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Sammy Wilson MP and Greg Smith MP
All-Party Parliamentary Loan Charge & Taxpayer Fairness Group
House of Commons
London
SW1A 0AA

1 October 2026

Dear Mr Wilson and Mr Smith,

Thank you for your letter dated 2 September 2026 addressed to IOPC Director General Rachel Watson, regarding HMRC referrals relating to suicide and serious harm of people facing the Loan Charge. I am responding as the Director of Engagement who leads our engagement with HMRC.

I want to begin by saying that we fully recognise that whenever someone takes their own life, it is a tragedy that has devastating consequences for their family and loved ones, and any such deaths or other self-harm are always very serious and distressing matters. Our decisions not to carry out independent investigations following referrals to us, or to conduct other thematic work, should not be taken as diminishing the seriousness of the loss of those who have died by suicide, or the deep impact it has on those around them.

It may be helpful for me to explain that we receive a very large number of referrals each year. However, the system is not structured or resourced in such a way that enables us to investigate all the matters that are referred to us. This means we are required to make difficult decisions about which cases to investigate independently ourselves. To give you a sense of the volume of cases that we are able to investigate independently, in the last financial year we received 7,166 referrals and 312 (4%) of these resulted in an independent investigation by us.

An indication that someone, very sadly, may have taken their own life following contact with a body under our jurisdiction (including HMRC) does not automatically mean an independent investigation by the IOPC is required. The majority of the referrals we receive regarding apparent suicides following police contact are also not independently investigated by us. For example, between August 2025 and August 2026 we received 794 referrals where suicide was a factor and out of these only 28 (4%) were independently investigated by the IOPC, with the vast majority (96%) either returned to force or being subject to a local investigation.

Those making decisions on whether the matters referred to us by HMRC should be investigated are aware of the concerns regarding the levy of the Loan Charge, and the Parliamentary and press interest in this matter. They have also looked at what information was known that would indicate whether the person HMRC had communicated with was at

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risk of harm and whether there were any apparent failures to safeguard an individual's welfare.

When considering whether we should independently investigate a matter relating to an apparent suicide, we consider various factors including the seriousness and public interest context, whether Article 2 of the European Convention on Human Rights appears to be engaged and whether there is an indication of a causal link between the actions or inaction of those under our jurisdiction (e.g. HMRC staff) and the death. In none of the cases referred to us by HMRC did we assess that there was an indication of this.

Where there has been an apparent suicide and we determine that we will not carry out an independent investigation, there will still be an investigation by the coroner. Where we have determined that a death or serious injury matter referred to us is to be investigated locally, the local investigation is subsequently reviewed by the IOPC. Where we have determined that a complaint referred to us is to be investigated locally, there is also a right to apply for a review of the outcome of the complaint. In our previous letter to you of 29 March 2023, we outlined examples of where learning had been identified through local investigation by HMRC and IOPC review.

Similarly to the position with what we investigate, our finite resources mean that we are not able to carry out thematic work on all matters that are referred to us, even when those matters involve common and important issues. We have to take many factors into account when deciding on which areas we will conduct thematic work: public and stakeholder interest, potential opportunity to identify learning and the size of evidence base available from our work are factors typically considered.

I hope the above information is helpful, and I would be happy to meet with you privately as the Chairs of the All-Party Parliamentary Loan Charge & Taxpayer Fairness Group to further discuss our work, our remit in relation to HMRC and how we have approached decisions in relation to the referrals we have received from HMRC. I will also ask our Oversight team to work with HMRC and assist with further engagement on this issue.

If you would like to arrange a meeting, please contact our Parliamentary Office at MP_Inbox@policeconduct.gov.uk or on 020 7166 3076.

Yours sincerely,



Derrick Campbell
Director of Engagement
Independent Office for Police Conduct