All-Party Parliamentary Loan Charge & Taxpayer Fairness Group

www.loanchargeappg.co.uk

Rachel Watson
Director General
Independent Office for Police Conduct
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6th November 2026

Dear Rachel,

Our letter regarding the IOPC's failure to investigate the Loan Charge suicides and 41 referrals

We are writing to you again regarding the Independent Office of Police Conduct's failure to investigate the confirmed 11 suicides and 30 other cases of serious self-harm, including attempted suicides, of people facing HMRC action related to the Loan Charge.

We are surprised and disappointed that you have declined to respond to our important letter dated 2nd September and instead have passed it on to one of the three 'directors of engagement', who is not even a member of the IOPC Executive Team, Derrick Campbell. According to the IOPC website, the *"three directors of engagement are responsible for developing productive relationships with stakeholders".* This is a public affairs role, not a role directly responsible for the record, performance and failings of the IOPC. That is your responsibility, as Director General, and we must therefore insist on a reply from you.

We also note that you have failed to respond to our request that you come and meet with members of the APPG. Instead, we have had an offer from Mr. Campbell to meet with us "privately", when this is clearly something that should be on record and minuted. We therefore request once again that you meet with us to discuss this and with this meeting being minuted, not some closed-door exercise, which appears to be an offer and a meeting designed to placate us, not a meeting to allow us to challenge the IOPC on why it won't investigate the common theme in these 41 tragic cases.

We also note that you have declined to answer the questions we asked of you in our last letter. We must therefore ask you again to do so.

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The simple reality is that the IOPC is failing in its stated duty, when it comes to the 41 cases of death and serious injury, by not only failing - but it refusing - to conduct a thematic investigation, when these 41 cases are clearly and demonstrably linked. As well as failing in the IOPC's statutory duty, it is also therefore letting down all those individuals and families who have been affected by these suicides and attempted suicides and other cases of serious self-harm. Even more importantly, however, by not investigating, the IOPC is ignoring the serious risk of further suicides, considering the warnings you have been given directly on this matter. Alas, due to the fact that thousands of people still face unfair and unaffordable demands, despite being victims of mis-selling, there is an ongoing risk of further tragedies and this must not be ignored.

Mr Campbell says in his letter that he and the IOPC, *"fully recognise that whenever someone takes their own life"* and that *"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*".

Yet to the families of those affected, this is hollow, considering at the same time, the IOPC is ignoring the linkage between all these cases, a linkage that is clear and undeniable. What is needed from the IOPC is not expressions of sympathy; what is needed is for the IOPC to do its duty and conduct a thematic investigation into these 41 referrals and acknowledge

The IOPC website states 'Our Values'… 'We seek the truth'. Yet in this case, not only is this not true, but you and the IOPC are actively ignoring the truth, that the Loan Charge and associated HMRC action has been a key factor in all these cases. The website also states 'we are tenacious' when in the case of the 41 tragic cases related to the Loan Charge scandal, this couldn't be further from the truth, with the IOPC choosing to ignore the underlying factor in all these cases. That could not be less 'tenacious'.

Part of your role is to ensure that there is public confidence in the system for dealing with cases of death and serious injury that involve police and other authorities. When it comes to referrals regarding HMRC, there can be no confidence in the system of investigating these nor IOPC's oversight of them, considering the fact that the IOPC is ignoring the clear link in these cases.

As you know, we wrote to the IOPC back in 2023 expressing our concern about the suicides related to the Loan Charge and the fact that the IOPC had not investigated any of these and 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.

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Yet not only is the IOPC continuing to ignore this link three years later – and the predicable and preventable cases referred to the IOPC since then – you have declined even to engage with us this time. In those three years there has been a notable increase in cases of death and serious injury related to the Loan Charge, ***something that we warned you was likely.***

In our last letter to you, dated 2nd September, we mentioned the IOPC video about thematic investigations and how they are conducted, pointing out that the IOPC has not followed the process in that video, has not 'joined the dots' and has not made any suggestions to recommend changes to policy and has instead chosen to ignore the clear impact of this Government policy/legislation. **We now note that this video has been removed from your website and YouTube.** This speaks volumes, as it appears to have been removed as a direct result of us raising with you the IOPC's clear failure to carry out a thematic investigation into the 41 referrals related to the Loan Charge.

Mr Campbell's letter refers to the actions of individual members of staff, as if that is the issue. This is also what HMRC routinely does and in doing so – and ignoring the wider context – the IOPC is not only failing to join the dots (that have already been joined including by Ray McCann) but is effectively assisting HMRC and Government from deflecting from the underlying factor in these cases, dangerous and unfair legislation.

Mr Campbell also refers to investigations by coroners. However, he and you are well aware that inquests are focused on the individual case, not on cases as a whole, so this is not relevant. It is the IOPC that has the duty to look at cases linked by a common theme, including a policy/law, not just conduct of individual officers or staff.

It seems from his letter, that the excuse for failing to conduct an investigation into these linked referrals is lack of resource. He states:

> "…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".

The "public interest" in this case is clear. Government (Treasury and HMRC) have been warned about the serious risk of suicides from the Loan Charge and associated HMRC action since 2018.

If, as may well be the case, that the IOPC was never given adequate resources to deal with HMRC referrals, other than as a tick box exercise, then we will call for increased funding. It is completely wrong that those who take their own lives due to interaction with HMRC are given fundamentally different and fundamentally inadequate treatment than those who take their own lives after

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interaction with a police force. This must change as the current rubber stamping of HMRC's own 'internal reviews' is a slap in the face for all affected by the 41 tragic cases referred to the IOPC.

It is clear that the IOPC is neither properly set up nor properly focused on referrals regarding HMRC, meaning there is a significant and glaring gap when it comes to HMRC referrals. That is something we urge you to address.

Your own role, as described on the IOPC website, is *"to lead the IOPC in our mission to improve policing through independent oversight of the police complaints system".* This statement makes clear that referrals regarding non police bodies are not core to the work of you and the IOPC. This must be addressed, or all we will see when it comes to HMRC referrals is the continued ignoring of thematic referrals and the continued rubber stamping of internal HMRC reviews, which is simply not acceptable and, with the risk of further suicides linked to the Loan Charge, dangerous. If this is a resource issue, we will raise this in parliament, but it is clearly also an issue of lack of attention to HMRC referrals and allowing them to operate without proper oversight or accountability.

In our view, it is now untenable for the IOPC to continue to ignore the clear linkage between these referrals and the common theme, now that the recent review commissioned by the Government has made clear the link is clear and undeniable. Former HMRC Assistant Director Ray McCann concluded in the foreword of his recent review of Loan Charge settlement terms that the Loan Charge scandal 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***".

We believe that if the IOPC continues to wilfully ignore this link, then it becomes culpable if there are further cases of death and serious injury linked to the Loan Charge and associated HMRC action. As you know, since Mr McCann wrote that, there was an eleventh suicide tragically confirmed by HMRC – and referred to the IOPC. We therefore hope that you will now personally respond to us and address this issue with the appropriate seriousness, which means proper investigation, not platitudes.

We also again ask you to answer the following questions, fully and properly, in the order they are asked:

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 referral back to 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?

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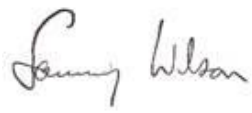
4. Has the role of the Loan Charge and HMRC's pursuit of, and the impact of, HMRC's engagement with the individual, however lawful, been considered?

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.

We also repeat again that we wish to meet with you, as Director General. You may of course bring one of your three directors of engagement with you, but it is you as Director General we wish to speak to. If you decline to meet with us, this is something we will seek to raise in Parliament, so we hope you will now agree to meet with us.

Yours sincerely,





Sammy Wilson MP
Co-Chair

Greg Smith MP
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