On November 9, 2026, at 11:32, Ethics Central Admin <ethics@ethicalapproach.co.uk> wrote:

Dear Ms Tandy

Re: SRA substantive response overdue - Correspondence to be published this week

I write again concerning my letter of 26 September to Sarah Rapson.

On 6 October, you confirmed that the correspondence was receiving attention and that the SRA would respond substantively.

My follow-up of 22 October remains unanswered.

The requested date of 31 October has passed without either a substantive response or an indication of when one will be provided.

The central question remains straightforward. Did the SRA consider Paul Easter's February 2022 report, including the capacity in which he described himself as acting, before giving its assurance of 9 July 2025?

If it did, please explain how the SRA reconciled that report and its institutional context with the assurance.

If it did not, please identify the enquiries on which the assurance was based and state whether the SRA now maintains it as originally expressed.

That question sits alongside the other specific matters in my letter of 26 September: what material the SRA received, what it understood about its provenance, how it used that material, and what account of the status of CRN 6029679/21 informed its assessment.

A general statement of regulatory independence would leave those factual questions unanswered.

If the SRA considers any part of my account inaccurate or incomplete, I invite it to identify the point and provide the correction or qualification by reference to the relevant records.

I will place the recent correspondence with the SRA in the public domain this week, in the public interest.

The correspondence concerns the factual basis of an assurance given by the regulator and its handling of material relevant to Mr Hyland. In fairness to the SRA and to all those directly involved, I would prefer to publish the SRA's substantive response alongside the correspondence, so that readers can consider its position in its own terms.

Please therefore provide the substantive response by 12 noon on Thursday, 12 November 2026. If a complete response cannot be provided by then, please supply the answers which are available, identify what remains outstanding, explain the reason for the further delay and give a firm date for completion.

If the response arrives after publication, I will arrange for it to be placed on the public record and linked to the original publication. At the point of publication, however, I will state accurately what has and has not been received.

Please bring this email to Ms Rapson's attention and to that of the person responsible for preparing the response.

I would appreciate prompt confirmation of who is dealing with it and when the SRA will respond.

Yours sincerely

Ian Clayton

Lead Investigator

Ethical Approach UK

cc: Philip Hyland

Subject: Re: Simultaneous Institutional Notice and Request for Candid, Substantive and Document-Based Responses
Date: Thu October 22, 2026 19:22

From: "Ethics Central Admin" <ethics@ethicalapproach.co.uk>

To: "Jane Tandy" <jane.tandy@sra.org.uk>

Cc: philip@pjhlaw.co.uk

Dear Ms Tandy

Re: Outstanding substantive response - Requested by 31 October 2026

Thank you for your email of 6 October confirming that my correspondence of 26 September was receiving attention and that a substantive response would follow.

I would be grateful for an update and confirmation of whether that response will be provided by 31 October 2026, as originally requested.

In early November, I will be attending a meeting with a senior figure whose national responsibilities are directly relevant to the accountability issues arising from my investigation. Matters materially connected with the correspondence before the SRA will form part of that discussion.

In fairness to the SRA, I would prefer to present its considered substantive position alongside the documentary material and the questions I have raised. That would of course enable the discussion to proceed with the benefit of the SRA's explanations, including any factual corrections or qualifications it considers necessary.

My purpose is to ensure that the SRA's position is represented accurately and on its own terms. A substantive response by 31 October would allow sufficient time for it to be considered before the meeting.

If a complete response cannot be provided by that date, please identify the matters that remain under consideration, provide such substantive answers as are presently available and give a firm date for completion.

I appreciate your assistance in bringing this request to the attention of those responsible for preparing the response.

Yours sincerely

Ian Clayton

Lead Investigator

Ethical Approach UK

cc: Philip Hyland

On October 6, 2026, at 15:22, Jane Tandy <jane.tandy@sra.org.uk> wrote:

Sensitivity: General

Dear Mr Clayton

Thank you for your email of 26 September 2026 to Sarah Rapson.

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

Yours sincerely

Jane Tandy PA to
Anna Bradley - Chair of the SRA Board

Jonathan Peddie - Executive Director Investigations, Enforcement and Litigation

Deb Jones - Executive Director Transformation

Solicitors Regulation Authority
www.sra.org.uk

-----Original Message-----

From: Ethics Central Admin <ethics@ethicalapproach.co.uk>

Sent: 26 September 2026 06:04

To: permanent.secretary@dhsc.gov.uk; Sarah Rapson <sarah.rapson@sra.org.uk>; SDT Enquiries <enquiries@solicitorsdt.com>

Cc: Philip Hyland <philip@pjhlaw.co.uk>; ComplaintsTeam <ComplaintsTeam@sra.org.uk>; dhsc.publicenquiries <dhsc.publicenquiries@dhsc.gov.uk>

Subject: Simultaneous Institutional Notice and Request for Candid, Substanti ve and Document-Based Responses

TIME SENSITIVE - SEEKING SUBSTANTIVE RESPONSE BY 31 OCTOBER 2026

For the urgent attention of:

1. Sarah Rapson (CEO, SRA)

2. Samantha Jones (Permanent Secretary, DHSC) 3. Ray Dhanowa (Clerk and Chief Legal Adviser, Solicitors Disciplinary Tribunal)

Re: Simultaneous Institutional Notice and Request for Candid, Substantive a nd Document-Based Responses

I write simultaneously to the Department of Health and Social Care, the Solic itors Regulation Authority and the Solicitors Disciplinary Tribunal concerning the documentary chronology examined in my recent Report Supplement whi ch is within the attached relevant document:

The Case of Philip Hyland Examined and Supplement No. 1 - The Minerva Ad visory Group: Paul Easter and Gary Gracey - A Material Chronological Develo pment

Each of your institutions has already been approached separately.

DHSC has already been provided with the principal evidential report and asked to account for its documented institutional “interest” in Philip Hyland, the “steps we took with the Solicitors Regulation Authority”, the request for a “non branded list” of “PJH law targets” to be sent to the SRA, the associated vaccine-security material and the relevant interface with policing, which is documented by way of primary police evidence in my possession.

The SRA has been asked to reconsider the factual assurance given on 9 July 2025 that it had not been approached by Government or its representatives to discourage or obstruct solicitors challenging Covid-related policies, in light of subsequently identified documentary evidence concerning the complaint made by Paul Easter.

The SDT has separately been provided with the said Supplement No. 1, referred to above, concerning the contemporaneously evidenced Minerva Advisory Group association of Paul Easter and Gary Gracey, including the fact that the documented association existed before Mr Easter’s February 2022 approach to the SRA and continued through the period in which Mr Gracey sat as one of the three members determining Mr Hyland’s substantive disciplinary proceedings in July 2024.

Until now, I have approached each institution separately because each possesses different records, different responsibilities and different knowledge.

The point has now been reached, however, where the evidential questions materially intersect.

It is therefore appropriate that each institution should now know what has b
een placed before the others.

There is now a documentary chronology crossing all three institutions which
contains matters capable of factual answer.

Those answers cannot sensibly be supplied by considering each institution in
artificial isolation from the others.

For completeness, I attach to this correspondence the original SRA Report F
orm dated 15 February 2022 submitted by Paul Easter concerning Philip Hyla
nd and PJH Law.

I do so because it is preferable that each recipient considers the primary und
erlying document itself rather than merely my description of it.

The form identifies Mr Easter's organisation as the Department of Health an
d Social Care, provides his DHSC email address and records his position in ex
press terms:

“I work for the DHSC on behalf of HMG assessing risks to the UK Vaccine pro gramme.”

Mr Easter went on to describe “Anti-vaccination groups” as presenting a “sig nificant and identified risk to the programme” and alleged that PJH Law was involved in disseminating misinformation.

Importantly, the activities identified within the complaint were not confined to social-media commentary. They included legal advice, drafting application s, representation in court, preparation for hearings, assembling counsel and legal support, obtaining expert and witness evidence, engaging private inves tigators and pursuing evidential material concerning vaccination-related issu es.

The complaint then stated that:

“the inability to differentiate between a crime reference number and an ope n police investigation indicates that the firm should be reported to the Solici tors Regulation Authority as misconduct.”

It concluded:

“action by the SRA must be taken as a matter of urgency.”

The document also records that the complained-of conduct had been brought to the attention of DHSC.

That primary document must now be considered alongside DHSC’s own later documentary record.

DHSC materials refer to:

“our interest in this individual and the steps we took with the Solicitors Regulation Authority.”

The same documentary history includes the request:

“Can you send me a non branded list of [TPDW]/PJH law targets since last Tuesday pse that I can send on to SRA”

and contemporaneous security material concerning Philip Hyland, PJH Law and CRN 6029679/21.

That is why DHSC's involvement can no longer adequately be described, wit hout further explanation, as the isolated act of an individual employee maki ng an independent complaint.

The Department's own records disclose a materially broader institutional chr onology.

There is then a separate and important issue concerning the true Metropolit an Police position in relation to CRN 6029679/21.

The status of that crime report was not peripheral to the regulatory history. It formed part of the factual basis upon which Philip Hyland and PJH Law wer e characterised as disseminating misinformation and as being unable to disti nguish between a crime reference number and an open police investigation.

The evidential position now available is materially different from the impres sion conveyed by the Metropolitan Police in February 2022.

In May 2022, Detective Superintendent Tor Garnett stated expressly that, if t he complainants had been informed that the allegations were subject to inv estigation, that:

“would not have been an inaccurate representation”

because:

“the allegations were, in fact, being reviewed/investigated to determine wh ether a crime should be recorded.”

More recently, in September 2026, PC Amanda Cousins of Metropolitan Poli ce Professional Standards has likewise made clear that an investigation did t ake place in relation to CRN 6029679/21.

Those clarifications do not stand alone.

Internal Metropolitan Police records now in my possession corroborate the position asserted by Detective Superintendent Garnett and PC Cousins and r ecord investigative activity/handling concerning the matter.

Accordingly, the proposition that Mr Hyland was wrong to describe an invest igation or evidential review as taking place can no longer be treated as an ad equate or complete account of the Metropolitan Police position.

This is not a semantic distinction. It concerns whether a materially accurate description of police activity was subsequently treated as misinformation in circumstances where later Metropolitan Police statements and internal reco rds indicate that investigative activity did, in fact, occur.

That issue requires particular attention because the supposed absence of an investigation was expressly relied upon in Mr Easter's complaint and becam e part of the wider institutional narrative concerning Mr Hyland.

The SRA's own later assurance also now requires consideration against that background.

On 9 July 2025, I was told by the SRA:

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

That assurance now has to be considered alongside the established fact that Paul Easter had approached the SRA in February 2022, identifying himself as working for DHSC:

“on behalf of HMG assessing risks to the UK Vaccine programme”

and seeking urgent regulatory action against PJH Law.

That makes the existence, provenance, treatment and institutional context o f that governmental contact plainly material to the assurance subsequently provided by the SRA.

There is then the separate but related SDT question.

Contemporaneous archived material now places both Paul Easter and Gary Gracey within the Minerva Advisory Group structure by 25 January 2022.

Mr Easter subsequently approached the SRA concerning PJH Law on 15 Febr uary 2022.

Mr Gracey subsequently sat as one of three members of the SDT determinin g the substantive disciplinary proceedings against Philip Hyland between 1 a nd 4 July 2024.

Archived Minerva material dated 19 July 2024 continued publicly to identify both men within that organisation.

The question is now whether that association between Mr Easter and Mr Gracey was known, considered or disclosed before Mr Gracey participated in determining the 2024 proceedings and whether any relevant conflict or apparent-conflict assessment was undertaken.

These matters are capable of being answered by evidence.

That is now what is required.

I therefore invite each institution to provide a candid, substantive and document-based response, addressing those matters which fall within its own knowledge, records and institutional responsibility.

By “candid” I mean precisely that.

If an earlier institutional assurance requires qualification, it should be qualified.

If a factual proposition advanced in my reports is wrong, it should be identifi ed and corrected by reference to the contemporaneous record.

If relevant information was not known at the time, that should be said.

If records establish an entirely proper explanation, they should be identified.

If an issue remains under examination, that too can be stated plainly.

What would not now constitute an adequate response, would be a repetitio n of general institutional assurances which do not engage with the specific is sues now placed before you.

Accordingly, I ask that the following matters are addressed.

Department of Health and Social Care

Please identify what constituted the Department's recorded "interest" in Phi lip Hyland and every material "step" taken with the Solicitors Regulation Aut hority.

Please identify the purpose, authorship, provenance and transmission of the "non branded list" of "PJH law targets", including what was sent, to whom, on whose authority and whether its governmental provenance was disclose d.

Please establish the relationship, if any, between the relevant security escala tion, Security Notices, assessments concerning CRN 6029679/21 and the dec ision to approach the SRA.

Please identify what relevant information passed between DHSC vaccine-pro gramme security and policing bodies concerning Philip Hyland, PJH Law or C RN 6029679/21.

Please state whether DHSC subsequently received clarification from the Met ropolitan Police that the allegations had in fact been reviewed or investigate d and, if so, whether any internal security record, communication or materia l supplied to the SRA was corrected or qualified accordingly.

Please also confirm that potentially relevant contemporaneous records have been preserved.

Solicitors Regulation Authority

Please state whether Paul Easter's complaint, his stated governmental role a nd its institutional provenance were identified and considered before the as surance given to me on 9 July 2025 was provided.

If they were, please explain how the assurance was reconciled with that mat erial.

If they were not, please identify what enquiries were undertaken before the assurance was provided.

Please identify all material received from DHSC, or persons acting within the Government vaccine-security environment, concerning Philip Hyland, PJH La w, CRN 6029679/21 or associated Covid-related legal activity, together with i ts provenance and subsequent regulatory use.

Please explain whether the SRA was made aware of the true provenance of any "non branded" material supplied to it and whether that provenance was disclosed to Mr Hyland and, where relevant, to the SDT.

Please also state whether, before or during the regulatory proceedings, the SRA obtained or was provided with the later Metropolitan Police position th at the allegations had in fact been “reviewed/investigated” and, if so, what e ffect that had upon its assessment of the earlier allegation that Mr Hyland h ad disseminated misinformation concerning the existence of an investigatio n.

Solicitors Disciplinary Tribunal

Please state whether the documented Minerva association between Paul Ea ster and Gary Gracey was known to the Tribunal before or during Mr Hyland’ s substantive hearing.

Please state whether that association was disclosed to the parties or conside red in connection with the constitution of the Tribunal.

Please identify whether any conflict, apparent-conflict, independence or imp artiality assessment was undertaken and whether any contemporaneous rec ord of that assessment exists.

Please also identify, insofar as the Tribunal record permits, what evidence co ncerning the true status of CRN 6029679/21 was placed before the Tribunal, including whether the Tribunal was provided with the Metropolitan Police p osition that the allegations had in fact been “reviewed/investigated”.

I appreciate that the SDT has already been afforded a separate period within which to respond to Supplement No. 1 referred to above.

Nothing in this correspondence is intended to curtail that period or prejudge the Tribunal's response.

The purpose of this simultaneous communication is different. It is to ensure that the three institutions now have mutual visibility of the documentary qu estions which cross their respective records and responsibilities.

That is important because the answers should ultimately be capable of stand ing beside one another.

If DHSC says material was sent to the SRA, the SRA should be able to account for its receipt and treatment.

If the SRA says particular provenance was disclosed into the disciplinary proc ess, the SDT record should be capable of confirming that.

If the SDT says a matter was known, disclosed or considered, the correspond ing institutional records should be capable of demonstrating it.

That is not an unreasonable standard. It is simply evidential consistency.

There are two further matters of present procedural importance which I con sider it appropriate to place before all three recipients.

First, issues arising from the documentary chronology addressed in this corr espondence are presently being placed before a police force which was not directly involved in CRN 6029679/21.

That step is being taken in light of primary evidence which has emerged sinc e early 2025 and which continues to emerge.

I do not presently propose to identify that police force within this correspon dence, nor do I suggest that the fact of such engagement determines any iss ue raised here.

I mention it because the matters under examination have now developed be yond the original institutional context and are being considered against an e xpanding primary evidential record.

Second, there is a separate and upcoming meeting scheduled for November 2026 at which matters materially connected with this chronology are expect ed to be discussed by senior-level individuals.

I am not presently in a position to identify those attendees because of the se nsitivity of the issues to be considered.

In those circumstances, I consider it important that the institutional record is clarified in advance of that November meeting. I therefore invite each recipi ent to provide its full substantive response no later than 31 October 2026.

I consider that period to be ample for each institution to examine its own re cords, identify any necessary internal decision-maker or responsible office a nd provide a considered, evidence-based account.

If any recipient considers that it cannot reasonably provide a full substantive response by that date, I ask that it explains why, identifies what work remai ns outstanding and provides a firm alternative date for completion.

The purpose of that timetable is not to manufacture urgency where none exi sts. It is to ensure that the relevant institutional positions are properly establ ished before further senior-level consideration of these matters takes place i n November.

I am not asking any institution to adopt my analysis.

I am asking each to account candidly and transparently for the part of the do cumentary history which lies within its own knowledge and records.

Non-engagement ought not to continue against a background of unanswere d questions.

The relevant documents, dates, individuals and institutional intersections ha ve now been identified with precision.

Each institution has been afforded an opportunity to correct the record and each now knows that the other institutions have been placed on notice of th e same evidential chronology.

The purpose of this correspondence is not to manufacture inference from in stitutional silence. It is to establish the institutional record.

For completeness, I attach the following documents:

(a) Paul Easter - SRA Report Form dated 15 February 2022;

(b) The Case of Philip Hyland Examined (including Supplements No 1 and No 2).

I would be grateful if receipt of this correspondence and the attachments co uld be acknowledged and if each institution would identify the office or seni or official responsible for considering the matters raised.

This correspondence is sent simultaneously because the documentary histor y is now simultaneously relevant to all three institutions.

The appropriate next step is no longer speculation. It is a candid institutional account, supported by the contemporaneous record.

I look forward to receiving one from each of you.

Yours sincerely

Ian Clayton

Lead Investigator

Ethical Approach UK

cc: Philip Hyland (PJH Law)