

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12819-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

MD TOWHIDUL ISLAM

Respondent

Before:

Mr M N Millin (in the chair)

Mr E Nally

Dr S Bown

Date of Hearing: 20-21 July 2026

Appearances

Susannah Stevens, Counsel, QEB Hollis Whiteman, 1-2 Laurence Pountney Hill, London, EC4R 0EU for the Applicant.

Dermot Keating KC, Counsel, 25 Bedford Row, London WC1R 4HD instructed by Richard Nelson LLP, 13a Cathedral Road, Cardiff, CF11 9HA for the Respondent.

JUDGMENT ON AGREED OUTCOME

Allegations

The allegations against the Respondent, MD Towhidul Islam, made by the SRA are that:

- 1.1. Between approximately 23 October 2019 and 19 November 2019, whilst employed as an Executive Officer at the Home Office, the Respondent misused the Home Office Central Referencing System (CRS) database by:

- 1.1.1. conducting unauthorised ‘lookups’ of seven UK visa applicants known personally to him; and / or
- 1.1.2. accessing eight visa application files, one of which was a live visa application at the time of access.

In circumstances where he knew and/or ought to have known that he did not have the requisite authority to perform such searches and/or to access application files when there was no legitimate business need to do so and in doing so breached either or both of Principle 2 of the SRA Principles 2011 and Principle 6 of the SRA Principles 2011.

- 1.2. During his onboarding and subsequent employment into the role of Executive Officer between 5 August 2019 to 21 November 2019, the Respondent failed to declare to the Home Office, that he was also working as a trainee solicitor at Waterstone Legal at the same time, and in doing so breached either or both of Principle 2 of the Principles 2011 and Principle 6 of the Principles 2011.

- 1.3. Between approximately 31 March 2022 and 10 January 2023, provided false and/or inaccurate information to the Home Office and/or the SRA during its respective investigations into his conduct:

- 1.3.1. in his attempt to explain why he performed the unauthorised ‘lookups’ and accessed eight visa application files on the CRS database; and/or
- 1.3.2. asserting that he fully disclosed to the Home Office during his employment that he was also working as a trainee solicitor at Waterstone Legal.

And in doing so breached any or all of Principle 2 SRA Principles 2019, Principle 4 SRA Principles 2019, Principle 5 SRA Principles 2019, Paragraph 1.4 SRA Code of Conduct for Solicitors, RELs and RFLs 2019 and Paragraph 7.4 SRA Code of Conduct for Solicitors, RELs and RFLs 2019.

- 1.4. On or around 15 May 2019, asked Ms HU, an individual assisting a client of his, to pay £300 as a final fee, which he retained for personal gain, providing untrue and misleading information to the client that the sum requested was to discharge outstanding fees owed to Waterstone Legal in the client’s matter,

and in doing so breached any or all of:

- 1.4.1 Principle 2 SRA Principles 2019
- 1.4.2 Principle 4 SRA Principles 2019
- 1.4.3 Principle 6 SRA Principles 2019

2. Allegations 1.1, 1.2, 1.3 and 1.4 are advanced on the basis that the Respondent's conduct was dishonest.
3. In the alternative to dishonesty, allegations 1.1, 1.2, and 1.4 are advanced on the basis that the Respondent's conduct was reckless.

Preliminary Applications

Application for permission to submit an Agreed Outcome out of time

4. This matter was listed for a five-day substantive hearing commencing on 20 July 2026. At the commencement of the hearing, the parties informed the Tribunal that they had reached agreement in principle in relation to the disposal of the proceedings. The parties advised that additional time was required to finalise the terms of the Agreed Outcome, which was subsequently presented to the Tribunal for approval on 21 July 2026.
5. As the Agreed Outcome was submitted 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 submit the Agreed Outcome out of time. The application was supported by the Respondent.
6. On behalf of the Applicant, it was submitted that the case had been kept under continuous review throughout the proceedings. Following recent admissions made by the Respondent, together with the receipt of additional evidence, the Applicant had concluded that it was in the public interest to accept those admissions and to pursue an agreed outcome in relation to Allegations 1.1 and 1.2. It was further submitted that, in light of the additional evidence received, the Applicant had concluded that it was no longer in the public interest to pursue Allegations 1.3 and 1.4 or the associated allegations of dishonesty in these two allegations and in Allegation 1.1 and 1.2.
7. 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 Agreed Outcome 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 of the Agreed Outcome, the Respondent's support for the application, and the overriding objective of dealing with proceedings fairly and justly.

Application to withdraw Allegations 1.3 and 1.4

8. The Applicant applied, pursuant to Rule 24 of the SDPR 2019, for permission to withdraw Allegations 1.3 and 1.4 together with the associated allegations of dishonesty. The application was supported by the Respondent.
9. On behalf of the Applicant, it was submitted that, following a review of the evidence, including recent admissions made by the Respondent and the receipt of additional evidence, it was no longer in the public interest to pursue Allegations 1.3 and 1.4 or the associated allegations of dishonesty.

10. The Tribunal considered the application and was satisfied that it was appropriate to grant permission, pursuant to Rule 24 of the SDPR 2019, for the withdrawal of Allegations 1.3 and 1.4 together with the associated allegations of dishonesty and the amendment to Allegation 1.1 and 1.2 by the withdrawal of the allegation of dishonesty in each. The Tribunal was satisfied that the proposed withdrawal formed part of the Agreed Outcome placed before it and that it was appropriate, in all the circumstances, to permit the Applicant to withdraw those allegations.

Admissions

11. The Respondent admitted Allegations 1.1 and 1.2 as set out in the Statement of Agreed Facts and Proposed Outcome.

Documents

12. The Tribunal had, amongst other things, the following documents before it: -
 - The Form of Application dated 13 August 2025.
 - Rule 12 Statement and Exhibits A1 dated 13 August 2025.
 - Statement of Agreed Facts and Proposed Outcome dated 21 July 2026¹

Findings of Fact and Law

13. 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.
14. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made.
15. 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 existed.
16. At the material time, the Respondent was employed by the Home Office as an Executive Officer Litigation Caseworker whilst simultaneously undertaking employment as a trainee solicitor with Waterstone Legal. His role within the Home Office involved dealing with pre-action protocol correspondence and judicial review claims. In that capacity, he was granted access to the Home Office's Central Referencing System ("CRS"), which contained highly confidential information relating to visa applications.
17. During October 2019, the Respondent accessed eight visa application records that had not been allocated to him. Those records related to members of his family, clients for whom he acted through Waterstone Legal, and an individual known to him personally. The Tribunal found that the Respondent did not have a legitimate business reason for accessing those records and had acted recklessly as to whether he was authorised to do

¹Which can be viewed [here](#).

so. The Tribunal further found that the Respondent had acted recklessly as to the conflict of interest arising from accessing records relating to individuals known to him personally and professionally.

18. The Respondent had accepted obligations of confidentiality upon commencing his employment with the Home Office, including obligations to exercise care in the use of information acquired in the course of his official duties. He nevertheless failed to notify the Home Office that he remained employed as a trainee solicitor with Waterstone Legal. Given the nature of his respective roles, the Tribunal found that the Respondent should have appreciated the potential conflict of interest arising from his concurrent employment and should have disclosed that position to his line manager or otherwise reduced the matter to writing so that it could be properly considered by the Home Office.
19. In assessing culpability, the Tribunal had regard to the Respondent's misplaced and inappropriate curiosity concerning the progress of immigration matters with which he was personally connected. The Respondent's misconduct was neither spontaneous nor isolated. The Respondent deliberately accessed eight records over a period of time, notwithstanding that none had been allocated to him. The Tribunal also attached significant weight to the fact that the Respondent occupied a position of trust, having been granted access to highly confidential information in the course of his employment with the Home Office. Whilst recognising that the Respondent was relatively inexperienced, the Tribunal was satisfied that the misconduct demonstrated a moderate to high degree of culpability.
20. In assessing harm, the Tribunal considered the impact of the Respondent's misconduct, together with the extent of the harm that was intended or might reasonably have been foreseen. The Respondent improperly accessed highly confidential personal information relating to eight individuals without any legitimate business reason for doing so. Whilst there was no evidence that the information was disclosed to any third party or that the Respondent intended to cause harm, the Tribunal was satisfied that the potential for harm was readily foreseeable.
21. The Tribunal attached particular weight to the fact that the misconduct involved the unauthorised access to confidential information held by a government department. Such conduct has the potential to undermine public confidence both in the proper handling of sensitive personal information and in the integrity expected of solicitors. The Tribunal was satisfied that the Respondent's conduct caused significant reputational harm to the profession and, when considered alongside the foreseeable risk to the individuals whose information had been accessed, justified an assessment of high harm.
22. The Tribunal considered that the proposed sanction, namely that the Respondent be suspended from practice for a period of 12 months, together with a Restriction Order thereafter appropriately reflected the seriousness of the Respondent's misconduct.
23. In all the circumstances, the Tribunal therefore accepted that the sanction (as set out in its order below) was reasonable and proportionate, serving to mark the seriousness of the misconduct, protect the public, and maintain the reputation of the profession.

Costs

24. The parties had agreed that the Respondent should pay costs in the sum of £41,350.00. The 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

25. The Tribunal ORDERED that the Respondent, MD TOWHIDUL ISLAM, solicitor, be SUSPENDED from practice as a solicitor for the period of 12 months to commence on 21 July 2026 and it further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £41,350.00.
- 25.1 Upon the expiry of the fixed term of suspension referred to above, the Respondent shall be subject to conditions imposed by the Tribunal for the period of 12 months as follows:
- 25.1.1 The Respondent may not:
- 25.1.2. Practise as a sole practitioner or sole manager or sole owner of an authorised or recognised body.
- 25.1.3 Be a partner or member of a Limited Liability Partnership (LLP), Legal Disciplinary Practice (LDP), or Alternative Business Structure (ABS) or other authorised or recognised body.
- 25.1.4 Be a Compliance Officer for Legal Practice or a Compliance Officer for Finance and Administration.
- 25.1.5 Work as a solicitor other than in employment approved by the Solicitors Regulation Authority Ltd.
- 25.1.6 There be liberty to either party to apply to the Tribunal to vary the conditions set out at paragraph 2 above.

Dated this 15th day of August 2026

On behalf of the Tribunal

M N Millin

M N Millin
Chair

BEFORE THE SOLICITORS' DISCIPLINARY
TRIBUNAL

Case No:
RGC-
00007883

IN THE MATTER OF THE SOLICITORS ACT 1974
(As Amended)

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY
LIMITED

Applicant

and

TOWHIDUL ISLAM

Respondent

STATEMENT OF AGREED FACTS AND PROPOSED

OUTCOME

1. By its application dated 13 August 2025 which included a statement pursuant to Rule 12(2) of the Solicitors (Disciplinary Proceedings Rules) 2019 (“the Rules”), the Applicant brought proceedings before the SDT against this Respondent.

THE ALLEGATIONS

2. The allegations against the Respondent are that:
 - 1.1 Between approximately 23 October 2019 and 19 November 2019, whilst employed as an Executive Officer at the Home Office, Mr Islam misused the Home Office CRS database by:
 - a. conducting unauthorised ‘lookups’ of seven UK visa applicants known personally to him;
 - b. accessing eight visa application files, one of which was a live visa application at the time of access, in circumstances where he knew and/or ought to have known that he did not have the requisite authority to perform such searches and/or to access application files when there was no legitimate business need to do so.
 - 1.2 During his onboarding and subsequent employment into the role of Executive Officer between 5 August 2019 to 21 November 2019, the Respondent failed to declare to the Home

Office, that he was also working as a trainee solicitor at Waterstone Legal at the same time.

3. Allegations 1.1 and 1.2 are advanced on the basis that the Respondent's conduct was reckless.

ADMISSIONS

4. The Respondent admits allegations 1.1 and 1.2. He admits the aggravating feature of recklessness in respect of both allegations 1.1 and 1.2.
5. It is accepted that the Respondent breached Principles 2 and 6 in relation to both allegations.

PROFESSIONAL DETAILS

6. The Respondent, who was born on March 1987, is a solicitor having been admitted to the Roll on 14 October 2020.
7. The Respondent holds a current practising certificate. The practising certificate is free from conditions.

AGREED FACTS

Allegation 1.1

8. The Respondent was employed by the Home Office ("HO") between approximately 5 August 2019 and 21 November 2019 as an Executive Officer Litigation Caseworker. This role entailed dealing with pre-action protocol letters and judicial review

claims.

9. On 22 August 2019, the Respondent's line manager emailed him a copy of his Executive Officer goals, which included: "Use resources only for the authorised public purposes for which they are provided". The goals also stipulate: "Treat data and personal information carefully".
10. To undertake his role, the Respondent was given access to the HO's databases, including the Central Referencing System ("CRS"), which holds highly confidential information regarding all UK Visa applications. A warning notice appears on the computer prior to the use of the data base, the CRS: *"Access to, and use of, this system is restricted to genuine users and is limited for the purpose of the organisation's business"*.
11. At the same time as working for the HO, the Respondent worked as a trainee solicitor for Waterstone Legal ("WL"). The immigration work in question included representing individuals in respect of their visa applications to the HO and pre-action protocol letters and judicial review applications against refusal decisions.
12. It is accepted that an audit of the CRS shows that the Respondent first accessed the CRS on 23 October 2019.

13. The Respondent accessed eight visa application files on the CRS, in respect of cases that had not been allocated to him. Five files concerned family members of the Respondent, two files related to clients of his at WL and a further file was a live file concerning someone that the Respondent knew. The files and the Respondent's applicable CRS searches are as follows:

i. Client A – Bangladeshi national – Visa reference 1437558.

Client A's UK visit visa application was received by the HO on 21 May 2019 and refused on 3 July 2019. The email address linked to the application is listed as towhid@waterstonesolicitors.com. This visa application was accessed by the Respondent three times on 23 October 2019 at 15:36:51, 15:37:55 and 15:42:16. This applicant was a client of the Respondent's at WL.

ii. Mr WA – Bangladeshi national - Visa reference 1574438.

Mr A's UK visit visa application was received by the HO on 20 September 2019 and granted on 27 September 2019. The visa application shows the mother and father of this applicant to share the same name as the Respondent's parents. This visa application was accessed three times on 23 October 2019 at 15:47:38, 15:48:09 and 16:07:53.

iii. Ms UJ – Bangladeshi national - Visa

reference 1032706. Ms UJ's UK Partner visa application was received by the HO on 22 August 2018 and granted on 24 January 2019. The partner is listed as MD Towhidul Islam. Within this application, there was a letter of authority submitted by Ms UJ appointing WL as her legal representative. This visa application was accessed by the Respondent four times on 24 October 2019 at 10:10:10, 10:10:27, 10:18:42 and 10:18:58.

iv. Mr NH – Bangladeshi national - Visa reference 1434532.

Mr NH's visit visa application was received by the HO on 29 October 2019 and granted on 5 November 2019 at 14:09:54. NH confirmed that she knew Mr Islam. This visa application was accessed by the Respondent a total of 12 times. This visa application was viewed by the Respondent whilst it was an application in progress, and again when it had been granted on 30 October 2019 at 11:10:59, 11:11:16, and 11:14:37; 5 November 2019 at 10:57:44, 10:58:16, 10:59:12, 10:59:50, 10:59:54, 15:07:07 and 6 November 2019 at 14:30:57 and 14:52:39.

v. Client B – Bangladeshi national - Visa reference 617289 and 614340. Client B's first visit visa application (visa reference 617289) was received by the HO on 31 July 2012 and refused on 12 August 2012.

The sponsor of this application is listed as MD Towhidul Islam. This visa application was accessed by the Respondent twice: on 19 November 2019 at 15:16:27 and 15:16:36. Client B's second visit visa application (visa reference 614340) was received by the HO on 4 July 2012 and granted on 2 May 2013. The sponsor of this application is listed as MD Towhidul Islam. During the progress/appeal stage of this visa application, there were various emails received from email address mtictg@gmail.com signed off as "Md Towhidul Islam Barrister at Law" referring to Client B as his client. This visa application was accessed by the Respondent four times: 19 November 2019 at 15:13:28, 15:13:35, 15:22:24 and 15:22:40.

- vi. Mr MT – Bangladeshi national – Visa reference 614341. Mr MT's visit visa application was received by the HO on 4 July 2012 and granted on 2 May 2013. The sponsor of this application is listed as MD Towhidul Islam. The visa application shows the mother and father of this applicant to share the same name as the Respondent's parents. This visit visa application was accessed by the Respondent three times: - 19 November 2019 at 15:17:21, 15:17:29 and 15:22:49.
- vii. Mr MI – Bangladeshi national – Visa

reference 568692. Mr MI's Student visa application was received by the HO on 30 January 2011 and refused on 5 June 2011. The visa application shows the mother and father of this applicant to share the same name as the Respondent's parents. This visa application was accessed four times: 19 November 2019 at 15:29:15, 15:29:38, 15:32:03 and 15:34:24.

14. It is accepted that the Respondent did not treat data and personal information carefully, and that he was reckless as to whether he had a legitimate business interest in relation to accessing the data. He accepts now that he did not have a legitimate business interest as none of the cases had been allocated to him. Further, he knew the eight applicants involved and had worked on behalf of two of the applicants in his role as a trainee solicitor at WL.
15. It is accepted that the Respondent should not have undertaken any searches and/or accessed data in respect of those known to him and/or clients of the firm. As and when he had difficulties operating the system, he should have asked for assistance from his line manager and/or his mentor. Further, he should have appreciated the risk of a conflict of interests and was reckless in that regard.
16. In relation to Client A, the Respondent accepts that the following chronology accurately reflects the

documentation within the WL file relating to Client A:

- 4 May 2019 – Client A instructs WL.
- 7 May 2019 – Payment of £50 to WL by Ms HU, on behalf of Client A and the Respondent emailed HU to confirm the receipt of documentation from Client A.
- 14 May 2019 – the Respondent emailed Client A and HU, having reviewed Client A's letter of employment.
- 15 May 2019 – Receipt for payment of £300 by HU, on behalf of Client A.
- 17 May 2019 –The Respondent emailed Client A a copy of the visa application form.
- 20 May 2019 – Application for a visa by Client A submitted by WL to the HO.
- 29 May 2019 – the Respondent sought a refund on behalf of Client A from the HO and an explanation for their purported delay.
- 31 July 2019 – the Respondent emailed Client A and HU stating that he is “aware of your refusal” and can discuss a “potential way to win the matter”. On the same date, he wrote to the HO on behalf of Client A seeking the reasons for the refusal of the visa application – notice and reasons.
- 8 September 2019 – the Respondent emailed Client A a copy of a pre-action protocol letter sent to the HO, in respect of not providing a reason for the refusal of the visa.

- 9 September 2019 – Letter before action sent to HO on behalf of Client A seeking reasons for the refusal notice.

Allegation 1.2

17. The Respondent admits that when he accepted employment by the HO, it was on the terms set out in a letter sent to him on 5 August 2019. This letter made plain that: “All civil servants owe duties of confidentiality and loyal service to the Crown. This means that they are required to exercise care in the use of information which they acquire in the course of their official duties and to protect information that they are expected to uphold”.
18. During his onboarding to the HO, and then subsequent employment into the role of Executive Officer, the Respondent failed to declare to the HO, that he was also working as a trainee solicitor at WL at the same time. The Respondent did not notify his line manager nor his mentor.
19. The HO Conflicts of Interest Policy (issued July 2008), makes the following plain:
 - i. *You must not misuse your official position or any information acquired during the course of your official duties to further your private interests or those of others.*

Principles

ii. *If you come into official contact with matters concerning a business organisation (including professional practices) in which you knowingly have an interest, you must inform your line manager and must follow any departmental instruction regarding the interest.*

iii. ...

iv. *In summary:*

v. ...

Where you suspect that there may be a conflict of interest you must declare it to your line manager, who should then inform your head of unit and the Home Office shared service centre (SSC) so that senior management can determine how to proceed.

20. The Civil Service Policy on Activities Outside Official Duties sets out that:

i. *You must not take part in any employment or public activity that compromises or could be seen to compromise your impartial service to the government.*

ii. ...

iii. *You must inform your line manager if you plan to undertake outside employment, whether or not it is within working hours.*

21. As the bulk of the Respondent's work was within

the immigration department at WL, it is accepted that he should have appreciated the potential for a conflict of interest in being employed by the HO as a Caseworker, responsible for pre-action protocol letters and judicial review claims. He should have notified his line manager and reduced the issue to writing. Albeit he notified the HO during the vetting stage, by adding the details of his employment at WL in the vetting form, he should have raised it at a later stage, in writing and/or with his line manager so that it could be considered, once a role had been allocated.

ALLEGATION AND BREACHES OF THE PRINCIPLES

Allegation 1.1

Principle 2, SRA Handbook 2011 – You Must Act with Integrity

22. The Respondent admits that by accessing sensitive HO and personal information on Government immigration systems, when the Respondent ought to have known that he did not have the requisite authority to undertake the searches and access data, the Respondent failed to act with integrity, i.e. with moral soundness, rectitude, and steady adherence to an ethical code.
23. The Respondent accepts that acting with integrity would have required the Respondent to have only accessed data and files that related to cases to which he had been allocated, in respect of which

there was a legitimate business purpose. Further, acting with integrity would require that the Respondent did not access confidential information about not just individuals, but HO processes and decision-making concerning family members, people who he knew and/or clients. The Respondent did not have sufficient regard to the potential conflict of interest, or to the sensitivity of the HO data.

Principle 6, SRA Handbook – You Must Behave in a Way that Maintains the Trust the Public Places in you and in the Provision of Legal Services

24. The Respondent accepts that the public need to be able to trust and have confidence that those who are given access to confidential and sensitive HO systems, only access the data for legitimate business interests. It is agreed that any accessing of family information and/or client information on HO systems, to which access has been given for a different purpose, brings the system into disrepute.
25. The Respondent admits that he searched and accessed the HO files without due regard to the impact of his actions on public trust.

Recklessness

26. The Respondent accepts that his actions were reckless in accordance with the test set out in the case of *Brett v SRA* [2014] EWHC 2974 (Admin).

27. The Respondent admits that he was aware that the risk of a conflict of interest existed and there was a risk of data protection breaches in searching for, and accessing, files in respect of people that he knew and/or were clients of WL. It is accepted that the risk was an unreasonable one for the Respondent to take and it was unnecessary, as he could have asked his mentor and/or line manager for help at any time.

Allegation 1.2

Principle 2, SRA Handbook 2011 – You Must Act with Integrity

28. It is admitted that the Respondent has acted with a lack of integrity in failing to be open and transparent with his line manager and during onboarding at the HO regarding his employment at WL in respect of immigration cases. It is agreed that the Respondent's attitude in failing to give full disclosure represents a lack of integrity.

Principle 6, SRA Handbook – You Must Behave in a Way that Maintains the Trust the Public Places in you and in the Provision of Legal Services

29. The Respondent accepts that members of the public would not expect a legal professional to recklessly withhold information from the HO, when that information was relevant to the HO's assessment of risk with regards to the suitability of employment, role and access to sensitive data

bases.

30. The Respondent admits that in failing to be sufficiently open with the HO, he breached the trust that the public places in solicitors and in the provision of legal services.

Recklessness

31. The Respondent was aware of a risk that a conflict of interest could arise as a result of working for the HO in respect of immigration applications, whilst at the same time representing clients in respect of their applications to the HO, for WL. Aware therefore of the risk, it was unreasonable to take it and he should have spoken to HR and/or his line manager about not only the fact of the job, but the nature of the work that he was undertaking.

PROPOSED SANCTION

32. The proposed sanction is that the Respondent be suspended for six months and a 12-month restriction order (practising certificate conditions) with conditions.

Aggravating factors

33. The following factors are admitted to be aggravating of the conduct:
- i. There were repeated 'lookups' of the 8 files in question, one of which was a live application.
 - ii. Two of the applicants were immigration clients of WL for whom the Respondent

was employed.

- iii. The data base was highly sensitive, relating to Home Office confidential records regarding immigration applications, reviews and appeals.
- iv. His actions were reckless and he ought to have known that (i) he was not authorised to access the files in question, (ii) there was a risk of conflict as the people were known to him and/or clients and (iii) he should have made clear to the HO his employed role at WL.

Mitigating Circumstances as to the conduct

34. The following mitigating factors are applicable:
- i. The majority of the unauthorised 'look ups' were on files that relate to family members and/or were closed applications
 - ii. The Respondent's actions had no direct impact on any live appeals.
 - iii. There was no evidence of loss or direct harm to the Home Office.
 - iv. The Respondent held the role at the HO for a very short period from August 2019 until he resigned in November 2019. This was 28 months prior to when the Home Office investigation commenced.

Mitigation

35. The following mitigation, which is not endorsed by the SRA, is put forward by the Respondent:
- i. The Respondent fully acknowledges that

his actions fell short of the standards expected of a solicitor and deeply regrets his conduct. He takes full responsibility for his conduct and understands the importance of upholding public trust and confidence in the legal profession.

- ii. The Respondent acknowledges that this experience has led to a significant period of reflection and he is determined that such conduct is never repeated. Accordingly, since these events, he has developed his practice and skills to become a better solicitor.
- iii. The Respondent was not an admitted solicitor at the time of these events in 2019.
- iv. The conduct took place at a time of significant personal difficulty, where the respondent struggled with the burden of studies, two jobs and a wife who had a number of complications with her pregnancy.
- v. There have been no previous disciplinary findings prior to or since these events against the respondent.
- vi. The actions of the Respondent were out of character as evidenced by the extensive written character evidence provided to the Tribunal by a variety of members of the legal profession who are aware of the nature of the charges.

Proposed penalty.

36. Taking account of the admitted misconduct and having considered the Solicitors Disciplinary Tribunal's Guidance Notes on Sanction – 11th Edition, the SRA contends, and the Respondent accepts, that the proper penalty in this case is as follows:
37. 6-month suspension from the date of the Tribunal's Order, followed by a 12-month restriction order (practising certificate conditions), with the following conditions:
1. Mr Islam may not act as a manager or owner of any authorised body
 2. Mr Islam may only act as a solicitor where his position has been approved by the SRA
 3. Mr Islam may not act as a Compliance Officer for Legal Practice (COLP) or Compliance Officer for Finance and Administration (COFA) for any authorised body.
 4. Mr Islam may not practise on his own account under regulation 10.2(a) or (b) of the SRA Authorisation of Individuals Regulations 2019.

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

38. In the circumstances, the seriousness of the Respondent's admitted misconduct is such that neither a Restriction Order alone, Reprimand nor a Fine is sufficient sanction or, in all the circumstances, appropriate. There is a need to protect the reputation of the legal profession from the future risk of Mr Islam but neither an indefinite suspension nor a Strike off Order is justified.

39. The proposed penalty is the appropriate sanction to uphold confidence in the profession and proportionate to the seriousness of the admitted misconduct.

Costs

40. With respect to costs, it is further agreed by Mr Islam that he should pay the SRA's costs of the enquiry and application fixed in the sum of £41,350.

Md Towhidul Islam

21/07/2026

21 July 2026 on behalf of the SRA