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Director General
Independent Office for Police Conduct
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2nd September 2026

Dear Rachel,

HMRC referrals for suicide & serious harm of people facing the Loan Charge and the IOPC's failure to conduct a thematic investigation

We are writing about the recent Freedom of Information disclosure by the Independent Office for Police Conduct that has revealed an increased number of referrals by HMRC for cases where people face HMRC action related to the Loan Charge/use of 'disguised remuneration' schemes.

According to the data provided by the IOPC, there have now been 55 referrals (between January 2018 and 11 June 2026) from HMRC to the IOPC related to the Loan Charge/related 'disguised remuneration' (DR) cases and HMRC's pursuit of them. We note that HMRC has now claimed that they believe they made 41 such referrals. It is not clear why this figure is different and which is the correct one for all cases where those affected have faced HMRC action related to the Loan Charge/related 'disguised remuneration' (DR) cases.

However either way, there have been a very worrying number of cases involving suicide, attempted suicide and other serious harm as well as an increase since the last published number of such referred cases.

This is deeply worrying and shows that there remains a risk of further suicides related to the Loan Charge – and yet the IOPC continues to ignore the underlying common factor in all of these referrals. We want to raise this with you, as we believe that the Independent Office of Police Conduct is failing in its duty to treat these cases as linked (as they clearly are) and to therefore do a thematic investigation.

The last figures we were aware of were from the reply to us from former First Permanent Secretary and Chief Executive Jim Harra on 12th September 2023. In this, Mr Harra stated that as well as the 10 referrals for the suicides, there had been 24 referrals of cases of 'serious injury', 13 of which were attempted suicides.

Tragically, an eleventh suicide was confirmed earlier this year, which HMRC referred to the IOPC. The other referrals since then must presumably have been for cases of 'serious injury' since 2023 (the category which includes attempted suicides).

According to the IOPC's own records, none of the referrals resulted in an independent, managed or supervised investigation by the IOPC. Most of them were simply returned to HMRC for them to look at internally.

The Freedom of Information response further confirmed that it holds no recorded analysis, review, briefing, submission or internal consideration of whether these repeated referrals should have been treated as representing a thematic or systemic issue. Considering the common factor in all these cases – and the glaringly obvious link – the IOPC has in our view been negligent in ignoring this – and the clear impact of the deeply controversial Loan Charge, with us and others warning of a very real suicide risk as far back as 2018.

We wrote to the IOPC back in 2023 expressing our concern about the (then) ten suicides related to the Loan Charge and the fact that the IOPC had not investigated any of these. In our letter, we were highly critical of the IOPC and the fact that it had failed to investigate any of the referrals and that it had failed to treat them as a related group. In that letter we stated that:

> "…the IOPC appear to have ignored the fact that these suicides were entirely predictable and clearly preventable, if the Government had listened and acted to change the whole approach to this group of taxpayers…We can therefore only conclude that the IOPC (and subsequently HMRC, in their internal investigation) are not looking at the real reasons why these ten people have taken their own lives and are instead only at compliance with procedure. That would make any 'investigations' worthless".

That remains our position and unless the IOPC properly considers these referrals together and looks at the reasons for these suicides, attempted suicides and cases of serious harm, then the IOPC is guilty of actually ignoring the underlying common factor in these suicides, attempted suicides and cases of serious self-harm.

The Loan Charge has been the subject of sustained Parliamentary scrutiny for many years, including debates in both Houses of Parliament, extensive ministerial correspondence, two independent reviews commissioned by Government, widespread media coverage and the continuing work of this cross-party Parliamentary Group. Public concern has also been heightened by multiple reported suicides and serious welfare incidents associated with the policy. In our 2023 letter, we laid out just how many times this APPG has raised concerns about the suicide risk of the Loan Charge and related HMRC action. We also published this document in 2023 with all the APPG documents warning of the suicide risk of the Loan Charge and HMRC's approach. We (and others) have continued to warn of the ongoing suicide risk, since then.

In the 2023 letter we concluded:

> The reality is that both the Treasury and HMRC have been well aware of the serious suicide risk of the Loan Charge and associated action for several years, yet still refuse to change the legislation, to reduce this risk. Yet the IOPC appear to have ignored the fact that these suicides were entirely predictable and clearly preventable, if the Government had listened and acted to change the whole approach to this group of taxpayers.

Against that background, it is difficult to understand how such a significant number of death or serious injury referrals connected with the same Government policy could have been considered solely on an individual basis, without any recorded assessment of whether the cumulative pattern indicated wider organisational or systemic issues requiring independent scrutiny.

In the recent Government commissioned review into Loan Charge settlement terms, former HMRC Assistant Director Ray McCann, who led this review, states very clearly that the Loan Charge has led to suicides. He states that his review has:

> **"a background where ten individuals had taken their own lives, *in whole or in part as a result of the anxiety and stress caused by the Loan Charge*"**

That is an unequivocal statement that the anxiety and stress of HMRC action related to the Loan Charge has pushed people to kill themselves. This is something that is already apparent from testimonies the APPG has heard from the families of those who tragically took their own lives. It is something that has been shamefully ignored, downplayed or denied by HMRC and the Treasury. Yet even when the Government appointed reviewer acknowledges this, the IOPC chooses to completely ignore it and the clear link with these referrals and the Loan Charge/associated HMRC action. It can be ignored no longer and it is now time that the IOPC stopped ignoring this and properly looked at these referrals as related.

The role of the IOPC is to provide independent oversight where concerns arise regarding the conduct of public authorities. Public confidence depends not only upon independence in individual cases but also upon recognising when repeated incidents may indicate systemic failings or justify broader examination. **The information released under the Freedom of Information Act indicates that no such assessment has ever been undertaken.**

That the IOPC is ignoring that these referrals are clearly related is now surely untenable.

We note that this flies in the face of what the IOPC states in the video on your own website.

In this video, headed 'Our thematic work', it states:

> **We look for patterns and things that come to us.**
>
> **We join the dots.**
>
> **If we see a common theme we take a closer look we call this our thematic work**
>
> **As part of this thematic work we might look into older cases that were similar and talk to more people with knowledge about the theme**
>
> **When we are finished we can recommend changes to policy…**
>
> **…or even changes to legislation.**

Yet in this case, despite the fact that we, as a group of Parliamentarians, pointed out that there is a common theme, the IOPC continues to ignore that. The IOPC has ignored patterns, despite this being pointed out to the IOPC. The IOPC has not only not 'joined the dots' but has ignored the dots in the first place and the clear links between them. The IOPC has ignored our suggestion to recommend changes to policy and has instead chosen to ignore the clear impact of this Government policy/legislation. This must now change, if people are to have any confidence in the point, never mind the process, of referrals from HMRC to the IOPC.

We therefore wish to ask you to answer the following questions:

1. Why none of the death or serious injury referrals connected with the Loan Charge resulted in an independent investigation by the IOPC.
2. What factors led the IOPC to conclude that investigation by HMRC itself was appropriate in every one of these cases.
3. Why has the IOPC looked at these referrals as separate cases and not as linked cases, which they clearly are, with an underlying common factor and cause, as clearly stated by Ray McCann in his recent review report?
4. Has the role of the Loan Charge and HMRC's pursuit of, and the impact of, HMRC's engagement with the individual, however lawful, been considered?

5. Whether the IOPC has any policy, guidance or threshold governing the point at which repeated referrals concerning the same organisation, or arising from the same underlying Government policy, should trigger consideration of a thematic or systemic review?
6. If so, does this policy, guidance or threshold apply to HMRC?
7. Why has the IOPC failed to carry out what the IOPC refers to as its ‘thematic work’, when the theme is obvious and when the Loan Charge and Taxpayer APPG asked it to investigate this theme back in 2023?
8. Why has the IOPC failed to ‘join the dots’, look at older cases and speak to “more people with knowledge about the theme” (including the APPG?) ?
9. Will the IOPC now investigate its own failure to launch such thematic work, when it was clearly necessary for it to do so and when doing so may well have led to policy or legislative changes that could have prevented the eleventh suicide and the other twenty cases of serious self harm?
10. Why does the IOPC treat referrals from HMRC so differently from referrals from/about other organisations (notably police forces), and with a much lower standard of scrutiny and in this case a wilful failure to carry out thematic work, despite a direct request?
11. Whether, considering the information now disclosed and the continuing public concern surrounding the Loan Charge and related HMRC action regarding DR cases, the IOPC intends to undertake a proper thematic review into these referrals?

Given the significant public interest in these matters and the clear failure of the IOPC to undertake glaringly obvious thematic work, we hope you will answer all these questions fully and properly.

In addition, the APPG would like to invite you, together with the senior officials responsible for the assessment and oversight of HMRC referrals, to attend a meeting of the APPG to explain the IOPC’s approach, the rationale behind its decision-making in these cases, and whether it considers any changes to policy or practice are now warranted in light of the pattern of referrals now disclosed. We believe such a discussion is vital and part of restoring public confidence in the point of HMRC referrals to the IOPC, when so far the whole process has failed victims and ignored the reality of these tragic and preventable cases.

We look forward to your response and sincerely hope you will accept this invitation to meet with us.

Yours sincerely,

Sammy Wilson MP
Co-Chair

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