

# SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12877-2025

**BETWEEN:**

ZAIN SIDDIQI

Applicant

and

THE SOLICITORS REGULATION AUTHORITY LTD

Respondent

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Before:

Mrs L Murphy (in the chair)  
Mr U Sheikh  
Mr A Pygram

Date of Hearing: 24 March 2026

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**Appearances**

The Applicant represented himself.

Montu Miah, barrister, of the Solicitors Regulation Authority Limited, The Cube  
199 Wharfside Street. B1 1RN, for the Respondent.

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**JUDGMENT ON APPLICATION TO VARY CONDITIONS**

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## Background to the Application

1. On 5 July 2018, the Applicant admitted (by way of an Agreed Outcome) and the Tribunal found proved the following allegations, namely that he:
  - (a) failed to have properly written up books of account, contrary to Rules 29.1, 29.3 and 29.9 of the Solicitors Accounts Rules 2011 (“the Accounts Rules”) and Principles 6 and 10 of the SRA Principles 2011 (“the Principles”).
  - (b) held client money otherwise than in the client account, contrary to Rule 15 of the Accounts Rules.
  - (c) held office money in the client account, contrary to Rule 17.3 of the Accounts Rules.
  - (d) held debit balances on the client account, contrary to Rule 20.6 of the Accounts Rules.
  - (e) failed to write up dealings with office money relating to any client matter in the office side of the appropriate client ledgers, contrary to Rule 29.4 of the Accounts Rules; and
  - (f) made inaccurate statements on professional indemnity insurance proposal forms in 2014, 2015 and 2016, contrary to Principle 6 of the Principles.
2. The Tribunal ordered that the Applicant pay a fine in the sum of £15,000 and costs in the sum of £2,000. The Tribunal further ordered that he be subject to the following restrictions on his practice, namely that he:
  - (a) may not practise as a solicitor on his own account.
  - (b) may not be a Manager or Owner of an authorised body.
  - (c) may not hold or receive client money, or act as a signatory to a client or office account or have the power to authorise any transfers from a client or office account.
  - (d) shall immediately inform any actual or prospective employer of these conditions and the reason for their imposition.
3. On 11 February 2022, following a review of the Applicant’s practising arrangements, the Solicitors Regulation Authority varied the conditions on his practising certificate. While certain conditions were removed, the SRA retained management-related restrictions in order to allow the Applicant to evidence engagement in managerial responsibilities prior to any consideration of the full removal of conditions.
4. The Applicant, by way of an Application dated 11 February 2022, applied to the Tribunal to vary the restrictions in order to harmonise them with the conditions placed on his practising certificate by the Solicitors Regulation Authority.

5. On 23 May 2022, the Tribunal varied the order made on 5 July 2018 as follows:  
The Applicant:
- (a) may not be a sole manager or sole owner of any authorised body; and
  - (b) may not be a Manager or Owner of an authorised body.

### **The Application**

6. On 1 December 2025, the Applicant submitted an Application to the Tribunal seeking to remove the outstanding conditions imposed on 23 May 2022.

### **Documents**

7. The Tribunal reviewed all the documents submitted by the parties, which included (but was not limited to):
- (a) Form of Application dated 1 December 2025.
  - (b) Statement in Support of the Application dated 1 December 2025.
  - (c) Exhibits to the Application AM1 (pages 1—70).
  - (d) The Judgment dated 5 July 2018.
  - (e) The Respondent's Response to the Applicant's Application dated 28 January 2026;  
and
  - (f) The Respondent's Schedule of Costs dated 13 March 2026.

### **Factual Background**

8. The Applicant was admitted to the Roll of Solicitors in February 2004.
9. He remains on the Roll and holds a current Practising Certificate for the year 2025/2026, which is free from all conditions.

### **The Applicant's Submissions**

10. The Applicant submitted that the 2018 proceedings were resolved by way of an Agreed Outcome, following which he accepted the financial penalty and the restrictions imposed on his practice. He stated that he had been fully compliant with those restrictions, had maintained continuous engagement with the regulator, and that no further complaints or regulatory concerns had arisen since that time.
11. He noted that the restrictions originally imposed by the Tribunal had been progressively reduced, and that the SRA—after conducting its own detailed review—had issued him condition-free practising certificates for the past two years. The present application, he submitted, sought to align the Tribunal's historic record with the current regulatory position.

12. The Applicant stated that the remaining conditions had adversely affected his employment prospects, as some firms remained reluctant to engage solicitors subject to restrictions. While he had been able to work as a consultant, he submitted that the removal of the conditions would enhance his prospects of securing substantive employment. He added that his consultancy work had enabled him to maintain and develop regulatory competence through advisory and managerial-level responsibilities.
13. In response to questions from the Tribunal, the Applicant clarified that although not formally appointed as a manager during his time at Archway Solicitors, the nature of his consultancy role between 2016 and 2023 had involved significant managerial and compliance-related duties. After leaving Archway Solicitors in 2023 and a brief period of reduced professional activity for personal reasons, he resumed legal practice through consultancy roles with several firms, including SH Solicitors and, more recently, Fosters Solicitors, and had received no adverse feedback from any engagement.
14. The Applicant further relied on the fact that the SRA did not oppose the application and had already considered him fit to practise without restriction after conducting its own detailed risk assessment.

### **The Respondent's Submissions**

15. Mr Miah, on behalf of the Respondent, confirmed that the Application was not opposed. He acknowledged that, as a necessary respondent to Rule 18 applications, the Respondent attended to assist the Tribunal, despite the matter being uncontested.
16. He submitted that the Respondent's neutral stance was informed by the risk assessment undertaken by its internal authorisations team, which had resulted in the Applicant being granted condition-free practising certificates. He accepted the Applicant's submission that it was desirable for the Tribunal's historical record to be brought into alignment with the SRA's current regulatory position.
17. Mr Miah further drew the Tribunal's attention to the Applicant's positive trajectory, highlighting his developing insight and understanding from the time of the original misconduct through to the Tribunal's 2022 variation decision and up to the present application.

### **Legal Framework**

18. In determining an application under Rule 18 of the SDPR 2019 to vary or remove conditions previously imposed on a solicitor's practice, the Tribunal relied upon the established proportionality test, namely whether the conditions remained necessary, reasonable, and proportionate in order to protect the public and maintain confidence in the profession. Although this test was articulated in the context of conditions imposed by the SRA on a practising certificate in *Bryant v SRA* [2012] EWHC 1475 (Admin) at [22]–[24], the Administrative Court's reasoning reflected a broader regulatory principle which applied equally to the Tribunal's supervisory jurisdiction over practice restrictions imposed on solicitors. The Tribunal regarded this assessment as forward-looking and evaluative, directed to whether there remains any continuing justification for regulatory intervention.

## The Tribunal's Decision

19. The Tribunal considered with care the submissions made by the parties by reference to the test adopted in *Bryant*, namely whether any continuing regulatory intervention remained necessary, reasonable, and proportionate.
20. The Tribunal noted that the Guidance Note "*Other powers of the Tribunal – 7<sup>th</sup> Edition*" (February 2025) was drafted principally for applications concerning the termination of suspension. However, it accepted that the factors identified at paragraph 5 of that Guidance provided a useful analytical structure for assessing, in a Rule 18 context, whether any residual risk justified the continuation of conditions. The Guidance Note is expressly non-binding and does not fetter the Tribunal's discretion; nonetheless, its listed considerations assisted the Tribunal in evaluating whether the proportionality test in *Bryant* was met on the facts of this case.
21. The Tribunal took into account the following as being relevant to its determination:
  - (a) The Applicant's original misconduct concerned breaches of the Solicitors Accounts Rules alongside the provision of inaccurate professional indemnity insurance information. The Applicant accepted the sanctions imposed in 2018, had complied fully with the restrictions and no further regulatory concerns had arisen.
  - (b) The Applicant had undertaken extensive regulatory training and had also provided in-house training, including training on the Solicitors Accounts Rules. Further, he had maintained and strengthened his regulatory competence through consultancy work, advising firms on compliance issues.
  - (c) The Applicant's work at Archway Solicitors had involved managerial level work and regulatory day-to-day supervision. The Applicant had subsequently worked as a consultant at two other firms, continuing to practise safely, with no adverse feedback from any of them.
  - (d) The SRA had carried out its own risk assessment and granted two consecutive Condition-free practising certificates. No regulatory concern had been raised during the present application, and the SRA did not oppose the removal of the remaining restrictions imposed since 2022.
22. The Tribunal determined that there was no evidence that public confidence required protection or that confidence in the profession would be undermined by permitting the Applicant to practice without restriction.
23. Accordingly, the Tribunal granted the Application for the removal of the following restrictions imposed on the Applicant's practice:
  - (a) That he must not practise as a solicitor on his own account; and
  - (b) That he may not be a Manager or Owner of an authorised body.

## Costs

24. Mr Miah, on behalf of the Respondent, referred the Tribunal to the Schedule of Costs dated 13 March 2026, originally totalling £2,197.00, and confirmed that, given the shorter duration of the hearing, a reduced sum of £1,937.00 was now sought. He submitted that the costs claimed were reasonable and proportionate, having regard to the preparatory work undertaken, the size of the bundle, and the need for the Respondent, as a necessary party, to attend and assist the Tribunal.
25. The Applicant noted that the Respondent did not oppose the relief sought, and no factual or legal dispute had arisen during the proceedings. He drew the Tribunal's attention to the previous Rule 18 application in May 2022, which resulted in agreed costs of £725 and submitted that there was no principled basis for a significant increase particularly as no specialist advocacy was required and the matter could have been handled by a caseworker. He further drew the Tribunal's attention to elements of the Respondent's Schedule of Costs which he argued represented duplication or unnecessary time.
26. In accordance with Rule 43 of the Solicitors (Disciplinary Proceedings) Rules 2019, the Tribunal considered it appropriate to make an order for costs. The only issue to be determined was quantum, and the Tribunal therefore considered whether the time claimed, the hourly rates, and the nature of the work undertaken were reasonable and proportionate. The Tribunal accepted that the Respondent, as a necessary party, was required to prepare the case and attend the hearing and was satisfied that the work undertaken was properly incurred. It also noted the reductions already applied by the Respondent to reflect the shortened hearing length.
27. Having considered the submissions of both parties, the Tribunal concluded that the costs claimed by the Respondent were reasonable and proportionate and therefore made an order in the sum claimed.

## Statement of Full Order

28. The Tribunal ORDERED that the Application of ZAIN SIDDIQI, for the removal of the conditions imposed by the Tribunal on 23 May 2022, be **GRANTED** and it further Ordered that the Applicant do pay the costs of the response of the Solicitors Regulation Authority Ltd to this application fixed in the sum of £1,937.00.

Dated this 27<sup>th</sup> day of April 2026

On behalf of the Tribunal



L. Murphy  
Chair