



Kieron Holmes [REDACTED]

Important: Misrepresentation Allegation – Formal Response and Technical Audit Notes for Webmaster

1 message

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

Tue, Sep 2, 2025 at 4:19 AM

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

Cc: webmaster@npa.co.uk, legal@npa.co.uk

Bcc: contact@blackbeltbarrister.com, Kieron Holmes [REDACTED], report@sra.org.uk, contactcentre@sra.org.uk

Dear Ms Day,

Your accusation of misrepresentation was **genuinely shocking** to me. I keep my legal correspondence factual rather than emotional, but I was taken aback that a **qualified legal professional** could put forward such a flimsy and **unsustainable claim**. I address it only because of its seriousness, and because the evidence would show the allegation to be unfounded.

I would also ask that you not characterise this email as “excessive.” I have explained already why such labelling risks amounting to victimisation under the Equality Act 2010. It is also a weak attempt at reversing pressure back onto me. As set out previously, you have been invited to provide any evidence of “excessive” communication using the published template on our website. That route remains open. At every stage I have backed my assertions with evidence, whether through statute, screenshots, or process notes. That is not excess; that is diligence.

I should add that I do value constructive feedback. If a qualified professional has valuable observations about my approach, I recognise it is in my professional interest to listen and reflect. That is how improvement is made. What I cannot accept are vague or unsubstantiated labels such as “excessive,” which risk becoming a tool of dismissal rather than a basis for improvement.

For the avoidance of doubt, “excessive communication” is not a recognised legal standard. In any fair process, no competent party would withhold relevant correspondence or evidence simply to avoid being called excessive. Imagine the state of our justice system if volume alone could be raised as a defence. Rights are not rationed; they are asserted through clarity, completeness, and persistence.

When you were studying law, did you ever complain to your lecturers that their teaching was excessive? **Nay**. Volume was expected, because accuracy and thoroughness demand it. The same applies here.

There is, of course, a difference between unreasonable duplication and the work I have undertaken. Nothing I have done meets that description. On the contrary, my communications -particularly the free real-time audit I provided - were constructive, substantive, and of clear service to you, your client, and their partner. Highlighting broken compliance links and wider issues with public-facing legal policies in the medical sector is not harassment or excess; it is accountability. It is the bare minimum any responsible **advocate**, regulator, or compliance officer would expect. When such omissions are left uncorrected, they undermine public confidence and expose organisations to unnecessary legal risk. Drawing attention to those failings delivered value at no cost.

On the substance of your allegation, to accuse a disabled peer advocate of “misrepresentation” is both inaccurate and damaging. It also rests on a conflation. Legal advocacy and peer-led advocacy are distinct. Legal advocacy involves reserved activities under the Legal Services Act 2007, which I have never claimed to provide. Peer-led advocacy, by contrast, is about drawing on lived experience, amplifying voices, and holding institutions accountable. None of that requires solicitor status.

The Reasonable Adjustment, which I founded, operates openly as a peer-led platform. At every stage, my website makes clear through numerous pages and disclaimers that **I am not a solicitor and do not hold any legal qualifications**. I am transparent about my boundaries. To suggest otherwise is unsustainable.

To avoid misunderstanding, I invite you to read this impartial explanation of peer advocacy:

<https://carelearning.org.uk/blog/advocacy/what-is-peer-advocacy-in-health-and-social-care/>

That source makes clear that peer advocacy is about:

- Shared experience – lived knowledge rather than professional qualifications.
- Empowerment – supporting people to understand and exercise their rights.
- Independence – acting outside of service provider control.
- Equality and respect – valuing the person's voice and challenging stigma.

Please provide a reasoned critique showing how I do not hold to these values. If you cannot, it is plain the allegation was unfounded and should be withdrawn.

Separately, please clarify your objection to me contacting legal@npa or corresponding with NPA directly. That address was given in your own out-of-office reply, and I retain evidence of this. If there has been a change of contact policy, confirm the correct authorised channel and explain why your earlier instruction conflicts with your later complaint.

Your allegation also risks breaching your professional obligations under the SRA Principles. Solicitors must act with honesty and integrity, uphold public trust in the profession, and encourage equality, diversity and inclusion. To accuse a disabled peer advocate of deception, despite clear disclaimers, fails on each of those counts. It weaponises legal terminology without basis, stigmatises peer-led advocacy, and risks undermining public confidence in the profession. If you maintain such a claim, I will raise it with the SRA.

As I have written elsewhere:

A right withheld is no right at all, it is a favour. And favours can be withdrawn. Rights, by definition, cannot. The moment an organisation treats rights as favours, it abandons law and slides into arbitrary power. That is not equality before the law - it is preference, and preference has no place in justice. Section 20 of the Equality Act 2010 establishes, reasonable adjustments for disabled people are duties, not optional courtesies.

(The above passage is my original writing. In the unlikely event it is used in any public-facing context, it must be attributed to me: Kieron Jay Holmes, The Reasonable Adjustment.)

For clarity, my communications have in effect provided NPA with a free real-time audit. To prevent issues in future, I would recommend:

1. Put a temporary tarpit or redirect page in place while documents are being updated.
2. Upload the corrected page only when all footer links have been tested and confirmed.
3. Remove the tarpit once the complete, verified version is live.

This process avoids the impression of disorder and prevents reactive firefighting when routine checks would have sufficed.

I am not trying to catch NPA out. My communications are shaped by my autism, and I am aware that what may read as overwhelming in writing is, in reality, simply the direct style shaped by my autism. In person, it is very different. I categorically refute any allegation of excessive communication. If pressure was felt by staff, that perception arose directly from NPA's own failings to maintain basic compliance.

You accused me of misrepresentation, yet my site has always carried clear disclaimers and functioning legal policy links. It saddens me that at no stage was I thanked for assisting in making your website compliant, free of charge. Instead, I was accused of **misrepresentation**, despite clear evidence that you have benefitted from my intervention.

I hope we can put this claim of "misrepresentation" down to a misunderstanding or miscommunication, perhaps exacerbated by the usual Monday morning pressures - and indeed the first of September, when many organisations face the start-of-term disruption after summer. If that is the case, then the simplest course is to acknowledge it, correct the record, and move forward constructively.

Please confirm, by 5 pm Friday 5 September 2025, whether you withdraw the allegation of misrepresentation and correct your records accordingly. If you maintain it, provide the evidence and legal basis you rely on. I would also appreciate confirmation of who authorised and signed off on the allegation, so that accountability is clear.

For transparency, I should add that this email has taken me almost five hours to draft and refine. I have already trimmed it down to avoid unnecessary bulk. My intention is not to be excessive, but to ensure clarity, accuracy, and fairness.

Ultimately, I have formed the **reasonable** view that the underlying failings lie with IPS. NPA has, regrettably, been caught up in the fire. My intention is not to create unnecessary conflict, but to ensure accountability is directed at the source and that my rights are properly respected in the process.

Finally, note that I document all correspondence in full. If this matter escalates, it may be placed before a judge or tribunal. In that forum, vague allegations and shifting explanations will not withstand scrutiny, whereas clear evidence and transparency will. I hold genuine respect for you, for your profession, and for NPA as an organisation, but I will not hesitate to rely on every lawful basis available to me to ensure my right to a fair hearing is upheld.

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(All resources are maintained and published in the public interest to ensure clarity, accountability, and lawful compliance.)

Yours sincerely,

Mr Kieron Jay Holmes

Founder,

The Reasonable Adjustment

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

Lived Experience Advocate | Neurodivergence, Disability, Data Rights

 advocacy@thereasonableadjustment.co.uk

 www.thereasonableadjustment.co.uk

We offer **free peer-led advocacy** to neurodivergent, disabled, and marginalised people who've been mistreated or ignored by the systems meant to support them.

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Mr Kieran [redacted] 

[redacted]

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Avg. speed (last 10 races):	110 WPM
Avg. speed (all time):	110.32 WPM
Last race:	100 WPM
Best race:	137 WPM
Races completed:	50
Races won:	14
Points:	3784
Skill level:	Nagaracer
Rank (WPM percentile):	99.4%
Experience Level:	Typist 2
Country:	United Kingdom 

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