The SRA assurance and the unanswered institutional record

Supplement No. 1

An assurance maintained, its foundation unexplained

1. The record has changed

The principal paper, dated 19 November 2026, recorded that the Solicitors Regulation Authority's promised substantive response remained outstanding.

On 20 November, Andrew Prince, the SRA's Corporate Complaints Manager, replied on the regulator's behalf.

He apologised for the delay, maintained the assurance previously given and declined to provide the requested statements and confirmations concerning the underlying regulatory matters.

This supplement records that development and my reply, which has now been sent and will be published shortly, along with the SRA's latest email, in the public interest.

The earlier statement that no substantive response had arrived describes the position at the date of the principal paper. It must not be presented as the position following today's response.

The issue has consequently moved from an awaited explanation to the adequacy of the explanation supplied.

The SRA has stated its position. The foundational factual question remains unanswered.

2. What the SRA now says

Mr Prince expressly maintains the SRA's assurance of 9 July 2025:

"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."

He says that receipt of *"individual-level complaints and reports"* does not undermine that assurance.

He explains that the SRA receives information from government representatives and statutory bodies, assesses

reports independently and does not take regulatory decisions because of external pressure.

He also invokes restrictions concerning regulatory information, confidence, data protection and possible prejudice to the SRA's regulatory function.

The result is a maintained assurance accompanied by a refusal to supply the case-specific confirmations sought. Both elements must appear in a fair public account.

3. The distinction the response does not resolve

The July 2025 assurance contains two propositions. One concerns the independence of the regulator. The other concerns whether government or its representatives approached it for a particular purpose: *Discouraging or obstructing solicitors challenging Covid-related policies*.

Those propositions require different evidence.

An independent response describes the recipient's conduct. The purpose of an approach concerns the person or institution making it.

A regulator could reject an improper approach completely and still have received it.

Mr Prince's explanation of independent assessment therefore does not, without more, establish the accuracy of the separate assurance about approaches received.

The missing link is the SRA's examination of the relevant contact, its provenance and its purpose.

The foundational question remains:

Did the SRA identify and consider Paul Easter's February 2022 report, his expressly stated governmental capacity and the institutional context before giving the July 2025 assurance? If so, how were those matters reconciled with its wording? If not, what enquiries supported it?

Today's response confirms that the SRA maintains the assurance. It does not say whether Easter's report was considered before that assurance was given, identify the enquiries then undertaken or explain its assessment of the purpose of his approach.

4. “Individual-level” does not settle institutional provenance

As the principal paper records, Easter identified himself as working for DHSC *“on behalf of HMG assessing risks to the UK Vaccine programme”*. His report sought urgent regulatory action against Philip Hyland and PJH Law.

Submission by a named individual does not resolve whether an approach was personal, undertaken within official responsibilities, instructed or institutionally approved.

Describing a complaint as *“individual-level”* leaves those possibilities undetermined.

The relevant distinction is the capacity in which the individual acted and the authority and purpose behind the communication.

The September correspondence also placed DHSC documentary extracts before the SRA:

References to an institutional ***“interest”***, ***“steps we took with the Solicitors Regulation Authority”*** and a requested ***“non branded list” of “[TPDW]/PJH law targets”***.

Those extracts were raised because provenance cannot reliably be assessed by looking only at the name on a report form.

The response supplies no case-specific explanation reconciling that wider context with the continuing assurance. That is an identifiable omission, not a conclusion about what undisclosed records must contain.

5. Political direction: An acknowledgment with defined limits

Mr Prince writes:

"We understand that political direction and ideology can feature in information provided to us, including from individuals acting on behalf of a body."

This is a general acknowledgment. It is not an admission that Easter's report contained political direction, that government instructed the SRA to act against Mr Hyland or that the regulator yielded to pressure.

Mr Prince expressly rejects the suggestion that political links cause the SRA to act differently.

Its relevance is nevertheless clear. The SRA recognises that such features can occur in information it receives. The question is therefore how it examined the particular approach before it and what factual basis supports its denial of an approach made for the purpose identified in the July assurance.

A general account of safeguards does not establish how a particular safeguard operated. Aggregate figures showing that the SRA takes no action on some reports likewise cannot establish how Easter's complaint was assessed or used.

6. Confidentiality and the foundation of an assurance

Mr Prince cites the SRA's publication and disclosure policies and refers to its earlier explanation of restrictions on regulatory information.

This supplement does not determine the lawfulness of withholding any particular document. The narrower criticism concerns the explanation actually provided.

The response does not identify which restriction prevents which requested confirmation. Nor does it explain whether a confined factual answer could be given without revealing protected investigative detail.

Asking whether a specified report was considered before an institutional assurance is different from requesting the entire confidential investigation file.

The SRA may have grounds for withholding particular information. That does not make the unanswered question disappear.

If it maintains an assurance whilst declining to explain its factual foundation, the public can record the assurance, the stated restriction and the resulting limit on independent examination.

The standard at issue is one of explanatory accountability.

A regulator which expects accuracy and substantive engagement from those it regulates should demonstrate those qualities itself when its own factual assurance is challenged.

Here, the SRA has explained its general approach but has not supplied the case-specific account needed to test that assurance.

7. The connection between the institutions remains material

The original September email went simultaneously to DHSC, the SRA and the Solicitors Disciplinary Tribunal because the documentary questions cross institutional boundaries.

The connecting issue remains the passage of material from a governmental setting into regulatory handling and where applicable, the disciplinary process: Its source, purpose, accuracy, use and disclosure.

The police account of CRN 6029679/21 is part of that issue too.

Easter's complaint relied upon an alleged inability to distinguish a crime reference number from an open investigation.

The September correspondence therefore asked what account the SRA used and whether the later police explanations affected its assessment.

Today's response from the SRA provides no specific account of that verification or reassessment.

The Tribunal question remains distinct: Whether the reported Minerva association between Easter and Gary Gracey was known, disclosed and assessed.

This latest SRA response neither answers that question on the Tribunal's behalf (which I would not actually expect in any event) nor establishes its answer from the SRA's perspective.

No conclusion about DHSC's or the Tribunal's response position is drawn in this supplement.

8. My response and the public record

I have taken Mr Prince's email as the SRA's final substantive response to my correspondence. That is my stated treatment of the exchange; his email did not expressly designate itself a final complaint determination or specify any review route.

My reply to him does not impose another deadline or repeat a demand for an answer. It instead invites the SRA to correct or complete the record by explaining what it knew about the governmental approach, when it knew it and how that knowledge informed its assurance.

It also states that Mr Prince's response and my reply will be published, with any subsequent substantive clarification added and linked.

If the SRA provides no further clarification, I shall understand that it does not wish to complete the record on those identified points.

That is not an admission of the underlying concerns. Rather, it leaves an assurance maintained and its case-specific foundation unexplained.

The public question is now precise:

On what established facts does the SRA maintain that no approach of the kind described was made?

Today's response from the SRA asserts its answer. It does not disclose the reasoning by which that answer was reached.

Ian Clayton
20 November 2026