

Horizon Compensation Advisory Board
Secretariat: Department for Business and Trade
Old Admiralty Building
London
SW1A 2DY

Paul Philip,
Chief Executive Officer,
Solicitors Regulatory Authority
By email

12th June 2025

Dear Paul,

Lawyers' Charging Victims of Post Office

I am writing on behalf of my colleagues on DBT's Horizon Compensation Advisory Board: Lord Arbuthnot, Lord Beamish and Professor Richard Moorhead.

As you will be aware, from time-to-time conduct matters have been raised in relation to lawyers charging clients for their services under the Post Office/Horizon compensation schemes.

There are in essence three main types of question:

1. whether lawyers should be charging at all where the schemes provide for costs recovery from the Post Office or DBT;
2. in situations where the answer to that question might be yes, whether charging agreements are reasonable in the circumstances; and
3. whether the approach to any fee agreements and associated matters is appropriate, not least given the particular vulnerabilities of claimants in these schemes which can be severe. Associated matters can include requests for interim payments and the enforcement of fee agreements in ways that raise their own questions.

We understand in the vast majority of cases under the GLO, OC and HCRS compensation schemes most lawyers are not charging their own clients. Under the first stage of the HSS scheme, there is no remuneration tariff, as the scheme was designed to operate at that first stage without the need for legal advice, although we understand that a small number of individuals have instructed lawyers. In the GLO, OC and HCRS schemes, on occasion, charging does occur. Some practices around such charging have been raised with us. There is the potential for problematic charging to arise in HSS claims too.

Not uncommonly, these have suggested to us matters requiring attention and investigation. We have discussed these with your colleagues where we are aware of them, as you will know, and sought to clarify how the regulators might assist in mitigating problems.

We are writing now to invite you to respond setting out the way in which your organisation can provide help (and in particular who and how they should contact you if they have concerns they would like to raise about charging matters). We understand you are agreeable to doing this and look forward to hearing from you.

We think it would be particularly helpful to have identified a person to act as a point of contact and liaison for these people and email and perhaps phone details to enable that contact. There are particular issues of loyalty and fear about raising matters on someone handling their future financial wellbeing which may make the need for a clear route into speaking to your colleagues important.

We do not think high volumes of concern will be raised, but do think that the matters need sympathetic, sensitive and expeditious handling.

I would be grateful for a response as soon as possible. Our intention would be to publish both our letter and your response.

With many thanks to you and your colleagues for your help with this to date.

Yours sincerely,

Christopher Hodges

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cc Sir Wyn Williams, Horizon Inquiry