Jean-Paul Marks CB
Chief Executive and First Permanent Secretary
HM Revenue & Customs
100 Parliament Street
London
SW1A 2BQ

20th August 2026

Dear Mr Marks,

90-day deadline for acceptance of revised offers following McCann Review

We write on behalf of the Loan Charge Action Group to express our concern about HMRC's 90-day deadline for those being sent revised offers following the Government's response to the McCann Review.

We have been informed that those affected by the Review are being sent letters informing them that they have 90 days in which to accept the revised amount, based on HMRC's calculations, with extensions apparently available only in very exceptional circumstances.

This is already causing additional anxiety and is also likely to make it more difficult for some people to reach an informed agreement with HMRC within the period allowed.

The reality is that there are many issues that may need to be explained, discussed and resolved within the 90-day period. Individuals must be given a full and proper explanation of the calculation, be allowed to challenge the figures and be able to provide information that may materially affect them.

We have also already been informed that some calculations contained in letters that have begun to be issued are inaccurate. This is, understandably, causing very significant anxiety for those affected. No one should be pushed into accepting or paying demands that are incorrect or based on incomplete or inaccurate information.

Our concern is not that HMRC wishes finally to bring long-running cases to a conclusion. We understand that objective. The issue is whether this 90-day acceptance period provides those affected with a fair opportunity to verify the accuracy of HMRC's calculations and resolve any errors before being required to make what may be a significant — and in many cases life-changing — and effectively irreversible financial decision.

Many of these cases concern complex tax histories extending back many years, in some cases as far as sixteen years. The calculations may involve multiple tax years, different schemes, historic payments, interest, previous settlements, credits and other adjustments. Those affected must be able to obtain records, take professional advice where necessary and satisfy themselves that the figures presented by HMRC are correct.

There is a particularly stark imbalance here. In many cases HMRC has had well over a decade to investigate, calculate and determine the liabilities concerned. Much of the elapsed time has arisen from HMRC's own administration, policy development, litigation, reviews and the preparation of the present arrangements. Yet, after that lengthy period, the individual is now expected to check HMRC's work, identify any mistakes, secure their correction and make a potentially life-changing decision within just 90 days.

That creates an obvious concern about procedural fairness. A deadline intended to encourage closure should not become a mechanism by which anyone feels compelled to accept figures that they reasonably believe may be wrong simply because HMRC has not completed the checking or correction process before the deadline expires. Nor should HMRC benefit from an incentive structure in which delay in resolving a disputed calculation places greater pressure on the individual to accept it.

Even if HMRC has discretion to extend the period, it is not at all clear in what circumstances that discretion will be exercised, what criteria will be applied or whether extensions will be granted only in a very limited number of cases. It would have been better, fairer and more practical for HMRC either not to impose such a rigid deadline or to provide expressly for the deadline to be suspended where genuine issues remain unresolved.

The effect, and inevitably the perception, of the current approach is to place pressure on people to accept the amounts demanded in order to avoid potentially less favourable consequences. That is particularly concerning given that tens of thousands of people were previously placed under considerable pressure to settle before the McCann Review because they understood that failure to do so could expose them to significantly higher liabilities through the application of the Loan Charge. Repeating that pressure now is likely to further erode trust in the process.

We would therefore be grateful if HMRC would explain:

- the evidence and reasoning used to determine that 90 days is an appropriate acceptance period;
- the circumstances in which HMRC will extend the 90-day period and the criteria that will be applied;
- whether the 90-day clock is paused where someone raises a bona fide query about the accuracy or completeness of HMRC's calculation;
- whether an individual will retain the benefit of the offer where an error or dispute raised within the 90-day period cannot be resolved by HMRC before the deadline;
- what safeguards exist to ensure that those facing these demands are not prejudiced by delays on HMRC's part in answering queries or correcting calculations; and
- what happens where an agreement has not been reached between the individual and HMRC when the 90-day period expires, particularly where the outstanding issue is still being considered by HMRC.

We also ask HMRC to reconsider whether the policy should provide expressly that, where someone raises a genuine and material issue concerning the accuracy or completeness of an offer within the 90-day period, the deadline is suspended until that issue has been properly determined. That would preserve HMRC's legitimate objective of concluding cases while removing the risk that administrative delay or disputed calculations force individuals into accepting figures that have not been properly verified.

After the extraordinary length of time for which many of these matters have remained unresolved, we do not believe it is unreasonable to expect HMRC to afford taxpayers sufficient time to establish that the final figures are correct before requiring acceptance.
We would ask you to respond urgently. HMRC has already begun issuing these offers and, for some of those affected, the 90-day countdown has already begun. These questions therefore require clarification now, while individuals still have the opportunity to understand and respond properly to the offers being made.

Yours sincerely,

LCAG Board
For and on behalf of the Loan Charge Action Group