The SRA assurance and the unanswered institutional record

The Solicitors Regulation Authority has been asked to explain the factual basis of an assurance it gave about government contact concerning solicitors challenging Covid-related policies.

It acknowledged the correspondence on 6 October 2026 and promised a substantive response.

As at my follow-up of 19 November, that response remains outstanding.

The issue extends beyond delayed correspondence. It concerns whether the regulator examined relevant records before giving its assurance, what it understood about material supplied from within government and how that material was subsequently used.

The SRA can answer those questions from its own institutional record. General assurances of independence cannot substitute for that account.

The assurance that requires explanation

On 9 July 2025, the SRA told me:

"We are independent of government, and we have not been approached by it or its representatives to discourage or obstruct solicitors challenging COVID 19 related policies."

The second part is a factual assurance about contact and its purpose.

My correspondence of 26 September 2026 asked how it had been reconciled with Paul Easter's report to the SRA of 15 February 2022 concerning Philip Hyland and PJH Law. The original report form was identified as an attachment, allowing the recipients to examine the underlying document.

As reproduced in that correspondence, Mr Easter identified his organisation as the Department of Health and Social Care and stated:

"I work for the DHSC on behalf of HMG assessing risks to the UK Vaccine programme."

He sought urgent regulatory action and alleged that PJH Law was disseminating misinformation.

The activities he described included legal advice, court representation and the gathering of evidence.

Did the SRA consider Mr Easter's report and stated capacity before giving me their 2025 assurance?

If it did, how did it assess the purpose of that contact?

If it did not, what enquiries supported the assurance and does the SRA still maintain 2025 the wording?

Those are the central questions. They ask the regulator to account for what it knew, checked and concluded. They do not require it to accept my interpretation of events.

Why the SRA is central to the enquiry

My original email was sent simultaneously to the SRA, DHSC and the Solicitors Disciplinary Tribunal because the documentary questions cross their respective responsibilities.

The connecting issue is the passage of material concerning a solicitor from a governmental setting into regulatory handling and where applicable, the disciplinary process:

What was supplied, what its provenance was, how it was tested and what was disclosed.

My September email quoted DHSC records referring to ***"our interest in this individual and the steps we took with the Solicitors Regulation Authority"***. It also quoted a request for a ***"non branded list" of "[TPDW]/PJH law targets"*** to be sent to the SRA.

These extracts require an account of the relevant communications.

DHSC should be able to identify what its recorded interest and steps comprised.

The SRA should be able to identify what it received, what it understood about the source and purpose and what regulatory use followed.

If material lacked government branding, the relevant question is whether its governmental provenance was nevertheless known and accurately disclosed.

The SRA's position is central because it received the complaint and is responsible for explaining its own handling.

The police account and the allegation of misinformation

Mr Easter's report, as quoted in my September email, asserted that an ***"inability to differentiate between a crime reference number and an open police investigation"*** indicated misconduct.

The status of CRN 6029679/21 therefore requires careful examination. The question is what the police actually did, what Mr Hyland said about it, and what information the SRA relied upon.

The correspondence placed before the SRA

I sent to the SRA, Detective Superintendent Tor Garnett's May 2022 explanation that the allegations were ***"being reviewed/investigated to determine whether a crime should be recorded"***.

I also drew attention to PC Amanda Cousins's September 2026 confirmation that an investigation had taken place.

I asked what the SRA knew of the later police position and whether it affected its assessment.

A statement made in September 2026 cannot establish what the SRA knew during earlier proceedings. Its significance is that it calls for the earlier factual assessment to be checked against the police record.

The SRA should identify which account it used, how it verified that account and whether subsequent information calls for correction or qualification.

A label of ***"misinformation"*** is itself a proposition requiring evidence.

The distinct Tribunal question

My September email also described archived material associating Mr Easter and Gary Gracey with the Minerva Advisory Group before Mr Easter's complaint and during the period of Mr Hyland's July 2024 disciplinary hearing, on whose panel Mr Gracey sat.

I asked whether that association was known, disclosed and assessed.

That requires the Tribunal's own account; the SRA cannot supply it on the Tribunal's behalf.

What the subsequent correspondence records

On 6 October, the SRA's Jane Tandy acknowledged the 26 September email and stated:

"Your correspondence is receiving attention, and we will respond substantively as soon as possible."

That was an acknowledgement and a commitment to answer. It did not address the questions themselves.

On 22 October, I requested the response by 31 October, the date originally proposed. I explained that fairness to the SRA favoured presenting its considered position alongside the documentary questions before a forthcoming meeting.

If a complete response was unavailable, I asked for the answers already available, the matters outstanding and a firm completion date.

On 9 November, I recorded that the October follow-up remained unanswered and that no substantive response or timetable had arrived. I restated the central question about Mr Easter's report and the July 2025 assurance and invited factual corrections supported by records. I notified the SRA of intended publication, sought a response by noon on 12 November and offered to place any later reply on the public record.

Today, 19 November, I followed up again, asking what was causing the delay and whether further evidence from me could assist. This was an opportunity to identify an actual obstacle to answering.

By now, 54 days have elapsed since the original email and 44 since Ms Tandy's acknowledgement.

The requested dates were correspondence deadlines - This paper does not describe them as statutory deadlines.

The criticism is specific:

Following its promise of a substantive response, the SRA had not supplied the explanation, partial answers or completion timetable sought in the correspondence.

I have not, for the purpose of this paper presented the response position of DHSC or the Tribunal and no conclusion about their engagement is drawn here.

What a meaningful response must resolve

The SRA should state whether Mr Easter's report was considered before the assurance, explain the enquiries and reasoning supporting that assurance and confirm whether it maintains or qualifies it.

It should identify the relevant material received, account for its provenance and use and explain how the police record was understood.

Any restriction on providing a particular document should be distinguished from the ability to give a factual answer.

The three institutional accounts should then be capable of comparison.

Material DHSC says it transmitted should correspond with the SRA's receipt and handling records.

Any disclosure the SRA says it made to the disciplinary process should be identifiable in the relevant records.

The Tribunal should explain its own consideration of the association raised.

This is the fundamental purpose of my simultaneous September 2026 email - To establish a consistent history across institutional boundaries.

Silence leaves a promised institutional explanation outstanding.

The SRA can defend its assurance, qualify it or correct it by reference to the evidence.

Public confidence is better served by that answer than by an assurance whose factual foundation remains unexplained.

Ian Clayton

19 November 2026