SOLICITORS DISCIPLINARY TRIBUNAL CASE NO. 12833-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY

APPLICANT

-AND-

CLIVE GRAHAM WOOD

RESPONDENT

RESPONDENT'S ANSWER TO APPLICATION

1. This Answer is filed by the Respondent pursuant to the standard directions hearing dated 19 September 2025 in order to advise the tribunal as to which of the allegations are admitted and which are denied. In respect of the allegations which are denied this Answer sets out the reason for the denial. This Answer is filed in condensed form and would be expanded upon in a statement to be filed and served in due course.

Definitions

2. The "Applicant" is the Solicitors Regulation Authority.
3. The "Respondent" is Clive Graham Wood (a solicitor).
4. "Person M" is [redacted] the complainant in this application.
5. "Person B" is [redacted] the Respondent's client.
6. The "Child" is the child of Person M and Person B.

Allegations

7. During July 2022, the Respondent attempted to take unfair advantage of Person M's position as a litigant in person by repeatedly asking her for her contact details when he knew or ought to have known that:

i. Person M did not want to provide him with that information;

ii. Person M had no legal duty to provide him with that information; and
iii. He did not need that information to progress his client's matter;

and in doing so breached any or all of Principles 2 and 5 of the SRA Principles 2019 ("the Principles") and Paragraph 1.2 of the SRA Code of Conduct for Solicitors,RELs and RFLs ("the Code for Solicitors").

8. During July 2022, he obtained contact details for Person M by means of a private investigator and then disclosed those contact details to his client when he knew or ought to have known that:
i. Obtaining Person M is likely contact details was not necessary;
ii. Person M would not have consented to her contact details being obtained by such means;
iii. The relevant Family Procedure Rules directed that Person M was entitled to withhold her contact details until directed to disclose them by a court order; and
iv. Doing so would prevent the court from being able to properly determine during an upcoming hearing whether such disclosure should in fact be made;

and in doing so breached any or all of Principles 1, 2, and 5 of the Principles, and Paragraph 1.2 of the Code for Solicitors.

Background

9. The Respondent was instructed by Person B to represent him in proceedings that Person can be had issued against Person M relating to the Child. The application issued by Person Be related to, inter-alia, the arrangements for Person B to spend time with the Child and the school which the Child was attending.
10. Initial instructions obtained by the Respondent from Person B gave no rise to any concern on the part of the Respondent that Person B was a threat to Person M. There was no evidence that an injunction had been obtained by Person M against Person B or that the police were involved in the investigation of any allegation against Person can be made by Person M.
11. Initial instructions obtained by the Respondent from Person B gave a history of behaviour on the part of Person M which suggested that she wished to exclude Person B from being involved in the life of the Child to the extent that "parental alienation" may prove to be a relevant consideration within the ongoing court application.
12. Person B expressed concern that he did not know the whereabouts of the Child's home address, nor did he have any knowledge as to the school that the Child was attending. In relation to the school, Person B had not been consulted about the school and it was believed by Person B that the Child had been entered into a boarding school which Person M knew was contrary to the expressed wishes of Person B. That Person M had unilaterally and without notice relocated her home and that of the child and had unilaterally and without

consultation entered the Child into a boarding school was in breach of the principles of the sharing of Parental Responsibility between Person M and Person B in relation to the Child.

13. Person B gave instructions that indicated that Person M was, on occasion, dishonest and may make allegations against Person B that were false. It was the assessment of the Respondent that Person B was honest and reliable and did not pose any threat to the safety of Person M or the Child.
14. It is within the experience of the Respondent that there are occasions when a party to family proceedings will seek to create a false narrative by presenting them as vulnerable or at risk in order to justify or explain their actions and that making non-specific allegations of harm is common in these circumstances.
15. Specific details as to the chronology of the Respondent obtaining instructions from Person B and correspondence with Person M together with the chronology as to the provision of information relating to the court application to the Respondent from Person M and from the court are detailed within the evidence filed within Section X of the bundle herein and will be expanded upon in the witness statement to be filed in due course by the Respondent when so directed.
16. The Respondent will say that whilst he was made aware that Person M did not wish to disclose her address that he was not made aware of or provided with any justification for Person M adopting such a position and that there was no evidence or suspicion that Person B being aware of the address of Person M or the Child would place either Person M or the Child at risk of harm.
17. Within the court proceedings Person M did not seek findings from the court regarding her allegations of harm set out in her Form C1A as being justification for supporting her objection to contact between Person M and the Child.

Answer

18. The Respondent will contend that in light of his instructions from Person B that it was reasonable for him to press Person M to provide details of her address and therefore that of the Child and that at the time of initially requesting this information from Person M that he had not been aware of any allegations of harm made by a Person M within the proceedings in that the Form C1A that Person M had filed within the proceedings had not been served upon Person B nor provided to the Respondent and, further, that it was not known to the Respondent that Person M had filed at court a Form C8 request for address confidentiality.
19. The Respondent will also contend that he had already instructed a private investigator to provide a report as to the likely address of Person M and that that information had been obtained and provided to Person B before the Respondent had had sight of the Form C1A or had had knowledge of the Form C8 and that he was not therefore reckless at the time when this information was provided to Person B. The Respondent acted diligently and promptly on the instructions of Person B to enquire as to the whereabouts of the Child. It

was necessary for the Respondent to obtain contact details for cat person M in order to establish the whereabouts of the Child to further the application of Person B to seek direct contact with the Child and, within the context of the ongoing proceedings, to establish the local court to which the proceedings would be transferred.

20. It is denied that the Respondent sought to take advantage of Person M as a litigant in person or otherwise and the evidence of Person M not being vulnerable to such pressure is that she was able to practically resist and justify (insofar as such was justified) her unwillingness to disclose her address or general location to the Respondent.
21. Had the Respondent been made aware that Person M had filed at court a Form C8 then he would not have pursued obtaining information as to Person M's contact details but by the time the Respondent was so aware the information had already been obtained and shared with Person B. It was, frankly, too late.
22. It is denied that the Respondent lacked integrity in his dealings with Party M or that his conduct fell short of that which is required or expected of a solicitor.
23. It cannot be said that the Respondent was reckless in his behaviour as no specific information as to potential harm had been raised. Further, the contention that a solicitor should first check whether a party to Children Act proceedings had filed a Form C1A allegations of harm or a Form C8 confidential address request before acting is both fanciful and unrealistic and not provided for in the Family Proceedings Rules. Recklessness implies a consideration of potential risk and proceeding without regard to that risk which cannot be established.

Evidence

24. The Respondent does not seek to adduce further evidence other than that contained within the bundle save that he would wish for the written decision of the single solicitor member dated 8 September 2025 who refused to certify the application to be included in the bundle. A copy of the written decision of the single solicitor has been requested but the Respondent has been informed that this is not a disclosable document.

[redacted]

Clive Graham Wood - Respondent

Dated 12 September 2025