulted in increases in the proportion of intermediate, higher, and top rate taxpayers in Scotland.⁵ Fiscal drag is more pronounced in Scotland than in the rest of the UK due to the higher number of tax bands.

27. In addition, recent periods of higher inflation have led to higher wage growth, increasing the amount of fiscal drag. This in part explains the increase in net contributions in recent years as set out in Exhibit 2.

Land and Buildings Transaction Tax

28. LBTT replaced Stamp Duty Land Tax (SDLT) in Scotland in 2015. The Scottish Government has made changes to tax band thresholds. The property value at which LBTT starts is now higher than that for SDLT, with rates thereafter increasing more steeply than in the UK system ([Exhibit 6, page 17](#)).

29. There are also different arrangements for first-time buyers in Scotland compared to the UK. In Scotland, first-time buyers do not pay LBTT on the first £175,000 of the property price, while in the UK this threshold is set at £300,000, with different qualifying criteria also applying.

30. The Scottish Government introduced the Additional Dwelling Supplement (ADS) in April 2016. This is an additional charge applied to second homes, rental properties and holiday homes. In December 2024, the Scottish Government increased the ADS rate from six to eight per cent. The UK SDLT system also includes a surcharge for additional properties.



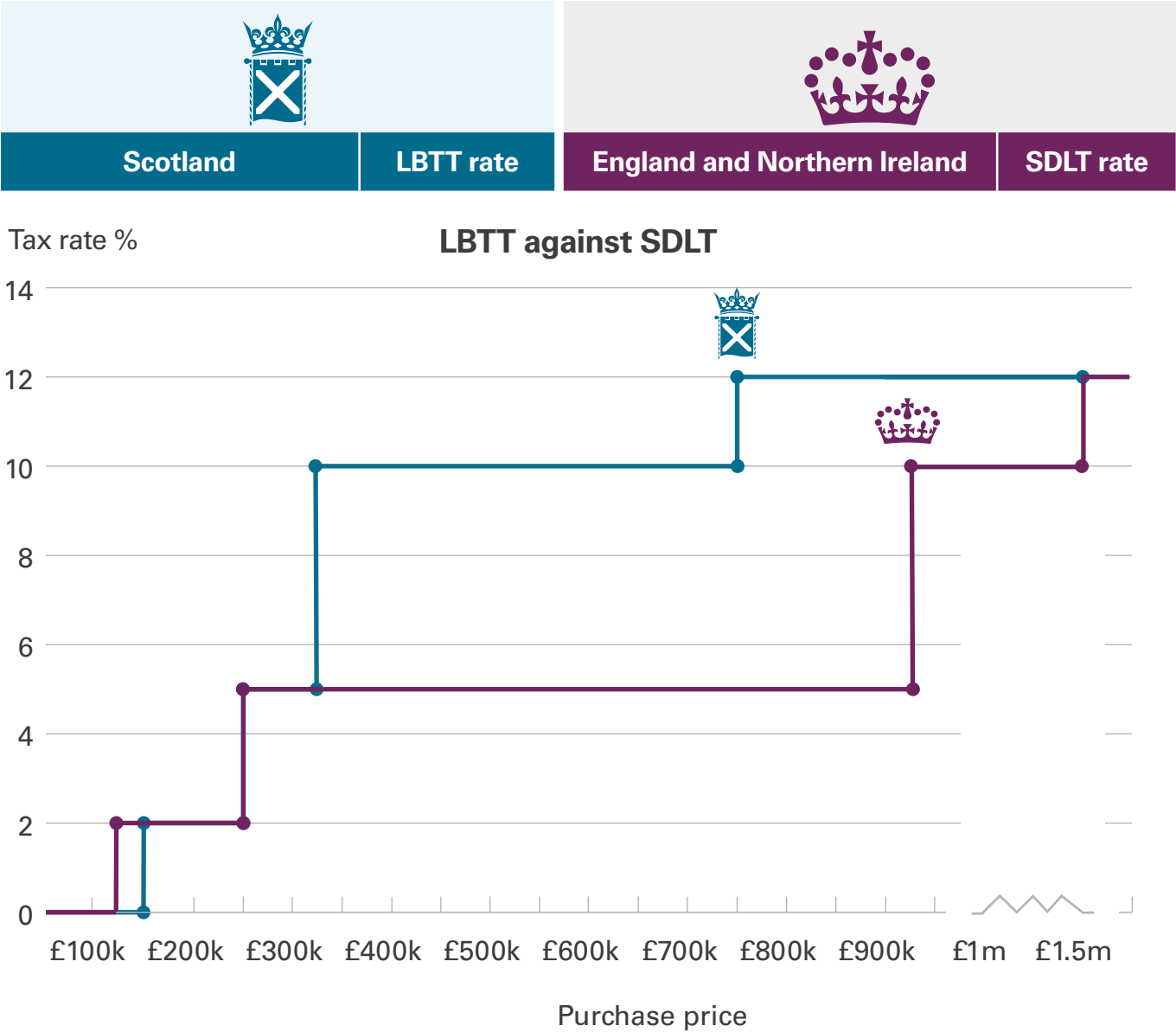
Fiscal drag

This term is used to describe when wages rise, due to factors such as inflation, while tax rates and bands remain unchanged or are increased by less than inflation. As their income grows, some taxpayers will become newly liable to pay income tax or to move between tax bands and consequently pay more tax.

Exhibit 6.

Comparing Land and Buildings Transaction Tax and Stamp Duty Land Tax

A comparison of the difference in rates between Land and Buildings Transaction Tax in Scotland and Stamp Duty Land Tax in England and Northern Ireland in 2025/26.



Sources: [Revenue Scotland, Residential Property Rates and Bands](#), and [UK Government, Stamp Duty Land Tax](#)

The weaker performance of the Scottish tax base compared to the rest of the UK is limiting the contribution of devolved taxes to fiscal sustainability

31. To date, the net benefit to the Scottish Budget relating to Scottish Income Tax has been significantly less than the additional tax revenue in Scotland. This is due in the main to an increased block grant adjustment driven by relatively better performance of the tax base in the rest of the UK compared to Scotland.

32. Since 2017/18, the growth in the tax base in Scotland has been relatively slower than in the rest of the UK. This is due to factors including:

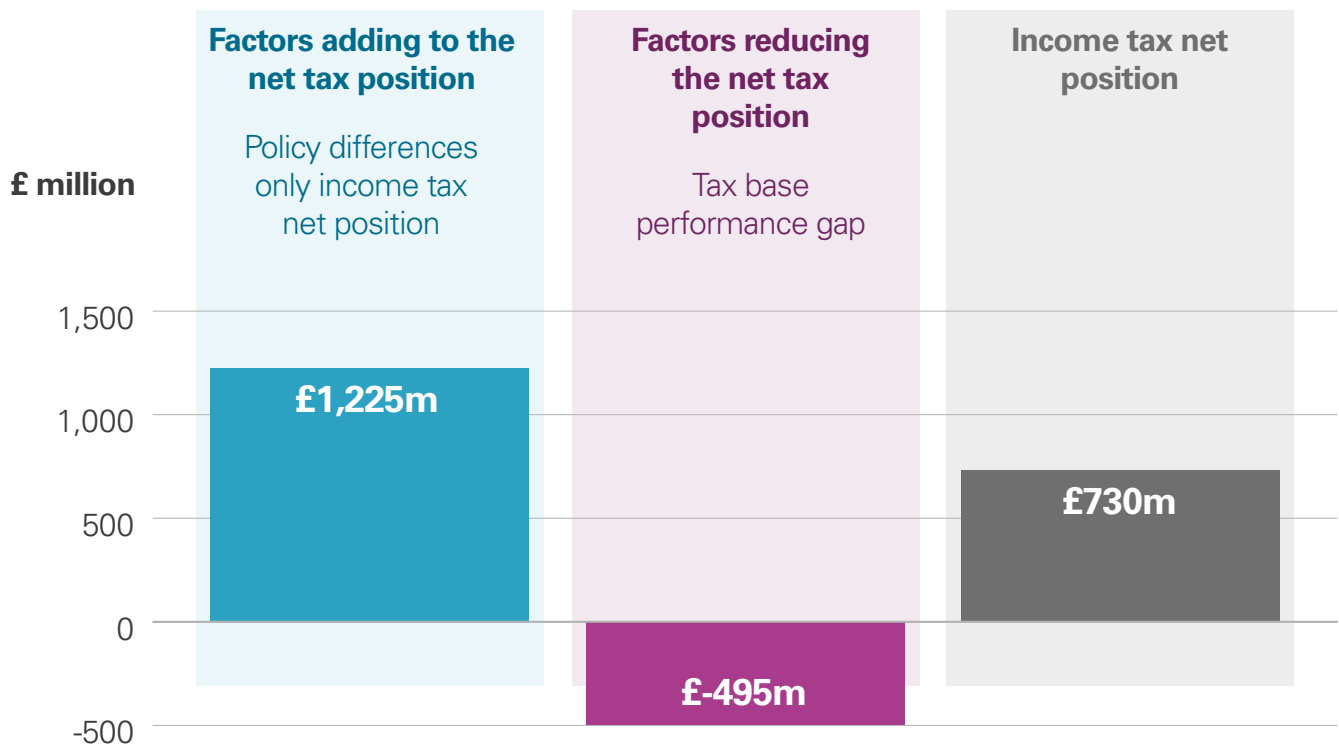
- weaker earnings and employment growth
- behavioural responses from taxpayers to policy changes, such as choosing to work fewer hours or exiting the workforce
- differences in the sectoral make-up of the economy, such as the sensitivity of the oil and gas industry in Scotland to changes in global oil prices
- a different distribution of incomes in Scotland compared to the rest of the UK.

33. This relative lower growth in Scotland acts as a drag on the Scottish Budget position. This in turn means that some of the tax revenues paid in Scotland, rather than increasing the overall size of the Scottish Budget, are instead offsetting larger adjustments to the block grant.

34. The Scottish Fiscal Commission (SFC) refers to this difference between tax raised and the net impact on the Scottish Budget as the 'tax base performance gap'. Determining how different elements contribute to the tax base performance gap is complex, but the SFC have stated that relative earnings and employment growth is the largest contributor. SFC analysis states that in 2023/24, poorer performance of the tax base in Scotland reduced the potential income tax net position by £495 million, compared to what it would have been if performance in Scotland matched the rest of the UK ([Exhibit 7, page 19](#)).

35. The Scottish Government set out its own approach to analysing the tax base performance gap in a [letter](#) to the Scottish Parliament's Public Audit Committee in April 2025. It has not published an analysis for 2023/24. However, for 2022/23, it estimated that, of a £617 million tax base performance gap, £159 million of this was due to behavioural change by Scottish taxpayers, £320 million was due to differences in how income was distributed across the Scottish and UK tax bases (we cover the impact of distributional factors further in [paragraphs 65–67](#)), and £137 million was due to other factors. Both the SFC and Scottish Government analyses demonstrate that relative performance of the Scottish tax base is the most significant of the factors reducing the overall impact of tax on the Scottish Budget.

Exhibit 7.
The additional income tax raised in Scotland is partly offset by the relative performance of the tax base (2023/24)



Source: [Fiscal Update, Scottish Fiscal Commission, August 2025 – Figure 2.3](#)

36. Scottish Landfill Tax and LBTT make up a relatively smaller proportion of the Scottish Budget. While the same issues with block grant adjustments based on performance in the rest of the UK also apply, these taxes are less likely to produce larger or more significant changes to the Scottish Budget and do not have the same direct economic policy considerations as income tax.

The Scottish Government is not sufficiently transparent in explaining how taxes contribute to the Scottish Budget

37. Budget and fiscal information can be complex. This means that clear and consistent communication of this information is critical to support public understanding and scrutiny. The Scottish Government, through its fiscal publications, has not done enough to explain why the potential funds raised from tax policy are so notably different from the net contribution to the Scottish Budget, and how it intends to address this.

38. For example, the section on tax policy in the Scottish Budget 2025/26 is clear in stating that the SFC projects that the Scottish Government’s income tax policy choices will raise up to an additional £1.7 billion in tax. However,

it is not clearly stated alongside this figure that the net impact on the Scottish Budget was projected to be £838 million. Instead, a reader would have to refer to annex information in the Scottish Budget, where the total net figure for all devolved taxes is presented. No additional explanation is provided to help the reader understand how these figures relate to those presented in the section on tax policy earlier in the budget document, nor are the net positions for individual taxes presented. The SFC has since published its latest forecasts in May 2025. This further reduced the projected budget impact of Scottish Income Tax from £838 million to £616 million.

39. The amount of tax expected to be raised and the estimated net effect on the Scottish Budget should be presented alongside each other within fiscal documents. This would allow more informed and widely understood scrutiny about the importance of relative performance of the tax base in Scotland compared to the rest of the UK. Both Audit Scotland and the SFC have previously raised the tax base performance risk built into the Fiscal Framework. The Scottish Government has presented useful information on the tax base performance gap, and its impact on the funding available to the Scottish Budget, in its Medium-Term Financial Strategies. However, this has not been done consistently and it does not refer to it in the Scottish Budget or its Fiscal Sustainability Delivery Plan. We discuss the Fiscal Sustainability Delivery Plan in more detail at [paragraphs 55–56](#).

It is unclear to what extent the Scottish public understand that the total of the taxes that they pay may differ to the net contribution to the Scottish Budget

40. Within both its [Framework for Tax](#) and [Tax Strategy](#) the Scottish Government has said it believes that taxes should be transparent and understandable. It commissions an annual survey of Scottish public attitudes to tax as part of its budget process. This indicates that the percentage of people who state that they do not understand taxes well, or at all, has been consistent at around 50 per cent (53 per cent in 2024) for the last five years. For UK taxes, it states that this figure is consistently around 40 per cent (39 per cent in 2024). In its 2024 Tax Strategy the Scottish Government stated that it would publish its tax literacy outcomes in early 2025 to support improving public understanding of tax. It published these in August 2025 as a good practice guide for improving communication on tax. This provides a foundation for the Scottish Government to build on in providing clear, accessible and transparent information to help improve public understanding of Scottish taxes.

2. The future role of taxes in delivering fiscal sustainability

The Scottish Government faces significant fiscal challenges, with the gap between its funding and spending forecast to increase

41. The Scottish Government's latest Medium-Term Financial Strategy (MTFS), published in June 2025, forecasts that, without corrective action, there will be a gap of £1 billion between its resource funding and spending plans in 2026/27, growing to £2.6 billion by 2029/30. For capital funding and spending, this gap is forecast to be £1.1 billion in 2026/27, growing to £2.1 billion by 2029/30.

42. The Scottish Government faces multiple pressures on its budget ([Exhibit 8](#)).

Exhibit 8. Existing pressures on the Scottish Budget

Budget pressures	Implications for Government
Factors impacting the whole of the UK 	Inflationary pressures on public sector pay.
	Demand-led spending, such as social security, carries a degree of forecast risk which can be difficult to predict.
	Climate change places greater pressure on public spending through mitigation efforts, adaptation costs and damages from severe weather.
	Ageing infrastructure assets are expensive to maintain, increasingly so due to inflationary pressures.
Factors specific to Scotland 	Scotland's public sector workforce is proportionately larger and better paid when compared to the rest of the UK.
	Scotland's population is, on average, older and sicker when compared to the rest of the UK, increasing demand for health and social care at a faster rate than the rest of the UK.
	Spending on Scottish Government policy commitments, such as concessionary travel, free university tuition, or the abolition of peak rail fares.
	A real-terms cut in the Scottish Government's capital block grant between 2025/26 and 2029/30.
	A slow real-terms growth rate in resource funding through the block grant, at 1 per cent per annum between 2025/26 and 2029/30.

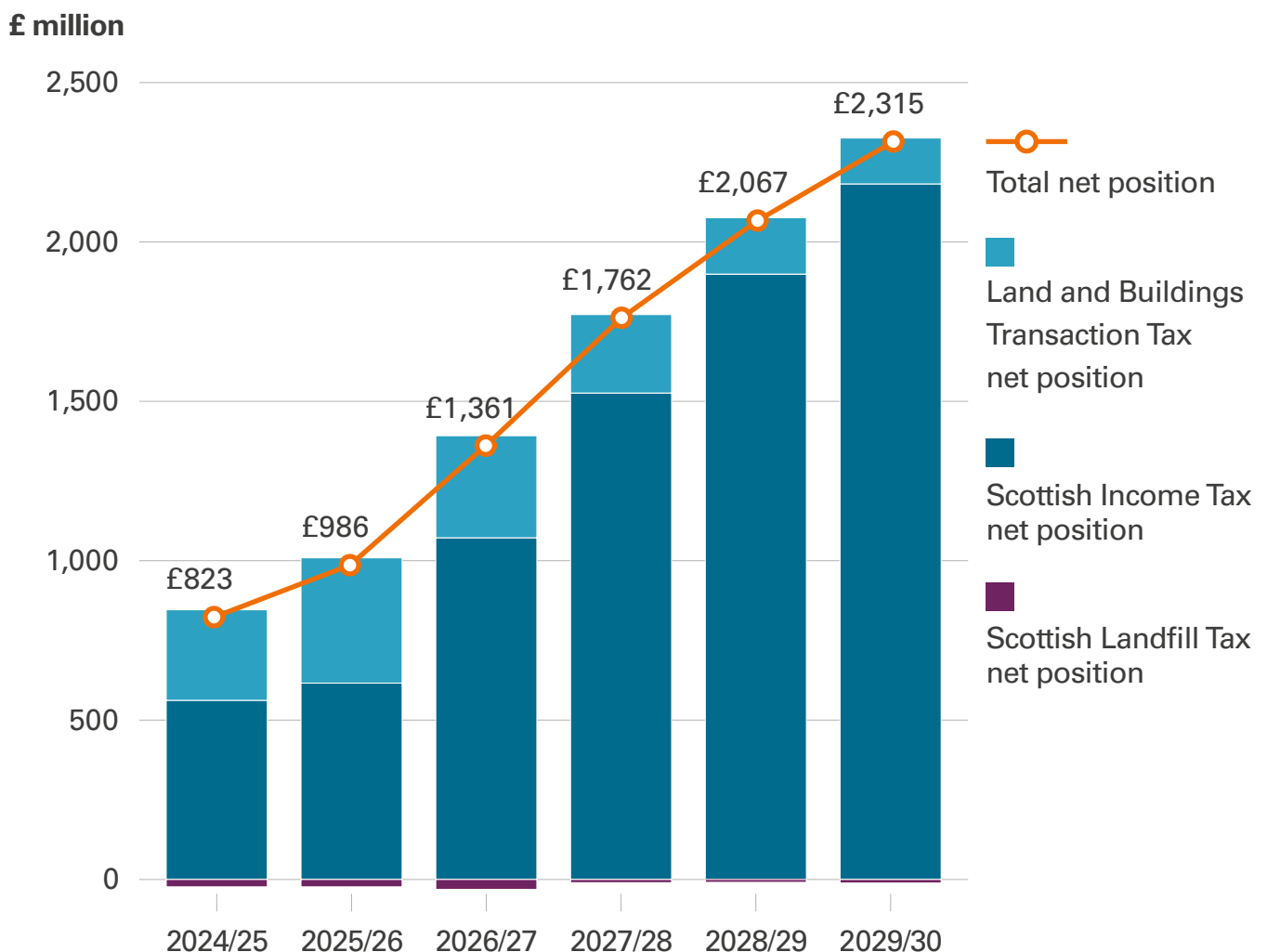
Sources: [Scotland's fiscal outlook: medium-term financial strategy, Scottish Government, June 2025](#)

The medium-term funding gap exists after projected tax contributions are taken into account

43. Devolved taxes are already expected to increasingly contribute to the size of the Scottish Budget over the next five years. This is included in the baseline projection of funding in the MTFS and does not affect the remaining £2.6 billion funding gap over the medium term. This means that any contribution devolved taxes will make to closing this gap will need to be over and above the baseline projections.

44. Currently, the net tax position is projected to grow from £986 million in 2025/26 to £2.3 billion in 2029/30. Most of this growth will be driven increasingly by Scottish Income Tax; the proportion of the net tax position made up of income tax is forecast to increase from 62 per cent in 2025/26 to 94 per cent in 2029/30 ([Exhibit 9](#)).

Exhibit 9. The net tax position is projected to increase over the medium term



Source: [Scotland's Economic and Fiscal Forecasts, Scottish Fiscal Commission, May 2025](#)

45. The SFC states that the strengthening Scottish Income Tax net position is a result of the divergence in income tax policy between Scotland and the rest of the UK. If the Scottish Government maintains higher rates and lower thresholds of income tax than the UK Government, the revenue it collects will be increasingly larger than the associated adjustment to the block grant. This, combined with the effects of fiscal drag as rates are kept frozen, will drive an increase in the net tax position.

46. The LBTT net position is forecast to remain positive over the medium term, but the scale of the contribution to the overall net tax position will decrease. The SFC note that this is driven by several different factors, such as forecast faster growth in property transactions in England than Scotland.

47. The Scottish Landfill Tax net position is forecast to be negative across the medium term. This is primarily as a result of the introduction of the biodegradable municipal waste ban regulations in Scotland in December 2025, which will reduce the amount of waste being sent to landfills in Scotland and subsequently the amount of tax paid.

Forecasts are by their nature subject to change, which means that the net tax position is not certain

48. Forecasts are by their nature subject to change, as the underpinning assumptions can be revised over time. This leads to changes in forecasts from one publication to the next, which makes the Scottish Government's financial planning more complicated. The forecasts which are used to set the Scottish Budget are produced by two different organisations, the SFC and the Office for Budget Responsibility (OBR). This adds complexity to the impact of forecast changes, as movements in the two sets of forecasts can either offset or compound each other.

49. Due to the way the Fiscal Framework accounts for relative tax base performance between Scotland and the UK, the assumptions the SFC and OBR make about earnings growth are a crucial part of projecting the net tax position. In its May 2025 forecasts, the SFC reported a £222 million reduction in the projected net income tax position for 2025/26 compared to its December 2024 forecasts. This was the result of the OBR, in its March 2025 forecasts, changing its assumptions about UK earnings growth to a more positive position. In its December 2024 forecasts the SFC had raised concern about the scale of difference between its and the OBR's earnings growth assumptions. It noted that this was out of line with historic trends and, as such, the projected net tax position was uncertain.

50. The future net tax position set out in Exhibit 9 is also subject to significant uncertainty. The sharp increase in the net tax position projected over the medium term is primarily due to more optimistic forecasts of earnings growth in Scotland by the SFC compared to the OBR's forecasts for the rest of the UK. The divergence between these two earnings growth forecasts is greater than has historically been the case, and the Scottish Government's MTFS states that this means the

actual net tax position will likely be lower than what is currently forecast. To illustrate the potential risk to the budget, the MTFS states that if earnings growth in Scotland is the same as that in the rest of the UK over the forecast period, then this will reduce the net tax position in 2029/30 by £950 million.

Certainty about the impact of tax on the Scottish Budget over the longer term is affected by the timescales for collection of income tax data

51. As tax revenues are based on forecasts, the Scottish Budget must be corrected, or reconciled, in future years once the actual amount of tax raised is confirmed. This is to ensure that funding is based on actual revenue raised. In the case of income tax there is a particularly long data lag, due mainly to the tax self-assessment process. This data lag means that this reconciliation happens, and is applied, three years after the financial year it relates to. For example, forecasts by the SFC in December 2022 were used for the 2023/24 Scottish Budget. Outturn data for 2023/24 was published in July 2025 to give the reconciliation which will be applied to the 2026/27 budget. These reconciliations are also affected by the corresponding outturn data for UK tax revenues. Higher or lower than forecast revenues in Scotland can be offset or compounded by higher or lower than forecast revenue in the rest of the UK.

52. These reconciliations can be significant in size, leading to uncertainty over the impact of tax on Scottish public finances over the longer term. This requires careful financial planning. We discuss the Scottish Government's approach to this at [paragraphs 79–82](#).

The Scottish Government is not clear about how much further taxes can go to address its medium-term fiscal sustainability challenge

53. The Scottish Government's approach to fiscal sustainability, as outlined in the MTFS is organised around three pillars:

- **Pillar 1: spending** – Ensuring public money is focused on delivering government objectives, underpinned by reform and prioritisation to maximise impact.
- **Pillar 2: economy** – Supporting sustainable, inclusive, economic policies with the greatest potential to grow Scotland's economy, expand and broaden the tax base to fund public services.
- **Pillar 3: taxes** – Ensuring a strategic approach to tax revenues, which considers the longer-term impact of our tax choices and competitiveness.

54. In the MTFS, the Scottish Government highlights the importance of all three pillars but notes that in the short to medium term, public spending will be the main lever by which it can improve fiscal sustainability.

55. Alongside its MTFS, the Scottish Government published its first Fiscal Sustainability Delivery Plan (FSDP) in June 2025. The plan follows the same three-pillar approach with most of the activities focused on spending decisions (Pillar 1), such as the public sector workforce reduction target. For these actions the Scottish Government includes timescales and milestones against which progress will be measured.

56. For the economy and taxes (Pillars 2 and 3), there is less detail, and it is unclear whether the associated actions are expected to have any additional impact on tax revenues and fiscal sustainability and, if so, over what timescales. Quantifying the direct impact on tax revenues of any individual set of economic interventions is difficult, but a more detailed assessment of the potential impact and timescales would support prioritisation of actions and better inform fiscal plans.

The Scottish Government has made policy choices which limit the further contribution tax can make to the fiscal position over the short to medium term

57. The Scottish Government has recently made several policy commitments relating to tax, which will apply for the remainder of the parliamentary term, which concludes in mid-2026. In its December 2024 Tax Strategy, the Scottish Government committed to:

- not introducing any new bands or increased rates of Scottish Income Tax
- uprating the starter and basic bands by at least inflation. This will reduce the impact of fiscal drag on inflation-based increases to wages
- maintaining the higher, advanced, and top rate thresholds at current levels in nominal terms. This means that those paying tax in these bands may experience the impact of fiscal drag if wage increases bring them into higher tax bands
- maintaining its previous commitment that over half of Scottish taxpayers will pay less income tax than they would in the rest of the UK. In practice, this means that those earning £30,300 or less annually will pay slightly less tax.

58. In its December 2024 publication, the SFC forecast that these policy choices will increase tax revenues by £52 million in 2025/26, rising to £215 million by 2029/30. The 2025 MTFS is based on the assumption that policy commitments made up until the end of the parliamentary term will continue beyond this over the medium term. If this were to be the case, and if the Scottish Government were to further use tax as a lever to close the medium-term fiscal gap, then it would need to increase tax revenues through other means.

Behavioural change risks reducing the impact of any future tax policy changes

59. Behavioural change refers to how individuals alter their behaviour in response to government policy. Understanding potential **behavioural responses** of taxpayers and the impact of this on tax revenues is highly complex. It is difficult to determine whether people change their behaviour solely because of changes to tax policy or because of a range of other factors, including the status of the wider labour market. However, behavioural change in response to changes in tax policy has the potential to reduce the overall additional revenue raised.

60. The scale of potential behavioural response to previous Scottish Income Tax changes has varied. More minor changes, including freezing thresholds, have tended to result in lower forecast levels of behavioural responses. In contrast, the more significant changes made in 2023/24 and 2024/25 have led to larger forecast behavioural responses, with the SFC forecasting that more than half of expected additional revenue would be offset by behavioural responses in 2024/25. Modelling of behavioural responses has indicated more significant impacts at higher tax bands. Modelling of changes to the additional rate in 2023/24 and the top rate in 2024/25 indicated significant behavioural responses, with behavioural change assumed to offset most of the additional revenue forecast to arise from the changes ([Exhibit 10](#)).



Behavioural responses to tax policy changes

This can include choices such as whether to work more hours, to divert income into pension contributions, take income as dividends instead of salary, or whether to seek employment elsewhere.

Exhibit 10.

Modelled impact of behavioural change on forecast revenue from Scottish Income Tax policy changes

	+	-	=
Tax policy change	Initial revenue £ million	Loss due to behavioural change £ million	Final revenue £ million
2023/24: Additional rate increased and threshold lowered	65	54 (83%)	11
2024/25: Top rate increased	53	45 (85%)	8

Source: [Scotland's Economic and Fiscal Forecasts, Scottish Fiscal Commission, December 2022](#) and [December 2023](#)

61. The SFC has also considered the effect of behavioural change in relation to LBTT policy changes. For example, it assessed the Scottish Government's increase to the ADS in December 2024, from six to eight per cent. The SFC forecast that the increase would reduce transactions which were liable to pay the supplement. This was forecast to result in just over half of the additional revenue being lost to behavioural change.

62. Behavioural responses to tax policy can significantly limit, or even entirely negate, the revenue impact of tax increases, especially for higher earners. For example, the Scottish Government publishes tax ready reckoners alongside the Scottish Budget which show the impact of illustrative changes to devolved tax policy. For the 2025/26 Scottish Budget, the associated ready reckoner estimated that a one percentage point increase in the top rate of Scottish Income Tax would raise only £5 million in additional revenue once behavioural responses are taken into account. Furthermore, the ready reckoner states that any further changes to the top rate could end up reducing the amount of revenue collected due to behavioural change. The Scottish Government will need to carefully consider the potential behavioural responses to any future changes in tax policy.

The Scottish Government is not clear on the extent to which it expects economic interventions to support tax revenues

63. Because the Scottish Government has chosen to maintain its current rates and bands of income tax until the end of the parliamentary term in 2026, the main means of increasing tax revenues and contributing towards fiscal sustainability, aside from fiscal drag, is to improve economic growth. Increasing the employment rate and wage growth can lead to greater tax revenues through greater numbers of people earning money and increasing wages bringing people into higher tax bands.

64. The Scottish Government, in its 2025 MTFS and FSDP, has stated that increasing tax revenues through economic growth is a key pillar of its approach to closing the fiscal gap it faces. However, interventions in the labour market, such as supporting people into employment or investing in skills, take time, often many years, to feed through to the tax base and increasing tax receipts. While the Scottish Government has set out in the FSDP a range of actions it is taking with the aim of increasing employment and stimulating wage growth, it does not set out over what timescale it expects the benefits of these actions to materialise.

There are structural differences between the Scottish and UK economies, which may impact the net tax position and are difficult to address

65. The distribution of higher and lower earners within the tax base can have a significant impact on the Scottish Government's net tax position. In particular, the earnings performance of very high earners, due to the progressive nature of the tax system, can have a disproportionate impact on relative tax performance.

66. The Scottish tax base contains proportionately fewer higher earners than the rest of the UK. In [a letter to the Scottish Parliament's Public Audit Committee in April 2025](#), the Scottish Government set out some of the impacts this would be expected to have in terms of the contribution of taxes to the Scottish Budget. In particular, it highlighted the role that the financial services sector plays in the UK, noting that the rest of the UK contained significant numbers of very high earners in areas like investment management and financial trading. By contrast, Scotland's financial services sector focuses more on pensions and insurance, which contain fewer very high earners. If wages grow for these very high earners, the UK Government's tax revenues would perform better relative to the Scottish Government's, because the UK tax base contains a greater proportion of these higher earners.

67. The composition of the tax base can also interact with the distribution of earnings growth. Annual earnings growth is not always evenly distributed across all levels of income; the earnings of some groups, such as higher earners, may grow at faster rates than others. Analysis carried out by the Scottish Government for the 2021 MTFS suggests that, even if Scotland grew its economy and average earnings at the same rate as the rest of the UK, the Scottish Budget could still be worse off if earnings growth is not even across all income deciles. This is due to the differences in the proportions of higher and lower earners between the Scottish and UK tax bases.

68. Changes in the economic make-up of different areas of Scotland can also impact the relative composition of the tax base. The north-east of Scotland is historically one of Scotland's best performing regions for income tax receipts due to the highly paid oil and gas sector. But it has seen weakening tax receipts since 2015/16 due to the changing role of the sector and fluctuations in the price of oil and gas. Because of the disproportionate impact of higher-paid taxpayers on tax receipts, changes such as these can have a significant impact on the net tax position.

69. The Scottish Government has acknowledged the challenges that differences in the make-up of the Scottish and UK tax bases can have for devolved taxes. However, it has not clearly set out in its plans for devolved taxes and fiscal sustainability how it intends to manage the impact of these differences, or indeed to what extent these differences can be mitigated.

3. Managing the risks and opportunities of tax as a lever for fiscal sustainability

The Scottish Government has not set out sufficiently the challenges of using tax to support fiscal sustainability and how it plans to address these

70. In our November 2024 report on [Fiscal sustainability and reform](#), we reported that the Scottish Government has not been sufficiently transparent with the Scottish Parliament or the public about the scale of the challenging fiscal outlook and what this means for public services. We reported that the Scottish Government had not been clear enough in its communication of medium-term risks and what choices it will need to make to balance its budget. The MTFS and the FSDP, while providing further detail on the Scottish Government's plans, do not yet go far enough on setting out its understanding of the challenges and key fiscal risks related to devolved taxes and how it plans to address these.

It is not clear how fiscal risks associated with the relative performance of the tax base are being managed

71. The Scottish Government has only set out a limited assessment of the factors contributing to the weaker relative earnings and employment performance in Scotland compared to the UK, and this has not been done transparently enough. In its letter to the Public Audit Committee, setting out its assessment, the Scottish Government committed to providing further analysis within the MTFS, but this was not included in the May 2025 publication.

72. It is not clear whether the Scottish Government has assessed which of the identified contributing elements can be addressed through economic policy interventions. This is important to understand to what extent it can mitigate the impact of relative tax base performance and whether its economic interventions can be expected to generate additional tax revenues.

It is not sufficiently clear how the Scottish Government is considering its economic strategies and tax growth together

73. In March 2022, the Scottish Government published its ten-year National Strategy for Economic Transformation (NSET). We reported on [progress of the NSET](#) in February 2024. We found that the Scottish Government needed to better understand which NSET actions were making the most difference and demonstrate clearly how this is contributing to the outcomes it wants Scotland to achieve.

74. As the Scottish Government's overarching economic strategy, the NSET will need to work in alignment with the Tax Strategy to deliver the economic growth needed to support tax revenues. In the FSDP, all actions listed under the economy pillar relate to existing NSET actions, but the alignment of these strategies to Scotland's public finances is not as developed as it needs to be. Greater clarity and prioritisation are needed of the actions within the NSET which will directly support growth of the Scottish tax base and earnings. In its Tax Strategy, the Scottish Government commits to assessing the links between tax policy and the economy in greater detail. Its initial focus was to be on income tax, with a plan to publish an initial evidence review in 2025. To date, the Scottish Government has not provided an update on this work.

75. There is developing engagement across tax and economic strategy teams within the Scottish Government. Senior civil servants from Scottish Government's Director-General Economy are part of the core membership of the Exchequer Board, the **Tax Policy Coordination Group** and the Fiscal Programme Board. Engagement and sharing of data also take places through other forums and less structured connections across teams. For example, LBTT is an area of consideration for the Housing Investment Task Force. This is in recognition of the key role housing plays in both driving and facilitating economic growth. Continuing to strengthen these arrangements, alongside clearer strategy alignment, will be important to support the Scottish Government in delivering on the economy pillar of the FSDP.

Data on behavioural change is improving but is currently underdeveloped, and will be crucial to understand the future impact of taxation

76. In producing the tax forecasts which are used to set the Scottish Budget, the SFC build in a range of assumptions about behavioural change. But it acknowledges that the evidence base for behavioural change in Scotland is limited. Alongside the budget, the Scottish Government publishes tax ready reckoners, which illustrate the potential fiscal impact of a range of changes to tax bands and thresholds. These ready reckoners are based on SFC models and assumptions of behavioural change. It publishes these with the aim of improving transparency and public understanding of the tax system. These help to illustrate some of the potential behavioural impact of choices which affect different tax bands. There is general understanding that taxpayers in higher tax bands are both more incentivised to change behaviour in response to tax changes and are more likely to have the means to do so. Due to the smaller numbers of taxpayers in these higher bands compared to the basic and intermediate rates, the impact of behavioural change can have a disproportionately large impact on overall tax revenues.



Tax Policy Coordination Group

This group was established in October 2023 and meets quarterly to provide a forum for senior officials to discuss tax policy, risks, and economy and fiscal developments. The group's remit is to provide coordinated tax policy advice to ministers. Its membership includes officers from across exchequer, economy, local government and housing directorates.

77. HMRC has produced three studies of behavioural change in Scotland in response to tax policy changes between 2018/19 and 2021/22. It found some evidence of behavioural responses to Scottish tax policy choices but noted that its findings are subject to a high degree of uncertainty due to the complexities of analysing behavioural change. Due to the time lag in income tax outturn data, with 2023/24 being the most current available, data to support understanding of behavioural change are still developing.

78. In its tax strategy, the Scottish Government sets out areas of future research interest to support its understanding and evaluation of tax policy choices. Its areas of interest include behavioural change and tax policy. In setting out these areas, and high-level research questions, the Scottish Government hopes to attract collaboration with the wider research community to progress these areas over the next five years.

The Scottish Government must be clearer on its approach to reconciliations to support scrutiny of its medium- to long-term budget management

79. The Scottish Government has specific **borrowing and reserves powers** to allow it to manage the budget impact of reconciliations. Together, its borrowing and reserves powers are intended to allow the Scottish Government to smooth out the impact of tax volatility and forecast errors. To date the Scottish Government's approach has focused only on the management of negative reconciliations, which can result in the need for short-term budget responses.

80. In its MTFS, the Scottish Government highlights the budget management risk it faces in relation to negative reconciliation and the volatility of these. The Scottish Government sets out that it will continue its approach of using borrowing powers to smooth the impact of these negative reconciliations on budgets. It does not comment on its approach for managing positive reconciliations. To date these have been incorporated into the overall budget position, generating a windfall gain in relevant financial years.



Borrowing and reserves powers

Under the Fiscal Framework, the Scottish Government can borrow resource funding for in-year cash management purposes and to manage the impact of tax and social security reconciliations, which arise due to forecast error. It can borrow £600 million in 2023/24 prices annually, and can hold up to £1.75 billion of resource funding debt in total. These limits are updated annually in line with inflation to maintain their value in real terms.

The Scotland Reserve provides the Scottish Government with the power to carry forward funds between financial years. There is a cap on the amount which can be held in the reserve, set at £700 million in 2023/24 prices, which is updated with inflation annually. If the balance in the reserve exceeds this limit, the excess funding is lost to the Scottish Government. Under the 2016 Fiscal Framework, annual drawdowns from the reserve were capped at £250 million. This limit was removed as part of the 2023 review of the Fiscal Framework.

81. The May 2025 fiscal forecast from the SFC project a substantial negative income tax reconciliation for 2027/28. At £851 million, this forecast negative reconciliation would be higher than the 2027/28 borrowing limit of £663 million. As these figures are based on forecasts, they are likely to be revised over time. In its May 2025 MTFS, the Scottish Government states that it will use its full borrowing powers to offset the 2027/28 reconciliation but acknowledges this will not be sufficient. Any shortfall, beyond borrowing limits, will need to be managed as part of wider budget decisions.

82. Setting out its strategy for reconciliations in the round, both positive and negative, would provide greater clarity on the Scottish Government's approach to managing this risk and support scrutiny of this.

The Scottish Government must monitor closely and manage the budgetary impact of external factors, such as any changes in UK Government tax policy

83. Due to the nature of the devolved tax arrangements, the Scottish Government will need to continue to understand and manage the impact of UK Government policy choices. This is the case not just for UK Government policy choices which directly relate to devolved taxes but also those which affect the wider tax landscape, such as changes to National Insurance or the treatment of dividends and savings.

84. Where the Scottish Government has diverged from UK tax policy, the impact of this on the Scottish Budget will be affected by UK Government choices which increases or decreases that divergence. For example, both the UK and Scottish Governments introduced reliefs to their respective residential property taxes during the Covid-19 pandemic with the aim of supporting housing market activity. The scale of changes and the length of time these were in place differed, which resulted in stronger relative LBTT revenue growth compared to SDLT during this period. Both LBTT and SDLT have moved back to their standard thresholds, reducing the relative performance of LBTT.

85. The Scottish Government has, to date, taken decisions to mirror some aspects of UK Government policy changes, such as the freezing of some tax band thresholds. Given the wider context of fiscal and economic challenges both in the UK and globally, it is likely that the Scottish Government will need to respond to further UK Government policy choices in the short-to medium-term. In responding to UK Government policy changes, it is important that the Scottish Government understands the fiscal risks and is clear on the extent to which the choices it takes reflect its tax principles and overall strategy.

Endnotes

- 1 When the Scottish Parliament was created, it was given the power to vary the basic rate of income tax in Scotland by up to three pence in the pound. This was known as the Scottish Variable Rate. This power was never used.
- 2 The Scotland Act 2016 stated that the receipts from the first 10p of the standard rate of VAT and the first 2.5p of the reduced rate of VAT in Scotland will be assigned to the Scottish Government's Budget. VAT being assigned rather than devolved means the Scottish Government would not have any policy control over VAT.
- 3 [The financing of the Scottish Government](#), House of Commons Library.
- 4 This is the cumulative budget position from 2015/16 to 2025/26. This includes both outturn data (up to 2023/24 for SIT and 2024/25 for LBTT and Scottish Landfill Tax) and forecasts which will be subject to revision through the reconciliation process.
- 5 [Scottish income tax outturn statistics 2023 to 2024](#), UK Government, July 2025.

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Audit Scotland, 4th Floor, 102 West Port, Edinburgh EH3 9DN

Phone: 0131 625 1500

www.audit.scot

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