



Horizon Compensation Advisory Board

Report of twenty-sixth meeting held on 14 October 2025

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

Carl Creswell; Rob Brightwell; Marcia King; Jo Bray; Eleri Wones; (all Department for Business and Trade – “DBT”).

1. DWP Independent Review into prosecutions of Post Office staff

- Neil Couling (Department for Work and Pensions “DWP”) joined the meeting for this item.
- DWP were considering commissioning an independent review of their prosecutions of postmasters during the period of the Horizon scandal. DWP’s own investigations to date suggested that such prosecutions had typically been based on evidence not related to Horizon, such as benefits order books discovered during searches or unexplained credits to individuals’ personal accounts. That was why cases prosecuted by DWP had been excluded from the convictions overturned by the Post Office (Horizon System) Offences Act 2024.
- DWP envisaged that an independent party would look at:
 - The methodology and processes used by the Department in gathering and reviewing evidence related to DWP prosecutions during the Horizon period; and
 - The thoroughness and adequacy of DWP’s efforts to obtain case documents.
- DWP said that there were major evidential issues affecting their ability to effectively review individual cases. Much of the evidence used in the prosecution had quite properly been destroyed in line with document retention policies. Whilst that made it difficult to rule out a link to Horizon in all cases, available evidence showed no sign of such a link.
- The Board explained that they had been approached by the family members of some individuals who have concerns about DWP-led convictions. The Board’s view was that there was sufficient quality testimony to warrant review by DWP. DWP explained they may be open to accepting submissions from some individuals but would need to consider it. They explained they did not envisage that this activity would be in scope of the independent review. DWP also noted 3

DWP cases had been dismissed by the Court of Appeal (CA). The Court found that Horizon evidence was not essential in these cases, and they were not Horizon shortfall cases. In one of the cases, the CA said *the mere fact that some part of the Horizon system was referred to in the prosecution's evidence does not mean that a conviction should necessarily be regarded as unsafe*.

- The Board acknowledged the perspective of DWP. For DWP, the independent review had value to ensure that previous investigations had been sufficient. The Board explained that they retained a concern that the value for affected postmasters of a review on this basis would be limited, and that unsafe convictions (including those already considered by the Court of Appeal) would be wrongly maintained, although they were pleased to hear that DWP had looked at some cases separately.
- The Board recommended that DWP should request submissions of evidence to the review, which should be undertaken independently of DWP, from those potentially affected. The reviewer could then advise DWP whether there were further lines of inquiry that should be explored to assess whether the conviction was truly sound.
- DWP agreed to consider the Board's recommendation and would confirm how they would proceed.

2. Discussion on the scope of the Horizon Shortfall Scheme (HSS) Independent Lawyer

- Recommendations 6 and 7 of the first volume of the Post Office Horizon IT Inquiry report had proposed the appointment of a senior lawyer to oversee the HSS. The Minister had announced the appointment of Sir Gary Hickinbottom to this role.
- DBT proposed that Sir Gary's role should be different to the role of independent lawyers in the GLO and the Horizon Convictions Redress schemes. His role would be more focused on resolving complex issues (ensuring that the management of cases by Post Office/DBT was consistent with the scheme goal to achieve full and fair redress) than the case management of individual cases. This was mainly because it would be impractical for him to consider individually the large number of cases in the HSS; furthermore, as most HSS claimants (prior to the Dispute Resolution Process) were unrepresented, case management could not work in the same way as for cases with legal representation. .
- DBT proposed that Sir Gary would have the power to direct a route forward in relation to complex issues and that had the potential to greatly speed up the process of getting to a full and fair offer.

- The Board suggested that Sir Gary's remit should include a more conventional case management function in respect of cases in the Dispute Resolution Process.
- DBT explained that they would be seeking the view of Sir Ross Cranston on the scope of Sir Gary's role, as well as consulting the Board.
- The Board agreed with DBT's proposed scope for the role. They noted that the involvement of Sir Gary would also provide claimants' legal representatives with the means to escalate any longstanding issues and seek an independent view, ultimately helping to speed up the claims process. They were clear, however, that Sir Gary's involvement should not be seen as an additional route of appeal.

3. Post Office Horizon IT Inquiry Report – DBT Response

- The Board noted the broadly positive reaction to the Department's response to Volume 1 of the Inquiry report.

4. AOB

- The Board noted that some restorative justice sessions had already taken place for affected postmasters. They noted the importance that the scandal was memorialised and appreciated that work was ongoing in this respect.
- The Board noted DBT's commitment to announce the Capture scheme in Autumn and highlighted the importance of engaging with those affected in advance of the launch.
- The Board considered a number of issues raised by Postmasters or their lawyers concerning the operation of schemes, and requested that further information should be obtained that would assist further discussion.