



Horizon Compensation Advisory Board

Report of twenty-second meeting held on 24 April 2025

Members present: Prof. Christopher Hodges (Chair); Lord Arbuthnot; Prof. Richard Moorhead.

Also present: Carl Creswell, Rob Brightwell, Eleri Wones (all Department for Business and Trade – “DBT”).

Apologies: Lord Beamish.

Case management in the GLO scheme

1. Rob Francis joined the meeting for this item. Mr Francis is the partner at Dentons leading on case management in the GLO scheme.
2. Mr Francis explained that Dentons’ role was to keep up the pace of the GLO scheme whilst maintaining fairness to postmasters. They had a variety of tools available to them to achieve this which reflected the variety of cases and claimants involved. Case management calls were a central technique to keep things moving.
3. Dentons had already spent more than 6,000 person-hours on GLO scheme work, including reviewing cases and chasing progress in discussion with lawyers for claimants and DBT. This included pushing for adherence to DBT’s targets of responding to claims and challenges within 40 working days. With 492 cases to oversee, this was not a job which could be done by one person. Dentons had a good relationship with Sir Gary Hickinbottom, who had played a key role in case management in the Overturned Convictions scheme.
4. As of 31 March, 446 full claims had been submitted. A further 28 claims had been submitted but had not yet been confirmed complete. First offers had been made on all but 14 of the completed claims. Settlement had been reached in 287 cases, leaving 145 cases in discussion.
5. The Board asked when the scheme was likely to be completed. Mr Francis replied that:
 - Now that issues of disclosure by the Post Office had been resolved, there were no bottlenecks in the scheme. Postmasters sometimes needed a

little time to consider and come to terms with an offer, but that was understandable.

- The independent panel had worked well in the fairly small number of cases which had been put to it. It would be a valuable tool for Dentons in securing resolution of some cases where the parties seemed unable to agree. A number of cases were currently before it.
 - Further cases could be submitted rapidly when needed: on average, the panel met 22 working days after a case was referred to it, including a period for the parties to write their submissions. Dentons could run multiple panels if needed. But it would not be right to rush cases to panel: a settlement agreed between the parties had the advantage that it left postmasters with a greater sense of closure. Dentons assessed when cases should go to panel on their merits, taking into account the views of the parties. If the parties believed that an agreed resolution was possible, reference to panel was usually not the right approach.
 - The scheme had always included provision for negotiation sessions. The Minister had recently announced that these were now to be enhanced, with DBT (and, if they wish, the claimant) to be present at the session. Mr Francis believed that this would help to resolve a number of cases.
 - Some of the most vulnerable claimants understandably found it very stressful to engage with the scheme. These represented most of the 18 claims which had not yet been submitted even in part. Whilst claimants' lawyers were working to support them, it was hard to predict when these claims would be received or resolved.
 - Perhaps aside from some of these vulnerable individuals, Mr Francis believed that all GLO cases would be settled before the end of 2025, and perhaps even sooner.
 - Dentons were not in need of additional powers to secure early settlements. Whilst there was some understandable frustration among postmasters, Dentons believed that the scheme's process was working.
6. The Board noted media reports suggesting significant differences between the size of claims made and the size of offers in response. Mr Francis said he was satisfied that DBT was not employing the commercial practice of "low-balling" first offers. His view was that they were making good offers, recognising that public money could only be offered in response to evidence. Significant mismatches between claims and offers reflected claimants' understandably high expectations, given their terrible experiences in terms of their interactions with Post Office over the years. Dentons' role was to allow the parties together to seek fair resolution

through negotiation, where claimants and their advisers wanted this, whilst encouraging a referral for decision of the independent panel in cases where negotiation was not likely to resolve matters.

7. The Board asked about the issue of late DBT requests for further information (RFIs). Mr Francis explained that to address this issue:
 - Dentons had recently introduced “stocktake” meetings between the lawyers for DBT and postmasters in respect of selected challenge cases. A couple of meetings had been held to date, and they were helping to get early agreement between the parties on what further action was required – and associated deadlines. This should reduce the need for late RFIs. Dentons did not have hard powers to enforce compliance with these deadlines, but in Mr Francis’s view such powers would not be appropriate in the context of the scheme. In any case Dentons had built good relationships with the parties, who were generally complying.
 - DBT had also begun to make interim payments or partial offers alongside such late RFIs. The Board asked for greater information on the frequency of such payments and offers.
 - DBT were trying to explain more clearly why further information was needed – generally so that a better offer could be made.
 - In Dentons’ view these were positive developments: they believed that claimants’ lawyers shared this view.

Past roles of Post Office staff

8. The Board has previously expressed concern that some Post Office staff involved in redress had previously had roles relevant to the scandal (although it is not known whether they were actually involved in it). The Board welcomed the Post Office’s assurance that the great majority of these individuals are no longer involved in redress work. It has asked the Post Office for clarification in respect of the remaining handful of individuals and, whilst they recognised the sensitivities involved, expressed concern at the length of time this had taken.

Prosecutions

9. Charlotte Heyes (DBT) joined the meeting for this item and the next.
10. She reported that the Ministry of Justice were currently completing a sampling process to validate their review of conviction cases under the Post Office (Horizon System) Offences Act 2024. They were confident that their error rate was very low.

11. In the Board's view, where MoJ had decided that a conviction had not been overturned because it was not within the Act's criteria, the individual concerned should be notified so that they could raise any questions or potential errors. DBT agreed to ask for MoJ's view on this point.

Capture

12. Charlotte Heyes updated the Board on the Department's development of a scheme to provide redress to postmasters affected by the Capture system. The aim was a scheme which took a holistic approach to each claim based on the totality of the evidence available – bearing in mind that with the passage of time, much evidence would have been lost. She was speaking to a group of affected postmasters the following week. The Board made some comments on aspects of the proposals, but overall strongly welcomed them. The Board reiterated its view that it was important also to overturn relevant convictions with great speed.

Horizon Shortfall Scheme

13. Harry Fallowfield (DBT) joined the meeting for this item.
14. The Post Office was writing to all current and former postmasters who had not previously claimed redress to encourage them to do so. The Public Accounts Committee had taken evidence from DBT officials on 7 April on matters including Horizon redress. It had asked whether the Post Office would issue reminder letters to those who did not respond to the first round of correspondence. Officials had undertaken to consult the Board.
15. In the Board's view the scheme had been sufficiently publicised. They concluded that reminder letters would be more appropriate once a scheme closure date has been announced.

Data on redress schemes

16. The Board noted DBT's [publication](#) of scheme data as at 31 March.
- 70 of 111 Overturned Convictions cases had now been settled. A further 8 offers were under discussion, with 8 more being prepared by the Post Office, who would hand the scheme over to DBT in June. Only 25 claims remained to be submitted.
 - As well as making 432 interim payments, DBT had settled all 339 of the HCRS claims which it had received.
 - Progress on the GLO scheme is described above: 432 offers have been made and 287 claims settled.

17. All three of these schemes are therefore progressing well. There has also been valuable progress on the HSS, largely thanks to the Fixed Sum Offer. Despite the large number of extra claims being submitted as a result of Post Office's reminder letters (the overwhelming majority of which are for the fixed sum offer), substantially more offers were now being issued than claims received. Once the number of additional claims subsides and Post Office responds to all the requests for fixed sums, the number of cases outstanding should be very much smaller.
18. The Board recognised that some individual claimants remained unhappy with their offers. However overall progress was positive and the overall design of the schemes seemed to be working well.

Business and Trade Select Committee

19. The Board noted the [Select Committee's comments](#) on the Government's response to the Committee's January report. Whilst the Board shared the Committee's desire to see redress delivered as quickly as possible, it did not agree with some of their recommendations – not least because there had been some major changes since the Committee took the evidence underlying its report.
- The Committee had been disappointed that the Government had not strengthened case management in the GLO scheme. In the light of its discussion with Dentons reported above, the Board did not agree that the existing case management arrangements needed to change.
 - The Committee had recommended that the Government should provide upfront legal advice for Horizon Shortfall Scheme claimants. In DBT's view, this would inevitably result in extensive delay in submitting – and hence resolving – claims, contrary to the outcome sought by the Committee. The Board agreed that the original design of the scheme had multiple shortcomings, only some of which had now been corrected. But simple claims were being resolved rapidly through the Fixed Sum Offer. And now that the HSS Appeals process was being launched, those with larger claims should be able to get fair and prompt settlements with the benefit of legal advice. On balance, the Board did not see any reason to reconsider its view on the provision of legal advice to claimants in the HSS.
 - The Committee had claimed that the Government had rejected its recommendation that DBT should take over responsibility for the HSS. The Board noted that no such decision had yet been taken.

Any other business

20. The Board noted the Minister's [statement](#) of 8 April. It welcomed the launch of the HSS Appeals process. It also noted the Minister's reference to discussions with Fujitsu. The Board strongly supported the need for Fujitsu to make a substantial contribution to the overall cost of the scandal, starting without delay. It encouraged the Department to consider whether action might be appropriate in respect of other individuals and organisations involved in the scandal.
21. The Board also noted the Financial Reporting Council's [announcement](#) of an investigation into the audit by Ernst & Young LLP of Post Office's accounts. It agreed to seek a meeting with the FRC on this topic.