



Department for
Business & Trade

Policy paper

Government response to the Post Office Horizon IT Inquiry report (volume 1)

Updated 5 November 2025

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Recommendation 1

HM Government, the department and where appropriate the Post Office and Fujitsu shall provide written responses to my recommendations by 10 October 2025.

Recommendation accepted

DBT accepts this recommendation and has fulfilled it by publishing this paper today.

Recommendation 2

The minister or the department in conjunction with the Post Office shall make a public announcement explaining what is meant by the phrase “full and fair financial redress”. Such an explanation should indicate that claimants should be awarded sums which are equivalent to those which they would receive in civil litigation brought before a judge in England and Wales, assuming that the judge hearing the civil claims awarded damages at the top end of the appropriate range of damages. The explanation should also include a statement to the effect that, if fairness demands it in a particular case, a decision maker may depart from the established legal principles which would normally govern the assessment of damages in civil litigation.

Recommendation accepted

DBT accepts the Inquiry's recommendation that it should publish a statement explaining the term “full and fair redress” (<https://www.gov.uk/government/publications/post-office-horizon-it-inquiry-statement-on-full-and-fair-financial-redress>).

Recommendation 3

The Post Office, the department and the minister shall ensure that all decision makers in Horizon Shortfall Scheme (HSS), Group Litigation Order Scheme (GLOS) and Overturned Convictions Scheme (OCS) and Horizon Convictions Redress Scheme (HCRS) apply the meaning to be given to the words “full and fair” when assessing the amounts to be awarded to individual claimants.

Recommendation accepted

DBT accepts this recommendation. Both DBT and Post Office have agreed to this definition, and it is referenced in respective scheme guidance, ensuring that decision makers in the different schemes uphold it. The HSS independent person will ensure that this principle is upheld through the assurance they carry out.

Recommendation 4

All claimants in HSS shall be entitled to obtain legal advice funded by the department prior to choosing between accepting the Fixed Sum Offer or seeking financial redress which is assessed. The remuneration for such advice shall be in accordance with a scale of fees commensurate with the scale which is operative in GLOS.

Recommendation accepted

DBT broadly accepts this recommendation.

DBT accepts that some HSS claimants require access to legal support on their decision to take the Fixed Sum Offer or the full assessment route. However, claimants’ legal advisors would not have sufficient capacity to submit claims on behalf of large numbers of additional clients within the few months prior to scheme closure. Creating an entitlement to up-front legal advice would run contrary to the impending closure of the scheme to new applications, as urged in Recommendation 15.

Paragraph 6.65 of the report states: “It is also worth stressing that if funded legal advice is made available (for those who wish to take it up) in order to choose between the Fixed Sum Offer and assessment, the need for funded legal advice “up front” probably becomes unnecessary.” The department

therefore interprets this recommendation as requiring the provision of funding for legal advice, not “up front” but at the point at which the postmaster chooses between accepting the Fixed Sum Offer or seeking individually assessed redress by seeking permission to appeal under Recommendation 9. The Department broadly accepts the recommendation on that basis.

We have also accepted Recommendation 5, which means applicants can have their claim assessed by the HSS Independent Panel and decide to revert to the Fixed Sum Offer (within 3 calendar months of the first fully assessed offer). This provides a further safeguard for applicants to have their claim valued by experts without the need for upfront legal advice.

DBT notes that, because it is also accepting Recommendation 9, this interpretation of the Inquiry’s recommendation will make legal advice available to a wider range of postmasters than would the alternative of up-front legal advice. That would be confined to those yet to apply, whereas DBT’s approach would also encompass people who have already settled.

DBT predicts that a postmaster will only need to be able to show a ‘prima facie’ case in order to be given permission to appeal against a Fixed Sum Offer. For instance, there might be a head of loss with potentially significant impact which the postmaster did not consider when accepting the Fixed Sum Offer; or the postmaster’s own assessment of their losses might have been close to £75,000. As a result, the evidence requirements at this stage will be light. For example if mental health impacts had not been considered, all that would be required would be the postmaster’s own testimony or GP notes about the effect on their health, rather than an independent medical assessment. It will be relatively simple for a legal advisor to identify and present such a prima facie case. Once permission to appeal is granted, full legal advice would be needed.

Postmasters already have access to that full legal advice under the tariff for the HSS Appeals process, which is higher than that for the GLO scheme. In response to Recommendation 4, DBT will offer early access to part of that tariff to support the preparation of a prima facie case for permission to appeal. If permission is granted, the full tariff will be available.

As an alternative to legal advice, DBT has also put in place an information and support service to help postmasters claim redress. The service will provide impartial information and support to HSS claimants on their options with regards to submitting a claim through the FSO or full assessment route, in order to make their own choice. The service will:

- explain information regarding the scheme, processes and requirements in simple straightforward language
- help claimants to understand the key details of their claim

- provide high-quality support and information to describe complex, technical redress issues in a simple, user-friendly way to claimants' which promotes understanding
- describe the heads of loss which could be included within the claim and provide help in completing the application form
- work with the claimant to help them to understand how the redressed issue affected them and then help them set out the full information relating to their claim
- explain the sorts of information or evidence that they may be able to provide to support the claim
- explain the role of expert evidence, such as from a medical specialist or a forensic accountant, to assist claimants to decide whether this should be requested

DBT will share more information about this service with eligible claimants soon.

DBT has discussed this approach with the Horizon Compensation Advisory Board. They support DBT's approach.

Recommendation 5

Any claimant who opts to have a claim assessed when the claim is submitted to the Post Office or the department may decide to accept the Fixed Sum Offer at any time thereafter up to and including the date which is three calendar months following the receipt by the claimant of a first assessed offer.

For the avoidance of any doubt, this recommendation applies to:

- all relevant schemes – HSS, OCS/HCRS and GLOS
- the time period stated in the first sentence

After that time period has ended, the claimant will no longer be able to accept the Fixed Sum Offer.

Recommendation accepted

From 9 October, claimants to the HSS and HCRS will have 3 months from receipt of their first detailed offer to revert to the Fixed Sum Offer, should

they wish. Any claimant who is already in receipt of a first offer but has not yet accepted this will also be eligible to revert to the Fixed Sum Offer within three months of today's date.

DBT is working with the Post Office and claimants' representatives to ensure claimants are appropriately notified of this.

Recommendation 6

A suitably qualified senior lawyer shall be appointed to HSS as soon as is practicable with the aim that any such appointee will take appropriate action to ensure that first offers to claimants (a) are "full and fair" (b) made to those who have submitted claims to the Post Office and which are to be assessed as soon as is reasonably practicable and (c) are made to future claimants whose claims are to be assessed within a reasonable time.

Recommendation accepted

Sir Gary Hickinbottom, currently Chair of the Independent panel on HCRS, has been appointed to the position of HSS Senior Lawyer. We will continue to work with the Post Office on the practical implementation of Sir Gary's appointment, and he will assume the role shortly.

In the meantime, any enquiries on Sir Gary Hickbottom's appointment should be directed to the Secretariat, Dentons, using the following email address, hss.islsecretariat@dentons.com.

Recommendation 7

The appointed person shall be given appropriate powers to ensure that these tasks can be performed and carried into effect. If it is considered necessary by the appointing authority, it should consult with the Advisory Board, Dentons, Sir Gary Hickinbottom, Sir Ross Cranston and an appropriate number of claimants' representatives (as well as its own advisors) before determining the appropriate powers.

Recommendation accepted

DBT agrees that the appropriate powers should be given to the appointed person. DBT will consult Sir Ross Cranston, the Advisory Board, Dentons, claimants' legal representatives and the Post Office to ensure that the appointee has the relevant powers to undertake the role successfully.

Recommendation 8

In HSS the Post Office shall be obliged to make, and the department shall be obliged to approve (when necessary) a first offer to a claimant which is no less than the sum recommended by the Independent Advisory Panel.

Recommendation accepted

This does not require any retrospective changes because no first offer has ever been made which is less than the sum recommended by the HSS Panel. The scheme documents have been amended to reflect this.

Recommendation 9

The department following consultation with the Advisory Board, claimants' representatives and any other persons or bodies it thinks appropriate, shall give urgent consideration to whether claimants who have accepted the Fixed Sum Offer in HSS should be afforded the opportunity to appeal against their acceptance of such an offer if they are granted permission so to do. If a right of appeal with permission is introduced, the issue of permission to pursue such an appeal must be considered by a person who is wholly independent of the department and the Post Office.

Recommendation accepted

People who have accepted the Fixed Sum Offer in HSS will have the opportunity to ask the Independent Reviewer in the Horizon Shortfall Scheme Appeals (HSSA) scheme (who has yet to be appointed) for permission to appeal.

DBT is working with the Advisory Board and the Independent Reviewer on the practical implementation of this, including on scope and criteria for appeal, as well as engaging with legal representatives and postmaster representative organisations before updating affected claimants.

Recommendation 10

The department shall issue a supplementary document or announcement clarifying the meaning and intent of the “best offer” principle in the HSSA process demonstrating how it is intended to operate in practice with appropriate examples, if thought necessary.

Recommendation accepted

DBT has updated the existing HSSA guidance and principles with this additional information.

In line with Recommendation 11, DBT will also co-ordinate the planned “best offer” principle in the panel stages of HSSA with that adopted in GLO, enhancing consistency across the schemes.

Recommendation 11

The “best offer” principle which will apply in HSSA, as explained in response to Recommendation 10, shall be equally applicable in GLOS.

Recommendation accepted

The minister announced on 8 July that DBT would adopt a best offer principle at panel stage on the GLO, HSSA and HCRS schemes. DBT consulted the Advisory Board, Sir Ross Cranston and claimants’ legal

representatives and has been implementing the policy at all panel stages, and per head of loss, since 12 August.

DBT will implement this change retrospectively. Any postmaster who received a binding award from the second panel that was lower than their final DBT offer will have their redress topped up to the higher level.

Recommendation 12

The scheme documents governing GLOS should be amended to give claimants the right to make oral submissions in support of their claim.

This right can be exercised by the claimant or by their recognised legal representative.

Oral submissions should take place at a hearing held by an independent panel before the panel makes its binding decision on the claim or any part of it.

The length of time afforded to claimants to make such oral submissions at the hearing should be no less than the time afforded to claimants for such submissions in HSSA.

Recommendation accepted

All claimants in the GLOS already had the right to make oral submissions for up to one hour in support of their claim at the hearing convened by the Independent Panel. The same approach is adopted in the HSSA process.

The Panel's Terms of Reference have been amended to reflect this existing practice. They are published on GOV.UK.

Recommendation 13

The current Dispute Resolution Procedure in HSS should close once all claimants in the procedure have settled their claims or transferred to HSSA.

No claimant who is not already in the Dispute Resolution Procedure when HSSA opens will be eligible to join it.

Recommendation rejected

DBT rejects this recommendation as we believe it comes into conflict with the principle of “full and fair” redress set out as we accepted Recommendation 2.

DBT’s view is that it would not be fair to postmasters to restrict their choice in this way. Nor would it be consistent with the reasonable expectations of postmasters in the light of the terms of the HSS. Many postmasters are expected to choose the HSSA process if they want to challenge their offer. However, DBT believes it is important that each postmaster decides the best route for their own case, with the benefit of funded legal advice.

Recommendation 14

During the 9 month period afforded to claimants to submit an appeal to the department in HSSA, the Post Office shall engage in negotiations and/or mediation with any claimants who notify the Post Office of a desire to seek a negotiated or mediated settlement of their claim.

Recommendation accepted

Prior to the publication of the Inquiry’s report, DBT had been in discussion with claimants’ legal representatives about the deadlines for submission of HSS Appeals. In the light of the representatives’ concerns, DBT has agreed that, instead of a 9 month period for postmasters to submit a full appeal, there should be a 3 month deadline to notify DBT of an intention to appeal. There will then be a further deadline for the submission of full papers.

The deadline for notification of intention to appeal will be 3 months from the publication of this paper, for those who have settled or previously rejected their claim, or 3 months from the date of rejection of an HSS independent panel offer.

These changes affect the context for implementation of the recommendation. DBT intends to apply it as fully as possible in the new context. Postmasters will therefore be able to engage in Good Faith or Escalation Meetings with the Post Office during the 3 month period whilst they decide whether to apply for HSSA.

Recommendation 15

No claims for financial redress under HSS shall be entertained after midnight 27 November 2025.

Recommendation accepted

DBT broadly accepts this recommendation and agrees with the need for finality.

However, postmasters who have yet to submit their claim will need sufficient notice of the closure date. The Post Office will send a reminder letter to claimants who have yet to respond, to warn them of the closure date. The Post Office will issue those letters shortly. It will close the HSS to new claims on 31 January 2026.

The department will work with the Post Office on the practicalities of closing the scheme, including ensuring that postmasters are adequately notified of the closure date and receive the information and support they need to make any outstanding claims ahead of closure.

There may be some exceptional cases that may miss the deadline of 31 January, for good reasons. DBT will work with the Post Office to publish clear guidance on the processes for any such cases received after the closure date, including any criteria for these exceptions.

Recommendation 16

The department will make a public announcement to confirm whether there will be any differences between the process for assessing financial redress in the merged HCRS and OCS, and the process currently used in OCS. If there are differences, the department will explain what they are.

Recommendation accepted

DBT confirms that the HCRS will apply the same principles as the previous OC scheme, ensuring no OC claimant is disadvantaged by the transfer to HCRS.

DBT has published further guidance on GOV.UK about the roles of Dentons and Sir Gary Hickinbottom in the HCRS scheme, as well as on the Alternative Dispute Resolution process. You can read this in the guidance on [Horizon Convictions Redress Scheme \(HCRS\): alternative dispute resolution \(ADR\) - GOV.UK](https://www.gov.uk/guidance/horizon-convictions-redress-scheme-hcrs-alternative-dispute-resolution-adr) (<https://www.gov.uk/guidance/horizon-convictions-redress-scheme-hcrs-alternative-dispute-resolution-adr>) and [Horizon Convictions Redress Scheme \(HCRS\): Independent Panel terms of reference - GOV.UK](https://www.gov.uk/government/publications/horizon-convictions-redress-scheme-hcrs-independent-panel-terms-of-reference) (<https://www.gov.uk/government/publications/horizon-convictions-redress-scheme-hcrs-independent-panel-terms-of-reference>).

DBT's aim for the HCRS is to identify delays and move cases forward, similar to the OC scheme, with case management processes and an independent panel. Case management involves resolving disputes with an independent party when bilateral agreement is not reached. Dentons and Sir Gary Hickinbottom will manage cases as needed. Sir Gary will cover both pecuniary and non-pecuniary aspects of claims. Before case management, DBT will engage with claimants' legal representatives to resolve claims early.

DBT is engaging with OC claimants' legal representatives to offer reassurance on the consistency of treatment between the HCRS and schemes.

Recommendation 17

As soon as is reasonably practicable, HM Government shall establish a standing public body which when called upon to do so, will devise, administer and deliver schemes for providing financial redress to persons who have been wronged by public bodies.

Recommendation acknowledged

DBT sees clear advantages of the recommendation but recognises that options to improve future delivery of redress will need to be carefully considered and the feasibility of an independent body will need to be properly explored, alongside existing mechanisms. The minister responsible for Postal Services will chair a ministerial group to lead this work. While it is unlikely that an independent body could be established in time to take over

delivery of redress for existing time-limited redress schemes, the government is actively considering its options and will make a substantive statement on this matter by summer 2026.

Recommendation 18

The department shall devise a process for providing financial redress to close family members of those most adversely affected by Horizon. Such family members shall qualify for such redress only if they themselves, have suffered serious adverse consequences by reason of their family relationship with the person or persons directly affected by Horizon.

Recommendation accepted

Some family members of postmasters suffered gravely because of the Horizon scandal. As set out in the Minister for Postal Affairs' statement to the House of Commons on 8 July 2025, DBT has committed to establishing a new redress scheme for postmasters' close family members who suffered personal injuries, including mental injuries, as a result of the Horizon scandal.

DBT is engaging closely with the Lost Chances for Subpostmasters' Children group, claimants' legal representatives and the Advisory Board. It will continue to seek input from key stakeholders as it designs the scheme and process for assessing claims.

Recommendation 19

By 31 October 2025, the department, Fujitsu and the Post Office shall publish, either separately or together, a report outlining any agreed programme of restorative justice or any actions taken by that date to produce such a programme. For the avoidance of any doubt, the word Fujitsu in this recommendation is intended to include both Fujitsu Services Limited and Fujitsu Limited.

Recommendation accepted

DBT, the Post Office and Fujitsu have jointly embarked on a restorative justice project for postmasters, facilitated by the Restorative Justice Council. All three parties are committed to the programme being postmaster-led. The first phase of the programme began on 23 September 2025, with a session in Belfast, followed by sessions in Glasgow, Cardiff and London. All sessions will be facilitated by advanced restorative justice practitioners. The conclusions of this phase will lead to development of the plan in the light of postmasters' views.

A detailed plan will be published on GOV.UK.



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