# SUPPLEMENT No. 2

# WHEN THE REGULATOR BECOMES PART OF THE EVIDENTIAL QUESTION

**The Case of Philip Hyland: An Analytical Report on Regulatory Action, Government Security Activity, CRN 6029679/21 and the Emerging Documentary Record**

**Date: 24 August 2026**

## Preliminary note concerning source material

This report is founded upon a substantial body of underlying documentary material, including contemporaneous correspondence, regulatory records, complaint material, subsequently disclosed governmental and policing records, and documents concerning the proceedings brought against solicitor Philip Hyland.

A significant part of that underlying evidential corpus contains sensitive or confidential information. It is therefore not being published with this report at the present time.

That decision must not be misunderstood. The propositions advanced below are capable of documentary proof. Where quotation marks are used for material drawn from the underlying documents, the quoted words are reproduced verbatim from the material examined.

This report does not contend that every inference adverse to the institutions concerned has already been proved. It does contend something both narrower and, in the circumstances, more serious: The documentary position has changed so substantially that explanations previously capable of being accepted at face value now require rigorous re-examination.

The issue is no longer simply what Philip Hyland was doing in recent years.

The issue is what the documentary record now shows to have happened around him.

## 1. Executive Summary

Philip Hyland is a practising solicitor who became directly involved in challenges concerning Government Covid policy and vaccination. He was also centrally associated with the allegations submitted to the Metropolitan Police under CRN 6029679/21.

He subsequently became the subject of regulatory action by the Solicitors Regulation Authority.

At the time, those regulatory proceedings could readily be presented as a conventional exercise of professional regulation:

A regulator had received concerns about a solicitor's conduct, investigated them and ultimately brought proceedings before an independent statutory tribunal.

The difficulty is that the evidential landscape no longer permits so uncomplicated an account.

Subsequently obtained material requires the SRA proceedings to be examined against a much wider institutional background involving:

- the Department of Health and Social Care;
- Government vaccine-security structures;
- the Metropolitan Police; CRN 6029679/21;
- Operation Talla;
- nationally coordinated policing activity;
- the SRA;
- and ultimately the Solicitors Disciplinary Tribunal.

The presently assembled material indicates that information concerning Philip and CRN 6029679/21 was being processed within DHSC before the SRA complaint concerning him; that material identifying him entered a DHSC process described as a *“Formal Reporting Escalation Process of Security Issues”*; that on 15 February 2022 Paul Easter approached the SRA concerning PJH Law; and that subsequent DHSC correspondence referred to:

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

The wider disclosed material also includes reference to:

*“ANTI-VACCINATION COORDINATION IN CRIME REFERENCE NUMBER 6029679/21 CAMPAIGN”*

and, separately, a request for a:

*“non branded list”*

of:

*“[TPDW]/PJH law targets”*

for transmission to the SRA.

Those expressions require explanation. They are not the vocabulary ordinarily expected in the simple narrative of an independent professional regulator receiving and determining a complaint about a solicitor.

They instead reveal a governmental security context surrounding a lawyer who was simultaneously involved in challenging Government policy and pursuing allegations of criminality.

That does not, without more, prove that Government controlled the SRA (though we must not forget, of course, that a core competence for regulators is an understanding that regulation is a tool of Government).

It does something sufficiently important without requiring that conclusion.

It establishes a legitimate evidential question as to how, why and to what extent Government activity intersected with the professional regulatory process subsequently deployed against Philip.

The evidence accumulated since 2022 makes that question impossible responsibly to dismiss.

## 2. Philip Hyland Was Not an Abstract *"Covid Dissenter"*

The starting point is important.

Philip was not merely expressing controversial opinions on social media.

He is a solicitor. He was involved professionally in matters challenging Government policy. He was associated with legal action. And, critically, he became involved with CRN 6029679/21.

These are not uncommon types of engagement for many members of the legal professions. It is typically a part of the job for some.

That CRN 6029679/21 crime report was made to the Metropolitan Police on 20 December 2021.

The subsequent public controversy surrounding it has often been framed around an apparently simple proposition:

- allegations were presented;
- the police assessed them;
- no criminal offences were identified;
- and no criminal investigation was commenced.

The internal documentary history now makes that description materially incomplete.

Subsequently disclosed MPS material records:

*“Screening Decision: IN”*

and:

*“Crime screened ‘in’ for further investigation.”*

The screening reason recorded was:

*“92 Proportionate Investigation”*.

The record identifies an investigating officer, detective allocation, CID involvement, supervisory activity and ultimately:

*“Investigation Complete”.*

Those records do not necessarily prove that a full suspect-focused criminal investigation commenced, but they are exceedingly difficult to reconcile with any proposition that nothing properly describable as investigative activity occurred at all.

That distinction is fundamental.

## 3. The Metropolitan Police's Own Words

There is an especially important contemporaneous document.

On 18 May 2022 Detective Superintendent Tor Garnett wrote:

*“If you, or any of the complainants, were informed that the allegation was subject to an investigation, this would not have been an inaccurate representation; the allegations were, in fact, being reviewed/investigated to determine whether a crime should be recorded.”*

These are remarkably important words.

They are not Philip's characterisation. Nor indeed are they Mark Sexton's.

They are the Metropolitan Police's.

The formulation actually used was:

*“reviewed/investigated”*.

And the MPS expressly acknowledged that describing the allegations as being *“subject to an investigation”* would not have been inaccurate.

That evidence must now be considered alongside the internal records describing the matter as screened in *“for further investigation”* and recording *“Proportionate Investigation”*.

The significance for Philip is obvious.

Any regulatory assessment of statements made by him about the status of CRN 6029679/21 cannot fairly be conducted by selecting only the later institutional language most favourable to the proposition that there was *“no investigation”*.

The complete evidential record must be considered and that record is considerably less favourable to such a categorical proposition.

## 4. CRN 6029679/21 Did Not Remain a Local Metropolitan Police Matter

There is a second development of profound significance.

CRN 6029679/21 acquired national policing relevance.

The presently assembled record establishes that the NPCC Chief Constables' Council was informed on *12 January 2022 that a "final assessment"* was expected concerning the matter and that a *"peer review assessment"* existed, with Operation Talla tasked with sharing its results with all chiefs.

This matters enormously.

Whatever view is ultimately taken of the allegations themselves, the proposition that CRN 6029679/21 was merely an eccentric complaint locally considered and rejected by one police force is no longer sustainable as a complete historical description.

The matter had reached the national policing architecture and the associated record brings Operation Talla squarely into the picture.

Contemporary and subsequently disclosed records concerning Operation Talla identify national coordination of Covid policing, including the development of an approach subsequently expressed through the language of *"guidance* *to not record”* and, in Scotland, the instruction that specified reports:

*“should be rejected”*.

A previously published analysis of the 12 January 2022 Chief Constables' Council material similarly identifies national strategic consideration of CRN 6029679/21 and an anticipated steer capable of dissemination across forces.

The question therefore becomes considerably larger:

*What was happening institutionally around CRN 6029679/21 at precisely the period when one of the lawyers associated with it was attracting Government security attention and professional regulatory action?*

## 5. The DHSC Evidence Changes the Case

This is where the evidential position becomes especially serious.

The subsequently disclosed DHSC material indicates that Philip was not simply noticed by an independent professional regulator acting in isolation.

Government was itself interested in him.

Material identifying him and CRN 6029679/21 entered a DHSC process described as a:

*“Formal Reporting Escalation Process of Security Issues”*

on 14 February 2022.

The following day, 15 February 2022, Paul Easter approached the SRA concerning PJH Law.

The wider governmental material examined for this report includes the language:

*“vexatious”*

and:

*“fraudulent”*.

It includes the expressly titled subject:

*“ANTI-VACCINATION COORDINATION IN CRIME REFERENCE NUMBER 6029679/21 CAMPAIGN”*.

And the documentary sequence later produces the extraordinary expression:

*“[TPDW]/PJH law targets”*.

These are not words which should be rhetorically inflated.

They require something much more useful: Explanation.

*Who were the “targets”?*

*Why were they described as targets?*

*Who selected them?*

*By what criteria?*

*What was to be done with the list?*

*What was the relationship between that Government activity and communications with the SRA?*

*What information passed?*

*What assessment accompanied it?*

*And what, if anything, did the SRA understand about the governmental security architecture from which the material originated?*

These are evidential questions. They cannot properly be answered by saying that the SRA is institutionally independent of Government.

Institutional independence is a constitutional arrangement.

Whether communications occurred, what they contained, and what effect they had are questions of fact.

## 6. *“Our Interest in This Individual”*

One piece of DHSC language deserves particular attention:

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

The significance is difficult to overstate.

The language is retrospective.

It speaks of *“our interest”*.

It speaks of *“the steps we took”*.

And the institution with which those steps were taken was Philip Hyland's professional regulator, the SRA.

Again, this does not prove improper governmental direction, but any serious public-law or regulatory analysis must recognise what follows.

Once Government documents themselves describe an interest in an individual and steps taken with that individual's professional regulator, it is no longer sufficient simply to ask:

*Did the SRA have regulatory grounds for investigating Philip Hyland?*

The additional question becomes:

*What precisely were the Government's “steps” with the SRA, why were they taken, what information was communicated, and what influence, if any, did they have upon the regulatory trajectory which followed?*

That question is not conspiratorial. It arises from the Government's own documentary language.

## 7. What the SRA Was Investigating

The SRA's own record provides further context.

A production notice served on Philip on 8 April 2022 concerned complaints that he had disseminated, permitted dissemination of, or endorsed allegedly misleading information regarding the Government's Covid-19 vaccination programme.

Philip challenged the basis upon which the regulator was proceeding.

He was also expressly raising the concern, contemporaneously, that regulated professionals were experiencing:

*“co-ordinated attempts to shut down debate under threat of regulatory action”*

and he stated:

*“My understanding is that no one is above the law and practitioners should be free to call out alleged criminality as part of upholding the rule of law without getting investigated by the SRA.”*

Those were Philip's allegations at the time.

They did not prove themselves, but they acquire a different evidential complexion once read alongside governmental material disclosed years later.

That is precisely why hindsight must now be used properly. Not to pretend that Philip knew in 2022 everything subsequently discovered, but to ask whether concerns which might then have appeared speculative are now supported by objective documentary facts which were unavailable to him.

## 8. The Missing 2023 Sequence: Police Challenge, Production Notice and Judicial Review

The documents now available substantially illuminate the sequence extending from 2022 into 2023. That sequence matters because it demonstrates that the relationship Philip was asserting between the police controversy and the regulatory proceedings was not constructed retrospectively after later disclosures.

As early as April 2022, Philip was expressly telling the SRA that there was a conflict of evidence concerning whether the Metropolitan Police were investigating CRN 6029679/21. He stated that the dispute could require resolution through internal processes or Judicial Review and identified contemporaneous police material as potentially relevant evidence in those proceedings.

His position was therefore not simply that the regulator should accept his description of the police position. He was directing the regulator to the underlying evidence from which that description arose.

That point becomes stronger when his June 2022 response is considered. On 13 June 2022 Philip supplied two witness statements. The first linked to a shared folder containing substantial additional material, including the police-station recording of the original report under CRN 6029679/21.

The subsequent Chambers report records that the 1 hour 25 minute recording was identified but was not listened to because of its length and because it was considered insufficiently relevant to the purpose of that matter, while leaving the decision maker free to listen to it if considered valuable.

This creates an important forensic distinction. The issue was not simply whether primary material existed. Material capable of testing what had actually been reported to the police, and the accuracy of later characterisations of CRN 6029679/21, had been placed within the regulatory evidential environment.

Philip had also told the SRA that it possessed his 25 January 2022 letter to Commissioner Dick requesting additional police resources. His witness evidence identified further occasions upon which police officers had, according to him, described an investigation as ongoing.

The regulatory question therefore cannot fairly be reduced to whether Philip supplied sufficient context. The documentary record indicates that he was repeatedly attempting to place the police controversy and the material underlying it before his regulator.

The chronology then moves to 2023.

On 31 March 2023 Philip sent a letter to the Metropolitan Police following up what he alleged was its failure to investigate CRN 6029679/21 and to respond to evidence supplied during 2022 and 2023.

On 19 April 2023, shortly after that police correspondence, the SRA served a further production notice. In his subsequent sworn Judicial Review statement Philip contemporaneously described the timing as *“odd”*.

The temporal proximity does not establish causation. On the evidence presently assembled, it would be wrong to assert that Philip’s 31 March letter caused the SRA production notice, or that the SRA knew of that police correspondence before issuing its notice, unless an evidential information pathway can be demonstrated.

But the chronology creates a legitimate and now important question: Was the timing coincidence, or was there an information pathway between the institutions concerned?

That question assumes a materially different complexion when considered alongside the subsequently disclosed DHSC language concerning *“our interest in this individual and the steps we took with the Solicitors Regulation Authority.”*

The April 2023 production notice is important for a further reason. According to Philip’s contemporaneous complaint, it required documents which had already been supplied to the SRA. The later independent review recorded an apology for precisely that occurrence: the SRA had sent a second production notice for information already supplied and said learning would be shared to ensure existing information was checked before such notices were issued.

This is not a trivial procedural matter - a statutory production notice is not an informal request.

Philip’s complaint was that documents already supplied were again demanded through a coercive regulatory mechanism carrying consequences for non-compliance. His subsequent sworn statement said that the relevant documents had been emailed to the SRA solicitor and investigator more than ten months earlier and characterised requiring them again *“on pain of a criminal penalty”* as abusive.

One need not adopt every adjective used by Philip to recognise the underlying procedural problem. The SRA itself apologised.

## 9. The Police Judicial Review Was Expressly Put Before the SRA

The documentary sequence shows that Judicial Review was not first introduced into the regulatory narrative in June 2023. Philip had already identified Judicial Review as a possible means of resolving the disputed police position in his April 2022 representations to the SRA.

By June 2023, however, the possibility had become an actual proposed proceeding.

On 8 June, Philip told the SRA that the Metropolitan Police's handling of the allegations was to be challenged by Judicial Review.

He stated that his witness statement had already been signed and expressly told the regulator:

*"This application for Judicial Review is material to the SRA's original production notice"*

and continued by explaining that part of his case concerned his allegation that regulators had sought to silence Covid dissenters.

The SRA therefore cannot reasonably be treated as having been unaware of the relationship Philip was asserting between the police controversy and the regulatory proceedings.

The following day, 9 June 2023, the SRA informed him that a notice recommended referral of his alleged conduct to the SDT. Importantly, the SRA correctly explained that this remained a recommendation and that an authorised decision maker would consider his representations.

But the same communication contained these words:

*"please keep us updated regarding your judicial proceedings against the police."*

That sentence matters.

It establishes beyond argument that the police litigation was within the SRA's knowledge while the regulatory proceedings were progressing towards the SDT.

The evidential question is therefore no longer what Philip failed to tell the regulator. It is what the regulator did with what Philip had already told it, what primary material was actually examined, and what information, if any, was meanwhile reaching the regulator from elsewhere.

## 10. The 1,900-Page Regulatory Bundle

On 9 June 2023 Philip acknowledged receipt of the regulatory bundle.

His contemporaneous description was:

*"1900 pages is quite epic."*

He requested an extension so that the authorised decision maker could have a full factual and legal presentation.

The extension was granted until 14 July.

The scale of the bundle demonstrates that by June 2023 this was a mature and substantial regulatory process.

It consequently raises important disclosure questions today.

*Of everything now known about the governmental and policing background to Philip's case, how much was contained in those 1,900 pages?*

*Was the authorised decision maker told about the DHSC security escalation?*

*Was the decision maker told the full provenance of the Government complaint?*

*Was the decision maker given the complete governmental correspondence?*

*Was the decision maker aware of the national Operation Talla treatment of CRN 6029679/21?*

*Was the decision maker aware of the internal MPS terminology subsequently disclosed?*

If the answer to any of those questions is no, the next question is unavoidable:

*Would it have mattered?*

## 11. The Independent Complaint Review

Philip pursued the SRA complaints procedure.

His Stage 3 complaint alleged, among other things, that the previous response had failed properly to address his complaints, that conclusions were not evidence-based and that the second production notice had sought documents previously supplied.

His complaint eventually went to an independent review process operated through CEDR.

Later, he challenged the independence and objectivity of that process.

His sworn statement of 4 August 2023 records:

*"I expected as a legal right an independent and objective ICR from CEDR Services Limited."*

He continued:

*“Most independent bystanders on the Peckham Omnibus in my view would not consider that I received such a service.”*

Again, those are Philip's views, not established adjudicative findings.

However, the question now is not whether his suspicions in 2023 automatically become fact. It is whether, viewed against everything subsequently discovered about the institutional environment surrounding his case, those concerns deserved, and now demand, closer scrutiny than they received.

## 12. Philip Hyland Was Warning the SRA Before the SDT Referral

One of the most striking features of the 2023 record is that Philip was not constructing these arguments retrospectively after losing before the Tribunal. He was making them contemporaneously.

- He wrote that lawyers could hold Government to account only if they knew they would not face unwarranted regulatory interference.
- He expressly connected the police Judicial Review with his regulatory position.

- And he warned, *“the SRA cannot say they have not had advanced notice of all these issues.”*

That sentence has acquired considerable force.

The subsequent disclosures to date do not prove every allegation Philip made, but they make it impossible fairly to portray his present case as a retrospective invention constructed only after regulatory proceedings went against him.

He was raising the central institutional concern at the time.

## 13. Then Comes the Solicitors Disciplinary Tribunal

The proceedings eventually reached the SDT.

The substantive hearing took place between 1 and 4 July 2024.

One member of the Tribunal was Gary Gracey.

Further research has now produced another significant fact.

Archived Minerva Advisory Group material dated 25 January 2022 publicly associated both Gracey and Paul Easter with the same specialist organisation.

Gracey was presented in connection with:

*“Policing/ Counter Terrorism”*

and Easter with:

*“counter Terrorism/Intelligence”*.

That archive predates Easter's 15 February 2022 approach to the SRA.

A further archived capture dated 19 July 2024, after Philip's substantive SDT hearing, continued publicly to identify both men within the Minerva structure.

That establishes an organisational overlap spanning the relevant chronology.

It does not establish that Easter and Gracey knew one another personally, worked together on Philip's case, communicated about him, or that Gracey's adjudication was influenced by the association. The available evidence does not presently prove those propositions.

That qualification is essential, but it does not make the proven connection irrelevant.

Quite the reverse.

### 14. The SDT Was Asked About the Connection

Philip subsequently raised the issue.

The response communicated on behalf of Gracey was, in substance, that although he was a consultant to Minerva, his services had last been called upon in 2017 in connection with security matters in Iraq; that Easter's name had not been mentioned in the bundle or, according to his recollection, during the hearing; and that he did not know Easter or his Minerva connection.

That explanation must now be examined against objective archived evidence showing that both men were publicly presented within Minerva's organisational structure before Easter's SRA approach and continued to be so presented after Gracey had sat upon Philip's Tribunal.

That does not make Gracey's explanation false, but it creates an obvious evidential tension requiring candid resolution.

The correct question is not:

*Can impropriety be assumed?*

Plainly it cannot.

The correct question is:

*Was the nature and extent of the common professional association sufficiently investigated before the assurance was given that no potential conflict existed?*

That is a very different question and it is one which the SDT should answer.

## 15. The Appearance of Independence Matters

A disciplinary tribunal determining allegations against a solicitor exercises grave power.

Professional reputation, livelihood and standing are at stake.

Actual bias is therefore not the only relevant concern.

The administration of justice depends upon public confidence in the objective independence of the tribunal.

Where it subsequently emerges that the individual who initiated a governmental approach to the regulator and a member of the tribunal eventually determining the resulting regulatory proceedings were contemporaneously publicly associated with the same specialist intelligence/security advisory organisation, the matter cannot responsibly be answered merely by saying that nobody recalls knowing the other.

That may ultimately be the complete answer, but it must be demonstrated by evidence.

The obvious enquiries include the nature of their respective consultancy arrangements; dates; projects; internal structures; meetings; communications; client work; shared assignments; access to organisational information; and whether either had reason to know of the other's role.

Fairness demands no predetermined conclusion. It equally demands no predetermined exoneration.

## 16. The Wider Pattern Cannot Be Ignored

Standing alone, each institutional event might admit of an innocent explanation.

That proposition should be acknowledged.

- A police force may legitimately assess an allegation and decide not to proceed.
- A Government department may legitimately protect a national vaccination programme from security threats.
- A professional regulator may legitimately investigate a solicitor.
- An independent reviewer may legitimately reject his complaint.
- A tribunal member may legitimately have professional associations entirely irrelevant to a case.

But, forensic analysis does not examine each fact in artificial isolation where the facts demonstrably intersect.

Here they intersect through the same individual, the same period, the same Covid policy environment and repeatedly through CRN 6029679/21.

That is what makes the cumulative chronology important.

## 17. Operation Talla Changes the Context Again

The significance of Operation Talla is not that it proves a conspiracy against Philip.

It is that it demonstrates a national policing architecture operating around precisely the subject matter with which he was engaged.

The internal policing record establishes that CRN 6029679/21 acquired national significance; that a peer-review assessment existed; and that Operation Talla was to disseminate the result to chiefs. That established fact alone places the connection between CRN 6029679/21 and Operation Talla beyond reasonable dispute as a matter of documentary history.

Subsequent material associated the relevant advice with NPCC and UK Gold Command structures.

The public record therefore increasingly points away from an interpretation based upon isolated institutional decisions and towards one requiring examination of inter-institutional information flows.

That is not the same thing as saying those information flows were unlawful. It is saying that they existed sufficiently to require carefully considered mapping.

## 18. The Central Evidential Paradox

The case can now be reduced to a simple paradox.

Philip Hyland was treated as a solicitor whose statements and conduct concerning Covid-related allegations required professional regulatory scrutiny.

Subsequently disclosed records concerning the very subject matter upon which he was speaking reveal facts of which neither he nor the public then had the benefit.

- The MPS record says, *“Screened In”*. It says, *“for further investigation”*. It records, *“Proportionate Investigation”*.
- The MPS itself subsequently accepted that telling the complainants the allegations were subject to an investigation, *“would not have been an inaccurate representation”*.
- National policing records show the CRN reaching Chief Constables' Council and Operation Talla.
- DHSC records reveal Government security interest in Philip and PJH Law.

- Government records speak of, *"our interest in this individual and the steps we took with the Solicitors Regulation Authority."*
- And the lawyer at the centre of it all was saying, contemporaneously, that the police proceedings were material to what the SRA was doing to him.

That does not prove that everything Philip ever said was correct. It does, however, create a powerful question:

*Was he professionally judged against an institutional narrative which subsequent primary evidence has itself materially destabilised?*

That question now requires an answer.

## 19. This Is Not About Whether One Agrees With Philip Hyland

This point deserves emphasis.

Professional protection cannot depend upon whether a lawyer's client, cause or opinion is fashionable. Nor does a solicitor acquire immunity from professional regulation merely because he challenges Government.

Philip remained subject to precisely the same professional standards as every other solicitor, but the converse is equally important.

Professional regulation cannot lawfully become a means by which inconvenient legal activity is neutralised merely because the activity is inconvenient.

That is why provenance matters. That is why communications matter. That is why chronology matters. And, that is why undisclosed institutional relationships matter.

The question is not whether Philip was entitled to be wrong.

The question is whether the machinery used against him was independent, properly informed, procedurally fair and uncontaminated by considerations extraneous to legitimate professional regulation.

## 20. The Cummings Evidence Now Has an Evidential Comparator

There is an unavoidable wider context.

Dominic Cummings gave Parliamentary evidence concerning the vaccine programme which included the expressions:

*“Ignore rules.”*

and:

*“If lawyers get in your way, come to us and we'll find ways of bulldozing them out of your way.”*

Those words do not prove what happened to Philip Hyland. They should not therefore be misused as though they do. However, subsequent documentary evidence now permits a question which could not responsibly have been formulated with the same specificity in 2021:

*What actually happened when lawyers did get in the way?*

In Philip's case there is now evidence capable of investigation.

- There was a particular lawyer.
- There was a Government interest in him.
- There was a Government security escalation.
- There was an approach from the governmental environment to his professional regulator.
- There were further communications concerning the regulator.
- There was regulatory action.
- And there were ultimately disciplinary proceedings.

Whether that sequence was entirely proper and coincidental, or whether any part of it provides evidence of the phenomenon described by Cummings, cannot legitimately be settled by rhetoric in either direction.

The communications will answer it.

They should therefore be preserved, recovered, disclosed and fully examined.

## 21. What This Report Does Not Allege

For the avoidance of doubt, this report does not presently assert as established fact that:

- Government ordered the SRA to prosecute Philip;
- the SRA knowingly acted as an instrument of Government;
- Operation Talla directed the SRA proceedings;
- Paul Easter and Gary Gracey communicated concerning Philip;
- Gracey knew of Easter's SRA activity when sitting on the Tribunal;
- any member of the SDT was actually biased;
- the CEDR reviewer acted upon Government instruction; or
- the outcome of Philip's disciplinary proceedings was predetermined.

Those would be grave allegations.

The evidence presently examined specifically for the purpose of this paper does not justify presenting them as established facts, but that is not the end of the analysis. It is the beginning of it.

There is now enough primary evidence to require those institutional interfaces to be investigated rather than assumed away.

## 22. The Questions Which Now Require Answers

The institutions concerned should now be capable of answering, candidly and by reference to records, a relatively straightforward series of questions:

- *What precisely caused DHSC to develop an "interest" in Philip Hyland?*
- *What was the "Formal Reporting Escalation Process of Security Issues", and why was material concerning Philip Hyland and CRN 6029679/21 placed within it?*
- *What precisely were the "steps we took with the Solicitors Regulation Authority"?*
- *Who authorised those steps?*
- *What information concerning Philip Hyland, PJH Law and CRN 6029679/21 passed from Government to the SRA?*
- *What was meant by "[TPDW]/PJH law targets"?*

- *What relationship, if any, existed between those governmental activities and Operation Talla or national policing structures?*
- *What did the SRA know about the national policing treatment of CRN 6029679/21 when assessing Philip Hyland's conduct?*
- *Was the SRA aware of the MPS material now demonstrating "Screened In", "further investigation" and "Proportionate Investigation"?*
- *What information about the Government provenance of the concerns was supplied to the authorised decision maker and subsequently to the SDT?*
- *Was there any information pathway by which the SRA became aware of Philip's 31 March 2023 correspondence with the Metropolitan Police before issuing its 19 April 2023 production notice?*
- *What was the complete professional relationship between Paul Easter and Gary Gracey through Minerva during the relevant period?*
- *What enquiries were actually undertaken before the SDT concluded that the Minerva issue created no conflict?*
- *What records exist capable of resolving these matters?*
- *Have all such records been preserved?*

None of these questions requires acceptance of Philip's case. They require only a commitment to finding out what happened.

## 23. The Evidential Burden Has Shifted

There comes a point in any forensic reconstruction at which repeated documentary coincidence ceases to justify mere institutional reassurance and begins to justify production of records.

That point has now been well and truly reached.

It is no longer sufficient to say:

*the police were merely assessing the matter*.

The internal police records must be addressed.

It is no longer sufficient to say:

*the SRA acted independently*.

The Government/SRA communications must be examined.

It is no longer sufficient to say:

*Government simply made a complaint*.

The security escalation, *"targets"* language and description of *"steps"* taken with the regulator require explanation.

It is no longer sufficient to say:

*there was no relevant SDT conflict*.

The contemporaneous Minerva overlap must be investigated and explained.

And it is no longer appropriate to characterise Philip's concerns as the assertions of a disgruntled regulated professional.

He was making materially similar complaints before much of the evidence now supporting the need for scrutiny had become available.

That is an incredibly significant fact.

## 24. The Case for Philip Hyland

The case in Philip's favour does not require exaggeration.

It is this.

- He became involved in an exceptionally controversial challenge to Government policy and in allegations recorded under CRN 6029679/21.
- Unknown to him and the public, that CRN had acquired significance within national policing structures.
- Government security personnel developed a documented interest in him and his firm.

- Government personnel took steps with his professional regulator.
- His regulator subjected him to coercive information-gathering and ultimately disciplinary proceedings.
- He repeatedly complained, while those proceedings were ongoing, that the police and regulatory dimensions were connected and that he feared professional regulation was being used against those challenging official policy.
- He expressly told the SRA about the police Judicial Review before referral to the SDT.
- The SRA expressly asked to be kept updated.
- The subsequent documentary record concerning the police handling of CRN 6029679/21 materially complicates the categorical narrative upon which aspects of the controversy surrounding Philip were based.
- And it has subsequently emerged that the Government-security figure who approached the SRA and a lay member who ultimately sat upon Philip's disciplinary tribunal were publicly associated during the relevant period with the same specialist intelligence and security advisory organisation.

Taken cumulatively, that is not a case which can responsibly be answered by coincidence, institutional status or reassurance alone.

It requires evidence.

## 25. Conclusion

The constitutional importance of this case extends considerably beyond Philip Hyland.

- A democratic state is entitled to defend public policy.
- A police service is entitled to reject allegations which genuinely do not satisfy the requirements for further action.
- A professional regulator is entitled, indeed required, to regulate solicitors.
- And a disciplinary tribunal is entitled to sanction professional misconduct proved before it.

But there is a boundary which must never become uncertain.

The State may answer the lawyer. It may defeat the lawyer's argument. It may defend proceedings brought by the lawyer. It may investigate misconduct by the lawyer where proper grounds exist.

What it must never do however, is use the machinery surrounding the lawyer to remove the difficulty presented by the lawyer's lawful challenge.

Whether anything approaching that occurred here is the question now requiring examination.

The importance of the emerging evidence is not that it permits that conclusion to be pronounced today.

It is that it makes the question impossible responsibly to suppress tomorrow.

Philip Hyland was asking questions in 2022 and 2023.

- He was challenging what he regarded as institutional contradictions.
- He was telling his regulator that the police controversy mattered.
- He was warning that professional regulation risked being deployed against those challenging Government.

At the time, institutions possessed information which he did not.

Years later, pieces of that institutional record have begun to emerge.

- They include national policing involvement.
- They include internal investigative terminology inconsistent with the simplest version of *“no investigation”*.
- They include Government security escalation.
- They include Government *“interest”* in Philip.

- They include Government *“steps”* with his regulator.
- They include *“targets”*.
- And they include a previously undisclosed organisational connection touching the composition of the Tribunal which ultimately determined his case.

There is therefore a point which should now be stated without qualification:

Philip Hyland's case deserves to be re-examined in the light of the evidence which exists today, not defended by reference to the informational landscape which existed when decisions were originally made.

That is not an indulgence to him. It is the minimum demanded by procedural fairness.

- If every institutional decision was proper, the records should demonstrate it.
- If every intersection was innocent, the chronology should withstand examination.
- If every decision was genuinely independent, transparency should vindicate those responsible.

But where Government security activity, national policing, a contested crime report, professional regulation and disciplinary adjudication converge around the same solicitor and the same subject matter, silence is no longer an adequate institutional response.

- The answer is disclosure.
- The answer is reconstruction.
- The answer is genuine and proper independent scrutiny.

Ultimately, the answer must be evidence, because Philip Hyland should not have to prove that an undisclosed institutional process was improper before he is permitted to discover what that process actually was.

That is the central issue now and it is one which all institutions concerned must respectively and essentially answer.

***Ian Clayton***

***24 August 2026***

# AFTERWORD TO SUPPLEMENT No. 2

# THE INDEPENDENT REVIEWER: INDEPENDENCE FROM WHOM?

There is another feature of Philip Hyland's case which deserves separate treatment because it goes directly to the architecture by which his concerns were supposed ultimately to receive independent scrutiny.

On 31 July 2023, Helen Holmes issued the Independent Complaint Review of Philip's complaints concerning the SRA.

Her stated remit was significant. She said that she could examine whether the SRA's investigation of Philip's complaints had been:

*“thorough and fair”*

whether:

*“all relevant facts were taken into account”*

and whether the conclusions reached were:

*“reasonable and properly explained”*.

She also made an express assertion concerning the character of her own function:

*“this review is independent from the SRA”.*

That assurance requires careful examination.

## The Subject Matter of Philip's Complaint

Philip's complaint was not simply that the SRA had handled correspondence badly.

Its substance went directly to institutional independence from Government.

The CEDR determination itself recorded that Philip complained that the regulatory investigation lacked:

*“integrity, independence and even handedness”*

and that he considered the SRA to be:

*“protecting the government, the police and the GMC”.*

That context is essential.

The independent reviewer was therefore being asked, amongst other things, to examine the adequacy of an internal SRA response to an allegation that the regulator itself had failed to act independently in a matter involving Government.

Who performed that review was not a peripheral question.

It went to the heart of the exercise.

## Helen Holmes' Position

A professional profile captured on 2 August 2023, two days after the decision, identified Helen Holmes as:

*“Chief Operating Officer, Solicitor, Chartered Company Secretary, CEDR Accredited Mediator.”*

It identified her organisation as the Cabinet Office and recorded her substantive employment as:

*“Chief Operating Officer, Office of Government Property”*

at the Cabinet Office from May 2019 onwards.

The same contemporaneous profile recorded her CEDR status as:

*“Accredited Mediator · Mar 2023 - Present”*

and, strikingly, displayed that role as:

*“Associated with Cabinet Office”*.

Nothing in those facts proves that Helen Holmes was actually biased and nothing presently examined for the purpose of producing this paper establishes that anybody within Government instructed, influenced or communicated with her about Philip's case.

Those are not allegations made here at this time.

The point is both narrower and more constitutionally serious.

*Was it appropriate for a senior serving Cabinet Office official to be selected to conduct the independent review of a complaint whose very subject matter included an allegation that a professional regulator was acting in a manner favourable to Government?*

That question almost asks itself.

## Independence Is Not Merely Independence From the Body Under Review

The difficulty with the assurance that the review was *"independent from the SRA"* is that this addressed only one side of the independence problem.

Philip's case was not merely, SRA versus solicitor.

His complaint was that the SRA's treatment of him might itself be connected with the governmental interests against which he had been acting.

In those circumstances, independence from the regulator alone was insufficient.

The reviewer also had to be demonstrably independent of the interest whose possible influence upon the regulator formed part of the very complaint she was being asked to assess.

That is why appearance matters.

Judicial and quasi-judicial independence is not protected merely by asking whether the decision maker subjectively believed herself capable of fairness.

The institutional question is whether the arrangement was one which could command the confidence of an informed and fair-minded observer.

Here, Philip was complaining that the SRA was favouring Government.

The organisation providing the supposedly independent review allocated that complaint to a person simultaneously occupying a senior position within the Cabinet Office.

Even without alleging actual bias, that combination plainly required disclosure, consideration and explanation.

## Philip Identified the Problem Immediately

There is an important evidential safeguard against any suggestion that this concern has been constructed retrospectively.

Philip discovered the position and complained within two days.

On 2 August 2023 he wrote to CEDR's Chief Executive asking:

*“How the case was allocated to Ms Holmes, given that from Linked In the only Helen Holmes who is listed as a CEDR mediator also works at the Cabinet Office.”*

He then asked:

*“What policy or procedures does the CEDR have in place to ensure cases are allocated to an appropriately independent person?”*

and specifically requested CEDR's policies or guidance governing:

*“appearance of bias, independence and or declaration of interests.”*

That is a measured and entirely foreseeable challenge.

Philip was not asking CEDR to accept that Holmes had acted dishonestly.

He was asking CEDR to explain why she had been allocated his case at all.

That question was legitimate in August 2023.

It is more significant now.

## The Substance of the Review

The problem is not limited to the identity of the reviewer.

Holmes ultimately concluded:

*“I cannot uphold your complaint that the SRA had not taken sufficient action to review your complaint.”*

She went further:

*“I agree with this conclusion and have no criticisms of the SRA’s stage 2 response.”*

and:

*“I do not see that you have any basis for a complaint about the SRA’s service in this matter.”*

Nonetheless, the same review recorded that the SRA had made a material error.

The second Production Notice issued in April 2023 sought information Philip had already supplied, and the SRA had apologised for doing so.

Holmes regarded that admission and apology as evidence that the SRA's review had been of sufficient quality and fairness.

Philip's complaint, however, went materially further.

His position was that the documents had not merely existed somewhere else within the regulator.

He asserted that the SRA solicitor and investigator themselves had been sent them more than ten months earlier.

In his subsequent witness statement he particularised the point:

*“There was substantial evidence that the Solicitor and the Investigator at the SRA had been emailed the documents over 10 months previously that were the subject matter of the second Production Notice”*

and challenged the explanation that the documents had somehow gone to another department.

That was capable of documentary verification.

The critical analytical issue was therefore not simply whether the SRA had apologised.

It was whether the explanation being offered for the mistake was factually sustainable.

That distinction was fundamental to Philip's complaint.

## The BMA Issue

There was a comparable concern about the alleged source of complaints.

Philip's 4 August witness statement recorded his position that:

*“There was no evidence either before the SRA or Helen Holmes that the BMA complained.”*

His 2 August letter had already explained why that mattered.

He contrasted the original SRA adjudicative wording:

*“The source of those complaints was wide-ranging, from members of the public to professional bodies.”*

with the later formulation:

*“In January 2022, the SRA began to receive complaints about Mr Hyland and PJH Law.”*

He was therefore raising a precise question about provenance, disclosure and whether an authorised decision maker had originally been presented with an inaccurate description of who had complained.

That was not a philosophical complaint about regulatory unfairness.

It was a testable evidential question.

## The Reviewer Could Not Investigate Beyond What She Was Given

There is another limitation which must now assume considerable importance.

Holmes expressly stated that, because her review was independent from the SRA:

*“I do not have direct access to any of its systems or documentation.”*

She continued:

*“I am only able to base my findings on the submissions available to me at the time of review.”*

and:

*“my role is not to search for and obtain additional evidence in order to substantiate complaints against the SRA.”*

That limitation must now be understood for what it means.

The CEDR determination was not a forensic investigation of the SRA's underlying file.

- Holmes did not independently interrogate SRA systems.
- She did not obtain all communications passing between Government and regulator.
- She did not have the subsequently disclosed DHSC material now showing governmental *“interest”* in Philip

and *“the steps we took with the Solicitors Regulation Authority.”*

- She did not have the subsequently disclosed policing material which has materially complicated the institutional narrative surrounding CRN 6029679/21.

Yet, she reached the emphatic conclusion that she had:

*“no criticisms of the SRA’s stage 2 response”*

and could see no basis for Philip's complaint.

That conclusion must now be read subject to the evidential limitations she herself identified.

## Why This Matters Now

In 2023, Philip's complaint that Government and professional regulation might have intersected could readily have been characterised as his interpretation of events.

That is no longer the evidential position.

Subsequent DHSC disclosures now demonstrate that Government did have an identified *“interest”* in him and did take *“steps”* with the SRA.

That does not retrospectively prove that Helen Holmes was biased.

It does something different.

It shows that the allegation she was reviewing, that the relationship between Government and regulator required serious independent scrutiny, was not a proposition that could safely be dismissed as fanciful, yet the person selected to provide the independent external assurance was herself, at that time, a senior Cabinet Office official.

There is an uncomfortable circularity to that arrangement.

Philip complained that the regulator was insufficiently independent of Government.

The regulator rejected that complaint.

The external review mechanism then allocated the complaint to a senior Government office-holder.

She agreed with the regulator.

The matter was then declared closed.

## A Further Development: Subsequent SRA Policy Work

A further fact has now emerged which materially enlarges the appearance-of-independence question.

Publicly available SRA material confirms that Helen Holmes remained named as a member of the SRA Independent Review team operated by CEDR in the SRA’s Independent Reviewer reports for 2023 and 2024.

More significantly, independent public reporting of a Joint V meeting held on 20 May 2025 records that representatives of the Solicitors Regulation Authority attended to provide an update on its Financial Penalties Consultation Paper and wider reforms to its financial penalties framework. The two individuals identified were Meenara Islam, Policy Manager - Regulatory Policy, and:

“Helen Holmes, Legal Policy Consultant”

The report describes both as attending from the Solicitors Regulation Authority.

That subsequent professional relationship does not establish that Holmes lacked independence when she reviewed Philip’s complaint in July 2023. Nor does the presently available public evidence establish when the SRA policy consultancy was first contemplated, discussed, offered or commenced. Those distinctions are important and must be preserved.

But the development creates a further evidential question which cannot sensibly be ignored. The individual selected through CEDR to provide the final independent review of Philip’s complaint against the SRA, whilst simultaneously holding senior office in the Cabinet Office, was subsequently publicly identified performing substantive legal-policy work for the SRA itself.

The chronology therefore now contains three institutional positions requiring to be mapped with precision:

- Cabinet Office office-holder;
- CEDR member of the SRA Independent Review team;
- and, subsequently, SRA Legal Policy Consultant.

The decisive evidence is temporal.

- When did the prospective SRA policy relationship first arise?
- When was Holmes first approached about undertaking work for the SRA?
- When did any discussion, negotiation, expression of interest or engagement begin?
- Was any such prospective relationship in existence when she dealt with Philip’s complaint?
- What declarations and conflict checks were made by Holmes, CEDR and the SRA?

If the SRA consultancy arose wholly after Philip’s review had concluded, with no antecedent discussion or contemplated engagement, that would materially affect the analysis.

If, however, any prospective professional relationship existed while Holmes was exercising the supposedly independent review function, the appearance-of-independence question would assume a materially different character.

There is a further reason why the dates matter. The SRA's own published material continued to identify Holmes as part of its CEDR-operated Independent Review team through the 2024 reporting period. The presently available material does not establish whether, or for how long, that independent-review role and her subsequent SRA policy work overlapped. That is a matter for records, not conjecture.

The proper course is therefore not to allege impropriety from the subsequent consultancy. It is to require the chronology to be disclosed. The relevant appointment, engagement, conflict-checking and declaration records should be capable of establishing whether the relationships were entirely sequential or whether there was any material temporal overlap.

## The Proper Question

The issue is therefore not whether Helen Holmes can now be accused, without evidence, of consciously favouring Government.

She cannot.

The proper question is much more exacting:

***Why was a serving senior Cabinet Office official considered an appropriate person to determine the***

***independent complaint review of a solicitor who was alleging that his regulator had failed to act independently of Government?***

And subsidiary questions necessarily follow.

*Was Holmes' Cabinet Office position disclosed to Philip before she accepted the appointment?*

*Was any conflict or appearance-of-bias assessment undertaken?*

*Did Holmes declare the nature of her Government employment to CEDR in relation to this particular case?*

*Did CEDR consider whether the subject matter of Philip's complaint made her appointment inappropriate irrespective of her personal integrity?*

*What allocation policy was applied?*

*What record exists of that decision?*

*And what answer was ultimately given to Philip when he raised precisely those questions on 2 August 2023?*

When did Holmes first become engaged, or enter discussions to become engaged, as a Legal Policy Consultant for the SRA?

Was any prospective SRA consultancy, policy role or other professional engagement contemplated or under discussion when she conducted Philip’s Independent Complaint Review?

Did her work as a member of the CEDR-operated SRA Independent Review team overlap in time with any direct consultancy or policy work undertaken for the SRA?

What declarations, conflict checks or safeguards were applied in relation to any such transition or overlap?

Those matters should now be answered by records.

## To Briefly Summarise

Philip Hyland sought an independent review because he believed that the SRA had failed properly to confront his allegation that professional regulation was being deployed in a manner favourable to Government.

Helen Holmes described her function as an *“Independent Complaint Reviewer”*.

But independence is not a label. It is a condition which must exist objectively and be capable of public demonstration.

Where the complaint itself concerned alleged governmental influence, the reviewer's simultaneous occupation of a senior position within the Cabinet Office could not sensibly be treated as irrelevant.

At minimum, it created an appearance question requiring transparent resolution.

Philip recognised that within forty-eight hours.

He asked the obvious question.

The documentary record now makes that question more important, not less.

There is now an additional institutional fact. By May 2025, Holmes was publicly identified as a “Legal Policy Consultant” participating in substantive regulatory-policy work for the SRA itself.

That later engagement does not prove that her 2023 review was compromised. It does, however, make the missing chronology important. A process presented as independent must be able to demonstrate not only independence at the moment of decision, but the absence of undisclosed relationships capable of giving rise to a reasonable appearance question.

There is also a final irony which should not be missed and this is very important:

The very purpose of the CEDR stage was to provide external assurance after the regulated professional had exhausted the regulator's own internal complaints machinery.

For Philip, this was supposed to be the point at which the process finally stepped outside the institution whose independence he challenged.

Instead, his complaint about the possible influence of Government upon his regulator arrived for independent determination on the desk of a senior official of Government itself.

No allegation of dishonesty is required to appreciate the constitutional discomfort in that fact.

It is sufficient to state the proposition which the documents themselves now demand:

Where independence was the issue, independence had to be beyond reasonable institutional question.

In Philip Hyland's case, it was not and that is yet another reason why the earlier assurances surrounding his regulatory treatment cannot be regarded as the end of the matter.

***Ian Clayton***

***24 August 2026***