



Horizon Compensation Advisory Board

Report of twenty-third meeting held on 04 June 2025

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

Also present: Carl Creswell; Rob Brightwell; Eleri Wones; (all Department for Business and Trade – “DBT”); Ruth Hudson (Ministry of Justice – “MoJ”)

Overtaken Convictions

1. Ruth Hudson joined the meeting for this item. Ms Hudson is a Deputy Director at the Ministry of Justice’s Criminal Appeals and Miscarriages of Justice Unit.
2. Ms Hudson explained that Royal Mail had notified MoJ of around 700 prosecutions which it had conducted historically. Most of these related to delivery staff rather than postmasters and so were not expected to be relevant to MoJ’s duties under the **Post Office (Horizon System) Offences Act 2024**. The vast majority of these are not in scope of the Act but MoJ determined that around 45 cases warranted a more in-depth investigation. The MoJ expected that only a very small number within those 45 would be in scope of the Act, but investigatory work was worthwhile to ensure that everybody who was potentially in scope could be identified. The majority of these cases have now been assessed, as set out in the monthly data publication.
3. Ms Hudson explained that the MoJ had conducted a quality assurance exercise on its assessments to confirm that individual cases met the requirements of the Act. This exercise found no substantive casework errors.
4. The Board also asked MoJ to consider further the issue of checking decisions in those cases that were rejected, and the types of situations in which issues might arise.
5. The Board noted the MoJ’s efforts to identify individuals in scope of the Act and the policies around not contacting those considered but identified as definitely outside scope. The Board noted the desirability of transparency and the potential for mistakes in the assessment. Whilst the risk of errors seemed very low, the impossibility of excluding all opportunity for error and the interests of transparency meant their advice was all people considered and rejected should

be notified. The Board noted that this approach could cause significant upset to individuals being told their convictions stand. They felt that this could be mitigated through clear and sensitive communication and could provide appropriate signposting for individuals to challenge this assessment or contact the Criminal Cases Review Commission (CCRC) if they accept their conviction is not in scope, but still believe their conviction was unjust. The Board's view was that it was important that Government was transparent in how it came to these assessments and provided individuals with the opportunity to challenge them.

6. Ms Hudson noted that the MoJ do accept cases that self-identify as being in scope, and they encourage Post Office to flag where it finds anyone who may be in scope. She highlighted that MoJ were keen to ensure everyone in scope is identified and would welcome the Board's steer in relation to any cohorts of individuals that MoJ should consider writing out to.
7. In the Board's opinion, anyone with even remote potential for being in scope should be contacted. It noted the potential risks of causing upset or disappointment and the need for clear communications.
8. Ms Hudson agreed to consider this point further, noting the views of the Board. DBT officials agreed to engage with the MoJ to provide support.
9. The Board reiterated its view that people whose cases had been excluded from the Act (because they had been prosecuted by DWP or considered by the Court of Appeal) deserved early review, and asked MoJ to encourage CCRC to prioritise them, especially given the age and health status of some of the people involved. The outcome of an independent review commissioned by the DWP was awaited.
10. The Board noted that there were several cases related to the Capture system that were being considered by the CCRC. The Board wished to reiterate that it did not distinguish between prosecutions resulting from the Horizon or Capture systems, and that the CCRC should look to treat Capture cases as equally high priority and move quickly to resolve them.
11. Ms Hudson noted the Board's view and highlighted that the MoJ was taking care to monitor the progress of such cases.

Capture Redress

12. Following the update provided on 24 April 2025, DBT provided a further update on the development of a redress scheme for postmasters affected by the Capture system. Further clarity was provided about how the scheme planned to apply a more holistic approach to case assessment.

13. The Board noted the additional work that had gone into proposals and reiterated their support for a swift, non-legalistic process. The Board requested that DBT specifically look at:

- How the scheme could be built in a way to ensure claims could be made and considered in a straightforward way, without the need for claimants to obtain expert evidence unless absolutely necessary.
- Ensuring that there will be an independent panel of experts presiding over the assessment of cases who fully grasp the need for a swift non-legalistic process.
- Ensuring that, if a claimant is unhappy with the panel assessment, the view of a respected external individual is sought, similar to the Reviewer in the GLO and HCRS schemes. The Board asked DBT to think creatively about who this could be.
- Providing claimants with the opportunity to have their experiences heard and to receive a personal apology, which have proved valuable in other schemes.
- Allowing a family member to attend any meetings with claimants in a supportive capacity.
- The board also queried whether claimants' family members would be eligible for redress.

Past Roles of Post Office staff

14. The Board continued to express concern that there were still some Post Office staff involved in redress who had past roles relevant to the scandal. As there had been no clarification from Post Office on this matter since the meeting on 24 April 2025, the Board agreed that it would write to the Post Office's Chair, Nigel Railton, to express their concern that this important action was not yet complete.

Meeting with the Financial Reporting Council (FRC).

15. At the meeting on 24 April 2025, the Board committed to meeting with the FRC. The Board noted that this meeting took place in May 2025, with the FRC explaining that they were actively proceeding with their investigation of the audits of Post Office Limited by Ernst & Young LLP for years from 2015. The Board awaited the outcome of that investigation with interest.

Data on redress schemes

16. The Board reviewed progress up until the end of May 2025. They noted that data would be published imminently.
17. The Board recommended that this data was e-mailed to all parliamentarians once available, to ensure they were aware of the positive progress that had been made.

Other

18. The Board noted the transfer of OC cases to the DBT-run HCRS scheme as of 3 June.
19. The Board highlighted that it continues to favour an independent investigative system for any future disasters but remains of the view that it is not feasible to switch to such a system in relation to compensation arising out of the Post Office scandal.
20. The Board reviewed issues raised with them and requested clarifications where needed with a view to maintaining an overview of the functioning of the various schemes. Officials explained that a catalogue of individual claim details is kept, aiding the checking of consistency between claims.
21. The Board discussed concerns related to legal representatives conduct that had been raised to them. The Board noted how they had been liaising with regulators to ensure systems were in place for addressing such concerns in the future given the particular risks of claimant vulnerability.
22. Minister Thomas had previously announced that he had asked officials to look at the scope for providing redress to members of postmasters' families and to postmasters' employees.
23. In regard to redress for family members, DBT explained that since the Board meeting on 24 April 2025, officials had met with the *Lost Chances* group and had read through and analysed the findings of Richard Moorhead's team's report *Understanding the Impacts of the Post Office Scandal*. This factored into continued their consideration of the potential for a redress scheme for family members, although a decision had not yet been made. The Board welcomed this update and highlighted that any potential redress process should so far as possible follow a non-legalistic process.
24. In regard to redress for employees, DBT highlighted that officials continued to consider the Board's previous suggestions regarding how issues around lack of available evidence could be mitigated. The Board noted progress and looked forward for a more substantive update on this as soon as possible.