

Witness name: Simon Recaldin

Statement No.: WITN09891000

Dated: 26 March 2025

POST OFFICE HORIZON IT INQUIRY
TENTH WITNESS STATEMENT OF SIMON RECALDIN

1. I, Simon Recaldin, of 100 Wood Street, London EC2V 7ER, will say as follows:

INTRODUCTION

2. The facts in this witness statement are true, complete and accurate to the best of my knowledge and belief. Where my knowledge and belief, as set out in this witness statement, has been informed by another person or by documents that I have reviewed, I acknowledge that person or those documents. I have been assisted in preparing this witness statement by Burges Salmon LLP and Fieldfisher LLP (together "**BSFf**"), who act on behalf of Post Office in the Post Office Horizon IT Inquiry (the "**Inquiry**").
3. I am employed by Post Office Limited ("**Post Office**") as the Director of the Remediation Unit and I have held this role since 10 January 2022. My line manager is Post Office's Interim Chief Operating Officer.
4. I make this witness statement in response to a request dated 13 February 2025 for information pursuant to Rule 9 of the Inquiry Rules 2006. Further to my sixth (WITN09890600), seventh (WITN09890700) and eighth (WITN09890800) witness statements, the Inquiry has requested supplemental data relating to the Horizon Shortfall Scheme ("**HSS**") and the Overturned Convictions Process

("**OC Process**"). For completeness, I have adopted the same terminology and definitions used in my previous witness statements.

5. Post Office has provided data in line with the headings supplied in the Rule 9 request which split the data by date of claims made. Accordingly, Post Office has used the date of when the application was received as opposed to when the offer was made by Post Office, or received, by the applicant.
6. As set out in my sixth (WITN09890600) and seventh (WITN09890700) witness statements, in response to Rule 9(56) and (59) respectively, there are various reasons why certain applications take different lengths of time to progress through certain stages of the process. The progress of a number of these stages is entirely in Post Office's hands. I have set out the steps Post Office has taken to speed up these stages in my witness statements and oral evidence (and latterly in the update shared with the Inquiry on 1 November 2024). However, sometimes an application takes more time to progress through one of the stages for reasons outside of Post Office's control. A commentary on the data and factors impacting timescales has not been requested in this Rule 9 however, Post Office is happy to provide further information if it would be of assistance to the Inquiry.
7. Also, as requested by the Inquiry, I exhibit to this statement the five letters sent to public interest Claimants on 25 January 2024¹, as referred to at paragraph 37 of my seventh witness statement (WITN09890700).

¹ POL00462741; POL00462742; POL00462743; POL00462744; POL00462745.

REQUESTED DATA

8. The Rule 9 request sought completion of the below table with data regarding the HSS:

HSS Stage	Number as of 30 January 2025
Total number of applications submitted	8,583
Total number of applications determined to be eligible	6,859
<i>For claims made from the launch of the HSS up to and including 27 November 2020:</i>	
Applications submitted	2,479
Applications determined to be eligible	2,349
Applicants who have received an offer following assessment	2,340
Accepted offers	2,032
Fixed sum offers accepted ²	N/A
BAT Claims awaiting settlement	1
Standard Claims awaiting settlement	104
Complex Claims awaiting settlement	210
Applicants in the Dispute Resolution Procedure ³	203
Applications currently at Meeting Stage ⁴	198
Applications resolved following Meeting Stage	160
Applications unresolved following Meeting Stage	12
Applications at Mediation Stage ⁵	3
Mediations resulting in a settlement agreement	7
Mediations not resulting in a settlement agreement	2 ⁶
Applications withdrawn from the HSS	6
<i>For Claims made from 28 November 2020 to 31 December 2023:</i>	
Applications submitted	508
Applications determined to be eligible	450
Applicants who have received an offer following assessment	397

² Fixed sum offers commenced in September 2024.

³ This is defined as per Clause 7 of the HSS Terms of Reference (last updated October 2024) ("ToR").

⁴ The 'Meeting Stage' being defined as those stages described in clauses 7(b) and (c) of the HSS ToR.

⁵ Cases either having been referred to Wandsworth Mediation Service ("WMS") or awaiting mediation with WMS as set out in clause 7(d) of the ToR.

⁶ As at 30 January 2025, settlement negotiations were ongoing.

Accepted offers	288
Fixed sum offers accepted	N/A
BAT Claims awaiting settlement	1
Standard Claims awaiting settlement	41
Complex Claims awaiting settlement	105
Applicants in the Dispute Resolution Procedure	88
Applications currently at Meeting Stage	88
Applications resolved following Meeting Stage	37
Applications unresolved following Meeting Stage	0
Applications at Mediation Stage	0
Mediations resulting in a settlement agreement	0
Mediations not resulting in a settlement agreement	0
Applications withdrawn from the HSS	2
<i>For claims made from 1 January 2024 to 31 July 2024:</i>	
Applications submitted	1,553
Applications determined to be eligible	1,288
Applicants who have received an offer following assessment	158
Accepted offers	104
Fixed sum offers accepted	N/A
BAT Claims awaiting settlement	0
Standard Claims awaiting settlement	276
Complex Claims awaiting settlement	465
Applicants in the Dispute Resolution Procedure	12
Applications currently at Meeting Stage	12
Applications resolved following Meeting Stage	0
Applications unresolved following Meeting Stage	0
Applications at Mediation Stage	0
Mediations resulting in a settlement agreement	0
Mediations not resulting in a settlement agreement	0
Applications withdrawn from the HSS	2
<i>For claims made from 1 August 2024 to 30 January 2025:</i>	
Applications submitted	4,043

Applications determined to be eligible	2,772
Applicants who have received an offer following assessment	8
Accepted offers	2
Fixed sum offers accepted	993 ⁷
BAT Claims awaiting settlement	0
Standard Claims awaiting settlement	166
Complex Claims awaiting settlement	125
Applicants in the Dispute Resolution Procedure	0
Applications currently at Meeting Stage	0
Applications resolved following Meeting Stage	0
Applications unresolved following Meeting Stage	0
Applications at Mediation Stage	0
Mediations resulting in a settlement agreement	0
Mediations not resulting in a settlement agreement	0
Applications withdrawn from the HSS	0
<i>Fixed Sum Offers Overall</i>	
How many Applicants who previously received an offer for less than £75,000, but whose applications are not yet settled, have received a fixed sum offer?	2 ⁸
How many SPMs who previously had not applied to the HSS or who had withdrawn, have been written to regarding the availability of the fixed sum offer?	18,528
<i>In relation to HSS and all Applicants whose claims had been settled prior to FSOs becoming available:</i>	
How many became eligible for top-up payments on the introduction of FSOs?	1,800
How many of those Applicants have received their top-up payments?	1,677 ⁹
During what time period did those Applicants receive their payments?	1,628 payments made between 1

⁷ Between October to December 2024, Post Office sent 18,528 letters regarding the availability of the Fixed Sum Offer ("FSO") to Postmasters. As of 27 February 2025, Post Office had received 5,359 applications for the FSO, with 2,283 FSOs being issued and 1,712 FSOs accepted.

⁸ Neither of these Applicants had accepted the HSS offer at the time the FSO was introduced.

⁹ The remaining 123 Applicants have been contacted by Post Office to encourage a response to the Top-Up offer.

	<p>August 2024 and 31 January 2025</p> <p>39 payments made between 1 February 2025 and 11 March 2025</p>
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9. The Rule 9 request sought completion of the below table detailing the average (mean) period of time an Applicant spent engaging in each stage of the DRP of the HSS:

Stage of DRP ¹⁰	Average (mean) time in weeks as of 30 January 2025
Time spent in DRP	69
Time awaiting and/or engaging in good faith meeting process	62
Time awaiting and/or engaging in escalation meeting process	44
Time awaiting and/or engaging in a mediation process	30

10. The Rule 9 request sought completion of the below table with data regarding the OC Process:

Stage of Process	Total as of 30 January 2025
Submissions of full assessment	16
Acceptance of £600,000 offer	58
Acceptance of £600,000 offer without interim payment	4
Initial interim payment applications	107
Initial interim payments made	107
Subsequent applications for interim payments ¹¹	103

¹⁰ The data metrics used exclude 'Paused' cases as defined in paragraph 195 of my sixth (WITN09890600) witness statement.

¹¹ This figure excludes requests for subsequent interim payments from two Claimants who have (1) not yet submitted fully particularised claims and (2) have received interim payments (of £500k+).

Subsequent interim payments made	99
Pecuniary claims assessed by POL	16
Non-pecuniary claims assessed by POL	74
Initial offers made for pecuniary claims	10
Initial offers made for non-pecuniary claims	74
Initial offers accepted for pecuniary claims	2
Initial offers accepted for non-pecuniary claims	39
Ongoing without prejudice discussions	13
Settlements following without prejudice discussions for pecuniary claims	8
Settlements following without prejudice discussions for non-pecuniary claims	10
Pecuniary claims referred to Independent Assessment Panel	1
Non-pecuniary claims referred to Lord Dyson	10
Pecuniary claims referred to Independent Assessment Panel resulting in settlement	0
Non-pecuniary claims referred to Lord Dyson resulting in settlement	9
Claims referred to a court for determination	0
The total number of eligible Claimants in the OC process	113
The number of eligible Claimants in the OC process whose convictions have been overturned	111
The number of eligible Claimants in the OC Process who are PNCs	2
The number of Claimants who have not reached full and final settlement and have not submitted a fully particularised claim (either pecuniary or non-pecuniary), excluding PNCs. ¹²	22
The number of PNC Claimants who have not reached full and final settlement and have not submitted a fully particularised claim (either pecuniary or non-pecuniary), but have received an initial interim payment.	1
The number of convicted Claimants who have not reached full and final settlement and have not submitted a fully particularised claim (either	22

¹² Including those who are minded to accept the fixed sum offer but could still submit an assessed claim.

pecuniary or non-pecuniary), but have received an initial interim payment.	
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11. The Rule 9 request sought completion of the below table detailing the average (mean) period of time Claimants have spent engaging in each stage of the OC Process:

Stage of OC Process	Average (mean) time in weeks as of 30 January 2025
Time from submission of full assessment to initial offer for pecuniary claims	6.9
Time from submission of full assessment to initial offer for non-pecuniary claims	4.3
Time from acceptance of £600,000 offer to receipt of £600,000	0.9
Time from acceptance of initial offer to payment (pecuniary claims)	0.7
Time from acceptance of initial offer to payment (non-pecuniary claims)	1.3
Time spent in without prejudice discussions following rejection of initial offer	12.1
Time from referral to Independent Assessment Panel to a determination being made	N/A ¹³
Time from referral to Lord Dyson to a determination being made	4.4

STATEMENT OF TRUTH

I believe the content of this statement to be true.

Signed:

GRO

Dated: 26 March 2025

¹³ One referral was made to the panel on 8 November 2024 and a full judgment is awaited.

Index of Exhibits to the Tenth Witness Statement of Simon Recaldin

Number	URN	Document Description	Control Number
1.	WITN09890600	Sixth witness statement of Simon Recaldin	WITN09890600
2.	WITN09890700	Seventh witness statement of Simon Recaldin	WITN09890700
3.	WITN09890800	Eighth witness statement of Simon Recaldin	WITN09890800
4.	POL00462741	Letter from HSF to Hudgell Solicitors re Compensation for Postmaster 1	POL-BSFF-FLP019-0000001
5.	POL00462742	Letter from HSF to Hudgell Solicitors re Compensation for Postmaster 2	POL-BSFF-FLP019-0000002
6.	POL00462743	Letter from HSF to Hudgell Solicitors re Compensation for Postmaster 3	POL-BSFF-FLP019-0000003
7.	POL00462744	Letter from HSF to Paul Marshall (Cornerstone Barristers) re Compensation for Postmaster 4	POL-BSFF-FLP019-0000004
8.	POL00462745	Letter from HSF to Paul Marshall (Cornerstone Barristers) re Compensation for Postmaster 5	POL-BSFF-FLP019-0000005

