SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 Case No. 12914-2026

BETWEEN:

QUEEN APPAHOH Applicant

and

SOLICITORS REGULATION AUTHORITY LTD Respondent

Before:

Mrs C Evans (in the chair)
Mr J Johnston
Mr G Gracey

Date of Hearing: 04 June 2026

Appearances

The Applicant appeared and represented herself.

Charlotte Elves, barrister, Outer Temple Chambers, 222 Strand, Temple, London WC2R 1BA for the Respondent).

JUDGMENT ON AN APPLICATION TO REMOVE CONDITIONS

Background to the Application

1. On 5 March 2020, the Tribunal approved an Agreed Outcome dated 3 February 2020 in respect of the Applicant (also known in these proceedings as Queen Gladys Appahoh).

2. The Applicant admitted a number of allegations arising from her conduct as a solicitor, salaried partner and Compliance Officer for Finance and Administration ("COFA") at Bilsan Henaku Solicitors. These included failures to safeguard client monies, comply with a court order, maintain proper accounting records, and fulfil her regulatory obligations. There was no finding of dishonesty.

3. The Tribunal ordered that the Applicant be suspended from practice for a period of 12 months, commencing on 4 February 2020.

4. The Tribunal further ordered that, upon the expiry of that period of suspension, the Applicant be subject to restrictions on her practice, namely that she:

   (a) may not act as a manager or owner of an authorised body;

   (b) may not act as a Compliance Officer for Legal Practice or Finance and administration;

   (c) may not hold, receive, or have access to client money, nor act as a signatory to any client or office account; and

   (d) may practise only in employment approved by the Respondent.

5. Since the Tribunal's Order of 5 March 2020, the Applicant's practising certificate has been granted subject to conditions reflecting the restrictions imposed by the Tribunal.

The Application

6. By an application dated 10 March 2026, the Applicant applied pursuant to section 47 of the Solicitors Act 1974 for the removal of the restrictions imposed on her practice.

7. The Respondent opposed the application.

Documents

8. The Tribunal reviewed all the documents submitted by the parties, which included (but was not limited to):

   (a) Form of Application dated 10 March 2026.

   (b) Statement in support of the Application dated 10 March 2026.

   (c) The Judgment dated 5 March 2020.

   (d) The Respondent's Response to the Applicant's Application dated 7 May 2026.

(e) The Respondent's Skeleton Argument dated 4 June 2026.

(f) The Respondent's Schedule of Costs dated 27 May 2026.

Factual Background

9. The Applicant was admitted to the Roll of Solicitors on 1 February 2010.

10. The Applicant's current practising certificate was granted on 10 February 2026.

The Applicant's Submissions

11. The Applicant emphasised that the purpose of regulatory conditions is protective, namely, to safeguard the public and maintain confidence in the profession, and not to operate as an indefinite restriction. She submitted that the protective purpose of the restrictions imposed on her practice had now been fulfilled and that the Tribunal should find that there was no continuing risk which would justify their retention.

12. The Applicant submitted that there was no evidence of any ongoing or recurrent risk. She maintained that since the imposition of the conditions there had been no further misconduct, allegations of dishonesty, or client complaints, and that she had complied with the restrictions imposed upon her. She further emphasised that the original misconduct did not involve dishonesty on her part and in itself did not justify the continued imposition of restrictive conditions.

13. The Applicant relied upon evidence of training and continuing professional development, as well as voluntary work and mentoring activities she had undertaken in support of her application. She submitted that these demonstrated her ongoing engagement with the profession and her efforts to maintain her knowledge and skills.

14. The Applicant addressed the practical impact of the restrictions. She submitted that they had significantly affected her ability to obtain employment, including positions other than that of a practising solicitor, as they created the false impression that findings of dishonesty had been made against her when that was not the case. She stated that she had been unable to secure employment and was currently reliant on state benefits. In those circumstances, she contended that the conditions had become a disproportionate impediment to her return to work rather than a continuing protective measure.

15. In response to questions from the Tribunal, the Applicant provided further clarification on the following matters:

(a) the extent of her post-suspension practice, confirming that since the imposition of the restrictions she had practised for a period of approximately four months between 2021 and 2022.

(b) the range of roles which she had applied for since the expiry of her suspension, included positions other than that of a practising solicitor. She had not met with success in securing such roles, including through approaches to recruitment agencies, which she attributed to the existence of the restrictions.

(c) the circumstances surrounding the regulatory warning issued in December 2022, explaining that she had notified her caseworker of her employment prior to commencement and believed that this was sufficient. She stated that she did not appreciate that, in addition to her own notification, the employing firm was required to obtain prior approval from the Respondent, and that the failure arose from that misunderstanding rather than any intention to conceal.

(d) the reference relied upon in support of the Application, confirming that it related to a period of employment some four years earlier, during which the referee had been willing to employ her but was unable to do so due to concerns arising from the restrictions; and

(e) her insight into the original misconduct, including the issue of client loss. The Applicant stated that she accepted responsibility for the findings made in 2020, had reflected upon her conduct, and had learned from the experience.

16. The Applicant submitted that, having regard to the passage of time, her compliance with regulatory obligations, and the absence of evidence of any ongoing risk, the continuation of the restrictions was no longer justified. She invited the Tribunal to remove all of the restrictions imposed on her practice.

17. In support of that position, the Applicant further assured the Tribunal that she did not seek or intend to undertake any managerial role or hold client money and would be willing to practise within a supervised and regulated environment.

The Respondent's Submissions

18. The Respondent opposed the Application and submitted that the restrictions remained necessary, reasonable, and proportionate for the protection of the public and the maintenance of confidence in the profession. It emphasised the seriousness of the original misconduct, which had resulted in significant financial loss to a client, and submitted that this remained a central consideration in assessing whether the restrictions should continue.

19. The Respondent raised concerns regarding the accuracy and reliability of certain representations made by the Applicant. In particular, it submitted that the Applicant's account of the circumstances surrounding her employment in March 2022 was inconsistent with the contemporaneous documentation. Contrary to the Applicant's account, there had not been a straightforward refusal by the Respondent to remove the conditions. Rather, the application had been withdrawn by the Applicant. These matters were indicative of inconsistencies in the Applicant's account.

20. The Respondent further submitted that the Applicant had failed to demonstrate consistent compliance with regulatory requirements. It relied on the regulatory warning issued in December 2022 and submitted that the explanation provided by the Applicant did not adequately demonstrate sufficient diligence or understanding of the relevant regulatory obligations. It emphasised that the absence of deliberate concealment did not remove the significance of the underlying failure.

21. In addition, the Respondent identified discrepancies between the Applicant's assertions and the documentary evidence regarding the continuity of her practising certificate, noting that there had been periods during which no certificate was held. It submitted that these discrepancies were relevant to the assessment of the Applicant's insight and raised further concern as to whether there remained a risk to the public.

22. The Respondent submitted that there was a lack of meaningful evidence of rehabilitation in practice. It noted that the Applicant had only undertaken a limited period of legal work since the imposition of the restrictions and that there was no structured or sustained evidence of compliant practice under supervision. It further submitted that there was no clear plan for future risk mitigation or oversight, and that the Application did not identify any concrete or verifiable arrangements which would address the risks arising from the original misconduct.

23. In relation to the restrictions, the Respondent submitted that the requirement for prior approval of employment was an important and necessary safeguard, enabling it to assess whether appropriate supervision and controls would be in place in any proposed role. Whilst it was accepted that the restriction was onerous, it was submitted that it was central to the effective management of risk and should be maintained. The Respondent further contended that, notwithstanding the Applicant's submissions as to the effect of the restrictions on her employment prospects, the overarching consideration remained the protection of the public and the maintenance of confidence in the profession, which outweighed any personal hardship.

Legal Framework

24. The Tribunal considered that an application under Rule 18 of the SDPR 2019 engages a forward-looking assessment grounded in proportionality, namely whether the continuation of restrictions on the Applicant's practice remains necessary, reasonable, and proportionate to secure public protection and maintain confidence in the profession. In adopting that test, the Tribunal derived assistance from the approach articulated in *Bryant v SRA* [2012] EWHC 1475 (Admin) at [22]– [24], recognising that the principles identified therein are not confined to practising certificate conditions but extend to the Tribunal's own jurisdiction over practice restrictions.

25. The central question to be determined was whether there remained any ongoing justification for regulatory intervention.

26. For the avoidance of doubt, this Judgment distinguishes between the restrictions imposed by the Tribunal and the mirror practising certificate conditions subsequently imposed administratively by the Respondent.

The Decision of the Tribunal

27. 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.

28. The Tribunal considered the Guidance Note "Other powers of the Tribunal – 7th Edition" (February 2025). Whilst recognising that the Guidance is primarily concerned

with applications for the termination of suspension, the Tribunal derived assistance from the factors set out at paragraph 5 as a means of structuring its assessment of residual risk in the context of the Application. The Guidance does not bind the Tribunal and does not constrain the exercise of its discretion. However, the factors identified within it provided a useful framework through which to evaluate whether the continuation of the restrictions remained justified under the proportionality test in *Bryant*.

29. The Tribunal had regard to the seriousness of the original misconduct. Whilst no finding of dishonesty had been made, the Tribunal accepted that the misconduct involved serious omissions in a regulatory role, which had resulted in significant financial loss to a client. The Tribunal considered that the gravity of those failings, including the failure to identify and act upon risk, remained an important starting point in assessing whether the continued imposition of restrictions was justified.

30. The Tribunal then considered the extent to which the Applicant had demonstrated a sufficient material change in circumstances, including maintaining her professional competence and providing evidence of insight. The Tribunal accepted that the Applicant had undertaken some training and engaged in mentoring and voluntary work, which indicated a degree of ongoing engagement with the profession. However, the Tribunal was not satisfied that there was sufficient evidence of recent relevant training or practice to demonstrate that the circumstances which justified the imposition of the restrictions had materially changed.

31. In relation to insight, the Tribunal carefully considered the Applicant's oral and written evidence. Whilst the Applicant indicated that she had reflected on her conduct and accepted the findings made in 2020, the Tribunal was not satisfied that she had demonstrated a sufficient appreciation of the nature and consequences of the misconduct. The Tribunal was concerned that certain aspects of the Applicant's evidence demonstrated limited insight, particularly in her treatment of the significant financial client loss identified in the original proceedings. It was further troubled by omissions in her application, including her failure to disclose the regulatory warning and discrepancies regarding the continuity of her practising certificate. While these matters were not found to be deliberately misleading, they nonetheless indicated ongoing concerns about her insight and her attention to regulatory obligations.

32. The Tribunal considered whether there remained any continuing risk to the public. Whilst the nature of that risk differed from that arising at the time of the original misconduct, the Tribunal was not satisfied that the Applicant had demonstrated that the risks previously identified had been sufficiently mitigated, in the absence of evidence of sustained practice, structured supervision, or clear oversight arrangements.

33. The Tribunal accepted that the restrictions were onerous and had had an adverse impact on the Applicant's ability to obtain employment. However, the Tribunal remained satisfied that the protection of the public and the maintenance of confidence in the profession continued to require regulatory intervention.

34. In all the circumstances, the Tribunal concluded that the restrictions remained necessary, reasonable, and proportionate. The Applicant had not demonstrated a

sufficiently material change in circumstances to justify their removal, and the Application was therefore refused.

35. The Tribunal indicated that any future application would be assisted by evidence of recent and relevant training, sustained engagement in regulated legal practice, and appropriate arrangements for supervision and risk management.

Costs

36. Ms Elves, on behalf of the Respondent, referred the Tribunal to the Schedule of Costs dated 27 May 2026 and invited the Tribunal to grant costs in the sum of £6,878.00. She relied on the Schedule as representing the costs reasonably incurred in responding to the Application as a necessary party to the proceedings and did not advance separate submissions on the principle of costs in light of the outcome. Ms Elves further submitted that the fact that the hearing had concluded in less than a full day did not reduce the costs claimed, as counsel's brief fee had been incurred on a full-day basis.

37. The Applicant indicated that she did not have the financial means to meet a costs order. She stated that she was not currently in employment and was reliant on state benefits, and that she would only be able to make payment if she were to obtain employment in the future.

38. 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.

39. The Tribunal first considered the reasonableness and proportionality of the costs claimed. Whilst satisfied that costs had been properly incurred in responding to the Application, the Tribunal had regard to the nature and scope of the issues and to the manner in which the hearing proceeded. In particular, the issues were capable of being addressed within a relatively confined hearing in which limited oral submissions were required. In those circumstances, the Tribunal considered that the full sum claimed was not proportionate and that a reduction was appropriate.

40. The Tribunal then considered the Applicant's financial circumstances. It had regard to her evidence that she was not in employment and was reliant on state benefits. Taking those matters into account, the Tribunal determined that a further reduction was required. In all the circumstances, the Tribunal fixed costs in the sum of £1,500.

Statement of Full Order

41. The Tribunal ORDERED that the application of QUEEN APPAHOH, solicitor for the removal of the conditions imposed by the Tribunal on 4 February 2020, be **REFUSED** 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 £1,500.

Dated this 7th day of July 2026
On behalf of the Tribunal

C. Evans

C Evans
Chair