

Note from SAH

I have prepared and sent this note to SS for their consideration. It suggests a way of approaching the claims- my suggestions are no more than tentative. Perhaps we could discuss on the phone on Thursday.

Quantify the losses for which SPM is or has been alleged to be responsible.	
Is it alleged by the PO that the losses were caused by theft? If yes, then, in the reasoned opinion of SS, were the losses caused by theft?	
Is it alleged (directly or indirectly) by the PO that the SPM, by some identified or unidentified act or omission, caused the losses? If yes, then, in the reasoned opinion of SS, did the SPM cause the losses and, if so and if possible, how?	
If in the reasoned opinion of SS the SPM caused the losses, should the SPM, in the reasoned opinion of SS, be held wholly or partially responsible for the losses? In considering this question, SS should consider whether, for example, the SPM received adequate training and/or assistance and whether the SPM could have or should have carried out checks to identify the causes of the losses?	
If in the reasoned opinion of SS the SPM did not cause the losses, what, in the reasoned opinion of SS, were the causes of the losses?	

In giving its opinion on disputed issues of fact, SS should explain what standard of proof SS has applied, ranging from sure to probable/likely.

In reaching its opinion, SS will have regard to other cases similar to that of the applicant.