

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12784-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

RIFFAT HUSSAIN

Respondent

Before:

Mr A Horrocks (in the chair)
Mrs F Kyriacou
Mr D Kearney

Date of Hearing: 30 March –1 April 2026

Appearances

Sam Clarke, barrister, 23 Essex Street Chambers, 1 Gray's Inn Square, WC1 5AA, for the Applicant.

The Respondent represented herself.

JUDGMENT

Allegations

1. The allegations against the Respondent, Ms Riffat Hussain, made by the SRA are that, while in practice as a solicitor at the University of Liverpool Law Clinic (“the Clinic”) she:
 - 1.1 On or about 18 September 2023 sought to mislead her employer as to when she received the Home Office’s letter dated 15 June 2023 and what action she took in response to it, by deleting from the University’s case management system:
 - 1.1.1 a self-task to ‘ensure decision letter sent’, and / or
 - 1.1.2 a blank template letter to the client.

and in doing so, she breached any or all of Principles 2, 4 and 5 of the SRA Principles (“the Principles”) and Paragraph 1.4 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“the Code for Solicitors”).

In the alternative to the allegation that the Respondent breached Principle 4, it is further alleged that by so acting she was reckless. Recklessness is alleged as an aggravating feature of the conduct for this allegation but is not an essential ingredient for proving this allegation.

- 1.2 On or about 19 September she attempted to mislead Judith Carter by stating she did not have the decision letter from the Home Office dated 15 June 2023 when it had been received in June 2023, when she knew this was not true.

and in doing so, she breached any or all of Principles 2, 4 and 5 of the SRA Principles (“the Principles”) Paragraph 1.4 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“the Code for Solicitors”).

Executive Summary

2. The case concerned the conduct of Ms Riffat Hussain (“the Respondent”), who had been employed as an immigration solicitor at the University of Liverpool Law Clinic (“the Clinic”). The Solicitors Regulation Authority (“the Applicant” or “the SRA”) advanced two allegations against her. The first was that the Respondent sought to mislead her employer by deleting from the Clinic’s case management system (“CMS”) (i) a self-task she had created on 26 June 2023 entitled “Ensure decision letter sent”, and (ii) a blank draft letter addressed to the client, thereby concealing when she had received the Home Office decision of 15 June 2023 and the actions she had taken in response to it.
3. The Clinic’s electronic case management system (“the CMS”) recorded activity such as the uploading, viewing, creation, and deletion of documents. The CMS data showed that the Home Office decision was uploaded by an administrator on 19 June 2023 and that a draft letter and reminder task to ensure the decision was sent to the client were created by the Respondent on 26 June 2023. The records further indicated no substantive activity on the file until mid-September, when a file note was added, and the draft and reminder task were deleted on 18 September 2023, by the

Respondent. On 19 September 2023, the Respondent spoke to her colleague, Ms Carter, about the case.

4. The Applicant's first allegation was that these recorded events demonstrated that, on 18 September 2023, the Respondent had sought to mislead the Clinic by deleting the reminder task and draft letter, which the Applicant said was done to conceal when she had received the Home Office decision and what action she had taken or failed to take in response. The Applicant relied in particular on the timing of the deletions, the irreversible nature of such deletions within the CMS, and the file note entered by the Respondent shortly beforehand, which the Applicant contended gave the false impression that the decision had only recently come to her attention.
5. The second allegation concerned the Respondent's conversation with her colleague, Ms Judith Carter, on 19 September 2023. The Applicant alleged that the Respondent had attempted to mislead Ms Carter by stating that she had not known about the June decision until very recently, when the CMS records showed that she had had it in June 2023. The Applicant relied on both Ms Carter's witness statement and the note she added to the file on the following day recording what she said the Respondent had told her.
6. The Respondent denied both allegations. She said when reviewing the case on 18 September 2023 she had not appreciated or retained any earlier awareness of it. She accepted that the audit trail showed the deletion of the self-task but said she did not recall deleting it and did not accept any intention to mislead by doing so. She said the deletion of the blank draft letter was a routine administrative action. She also disputed the accuracy of the account given by Ms Carter, saying she did not recall stating that she had been unaware of the decision and that any misunderstanding had arisen from her own confusion rather than from any intention to mislead.
7. After considering the written and oral evidence during a three day hearing, the Tribunal did not find either allegation proved. In relation to Allegation 1.1, although the Tribunal found that the Respondent deleted the June self-task and the draft letter it was not satisfied that she did so with the intention of misleading her employer. The contemporaneous records, her immediate efforts to contact the client, and the retention of other June entries on the CMS were inconsistent with a deliberate attempt at concealment. In relation to Allegation 1.2, the Tribunal was not satisfied, on the balance of probabilities, that the Respondent made the statement attributed to her by Ms Carter, nor that she sought to mislead her; the Tribunal noted in reaching this conclusion the limitations of Ms Carter's recollection and the timing of her note in relation to conversations she had with others at the time. Ultimately there was an absence of clear and cogent evidence that the Respondent intended to mislead Ms Carter. Accordingly, both allegations were dismissed.

Documents

8. The Tribunal considered all of the documents in the case which included:
 - (a) The Applicant's Rule 12 Statement dated 12 June 2025, and the exhibits attached to the Application.

- (b) The Respondent's Answer to the Rule 12 Statement dated 12 August 2025.
- (c) The Respondent's Schedule of Clarifications to the SRA's Rule 12 Statement dated 9 February 2026.
- (d) The Respondent's Supplemental Answer to the Applicant's Statement dated 9 February 2026.
- (e) The Respondent's Witness Statement dated 10 December 2024.
- (f) The Witness Statement of Helenor Birt dated 18 September 2025 and attached Exhibits.
- (g) The Witness Statement of Deborah Tyfield dated 19 March 2024; and
- (h) The Further Witness Statement of Deborah Tyfield dated 31 March 2026.

Preliminary Matters

9. At the start of the hearing the Tribunal made an anonymity order of its own motion in respect of the individual referred to in these proceedings as "Client A". Applying the principles in *Solicitors Regulation Authority v Williams* [2023] EWHC 2151 (Admin), the Tribunal directed that the individual's identity should not be disclosed and that the individual be referred to as "Client A" in all publicly available materials. The Tribunal further ordered that no information be published which might lead to that individual's identification.
10. Before any evidence was heard, the Applicant applied to amend the wording of Allegation 1.2. The amendment sought to insert the words "*when it had*" before "*been received in June 2023*". The Respondent did not oppose the application. The Tribunal was satisfied that the amendment was minor, did not alter the substance of the allegation, and caused no prejudice to the Respondent. The Tribunal therefore allowed the amendment.

Factual Background

Background of the Respondent

11. The Respondent was admitted to the Roll on 15 October 2013.
12. The Respondent holds a current practising certificate which is subject to conditions. The following conditions were imposed on the Respondent's practising certificate by an adjudicator on 21 May 2024 to take effect from 30 days of the decision:
 - (a) Ms Hussain shall not act as a supervisor under Rule 9.4 of the Authorisation of Firms Rules for any authorised body.
 - (b) Ms Hussain's legal work in any authorised body must be supervised, and the arrangements for the supervision of her work must first have been approved by the SRA.

13. In addition, the Respondent practised separately through IBSA Legal Limited, a firm specialising in immigration law, where she was Managing Director as well as its Compliance Officer for Legal Practice (COLP) and Compliance Officer for Finance and Administration (COFA).
14. For the purposes of Rule 9.4 of the Authorisation of Firms Rules, the SRA also imposed a condition on the Firm that any individual supervising work undertaken by IBSA Legal Limited must first be approved by the SRA.

Background to the Allegations

15. The case against the Respondent was brought by the SRA and arose from the handling of a client matter in 2023, during which time she was employed as an immigration solicitor by the University of Liverpool Law Clinic (“the Clinic”), having commenced her employment there on 4 July 2022.
16. The Respondent worked there alongside another immigration lawyer, a Ms Judith Carter (“Ms Carter”). They were peers and neither reported to the other. The Respondent had her own caseload but did regularly discuss her matters with Ms Carter.
17. Ms Helenor Birt (“Ms Birt”) and a Ms Deborah Tyfield (“Ms Tyfield”) were co-directors of the clinic, but neither were immigration lawyers and did not directly supervise the Respondent’s legal work.
18. At the time of the events relevant to the allegations, the co-directors of the clinic had some concerns about the Respondent’s work which had led them to review some of her matters, including the client matter with which this case is concerned, on the clinic’s computerised case management system, which was called Advice Pro.
19. There were also concerns about the way the system was being operated by the clinic’s staff at an administrative level.
20. The system stored all letters and emails relevant to each client matter. It also allowed users to generate tasks on individual client matters for themselves or for other users and to generate and store draft letters. When a task was generated, it had a due date, and an email was sent to the user to whom it was allocated telling them of its creation. The system displayed to the user a list of tasks which they had been allocated. The user had the ability to mark them as completed on the system and choose whether their own list of tasks displayed all tasks or only those which had not been completed. The user could also delete tasks and drafts.
21. In June 2023 the Respondent was handling a client matter in which a fresh immigration claim had been made to the Home Office. A decision adverse to the client was sent to the clinic which was uploaded to the system on 19 June 2023 by an administrator. A task was created on the system notifying the Respondent of the decision and an automated email was generated to alert her to it. The Respondent accessed the client matter on the system on 26 June and marked the notification task as complete. She further created a self-task for herself entitled “*ensure decision letter*”

sent”, with a due date of 4 July 2023. On the same date, she created a blank template letter to the client on the system. The letter was blank and had no content.

22. The Respondent did not send the decision letter to the client. She was away from the office in August and was experiencing significant personal issues at that time. She took no substantive action on the file until late afternoon on 18 September 2023 after she had been notified via the system that Client A had written enquiring about the progress of the matter.
23. The Respondent then reviewed the file, including the Home Office decision, and unsuccessfully attempted to speak with Client A by telephone. The Respondent deleted the task she had created for herself in June to ensure the decision letter was sent but did not delete the completed notification task placed on the system by the administrator. She then sent the client an email and a text message requesting them to get in touch. The Respondent deleted the template letter and created a new task for herself to make contact with the client.
24. On 19 September 2023, Ms Hussain spoke with Ms Carter about Client A’s matter, among others. The meeting was not arranged to discuss this particular client matter but was a routine meeting between colleagues at the end of the day. The detail of what was discussed about the relevant client matter is in issue. It is, however, not in dispute that they discussed the fact, as it was by then, that the three-month period for commencing judicial review proceedings, the only means by which the Home Office decision could be challenged, had expired. There was also discussion about administrative problems the Clinic had been encountering with the system.
25. The day after that, 20 September 2023, there were discussions between Ms Carter, Ms Tyfield and Ms Birt (though not all three of them together) about the client file. The audit file shows that Ms Tyfield and Ms Carter both accessed the client file on 20 September. Ms Tyfield’s evidence is that she noted the deletion of the self-task and template letter by the Respondent on 18 September. Ms Tyfield knew those two things had previously been on the system until earlier on 18 September because she had herself accessed the file earlier that day as part of the review of the Respondent’s matters.
26. Those discussions resulted in the conclusion that the Respondent had provided an inaccurate account to Ms Carter of her knowledge of the Home Office decision.
27. The Respondent was suspended from her duties shortly afterwards and she resigned from her role at the Clinic on 6 March 2024.

Witnesses

28. The written and oral evidence of witnesses is quoted or summarised in the Findings of Fact and Law below. The evidence referred to will be that which was relevant to the findings of the Tribunal and to facts or issues in dispute between the parties.
29. The following witnesses gave evidence during the hearing:
 - (a) Deborah Tyfield – called by the Applicant.

- (b) Helenor Birt – called by the Applicant.
- (c) Judith Carter – called by the Applicant; and
- (d) The Respondent.

Findings of Fact and Law

30. The Applicant was required by Rule 5 of The Solicitors (Disciplinary Proceedings) Rules 2019 to prove the allegations to the standard applicable in civil proceedings (on the balance of probabilities). The Tribunal had due regard to its statutory duty under section 6 of the Human Rights Act 1998.
31. For the avoidance of doubt, the Tribunal read all of the documents in the case and made notes of the oral evidence of all witnesses. The absence of any reference to particular evidence should not be taken as an indication that the Tribunal did not read, hear or consider that evidence.

The Applicant's Case Against the Respondent

32. The Applicant's case in respect of Allegation 1.1 is set out at paragraphs 34–79 of the Rule 12 Statement. The Applicant's case in respect of Allegation 1.2 is set out at paragraphs 80–113 of the Rule 12 Statement. The Rule 12 Statement can be accessed [\[here\]](#).

The Respondent's Position

33. The Respondent's position is contained in the documents she adopted as her evidence, namely:
- (a) her witness statement dated 10 December 2024.
 - (b) her Supplemental Answer to the Applicant's Rule 12 Statement dated 9 February 2026 which can be accessed [\[here\]](#) and
 - (c) the Schedule of Clarifications dated 9 February 2026 which can be accessed [\[here\]](#).

The Respondent gave evidence which is summarised below:

- (a) At the outset of her oral evidence, the Respondent clarified that a passage in paragraph 6 of her Supplemental Answer was inaccurate. She explained that, when drafting that document, she had mistakenly believed that her conversation with Ms Carter had taken place on 18 September 2023. She now accepted, having revisited the sequence of events, that the conversation occurred on 19 September 2023, that is after she had reviewed the file on 18 September. She told the Tribunal that it was therefore “not feasible” for her to have said that she was unaware of the Home Office decision at the time she spoke to Ms Carter. Her intended meaning, she said, was that she had known about the decision in June but had forgotten about it and “*had not retained a clear recollection*” of the June notification until reminded of it in September.

- (b) The Respondent accepted that she had been aware of the Home Office decision in June 2023. She said that although she had known of it at the time, she later forgot about it over the three-month period until she revisited the file in mid-September. She stated that her file note of 18 September was not intended to convey first discovery but was written after she had “*rediscovered*” the decision when reviewing the file.
- (c) The Respondent also accepted that she had created both the blank template letter and the self-task (“ensure letter re decision sent”) on 26 June 2023 but said these were preparatory steps to arrange a meeting with the client rather than steps to send the refusal decision itself. She said it was her usual practice in asylum matters to notify vulnerable clients in person rather than by letter.
- (d) The Respondent said she spent approximately 30 minutes reviewing the file before writing the file note. She stated that she did not necessarily review the diary tab at that point and instead focussed on the notes and correspondence tabs to establish what substantive work had been done. She said that her wording (“*reviewing file*”; “*there is a decision*”) reflected her review at that moment and was not intended to imply that this was the first time she had ever encountered the decision. She said her note was done to record her actions at the time and was not meant to be a full summary of the position on the file.
- (e) The Respondent maintained that she had no recollection of deleting the self-task. She accepted that she must have deleted the blank template letter but said this was done to avoid “cluttering” the correspondence tab and because it was not now needed. She denied that she had deleted either item in an attempt to conceal her earlier knowledge of the decision.
- (f) The Respondent confirmed that she spoke with Ms Carter on 19 September, but she did not recall the precise words she used. She denied blaming the administrator and said any reference to administrative difficulties concerned wider, ongoing issues within the clinic rather than an attempt to deflect responsibility for the case. She maintained that she had attempted to be transparent and had told Ms Carter that a decision from June was on the file. She denied saying that she had been unaware of it when it first arrived.
- (g) The Respondent explained that she normally used the “show all tasks” view, which displayed completed and uncompleted tasks together. She accepted that her usual practice was to mark tasks as completed rather than delete them, and that deletion of tasks was not normal practice. She also described how she used self-tasks as prompts to import reminders into her Outlook diary.

The Tribunal’s Findings

34. The Tribunal heard and considered the evidence over a three-day hearing. The underlying chronology — including the dates on which the Home Office decision was uploaded, viewed, acted upon, and later deleted — was largely derived from the Clinic’s case management system and was not substantially in dispute. However, the inferences to be drawn from those events, the Respondent’s state of knowledge at the relevant times, and the content of her discussion with Ms Carter on

19 September 2023 were all matters in issue and required careful evaluation of the oral evidence.

35. The Tribunal noted the positive character references provided on behalf of the Respondent. In accordance with the principles in *Sawati v General Medical Council* [2022] EWHC 283 (Admin) at [53]– [54], it considered that such material might be relevant to credibility where there is a conflict of evidence, and to propensity where allegations of misleading conduct are made.
36. The Tribunal also reminded itself that allegations of misleading conduct, particularly where they are capable of amounting to dishonesty, must be proved by clear and cogent evidence, consistent with the caution in *Fish v General Medical Council* [2012] EWHC 1269 (Admin) at [66]– [67], and [70].
37. **Allegation 1.1: On or about 18 September 2023 sought to mislead her employer as to when she received the Home Office’s letter dated 15 June 2023 and what action she took in response to it, by deleting from the University’s case management system:**

1.1.1 a self-task to ‘ensure decision letter sent’, and / or

1.1.2 a blank template letter to the client.

- 37.1 The Tribunal found that on 18 September 2023 the Respondent deleted the self-task at 6.32 pm and the blank template letter at 7.04 pm. This was evidenced by the audit trail report and not disputed by the Respondent.
- 37.2 The Tribunal however did not find to the requisite standard that the Respondent in deleting the two items from the case management system sought to mislead her employer. The Tribunal concluded from the evidence that, if she had been her intention, she would have taken other steps more obviously directed to that objective but did not do so. In particular:
- (a) she could have deleted the original notification of the Home Office refusal decision which plainly showed that she had first received it on 26 June 2023, but she did not do so.
 - (b) she did not delete or alter the decision itself, which remained on the system with its June date.
 - (c) she did not avoid contacting or telling the client. On the contrary, she took immediate steps on 18 September 2023 to contact the client by various means and logged the email and SMS sent to the client on the system.
 - (d) despite there being some dispute about the detail of the discussion with Ms Carter on 19 September 2023, the Respondent herself raised the file and the missed time limit in that conversation.
 - (e) the Respondent put a file note on the system which made it clear for all to see that a decision had been made in June with no action having been taken.

- 37.3 The Tribunal rejected the submission that the Respondent's file note was an attempt, or part of an attempt, to conceal the true position. It considered that the note was prepared to record what she had just done and the actions to be taken, and that given the purpose of the note it was not surprising or misleading for it not to give a full account of her responsibility for the problem. Allegation 1.1 did not in any event allege concealment by means of the note.
- 37.4 The Tribunal also identified other reasons why the two items were no longer needed at the time they were deleted, which reinforced its conclusion that their removal was not motivated by an intention to conceal anything. In particular, the task she deleted was to send the client the decision, but she had already taken steps on 18 September to contact the client to inform them of it, so the task was no longer reasonably required. In addition, the template letter she deleted was entirely blank, so its removal did not conceal any information.
- 37.5 Having considered all the evidence, the Tribunal was not satisfied that the Respondent sought to mislead by deleting the two items from the case management system, and found Allegation 1.1 was therefore not proved.
- 37.6 Allegation 1.1 was therefore dismissed, and the Tribunal did not need to proceed to consider the alleged breaches of the Principles and Code alleged in respect of that allegation.
38. **Allegation 1.2: On or about 19 September she attempted to mislead Judith Carter by stating she did not have the decision letter from the Home Office dated 15 June 2023 when it had been received in June 2023, when she knew this was not true.**
- 38.1 The allegation turned on what was said during an informal conversation between the Respondent and Ms Carter on 19 September 2023.
- 38.2 In summary, Ms Carter's evidence was that the Respondent told her during the conversation that she had not been aware of the June decision until very recently, giving the impression that there had been administrative failings within the Clinic. The Respondent denied saying that. She accepted that she referred to administrative or communication problems in the conversation but said she did not tell Ms Carter that she had been unaware of the decision or that the decision had not been communicated to her in June.
- 38.3 The Tribunal noted that the Respondent did not volunteer in the conversation that she had been notified of the decision in June but observed that this was not the allegation it was required to determine.
- 38.4 The Tribunal accepted that Ms Carter was a straightforward witness who was doing her best to assist the Tribunal with her recollections. However, her account of the precise words used in the conversation depended largely on a note she created the following day, after she had spoken to Ms Tyfield and Ms Birt, and after viewing the CMS entries relating to the June decision.

- 38.5 By the time Ms Carter created her note on 20 September 2023, she had already accessed the CMS and had spoken with Ms Tyfield and Ms Birt about the file. The CMS log confirmed that Ms Tyfield had been reviewing the system at around the same time. The Tribunal did not doubt that after speaking to Ms Tyfield and Ms Birt on 20 September she formed the belief that the Respondent had misled her. Bearing in mind that the Respondent and this particular file was already being investigated by the Clinic the Tribunal considered that these discussions, and the information Ms Carter obtained from the CMS before writing the note, were likely to have influenced both the terms of the note prepared by Ms Carter and her subsequent recollection of the Respondent's precise words. It could not therefore be satisfied that the note and her recollection precisely reflected the actual words used by the Respondent on 19 September 2023.
- 38.6 The Tribunal also noted that there were evident limits to the recollection of Ms Carter and, indeed, of the other witnesses as to events and discussions that took place between 18 and 20 September 2023. Their accounts differed in certain respects as to who said what, and when, during that period. In particular, Ms Carter's evidence was that she spoke to the Respondent on 19 September 2023 and raised the matter with Ms Birt the following day, whereas Ms Birt did not recall such a conversation and was unable to assist as to its timing or content, given the number of discussions taking place that week. Further, the witnesses' accounts differed as to how and when concerns first crystallised and were escalated within the Clinic during that period. These inconsistencies reinforced the Tribunal's view that Ms Carter's recollection of the precise words used in the conversation could not safely be relied upon.
- 38.7 Although Allegation 1.2 is a separate factual allegation, the Tribunal noted that the Applicant had advanced both allegations as part of an alleged continuum of concealment. The Tribunal did not allow its conclusion on Allegation 1.1 to predetermine its approach to Allegation 1.2 and considered the evidence relating to this allegation on its own merits. However, in light of its finding that the Respondent had not sought to mislead by deleting items from the CMS, it regarded it as inherently unlikely that she would have sought to mislead Ms Carter for a similar purpose the following day.
- 38.8 The Tribunal was not satisfied, given the need for clear and cogent evidence, that the Respondent used the exact words attributed to her by Ms Carter, upon which Allegation 1.2 narrowly turns, or that she attempted to mislead her during the conversation.
- 38.9 Allegation 1.2 was therefore dismissed, and the Tribunal did not proceed to consider the alleged breaches of the Principles and Code arising from that allegation.

Previous Disciplinary Matters

39. The Respondent has an unblemished regulatory record

Costs

The Respondent's Application

40. The Respondent made a short application for costs on the basis that the Applicant had acted unreasonably in bringing the proceedings. She submitted that the case should not have been brought given the extensive evidence and full cooperation she had provided to the regulator during the investigation stage.
41. She further submitted that a hearing had not been required, as the issues had been addressed in her detailed witness statement of December 2024, supplemented by written representations prepared by her solicitor. Those documents had identified contradictions and weaknesses in the Applicant's evidence which were reflected in the Tribunal's findings. The Applicant had not engaged with those points prior to referral and had not addressed the inconsistencies until the hearing itself. The need for oral evidence, she submitted, was therefore created by the Applicant's failure to deal with issues that had been raised with it in advance.
42. In those circumstances, she contended that the regulator's decision to prosecute had been unreasonable and this provided a sufficient basis for the Tribunal to depart from the default position of making no order as to costs.

The Applicant's Response

43. Mr Clark opposed the application for costs. He submitted that in regulatory proceedings the principle that costs follow the event does not apply, and that the starting point where allegations are dismissed is that there should be no order as to costs against the regulator.
44. He further submitted that a Tribunal may only depart from the starting point where there is a good reason to do so which is generally limited to cases where proceedings were improperly brought or were conducted so badly as to amount to a "*shambles from start to finish*", or for other reasons of comparable gravity.
45. Mr Clark argued that this was not such a case where any of the exceptions to the starting point applied. A proper determination of the issues turned substantially on oral evidence, and the credibility and reliability of the witnesses could not have been assessed on the papers. It had therefore been appropriate for the Applicant to bring the case to a hearing in order to test the evidence.

The Decision of the Tribunal

46. The Tribunal reminded itself of its jurisdiction under Rule 43 of the SDPR 2019 to make such order for costs as it considers just. It also had regard to the principles set out in *Baxendale-Walker v The Law Society* [2007] EWCA Civ 233 and *SRA v Hon-Ying Amie Tsang* [2024] EWHC 1150.
47. The Tribunal noted the guidance in *Tsang* that adverse costs orders against regulators set a high bar. A departure from that position is ordinarily justified only where

proceedings were improperly brought, badly conducted, or justified by another reason of comparable gravity.

48. The Tribunal found that the case was properly brought and had not been badly conducted by the Applicant to such an extent as to displace the default position on costs. It noted that the issues in the case were not sufficiently straightforward to be dealt with on the papers. The hearing had occupied the Tribunal for the best part of three days and required a careful assessment of oral evidence.
49. The Tribunal did not consider that there was good reason to depart from the established position. The Respondent's application for costs was refused, and no order as to costs was made.

Statement of Full Order

50. The Tribunal ORDERED that the allegations against RIFFAT HUSSAIN, Solicitor be DISMISSED. The Tribunal further ORDERED that there be no Order as to costs.

Dated this 8th day of May 2026
On behalf of the Tribunal

A Horrocks

A Horrocks
Chair