

RE: Important: Contradictory Dispatch vs “Awaiting Stock” Narrative – Legal Implications and Required Actions (AD/14052312)

"Alicia Day" <A.Day@npa.co.uk>

August 26, 2025 at 7:41 AM

To: "The Reasonable Adjustment"

<advocacy@thereasonableadjustment.co.uk>

Dear Mr Holmes,

I write to confirm receipt of your emails. I have been off for a few days but I am planning on working through each one, noting your complaints and then will come back to you asking you to confirm them, to ensure I have everything. I am able to deal with all of your complaints, whether they are clinical disputes, GDPR/data disputes or Equality Act disputes. I will have a look at your emails and speak with our insured this week, especially in light of your request for information. I understand they did provide you with information, and I will need to confirm with them whether they hold anything else relating to you.

Kind regards,

Alicia Day

Solicitor

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We care

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From: The Reasonable Adjustment <advocacy@thereasonableadjustment.co.uk>

Sent: 26 August 2025 07:30

To: Alicia Day <A.Day@npa.co.uk>

Cc: Legal Indemnity Enquiries <legal@npa.co.uk>

Subject: Important: Contradictory Dispatch vs "Awaiting Stock" Narrative – Legal Implications and Required Actions (AD/14052312)

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Dear Ms Day,

Further to my earlier correspondence, I need to draw your urgent attention to a material contradiction in your client's account.

At 14:22 on 22 August 2025, Curaleaf Clinic informed me that IPS reported they were “awaiting arrival of urgent stock” to fulfil my current prescription and that IPS would not process future prescriptions.

At 21:06 that same evening, Royal Mail confirmed receipt of a Special Delivery parcel from Vertical Pharma Resources Limited for delivery by 13:00 on Saturday 23 August 2025.

These two records cannot be reconciled without a credible explanation from IPS. Either stock was available and dispatch-ready on the evening of 22 August, or IPS's earlier communication about “awaiting urgent stock” was inaccurate or misleading. The timing also follows IPS's decision to cease serving me, notified via Curaleaf rather than to me directly in writing.

It is also notable that dispatch occurred only hours after I had raised in writing that, without action, the delay would amount to 12 days between payment and delivery. This coincidence makes it difficult not to view IPS's representations about stock with scepticism.

This has the following legal implications:

1) Equality Act 2010 – victimisation and reasonable adjustments

I have a documented written-only communication adjustment. IPS attempted phone contact instead of written notice, then routed a service-termination message via a third party. In context with the “awaiting stock” statement that same day, the optics support a narrative of punitive or retaliatory conduct following protected acts. I intend to present this timeline as evidence in any future proceedings.

2) UK GDPR – accuracy, transparency, and SAR non-compliance

If IPS represented to a clinical partner that stock was not yet available while simultaneously dispatching my medication that evening, this raises questions about record accuracy and transparency.

I must also stress that I am still waiting for any form of lawful response to the Subject Access Request I submitted on 24 July 2025. Given that your client asked me **basic** questions about the SAR's scope only days before the statutory deadline, it is reasonable to assume that I may be waiting a long time if a response comes at all. This reflects very poorly on any organisation, but particularly on a regulated pharmacy.

3) Credibility and litigation risk

Your client's messaging appears inconsistent with the objective dispatch record. This undermines the credibility of prior explanations around cutoffs, stock status, and delays, and will be relied upon in any regulatory or legal forum.

Given the above, please provide by return:

- A written explanation reconciling Curaleaf's "awaiting urgent stock" message at 14:22 with Royal Mail's acceptance scan at 21:06 the same day. Identify who at IPS communicated the stock position to Curaleaf and on what basis.
- The rationale and authorisation trail for terminating service, including why I was not notified directly in writing despite my reasonable adjustment.
- Confirmation that a comprehensive litigation hold is in place across IPS systems covering emails, CRM notes, call logs, and any internal chats referencing me.
- Clarification of your client's intentions regarding my SAR response, given the statutory deadline has now expired.

For completeness, I am attaching the Curaleaf notification and the Royal Mail dispatch confirmation referenced above.

I remain open to constructive resolution. However, this contradiction significantly elevates both legal and reputational exposure for your client. Please treat this as urgent.

Kind regards,
Kieron Jay Holmes

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The Reasonable Adjustment

An independent advocacy platform politely causing confusion for disorganised institutions, one lawful request at a time.

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