

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT

Case No. 12856-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY

Applicant

and

PETER ALBANY BAKER

Respondent

Before:

Mr G Sydenham (in the chair)

Mr D Green

Mrs L McMahon-Hathway

Date of Hearing: 05 October 2026

Appearances

There were no appearances as the matter was dealt with on the papers.

JUDGMENT ON AGREED OUTCOME

Allegations

1. The allegations against the Respondent, Mr Peter Albany Baker, made by the SRA are that, while in practice as a Partner at Freeths LLP (the “Firm”):
 - 1.1 Between 10 December 2021 and 30 September 2022, Mr Baker submitted six title reports to Bank H stating that searches had been carried out on the six properties and were clear of concerns, when no searches had been undertaken,

and in doing so 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 of Conduct”).

In addition, allegation 1.1 is advanced on the basis that the Respondent’s conduct was reckless. Recklessness is alleged as an aggravating feature of the Respondent’s misconduct but is not an essential ingredient in proving the allegation.
 - 1.2 On 27 January 2022, Mr Baker authorised a payment of £3,806 from the account of Client C to pay the completion fee on a property for Client B without authority

and in doing so breached any or all of Rules 5.1 and 5.2 of the SRA Accounts Rules (the “Accounts Rules”) and Principle 2 of the Principles

Preliminary Applications

Application for permission to submit an Agreed Outcome out of time

2. This matter was listed for a four-day substantive hearing commencing on 5 October 2026. On 30 September 2026, the Applicant filed an application for permission to file a Statement of Agreed Facts and Proposed Outcome (“AO”). As the AO was to be filed less than 28 days before the commencement of the substantive hearing, the Applicant applied, pursuant to Rule 25 of the Solicitors (Disciplinary Proceedings) Rules 2019 (“SDPR 2019”), for permission to file the AO out of time. The application was supported by the Respondent.
3. The Applicant stated that its decision to seek withdrawal of Allegation 1.1 provided the basis for the parties’ agreement to proceed by way of an AO in relation to Allegation 1.2. The Applicant’s reasons for seeking to withdraw Allegation 1.1 were set out more fully in its separate application pursuant to Rule 24 of the SDPR 2019, which the Tribunal considered separately below.
4. The Applicant further submitted that this approach, and its application to file the AO out of time, was consistent with the overriding objective and would enable the matter to be dealt with justly and at proportionate cost, while saving Tribunal time and resources.
5. The Tribunal considered the application and was satisfied that it was appropriate, pursuant to Rules 6 and 25 of the SDPR 2019, to permit the AO to be submitted notwithstanding that it had been filed less than 28 days before the commencement of the substantive hearing. In reaching that conclusion, the Tribunal took into account the

Applicant's explanation for the late filing, the Respondent's support for the application and the overriding objective, including the need to deal with proceedings fairly and justly and at proportionate cost.

Application to withdraw Allegation 1.1

6. The Applicant applied, pursuant to Rule 24 of the SDPR 2019, for permission to withdraw Allegation 1.1, together with the associated allegation of recklessness. The application was supported by the Respondent.
7. The Applicant indicated that the Firm had provided further documents and information in September 2026 in response to a request made by the Respondent's legal representative. The Applicant submitted that, following a review of that evidence, it no longer considered that it was able to discharge the burden of proof in relation to Allegation 1.1. The Applicant considered that its decision to withdraw the allegation was consistent with the overriding objective and invited the Tribunal to grant permission for the withdrawal.
8. The Tribunal considered the application and was satisfied that it was appropriate, pursuant to Rule 24 of the SDPR 2019, to grant permission for the withdrawal of Allegation 1.1, together with the associated allegation of recklessness. The Tribunal noted that the proposed withdrawal formed part of the AO placed before it and was satisfied that, in all the circumstances, it was appropriate to permit the Applicant to withdraw the allegation.

Admissions

9. The Respondent admitted Allegation 1.2 as set out in the AO.

Documents

10. The Tribunal had, amongst other things, the following documents before it: -
 - The Form of Application dated 15 October 2025.
 - Rule 12 Statement and exhibit AW1 dated 15 October 2025
 - Rule 14 Statement dated 13 March 2026
 - Statement of Agreed Facts and Proposed Outcome dated 30 September 2026¹

Findings of Fact and Law

11. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under Section 6 of the Human Rights Act 1998, to act in a manner which was compatible with the Respondent's rights to a fair trial and to respect for his private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.
12. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made.

¹ Which can be viewed [here](#).

The Tribunal considered the Guidance Note on Sanction (11th edition). In doing so the Tribunal assessed the culpability and harm identified together with the aggravating and mitigating factors that applied.

13. At the material time, the Respondent was a Partner at the Firm specialising in real estate work, primarily in the commercial sector. He retired from the role of Partner in November 2022 but remained as a consultant on a zero-hour contract until 2 October 2023.
14. Following the Respondent's departure from the Firm, a review of his files was undertaken. The review resulted in the Firm making a report to the Applicant regarding the Respondent's conduct.
15. The Firm's review identified that on 27 January 2022, the Respondent authorised a payment of £3,806.00 from the account of Client C to pay a completion fee on a property that was unrelated to that client (the "Payment"). The Payment was visible on Client C's ledger and on a faster payment request report bearing the same date.
16. Although it was unclear whether the completion fee related to a property purchase for Client B or for another client, the Respondent accepted that the Payment did not relate to a purchase made by Client C. The Respondent therefore admitted that he had breached Rule 5.1 of the Accounts Rules, which precludes, *inter alia*, the withdrawal of client money from a client account for a purpose other than that for which it was being held.
17. Rule 5.2 of the Accounts Rules required the Respondent to ensure that withdrawals made from a client account were appropriately authorised and supervised. The Respondent accepted that he had failed to appropriately authorise or supervise the withdrawal arising from the Payment as he ought not to have authorised it. He therefore admitted that he had breached Rule 5.2 of the Accounts Rules.
18. The Respondent also admitted that, by reason of the above conduct, he had breached Principle 2 of the Principles, which required him to act in a way that upheld public trust and confidence in the solicitors' profession and in legal services provided by authorised persons².
19. The Tribunal considered that the Respondent's level of culpability was low. There was no identifiable harm caused to any individual, and the risk of any such harm was negligible. The Tribunal noted that the Respondent had demonstrated genuine insight into his misconduct and assessed the likelihood of future misconduct of a similar nature as low.
20. The Tribunal concluded that the misconduct was nevertheless too serious to warrant taking no action. It determined, however, that the seriousness of the Respondent's misconduct justified a sanction at the lowest level and that neither the protection of the public nor the reputation of the legal profession required a greater sanction. The Tribunal therefore determined that a Reprimand was appropriate. It was satisfied that

² Although the Applicant had alleged in the Rule 12 Statement that the Respondent had also demonstrated manifest incompetence, the parties made clear in the AO that this allegation was not pursued. The Tribunal therefore made no finding in relation to manifest incompetence.

this sanction was reasonable and proportionate, serving to mark the seriousness of the misconduct, protect the public and maintain the reputation of the profession.

21. The AO proposed a Reprimand as the appropriate sanction. Accordingly, the Tribunal approved the AO and imposed a Reprimand.

Costs

22. The parties had agreed that the Respondent should pay costs in the sum of £1,986.00. The
23. Tribunal considered the Applicant's costs schedule and determined that the agreed amount was reasonable and appropriate. Accordingly, the Tribunal ordered that the Respondent pay costs in the agreed sum.

Statement of Full Order

24. The Tribunal ORDERS that the Respondent PETER ALBANY BAKER, solicitor, SRA Number 16144, be REPRIMANDED and it further Orders that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £1,986.00.

DATED AND FILED WITH THE LAW SOCIETY

This 16th day of October 2026

On behalf of the Tribunal

G Sydenham

G Sydenham
Chair

IN THE SOLICITORS DISCIPLINARY TRIBUNAL

Case No. 12856-2025

IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)

BETWEEN

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

-and-

MR PETER ALBANY BAKER

Respondent

STATEMENT OF AGREED FACTS AND PROPOSED OUTCOME

1. By its application dated 15 October 2025 and the statements dated 15 October 2025 and 13 March 2026 made pursuant to Rules 12(2) and 14(1) of the Solicitors (Disciplinary Proceedings) Rules 2019 (respectively), the Solicitors Regulation Authority Limited (the “SRA”) brought proceedings before the Solicitors Disciplinary Tribunal (the “SDT”) making two allegations of misconduct against Peter Albany Baker (the “Respondent”).

The allegations

2. The allegations against the Respondent made within the aforementioned statements were that, while in practice at Freeths LLP (the “Firm”):

- a. Allegation 1.1

Between 10 December 2021 and 30 September 2022, Mr Baker submitted six title reports to Bank H stating that searches had been carried out on the six properties and were clear of concerns, when no searches had been undertaken,

and in doing so 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 of Conduct”).

In addition, allegation 1.1 is advanced on the basis that the Respondent's conduct was reckless. Recklessness is alleged as an aggravating feature of the Respondent's misconduct but is not an essential ingredient in proving the allegation.

b. Allegation 1.2

On 27 January 2022, Mr Baker authorised a payment of £3,806 from the account of Client C to pay the completion fee on a property for Client B without authority,

and in doing so breached any or all of Rules 5.1 and 5.2 of the SRA Accounts Rules (the "**Accounts Rules**") and Principle 2 of the Principles.

Admissions

3. The SRA has applied to the SDT to withdraw allegation 1.1 in its entirety.
4. The Respondent admits the breaches set out in allegation 1.2, save that the Respondent does not admit (and the SRA does not pursue) the allegation as an instance of manifest incompetence. The Respondent accepts the factual basis of allegation 1.2 as set out in this document.
5. The SRA has considered the admissions being made and whether these admissions and the outcome proposed in this document meet the public interest having regard to the gravity of the matters alleged. For the reasons explained below, and subject to the SDT's approval, the SRA is satisfied that the admissions and outcome do satisfy the public interest.
6. The parties consider in all the circumstances that the proposed Agreed Outcome represents a proportionate outcome to the proceedings which is in the public interest. On this basis, the SDT is invited to approve this Agreed Outcome.

Agreed facts

7. The following facts and matters, which are relied upon by the SRA in support of the allegation set out within paragraph 2.b of this document, are agreed between the SRA and the Respondent.

8. The Respondent was admitted as a solicitor on 16 October 1995 (SRA number 16144). At the time of the misconduct, he was a Partner at the Firm specialising in real estate work, primarily in the commercial sector. He retired from the role of Partner in November 2022 but remained as a consultant on a zero-hour contract until 2 October 2023. The Respondent is now retired and does not hold a practising certificate.
9. Following the Respondent's departure from the Firm, a review of his files was undertaken. The review resulted in a report in relation to the Respondent's conduct being made to the SRA by the Firm's COLP, Mr Paul Derek Thorogood (SRA number 126066), on 5 September 2023.
10. On 27 January 2022, the Respondent authorised a payment of £3,806 from the account of Client C to pay a completion fee on a property that was unrelated to that client (the "**Payment**"). The payment is visible on Client C's ledger as well as on a faster payment request report with the same date.
11. Although it is unclear whether the completion fee was in relation to a property purchase for Client B or some other client, the Respondent accepts that the Payment did not relate to a purchase made by Client C.
12. The Respondent admits that he breached Rules 5.1 and 5.2 of the Accounts Rules and Principle 2 of the Principles.

Non-agreed mitigation

13. The following mitigation, which is neither agreed nor endorsed by the SRA, is put forward by the Respondent:
14. The Respondent apologises unreservedly for the breach admitted at paragraph 12 above. He accepts that the Payment should not have been made from the ledger of Client C, that it was his responsibility to ensure that it was not, and that he failed to discharge that responsibility.
15. The circumstances were these. The faster payment request form dated 27 January 2022 was prepared by a legal assistant and was checked and authorised by the Respondent. The form identified Client C. When authorising it, the Respondent did not check the name on the form against the matter to which the completion related. Had he done so, the error would have been apparent on its face. The

authorisation was his, and the responsibility for it is his alone. He does not seek to place it elsewhere.

16. The Respondent invites the Tribunal to note the following features of the admitted breach.
 - a. **It was a single transaction.** The Payment was made on one day, in one sum, and arose from a single omission: a failure to check the name on a payment authority against the matter to which the payment related. No course of conduct is alleged, and no other transaction is the subject of any allegation.
 - b. **It was inadvertent.** Dishonesty is not alleged. Recklessness is not alleged. It is not alleged that the Respondent knew, or suspected, that the ledger identified on the form was not the correct one.
 - c. **The Respondent derived no benefit from it, financial or otherwise.** The money was not retained by him and was not applied for his own purposes. It was paid away the same day, as completion money, to an independent firm of solicitors in connection with a property transaction.
 - d. **No loss is alleged and none is known to have been caused.** The SRA does not allege that any client suffered financial loss. No client has complained of the Payment. The Respondent understands that the ledger position was corrected by the Firm after his departure.
 - e. **It was an isolated departure in a long career.** The Respondent was admitted as a solicitor on 16 October 1995. The Payment was made more than twenty-six years later. He has not previously appeared before the Tribunal, and no adverse regulatory finding has previously been made against him.
17. The Respondent further invites the Tribunal to have regard to the following matters.
 - a. **The circumstances in which the authorisation was given.** At the material time the Respondent was a partner in a small real estate team carrying what the SRA's own witness describes as "a substantial case load". That is advanced not as an excuse; the check which was missed

was a simple one, and he should have made it, but as an explanation of how a routine authorisation came to be given without it.

- b. **Insight, admission and engagement.** The Respondent has engaged with the SRA throughout its investigation. He admits the breach, accepts the factual basis on which it is advanced, and has agreed the facts recorded at paragraphs 7 to 12 above. He has at no stage sought to minimise what occurred or to attribute it to another.
 - c. **The passage of time.** The Payment was made on 27 January 2022. The matter was reported to the SRA on 5 September 2023 and proceedings were commenced on 15 October 2025. The Respondent has had these proceedings, and the investigation which preceded them, hanging over him for a period approaching five years from the transaction itself, through no fault of his own.
18. The Respondent respectfully submits that the conduct admitted is properly characterised as an isolated and inadvertent administrative error: one of low culpability, causing no identifiable harm, carrying a negligible risk of harm, and attended by no realistic prospect of repetition. He invites the Tribunal to approve the outcome proposed below.

Proposed penalty and costs

19. It is proposed that the Respondent receives a reprimand and be ordered to make a contribution of £1,986.00 towards the SRA's costs.

Explanation as to why such an order would be in accordance with the SDT's sanctions guidance

20. The SDT's 'Guidance Note on Sanction' (11th edition, applicable from February 2025), provides as follows in relation to reprimands (paragraph 27):

"A Reprimand will be imposed where the Tribunal has determined that the seriousness of the respondent's misconduct justifies a sanction at the lowest level and that the protection of the public and the reputation of the legal profession does not require a greater sanction.

Relevant factors may include:

- *the respondent's culpability is low;*
- *there is no identifiable harm caused to any individual;*

- *the risk of any such harm is negligible;*
- *the likelihood of future misconduct of a similar nature or any misconduct is very low;*
- *evidence of genuine insight, assessed by the Tribunal on the basis of facts found proved and the respondent's evidence;*
- *minor breaches of regulation not dealt with under the SRA's own disciplinary jurisdiction."*

21. Having regard to these factors and noting in particular the inadvertent nature of the conduct and the genuine insight shown by the Respondent (evidenced by his candour in relation to the allegation), it is agreed that the fair and proportionate penalty in this case is for the Respondent to receive a reprimand and be ordered to make a contribution of £1,986.00 towards the SRA's costs.

Alastair Willcox, Head (Interim) Investigations, Enforcement and Litigation
30 September 2026
Signed for and on behalf of the SRA

Peter Albany Baker