

THE REGULAOR, THE GOVERNMENT AND THE FACT-CHECKER

Sometimes five documents should simply be placed beside one another.

No theory.

No allegation.

Just chronology.

DOCUMENT ONE - 14 FEBRUARY 2022

Internal correspondence shows the SRA itself alerted Full Fact to PJH Law:

“Are you aware of another firm we regulate called PJH Law?”

The SRA then told Full Fact:

“We have had two complaints about this firm.”

Full Fact replied:

“I wasn't aware of PJH Law so really appreciate you sending this over.”

The following day, the SRA told Full Fact that a decision whether to investigate was normally made ***“in weeks if not days”***.

By 17 February, the exchanges had progressed to telephone contact.

The SRA suggested Full Fact search Twitter for information concerning the complainants; Full Fact thanked the SRA for ***“flagging the tweets”*** and asked whether it could say publicly that the SRA had confirmed receipt of two reports.

By 4 March, Full Fact was asking whether all complaints concerning PJH Law and Broad Yorkshire Law were directly related to CRN 6029679/21 and whether the SRA had formally decided to investigate.

The SRA replied:

“All the complaints that we're talking about in the public domain relate to the crime number”

and:

“We are still gathering all relevant information before deciding on any next steps.”

Remember that.

DOCUMENT TWO - THE POLICING AND FACT-CHECKING RECORD

Two disclosed items of internal policing correspondence add a further contemporaneous layer to the chronology.

On 14 February 2022, Full Fact approached the NPCC about what it described as **“false claims”** that there was a live criminal investigation into the Covid-19 vaccine, expressly referring to campaigners using a crime reference number and serving police with bundles of evidence.

The NPCC response chain recorded that, to its knowledge, only two records had formally been created by police forces: the Metropolitan Police record and a second record in West Yorkshire.

Then came this internal assessment, sent to Owen Weatherill, then Assistant Chief Constable, National Mobilisation Coordinator and Operation Talla Silver:

“We have not been formally recording numbers of attempts to follow this process across the country. Our latest assessment shows that it is still occurring, it would appear that the guidance to not record has been a success as only one additional report has been created.”

That is a significant addition to the evidential picture.

On the same day that Full Fact was asking the NPCC about claims of a live investigation, an internal national policing communication was expressly referring to ***“the guidance to not record”*** and assessing that guidance as ***“a success”***.

Two days later, on 16 February 2022, the Metropolitan Police were preparing proactive press lines concerning CRN 6029679/21.

The draft stated that, following an assessment of the available evidence, no criminal offences were apparent, that the Metropolitan Police would not be launching a criminal investigation and that no further action would be taken.

It also proposed saying publicly that the existence of the crime reference number had been ***“widely misrepresented as evidence of a criminal investigation or of findings of wrongdoing”***.

Yet the same disclosed email chain records, at 06:45 that morning, that the communication concerned:

“the CRIS report which is with Hammersmith CID.”

And the previous afternoon, 15 February, a Detective Superintendent recorded that a ***“no crime’ letter”*** had been approved within the Metropolitan Police Directorate of Legal Services, with press lines to be updated to coincide with it.

At 13:01 on 16 February, Temporary Deputy Assistant Commissioner Jane Connors, the Metropolitan Police Covid Lead, forwarded the completed material to Owen Weatherill with the words:

“FYI this will trigger backlash but it is now complete”

The significance is not that these documents, by themselves, establish that a substantive criminal investigation into the alleged offences was underway. They do not.

The significance is that the public-facing proposition about the crime reference number was being developed within a much wider national policing environment: Hammersmith CID held the CRIS report; the Directorate of Legal Services had approved the ***‘no crime’*** letter; Metropolitan Police communications were preparing proactive national-facing lines; the Metropolitan Police Covid Lead forwarded the completed position to Operation Talla Silver; and separately, the NPCC chain recorded that ***“guidance to not record”*** had been regarded as ***“a success”***.

The following chronological intersection should not be missed.

The SRA's approach to Full Fact concerning PJH Law began on 14 February 2022.

On that same date, Full Fact was corresponding with the NPCC about CRN 6029679/21 and claims of a live vaccine investigation, while the NPCC's internal response chain recorded that ***“the guidance to not record”*** had been regarded as ***“a success”*** in the context of activity occurring ***“across the country”***.

It is established that these events were occurring contemporaneously around the same underlying crime reference number and controversy.

That chronology now belongs beside the Government and regulatory records.

DOCUMENT THREE - THE GOVERNMENT RECORD

DHSC's subsequently disclosed records show something the public could not then see.

Before the regulatory referral, information concerning Philip Hyland and CRN 6029679/21 was already circulating within DHSC.

On 14 February 2022, material identifying him entered what DHSC records describe as a:

“Formal Reporting Escalation Process of Security Issues”.

On 15 February, PJH Law was reported to the SRA.

The complainant identified himself as working for DHSC on behalf of HMG assessing risks to the UK vaccine.

Then, on 22 February, an internal DHSC conversation recorded:

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

A ***“non branded list”***.

Of ***“PJH law targets”***.

To ***“send on to SRA”***.

And DHSC subsequently described the documentary history in its own words:

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

DOCUMENT FOUR - DISCLOSURE

During Philip Hyland's disciplinary proceedings, disclosure was sought.

On 28 June 2024, law firm, Capsticks, acting for the SRA, recorded the SRA's position that the disclosure sought was

not relevant and was *“extremely wide-ranging and disproportionate”*.

It nevertheless confirmed that the SRA had reviewed the material in its possession and concluded that it held no further material meeting the Tribunal's disclosure test.

DOCUMENT FIVE - 9 JULY 2025

Then came the SRA's answer to my own (Ian Clayton's) questions concerning Government interference and access to justice:

“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.”

Now put the documents down and ask the question a KC would ask:

WHAT ENQUIRIES WERE UNDERTAKEN BY THE SRA BEFORE THAT CATEGORICAL ASSURANCE BY THEM WAS GIVEN?

Because, the question is no longer whether somebody can imagine a Government/regulator interface.

DHSC's own records describe:

“our interest in this individual”

and:

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

They record a request for a:

“non branded list”

of:

“PJH law targets”

to be sent to the SRA.

And separately, the SRA's own disclosed correspondence shows it communicating with Full Fact about PJH Law and the complaints connected with CRN 6029679/21. The newly disclosed policing material now shows that Full Fact was also corresponding with the NPCC about that same crime reference number on 14 February 2022, while the NPCC's internal chain recorded that ***“the guidance to not record has been a success”.***

This all makes one question unavoidable:

Upon what evidential investigation was that assurance given by the SRA on 9 July 2025 founded?

Who was asked?

What records were searched?

Were the DHSC communications identified?

Was the provenance of material supplied to the SRA examined?

Was the **“non branded list”** identified?

And was the person giving the assurance aware of the SRA's own contemporaneous communications concerning PJH Law?

Was the SRA aware that, on 14 February 2022, Full Fact was simultaneously corresponding with the NPCC about CRN 6029679/21?

Was the SRA aware of the national policing communication that described **“the guidance to not record”** as **“a success”**?

Was any of the Metropolitan Police, NPCC or Operation Talla material known to, obtained by, or considered by the SRA when assessing Philip Hyland's representations concerning CRN 6029679/21?

These are disclosure questions and after four years, they have become remarkably simple:

Government has disclosed what Government was doing.

The SRA has disclosed what the SRA was doing.

The SRA gave an assurance on 9 July 2025.

The documents can now be placed side by side.

The remaining task is not speculation.

It is reconciliation.

Oh, and we must not of course forget what Dominic Cummings told Parliament was said, by Government officials, to the Chair of the COVID 19 Vaccination Taskforce, Kate Bingham....

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

What a spectacular coincidence.

There is more, a lot more, still to come.

Ian Clayton

3 September 2026