

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL
IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)
B E T W E E N:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

MUHAMMAD NAZAR HAYAT
(SRA ID: 549189)

Respondent

**STATEMENT PURSUANT TO RULE 12 (2) OF THE SOLICITORS (DISCIPLINARY
PROCEEDINGS) RULES 2019**

I, John Tippett-Cooper, am employed by Capsticks Solicitors LLP, of 1 St George's Road, London, SW19 4DR. I make this Statement on behalf of the Applicant, the Solicitors Regulation Authority Limited ("the SRA").

The Allegation

1. The Allegation against the Respondent, Muhammad Nazar Hayat, made by the SRA, is that, whilst working as a solicitor at Lincoln Lawrence Solicitors ("the Firm"), he:
 - 1.1. On or around 18 May 2023, advised a person he believed to be a prospective client to provide a false narrative in support of an asylum claim within the United Kingdom, and in doing so breached any or all of Paragraph 1.4 of the Code of Conduct for Solicitors, RELs and RFLs 2019 ("the Code") and Principles 1, 2, 4 and 5 of the SRA Principles 2019 ("the Principles").

The facts and matters in support of this Allegation are set out in paragraphs 10 to 26 below.

Appendices and Documents

2. I attach to this Statement the following appendix:
Appendix 1: Relevant Rules and Regulations
3. I also attach to this Statement a bundle of documents, marked **Exhibit JTC/1**, to which I refer in this Statement. Unless otherwise stated, the page references in this Statement relate to the documents contained in that bundle.
4. The bundle **Exhibit JTC/1** is divided into the following sections:
Section A: Referral Notice and bundle
Section B: Additional documentation post-referral.

Background Summary

5. The Respondent is a solicitor (SRA ID: 549189), who was admitted to the Roll on 2 December 2013. His date of birth is 20 June 1969. At the time of these Allegations, the Respondent was working at the Firm (SRA ID: 657631).
6. At the time of the Allegation, the Respondent was registered as an Owner, Manager and Director of the Firm, as well as its Compliance Officer for Legal Practice ("COLP"), Compliance Officer for Finance and Administration ("COFA") and Money Laundering Reporting Officer ("MLRO") [**JTC/1, p.1**].
7. The Respondent's 2022 – 2023 Practising Certificate was suspended on 31 July 2023 as a result of the intervention into the Firm. The Respondent does not hold a current Practising Certificate.
8. He was assisted by three qualified staff and four unadmitted staff.
9. 98% of the Firm's income was derived from the following six practice areas:
 - 9.1. Immigration – 81.36%;
 - 9.2. Matrimonial – 3%;
 - 9.3. Conveyancing – commercial and residential – 7.64%;
 - 9.4. Criminal Law – 2%;
 - 9.5. Landlord and Tenant – 2%; and
 - 9.6. Litigation – 2%.

The facts and the matters relied upon in support of the Allegation

10. In January 2023, Thomas Kelly, an Investigations Editor at The Daily Mail Newspaper received information regarding the actions of a number of immigration solicitors' firms and their conduct in relation to asylum claims. Following consultation with their legal department, a decision was made by The Daily Mail to conduct an undercover investigation using covert recording equipment **[JTC/1, p.91]**.
11. The Daily Mail formulated a scenario that would be the focus for this investigation: an undercover reporter would pose as a recently-arrived illegal migrant who had no legitimate reason to claim asylum, and would ask the solicitors if there was anything they could do to normalise their stay in the UK. The parameters of this scenario involved the instructions that the undercover reporter:
 - 11.1. Could not ask leading questions;
 - 11.2. Could not themselves suggest making an asylum application; and
 - 11.3. If asked, they would be clear that there was no basis for a legal claim for asylum **[JTC/1, p.94]**.
12. On 1 February 2023, Mr Kelly met with Paul Samrai, one of the undercover journalists tasked with carrying out this investigation. Mr Kelly explained to Mr Samrai the parameters of the investigation, as set out above **[JTC/1, p.94]**. It was agreed that Mr Samrai would pose as the uncle of a person who had entered the UK illegally (i.e. they had no legal basis to be in the UK and had not submitted a claim for asylum) **[JTC/1, p.94]**.
13. Mr Samrai was provided with names of solicitors' firms that should be approached as part of this investigation; he was not provided with the names of individual solicitors **[JTC/1, p.94]**.
14. On 3 May 2023, Mr Samrai attended the Firm's offices, and an appointment was made for 18 May 2023 **[JTC/1, p.95]**. Mr Samrai attended the Firm's offices on 18 May 2023, accompanied by two other undercover operatives; one posing as his son, and the other as the "illegal migrant" **[JTC/1, p.95]**. These three undercover journalists then conducted a meeting with the Respondent.
15. The meeting between the journalists and the Respondent was covertly digitally recorded on the Lawmate PV500 Neo System **[JTC/1, p.96]**. Following the meeting, Mr Samrai met with Thomas Kelly, who downloaded the recording to his laptop **[JTC/1, p.96]**. Mr Samrai has confirmed that he did not edit the recordings before they were downloaded by Mr Kelly **[JTC/1, p.96]**.
16. Mr Kelly has confirmed that did not edit any of the recordings once they had been downloaded to his laptop **[JTC/1, p.93]**.
17. Mr Kelly obtained transcripts from the recordings, using a Punjabi interpreter. Extracts from the recordings were then included in articles published by The Daily Mail, both in

newspaper and online, and in a video that was uploaded to YouTube during July 2023 [JTC/1, p.93].

18. Following a request from the SRA, The Daily Mail provided copies of both the recordings and the transcripts. The recordings were provided to the SRA by an Izzy Lyons of The Daily Mail, using her WeTransfer account [JTC/1, p.93].
19. Following receipt of the recordings, as the meeting between the Respondent and the three undercover journalists had been conducted part in English and part in Punjabi, the SRA sought a transcript of the recordings from Language Line Solutions.
20. Ophelie Guenaud of Language Line Solutions [JTC/1, pp.23-25] has confirmed that transcripts were prepared by a Linguist within the company who is fluent in Punjabi. Upon completion of those transcripts by the Linguist, they were then sent to a Proofreader, who also spoke Punjabi, to carry out a quality assurance check [para.4-6, JTC/1, p.24].
21. Following completion of the quality assurance check by the Proofreader, Ophelie Guenaud then also conducted a further quality assurance review of the English part of the transcripts [para.7, JTC/1, p.24].
22. The recordings were contained in three separate files. The transcript from the first of those three files (from the booking of the appointment that occurred on 3 May 2023) can be seen at JTC/1, pp.27-30. The transcript from the second file can be seen at JTC/1, pp.32-43, with the transcript from the third file at JTC/1, pp.45-47.
23. The recordings themselves were analysed by Stephen Cole, a Technical Director specialising in digital imaging and video [pp.51-90]. Mr Cole has confirmed that the recordings gave no indication of editing [JTC/1, p.62].
24. As the Respondent took issue with the accuracy of the transcript provided by Language Line, a further copy of the transcripts has been prepared by Atlas Translations [JTC/1, pp.151-211]. Statements confirming the process have been provided by Rhys Stevenson [JTC/1, p.148], Bushra Mohammed (the transcriber) [JTC/1, p.149] and Mamoona Azam (the translator) [JTC/1, p.150].
25. From the Atlas Translations transcript, it can be seen that the following exchanges were captured by the recordings:
 - 25.1. When making the appointment to see the Respondent on 18 May 2023, the following information was provided:

Male Speaker 2¹: ...our boy came from Punjab. I need a lawyer for him, I need a lawyer from here to submit his application. Thank you to you...you are away aren't

¹ In the course of the Atlas transcripts, Male Speaker 2 is Mr Samrai, Male Speaker 1 is the undercover reporter posing as his son and Male Speaker 3 is the undercover reporter posing as "Garpinder Singh."

you? He is our boy from Punjab...he is single therefore he is nothing there. You know there is nothing for us there. They have sent him here to have a go to try to improve his life. This is what we are here for” [JTC/1, pp.158-159].

- 25.2. At the 18 May 2023 appointment, after dealing with the introductions of “Garpinder Singh” (the undercover reporter posing as an illegal immigrant), being told a brief summary of how “Garpinder Singh” arrived in the UK via a small boat, and being informed that “...we are now exploring ways for how we can keep him here” [JTC/1, p.178], the Respondent made enquiries as to “Mr Singh’s” marriage status and his occupation in India [JTC/1, pp.178-179];
- 25.3. Following questions about “Mr Singh’s” family connections and education [JTC/1, pp.178-179], the following exchange occurred:

<i>“Solicitor²:</i>	<i>Any enmity with anyone?</i>
<i>Male Speaker 3:</i>	<i>No</i>
<i>Solicitor:</i>	<i>Any links to political organisations?</i>
<i>Male Speaker 3:</i>	<i>How?</i>
<i>Solicitor:</i>	<i>Khalistan, Khalsa?</i>
<i>Male Speaker 3:</i>	<i>Khalistan, just support them a little bit no more than that.</i>
<i>Solicitor:</i>	<i>Any membership etc?</i>
<i>Male Speaker 3:</i>	<i>Member?</i>
<i>Solicitor:</i>	<i>Of their organisation? Those who support Khalistan.</i>
<i>Male Speaker 3:</i>	<i>Yes, we do like a little like Amrit Pal. No more than that.</i>
<i>Solicitor:</i>	<i>OK, you were supporting Amrit Pal.</i>
<i>Male Speaker 3:</i>	<i>I didn’t stand with him, I came here.... [inaudible]</i>
<i>Solicitor:</i>	<i>How many people did this capture and crack down on when the whole Amrit Pal issue occurred?</i>
<i>Male Speaker 3:</i>	<i>How many of ours?</i>
<i>Solicitor:</i>	<i>In your area Patiala</i>

² Whilst the solicitor provides the name of “Mr Malik”, and the name “Mr Malik” appears under “Solicitor” in the second column of the transcript, it is not disputed that this was the Respondent.

Male Speaker 3: Yes.

Solicitor: *Is Amrit Pal from Patiala? Where is he originally from?*

Male Speaker 3: *Look, I don't know that, the way other friends would say to support him, I would do more so but no more than that..." [JTC/1, pp.181-183].*

25.4. After a discussion of Mr Samrai's level of Punjabi, and the origins of "Amrit Pal", the Respondent then asked the following questions:

"Solicitor: *How many were caught in the past few days when there was a crackdown, and the whole matter was raised?*

Male Speaker 3: *Oh when...*

Solicitor: *When people were caught.*

Male Speaker 3: *Yes, I think those supported him were caught. Those that ran away, when they ran away in their cars, then.*

Solicitor: *How many were caught?*

Male Speaker 3: *8 or 10 people, I don't know.*

Solicitor: *Are the police still after them?*

Male Speaker 3: *Yes, they also caught those that were with him. They caught them. There is something in the system.*

Solicitor: *Ok, tell me about the farmers' demonstration.*

Male Speaker 3: *Pardon?*

Solicitor: *Were you involved in that?*

Male Speaker 3: *Yes, I was involved.*

Solicitor: *Did you take a tractor?*

Male Speaker 3: *We did everything then. We went with friends. I don't have my own tractor. I mean I supported them.*

Solicitor: *Those farmers that raised the issue there, did you go with them and raise the flag?*

Male Speaker 3: *Yes, we raised the banners.*

- Solicitor: We had banners and we raised the flag in Delhi. Were you there at that time?*
- Male Speaker 3: I wasn't there at that time.*
- Solicitor: Did the police take your name at that time or anything else like that?*
- Male Speaker 3: I think my name could have been involved in that. Don't scare me. What is the issue here?*
- Solicitor: I am telling you simply. Basically. We are thinking about the asylum case that we need to submit for you" [JTC/1, pp.184-186];*

25.5. Having introduced the issue of asylum, the Respondent continued the exchange as follows:

- "Solicitor: I am telling you that if you have something...
Need some information how to get start. I am preparing case.*
- Male Speaker 2: No. To be honest he is a good character. He is not a political man.*
- Solicitors: We don't need a good character person.*
- Male Speaker 2: Ok.*
- Solicitor: For asylum, if any
If he is a good character, then they will ask him to go back.*
- Male Speaker 2: Ok*
- Solicitor: They will not accept his claim. If he's got extending prosecution and fear of any assassination. So, and they will catch him if he goes moves to...*
- Male Speaker 2: What to do so we have to make him a bad character?*
- Solicitor: Obviously we need some information if he done something in previously and the police and the government is after him then he can seek for asylum here.*
- Male Speaker 2: We can say that there is no government but*

To our knowledge government is not but

There could be

Male Speaker 3: Uncle when there was a fight between neighbours, I was involved in that. I went to the police station...in that I mean...

Solicitor: Basically, I am connecting him in any league I am finding any league so any way. Because right now we don't have he doesn't have the history.

Male Speaker 2: True, true, we know that yeah.

Solicitor: Obviously, he is a good person he is a good character person. Why do you want to go back home?

If you want to stay here

If he wants to stay here he must have a fear of prosecution in the back home and fear of assassination or anything.

Male Speaker 2: Okay.

Solicitor: And the Punjab the India is not a safe country for him.

Male Speaker 2: Yes.

Solicitor: I am going on that way.

Male Speaker 2: So it's not safe for him to be in Punjab.

Solicitor: In India.

Male Speaker 2: In India generally.

Solicitor: In India generally generally. He can't...they can look as it anywhere in the country

Male Speaker 2: So what do we have to do? What we have to say?

Solicitor: So, because I'm grabbing all the information as it everything any league, any political party, any organisation, because the, the last time the farmers they raised some issues and it is against the government, the strike.

Male Speaker 2: Yes, the farmer strike.

Solicitor: And later on Amritpal it was a huge problem and I need to know, whether his force attend that and

police was after them, he got some links with this and in genuinely he got some fear of prosecution in a back home and the assassination [inaudible].

Male Speaker 2: We can say that?

Solicitor: Yes, but you need to prepare him in the [inaudible] way” [JTC/1, pp.186-189].

25.6. After being asked to advise on how they should prepare “Mr Singh”, the following comments were the made:

“Solicitor: Step by step

Because you came to me and you waited. I don’t want to say anything to raise his hopes. I don’t want to submit an attitude. Do this, not problem, give me the money, I will fight your case and you will get 100%. But the problem is he doesn’t have anything now. We have to make evidence. We have to, you can say we have to create something.

Male Speaker 2: Yes, can you explain to him in English. I will manage him.

Solicitor: Okay, he has got some issues, links with the farmers’ organisation.

Male Speaker 2: The first thing, we are all Sikh and we are Jatt Sikh. We are all from the caste farmer and we are from that area. Punjab which is a farming area and we can start from there. We can make the links.

Solicitor: He was living in India.

Male Speaker 2: Yeah

Solicitor: In Punjab and he started supporting farmers. He participate in the farmer agitate.

Male Speaker 2: Agitation, so we say that?

Solicitor: Yeah. In the agitation and later its .. he has someone employing him to join Amerpal, Amritpal.

Male Speaker 2: Amritpal, Amritpal.

- Solicitor:* And this people, the group of people they started eh hh movement for freedom, Khalistan. They wanted to make a separate country.
- Male Speaker 2:* Okay.
- Solicitor:* And now we have got some fear because the police is after him, secret agencies are after him. He managed to escape from India to here.
- Male Speaker 2:* Okay, so how high did he go up? How high shall we say that he was in the organisation?
- Solicitor:* So we have to find out, we have to work on that. You will... will sit, and we will, so we will sit head to head and grab some information over the internet and basically what happened there and then farmer, agitation and the Amritpal and we will get some information and we will sit here and we will make the story up and we will prepare him.
- Male Speaker 2:* Okay, that's the way we are going forward.
- Solicitor:* Yes, exactly because if otherwise he doesn't have any history. The same thing is he is living here illegally, if he continue, someone stop and search him, they will detain him and remove him, because he doesn't have any genuine circumstances" [JTC/1, pp.190-192].

25.7. After discussing the extent to which efforts had been made to change the appearance of "Gurpinder Singh", the following exchange occurred:

- "Solicitor:* On top he is a victim of human trafficking, because he contacting someone an agent, he's given some money and he is ready to take him here and so, he promised him when you come here so you get job, get visa, this everything. Now, the agent disappeared, and he is merciless. He left him abandoned.
- Male Speaker 2:* That's why he came for job, that's true.
- Solicitor:* Yeah, yeah. The agent promised him you will get the job, you will get the visa and everything, now

the agent disappeared. He is victim of human trafficking as well. We will include this as well.

Male Speaker 2: We will include that as well.

Solicitor: As well. And second is he got fear of prosecution and assassination in the back home. And the other thing is already explained what is that. And in the next meeting. This is short, how to get start. When in the next time, when see in the meeting again we will prepare everything. So, we will make the statement all we will submit everything.

Male Speaker 2: That would be next meeting, that would be his story.

Solicitor: Yes, now I have given you something to do. This is the direction and which way we are going, going forward” [JTC/1, pp.194-195].

25.8. When asked about fees, the Respondent replied:

“Total amount I will tell you exactly we charge a lot. But you selected me. That’s the reason I have a lot of respect. We charge 12,000, 15,000, we charge. But in your matter so we will charge 5,500 all process, not...the whole process” [JTC/1, p.196].

25.9. When the discussion moved to the Firm’s success rate and its status within the Home Office, the following exchange occurred:

“Solicitor: We have a good success rate.

Male Speaker 2: Would you have good name in the Home Office?

Solicitor: Everything perfect.

Male Speaker 2: Generally you get the cases?

Solicitor: We have good interview everything

Male Speaker 2: Good hit rate?

Solicitor: Yes, good hit rate. Good success rate” [JTC/1, pp.197-198].

26. On 28 September 2023, the Respondent e-mailed the SRA and complained of the quality of the translation provided by the Daily Mail, encouraged the SRA to have the

videos “retranslated”, and attached transcripts that he had obtained himself from Absolute Translations [JTC/1, pp.97-118].

Respondent’s response to Notice

27. On 22 November 2023, the Respondent was sent a copy of the Notice recommending referral of his case to the Tribunal [JTC/1, p.124 and pp.1-20]. On 5 January 2024, the Respondent e-mailed the SRA [JTC/1, p.119], and attached his representations in response to the Notice [JTC/1, pp.126-142]. This response contained the following comments:
- 27.1. The Respondent took issue with both the accuracy of the Daily Mail transcript, as well as the transcript produced by Language Line;
- 27.2. The Respondent did not, “...support a fake asylum application and neither did he advise upon how to create false evidence and testimony” [JTC/1, p.129];
- 27.3. During his meeting with the Daily Mail reporters, they “...make comments and assertions which are designed to elicit illegality and breach solicitors conduct and ethics code” [JTC/1, p.131];
- 27.4. In the course of the meeting, the “client” used an expression that translates to “I came as a donkey”. The Respondent understood this to mean that the client was trafficked into the country [JTC/1, p.133].

Allegations and Breaches of Principles and the Code of Conduct

28. Paragraphs 11 to 26 above are repeated. The Respondent was expressly informed that the “client” had been sent to the UK “...to have a go to try and improve his life.” Despite this, the Respondent actively sought to encourage the would-be client to advance an account that would assist in any attempt to make claim for asylum, including:
- 28.1. Introducing the concept before any account had been given by the “client” that would warrant a discussion of such a claim;
- 28.2. Indicating that the “client” “...must have a fear of prosecution in the back home and fear of assassination or anything”;
- 28.3. Indicating that he would need to assert that “...he got some fear of prosecution in a back home and the assassination...”;
- 28.4. Indicating to the “client’s” would-be uncle that he would need to prepare him;
- 28.5. Stating, “...But the problem is he doesn’t have anything now. We have to make evidence. We have to, you can say we have to create something”;
- 28.6. Stating, “...And now we have got some fear because the police is after him, secret agencies are after him. He managed to escape from India to here”, despite the account from the client not suggesting this;

- 28.7. Indicating that they would need to, “...grab some information over the internet...” and “...make the story up and we will prepare him”; and
- 28.8. Warning the client that if he was stopped and searched he would be removed from the country as, “...he doesn't have any genuine circumstances”.
29. The exchange between the Respondent and the undercover reporters clearly demonstrates encouragement from the Respondent for the “client” to advance a false narrative in support of a claim for asylum.
30. In fact, the undercover journalists had no intention of submitting a claim for asylum. However, actual deception of the Home Office is not necessary for a breach of paragraph 1.4 of the Code. This paragraph prohibits solicitors from both misleading and attempting to mislead courts, clients or others, either through their own acts or omissions, or being complicit in the acts or omissions of others. In encouraging the “client” to provide a false narrative in support of a claim for asylum, the Respondent has attempted to become involved in a deception of the Home Office.
31. Section 24A of the Immigration Act 1971 makes it a criminal offence for a person who is not a British citizen to obtain, or seek to obtain, leave to remain in the UK by means which include deception. The Respondent has therefore encouraged what he believed to be a potential client to commit a criminal offence, and did not warn the potential client about the consequences of committing a criminal act. In doing so, the Respondent has failed to uphold the rule of law and the proper administration of justice. The Respondent has therefore breached Principle 1.
32. In encouraging an individual the Respondent believed to be a potential client to submit what was effectively a false claim for asylum, the Respondent was seeking to abuse the immigration system and add to an over-burdened process with an unmeritorious claim. Immigration is a current topic with a high degree of public interest, and such conduct would serve to damage the public's trust and confidence in the solicitors' profession and in the provision of legal services. The Respondent has therefore breached Principle 2.
33. In *Wingate v Solicitors Regulation Authority v Malins* [2018] EWCA Civ 366, it was said that integrity connotes adherence to the ethical standards of one's own profession. A solicitor acting with integrity (i.e. with moral soundness, rectitude and steady adherence with an ethical code³) would not encourage a client to submit a false narrative in support of a bogus claim for asylum. The Respondent has therefore breached Principle 5.

³ *Hoodless & Anor v Financial Services Authority* [2003] UKFSM FSM007

Dishonesty

34. The Applicant relies upon the test for dishonesty stated by the Supreme Court in *Ivey v Genting Casinos* [2017] UKSC 67 which applies to all forms of legal proceedings, namely that the person has acted dishonestly by the ordinary standards of reasonable and honest people:

“When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual’s knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the fact-finder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest.”

35. If the Tribunal concludes that the Respondent has indeed advised a potential client deliberately to provide a false narrative in support of a claim for asylum, this is conduct that would be viewed as dishonest by the standards of ordinary decent people.
36. The advice given by the Respondent to the “client” amounts to an attempt on his part to instigate a false claim for asylum, with the intention of deceiving the Home Office. An honest solicitor would not contemplate advising a client to act in such a manner, which amounts to a criminal offence.
37. Advising a potential client to advance a false narrative in support of a claim for asylum is conduct that would be viewed as dishonest by ordinary decent people. Therefore the Respondent has breached Principle 4.

The SRA’s Investigation

37. The SRA have taken the following steps to investigate the allegations which it makes against the Respondent.
38. On 22 November 2023, the Respondent was sent a copy of the Notice recommending referral of his case to the Tribunal [**JTC/1, p.124 and JTC/1, pp.1-20**].
39. On 5 January 2024, the Respondent e-mailed the SRA [**JTC/1, p.119**], and attached his representations in response to the Notice [**JTC/1, pp.126-142**].
40. On 17 January 2024, an authorised decision maker referred the conduct of the Respondent to the Tribunal [**JTC/1, pp.146-147**].

I believe that the facts and matters stated in this statement are true.

Signed: 

John Tippett-Cooper

Date: 13 June 2024

**BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL
IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)**

B E T W E E N:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

MUHAMMAD NAZAR HAYAT

(SRA ID: 549189)

Respondent

**APPENDIX 1 TO STATEMENT PURSUANT TO RULE 12 (2) OF THE SOLICITORS
(DISCIPLINARY PROCEEDINGS) RULES 2019**

Relevant Rules and Regulations

SRA Principles 2019

You act:

Principle 1: in a way that upholds the constitutional principle of the rule of law, and the proper administration of justice.

Principle 2: in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

Principle 4: with honesty.

Principle 5: with integrity.

SRA Code of Conduct for Solicitors, RELs and RFLs 2019

Paragraph 1.4: You do not mislead or attempt to mislead your clients, the court or others, either by your own acts or omissions or allowing or being complicit in the acts or omissions of others (including your client).