SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 Case No. 12921-2026

BETWEEN:

GILLIAN MARGARET WALKER now HADLEY Applicant

and

SOLICITORS REGULATION AUTHORITY LTD Respondent

Before:

Mr U Sheikh (Chair)
Ms V Kaye
Dr A Richards

Date of Hearing: 7 July 2026

Appearances

The Applicant represented herself.

Philip Ahlquist, counsel of Fountain Court Chambers, Temple, London EC4Y 9DH, for the Respondent.

APPLICATION FOR REVOCATION OF SECTION 43 ORDER

The Legal Framework

1. The application before the Tribunal was made by Ms Walker (now Hadley), the Applicant, who is subject to a Section 43 Order. The Order had been made by the Solicitors Disciplinary Tribunal on 17 December 2020 pursuant to Section 43(2) of the Solicitors Act 1974. The Applicant sought revocation of the order.

2. Section 43(3A) provides that, on review, the Tribunal may order the quashing of the order, the variation of the order, or the confirmation of the order. On an application for revocation made to the Tribunal in respect of an order which the Tribunal made, the Tribunal considers relevant facts and circumstances arising since the making of the original order and, where necessary, makes findings in respect of disputed facts on the civil standard of proof.

3. A Section 43 Order is regulatory, not punitive. The purpose of such an order is to safeguard the public and the reputation of the legal profession by controlling the circumstances in which a non-solicitor may be employed, remunerated, permitted to act as a manager of a recognised body, or permitted to have an interest in such a body.

4. The relevant question is the one identified in *SRA v Ali* [2013] EWHC 2584 (Admin): whether, in all the circumstances, it is any longer necessary for the level of regulatory control imposed by the Section 43 Order to remain in place.

5. The application was therefore not a rehearing of the original disciplinary proceedings. It was not concerned with whether the original findings were justified or whether the Order should have been made in December 2020. The question for this Tribunal was whether the Order remained necessary now, having regard to the original findings, the purpose of the Order, the protection of the public, the reputation of the profession, and all relevant facts and circumstances since the Order was made.

Background

6. The Applicant is an unadmitted person and a Fellow of the Chartered Institute of Legal Executives. She was formerly a fee-earner at Opes Law Limited, a firm which began trading in October 2015 and dealt with holiday sickness claims.

7. In the original proceedings, Case No. 12095-2020, the SRA brought proceedings against the Applicant. The substantive hearing took place between 15 and 17 December 2020 before Mr J C Chesterton, in the chair, Mr M N Millin and Ms E A Chapman.

8. The original proceedings concerned six allegations. The Tribunal found all six allegations proved. The Applicant did not seek to re-open those findings in this application.

The Original Allegations and Findings

9. The six allegations found proved fell broadly into three categories:

- failures to obtain regulatory approval (allegations 1.1 and 1.2).

- conduct directed at a potential witness (allegations 1.3 and 1.4).

- and misleading correspondence and failures of disclosure to clients (allegations 1.5 and 1.6).

In summary:

9.1 Allegation 1.1 was that, between no later than 13 April 2016 and 24 May 2017, whilst acting as a director of Opus Law Limited, the Applicant failed to ensure that her position as a manager of the Firm was approved by the SRA, in breach of Rules 8.1 and/or 8.6 of the SRA Authorisation Rules 2011 and Principle 7 of the SRA Principles 2011.

9.2 Allegation 1.2 was that, between no later than 6 October 2016 and 24 May 2017, whilst owning the share capital of the Firm, the Applicant failed to ensure that her position as an owner was approved by the SRA, in breach of the same Rules and Principle.

9.3 Allegation 1.3 was that, on 11 May 2017, the Applicant wrote a letter to a potential witness for a defendant tour company which impliedly threatened to expose the witness to allegations of benefit fraud if the witness gave evidence in accordance with her statement, in breach of Principles 1, 2 and/or 6.

9.4 Allegation 1.4 was that, on 13 November 2017, the Applicant sent an email to her client enabling and/or encouraging him to report a potential witness to the benefit fraud helpline in order to discourage that witness from giving evidence for a defendant tour company, again in breach of Principles 1, 2 and/or 6.

9.5 Allegation 1.5 was that, on or about 6 April 2017, the Applicant caused or allowed signed Parental Indemnity Forms to be sent to solicitors acting for Company J's insurers, in circumstances where the forms were misleading because they purported to accept settlement where no agreement had been reached, in breach of Principles 5 and/or 8.

9.6 Allegation 1.6 was that, between 5 September 2016 and 24 May 2017, the Applicant failed properly to inform the Firm's clients of the details of its fee-sharing arrangements, in breach of Outcomes 9.4 and/or 9.5 of the SRA Code of Conduct and Principle 5.

9.7 In relation to allegations 1.1, 1.2, 1.5 and 1.6, the original Tribunal described the misconduct as consisting of acts of omission and not as planned conduct.

9.8 As to allegations 1.3 and 1.4. the original Tribunal found that the Applicant's passion in defence of her client crossed the line into misconduct; that the actions were planned and considered; and that, after being warned of the conduct risk posed by her letter to the witness, the Applicant then sent the email to her client encouraging him to report the witness in order to discourage the witness from giving evidence.

The Section 43 Order Made on 17 December 2020

10. The Order made on 17 December 2020 provided that, except in accordance with Law Society permission, no solicitor should employ or remunerate the Applicant in

connection with practice as a solicitor; no employee of a solicitor should employ or remunerate her in connection with the solicitor's practice; no recognised body should employ or remunerate her; no manager or employee of a recognised body should employ or remunerate her in connection with the business of that body; no recognised body or manager or employee of such a body should permit her to be a manager of the body; and no recognised body or manager or employee of such a body should permit her to have an interest in the body.

11. The Tribunal also ordered the Applicant to pay the costs of and incidental to the application and enquiry fixed in the sum of £15,000.

Previous Application in 2024

12. There was an earlier application by the Applicant for review or revocation of the Section 43 Order. That application was made by application dated 22 March 2024 and was listed before a Tribunal on 5 August 2024.

13. At the commencement of that hearing, counsel for the Applicant informed the Tribunal that, after discussion with counsel for the SRA and after taking instructions from the Applicant, it was the Applicant's wish to withdraw the application.

14. The Tribunal acceded to the withdrawal of the application and ordered the Applicant to pay costs fixed in the sum of £2,200.

The Present Application

15. The present application was dated 23 March 2026 according to the SRA's Answer. The Applicant sought revocation of the Section 43 Order on the basis that it was no longer necessary, having regard to her conduct, employment, professional development, compliance, and rehabilitation since the Order was made.

16. The Applicant expressly accepted that the Tribunal was not concerned with whether the original findings were correct. Her case was that events since 17 December 2020 demonstrated that the regulatory control imposed by the Order was no longer required.

17. The SRA opposed the application. Its position was that the application was premature and that the evidence did not establish the necessary degree of rehabilitation to enable the Tribunal and the public to have confidence that the Applicant may be involved in legal practice without the supervision or control afforded by the Section 43 Order.

The Applicant's Case

18. The Applicant submitted that the Tribunal must consider the evidence as a whole rather than by focusing on isolated matters. She said that the statutory question was not whether the original Order was justified, but whether the Order remained necessary.

19. The Applicant submitted that neither the Solicitors Act 1974 nor the Section 43 Order prescribes a particular route by which rehabilitation must be demonstrated. In particular, she submitted that there was no requirement that rehabilitation can only be demonstrated by employment within an SRA-recognised body.

20. The Applicant relied on the following matters: continuous compliance with the Section 43 Order; long-standing employment involving legal work and public responsibility; positive professional references; continued professional development; payment of the costs order; and the absence of any breach, complaint, disciplinary finding or regulatory concern since the making of the Order.

21. *Equilaw*

21.1 The Applicant relied first on her work with Equilaw. She said that, following the Section 43 Order, Equilaw immediately applied to the SRA for approval for her to continue in her role and that approval was granted in April 2021. The Equilaw role extended beyond purely administrative tasks. She described the role as involving meetings with clients in their homes, many of whom were elderly or vulnerable, to go through equity release documentation after legal advice had been provided by the advising solicitor.

21.2 The Applicant said that her work included reminding clients of the legal advice previously given by the advising solicitor, ensuring that they understood the documents before signing, explaining the practical effect of the documentation without giving legal advice, recognising issues relating to vulnerability or capacity, and referring any concerns back to the advising solicitor where appropriate. The Applicant described this as work performed closely with SRA-regulated solicitors and stated that she had continued in that role without complaint or concern. She relied on witness statements from David Bush, Compliance Director at Equilaw.

22. *Faith Legal Services*

22.1 The Applicant also relied on her work with Faith Legal Services, which she had established before the Tribunal hearing in December 2020. Her case was that she has continued to operate that business within the restrictions imposed by the Section 43 Order and has worked alongside solicitors, barristers, and CILEX practitioners without regulatory concern.

22.2 The Applicant relied on references from Chris Morris, Carol E Dunkerley, Andrew Littler and Alexandra Peremezhko in respect of Faith Legal Services.

23. *City of Doncaster Council*

23.1 The Applicant placed significant reliance on her current role as a Locum Senior Legal Officer within the litigation team at the City of Doncaster Council. She stated that she was appointed to that role on 12 March 2024. She described the role as involving civil litigation, including complex housing disrepair claims. She is responsible for defending housing disrepair claims on behalf of the Council, preparing witness statements, pleadings, interim applications, case management conference documents, and instructions to counsel for trial.

23.2 The Applicant said that she works with barristers, surveyors and other professionals and regularly deals with difficult legal issues where liability is disputed. She also carries out legal research, prepares and reviews complex pleadings, liaises with claimant solicitors daily and exercises professional judgment when drafting defences. She also considered issues such as whether defects arise from disrepair, tenant use, contractor workmanship or wider property management issues, including one matter involving an AI-controlled heating system. She also relied on assisting with concerns regarding the conduct of claimant solicitors, alleged breaches of the Pre-Action Protocol or the SRA Code of Conduct, and complaints to RICS concerning expert surveyors.

23.3 The Applicant submitted that this role involves significant responsibility and trust, including decisions affecting public funds. She says her contract has been extended on several occasions, including to December 2026 with a likelihood of continuation to May 2027. She relied on references from Craig Parkin and Helen Potts.

24. *Professional Development*

24.1 The Applicant relied on continuing professional development since the Order was made. She said that she was accepted onto the Judicial Mentoring Scheme in June 2025, shadowed a Circuit Judge at Bradford County Court in March 2026, and enrolled on the University of Law CILEX Practice Rights course on 23 May 2026. The CILEX Practice Rights course commenced on 22 June 2026, and that written and practical assessments were scheduled for the end of July 2026. She also referred to attending housing disrepair workshops, most recently on 19 June 2026.

24.2 The Applicant submitted that this professional development demonstrated ongoing commitment to maintaining and improving professional standards. She submitted that ambition, further education, and professional development should be treated as evidence supporting rehabilitation rather than as matters weighing against it.

25. *Compliance and Insight*

25.1 The Applicant submitted that she had complied fully with the Section 43 Order since it was made. She relied on the absence of any alleged breach and referred to the Respondent's letter dated 10 March 2025 as confirming that there had been no breach of the Order.

25.2 The Applicant further relied on the payment of the costs order made in December 2020 as evidence of compliance with the Tribunal's order and acceptance of responsibility.

25.3 In conclusion she said that her roles since December 2020 show increasing levels of trust and responsibility and that her conduct, employment history, references, and professional development together demonstrate rehabilitation.

26. *Questions from the Tribunal*

26.1 In answer to questions from Dr Richards as to the regulations applying to her working environment at the Council, the Applicant described governance policies, regular audits, and layers of management. She said that drafted defences were referred first to the ALMO, the management arm of the Council responsible for its housing stock and then escalated to a manager within the Council for sign-off, and that there were regular meetings, at least two or three each week, to discuss strategy on litigated cases. Although a locum, she was required to adhere to and comply with those policies.

26.2 The Applicant confirmed that she had not informed the recruitment agency through which she obtained the Council position of the existence of the Section 43 Order. She said that the application form had asked whether there were any 'pending investigations,' to which she had truthfully answered that there were none. She had disclosed that she previously went by the name of Walker and now went by the name of Hadley, and had provided identification in both names, namely her passport in the name of Walker and her driving licence in the name of Hadley, so that the agency's compliance department could carry out its own checks. Had the application form asked whether she was subject to restrictions of any nature, she said she would have answered yes.

26.3 The Applicant further confirmed that the managers within the Council legal department did not know of the Section 43 Order, and that the referees who had provided character evidence in support of the application, including Mr Parkin and Ms Potts, likewise did not know of it. She explained that those references had been collated for the purposes of an annual review required by her umbrella company rather than specifically for this application. Her position was that the Section 43 Order was relevant only to employment within an SRA-regulated practice, that it did not apply to her locum position with the local authority, and that she was accordingly under no obligation to volunteer its existence. She maintained that she had answered every question asked of her honestly and had concealed nothing.

The Respondent's Case

27. Mr Ahlquist, for the SRA opposed the application submitting it was premature and that the evidence did not demonstrate the necessary degree of rehabilitation required before the Section 43 Order could safely be revoked. The seriousness of the original misconduct was central to the Tribunal's assessment. Counsel relied particularly on the findings relating to allegations 1.3 and 1.4, which concerned conduct directed at discouraging a potential witness from giving evidence, and on the Tribunal's findings that the Applicant continued despite warnings about the conduct risk.

28. Counsel's submission was that revocation would require clear evidence of real rehabilitation sufficient to give not only the Tribunal but also the public confidence in the Applicant's ability to practice ethically without the supervision or control provided by a Section 43 Order.

29. His skeleton argument submitted that allegations 1.3 and 1.4 were especially serious because they concerned conduct directed at deterring a potential witness from giving evidence in legal proceedings and involved breaches of Principles 1, 2 and 6, namely upholding the administration of justice, acting with integrity, and maintaining public trust and confidence in the profession.

30. In oral submissions, Counsel submitted that there was a real question as to whether the application demonstrated the insight and rehabilitation which was the essential precondition for revocation. He drew attention to paragraphs 45 and 46 of the application, in which the Applicant stated that she had been unrepresented at the original hearing, that this had placed her at a disadvantage in explaining the background to the matters under consideration, and that her inability properly to articulate her position may have led to an incomplete picture being presented to the Tribunal. Counsel

submitted that this implied that, had the Applicant been represented or presented her case differently, the outcome could or would have been different, and that this qualified acceptance of the original findings was itself a matter of concern when assessing insight. The overall impression, he submitted, was that the Applicant treated the Order as an administrative restriction on parts of her practice rather than as flowing from a fundamental and important finding of misconduct.

31. Counsel further submitted that, in applying the test in *SRA v Ali*, the Tribunal should have regard to the principles identified by Sir Thomas Bingham MR in *Bolton v Law Society* [1994] 1 WLR 512. The purpose of the Order was not only to prevent repetition of the misconduct but also, and more fundamentally, to maintain the reputation of, and public confidence in, the profession. Glowing testimonials, personal consequences, and genuine efforts at re-establishment, while relevant, did not touch that essential issue. The question was not simply whether the Applicant had shown that she would not repeat the misconduct, but whether she had demonstrated it so clearly that a well-informed member of the public would have well-founded confidence that no further control or supervision was necessary. Counsel also drew an analogy with applications for restoration to the Roll, in respect of which the Tribunal's Guidance Note contemplates a minimum of six years' evidence of rehabilitation in cases of comparable seriousness. The period here, some five and a half years since the Order was imposed, remained within that range and there was nothing exceptional about it.

32. *SRA Position on Equilaw*

32.1 Counsel said the Respondent accepted that it approved Equilaw's application to employ the Applicant under Section 43 on 26 April 2021 and that it subsequently approved a variation concerning a change of supervisor on 14 January 2022. However, the Respondent characterised the Equilaw role as limited, stating that the Applicant's role was limited to visiting clients at home to confirm identity and witness signatures, and that she did not have managerial responsibilities, did not supervise staff, did not complete legal work, did not give advice and did not have access to client files. The performance of such work under approved supervision did not demonstrate that the Applicant was fit to be involved in legal practice without the controls imposed by the Section 43 Order.

33. *SRA Position on Doncaster Council*

33.1 Counsel submitted that the City of Doncaster Council role did not demonstrate the Applicant's ability to work within the regulated framework controlled by the Section 43 Order. Approval was not required because the Applicant worked for the Council via an umbrella company and the Respondent's case was that there is no evidence establishing whether the Applicant worked in a well-supervised environment and that efforts to rehabilitate did not equate with rehabilitation itself.

33.2 Further, the Council references were generic and did not speak sufficiently to the Applicant's ability to comply with professional standards if permitted to work without restriction in a recognised body. The Respondent also noted that the referees had not confirmed that they knew their references would be used in support of an application to revoke a Section 43 Order.

33.3 In oral submissions, Counsel added that the environment which the Applicant had described in answer to questions from the Tribunal, namely layers of management, the sign-off of drafts, audits and governance policies, was that of a well-managed workplace rather than a regulated one. Compliance with an employer's protocols and established policies did not engage with questions of professional ethics, professional conduct or authorisation of the kind regulated by the SRA.

33.4 In answer to a question from Ms Kaye, Counsel confirmed that the Respondent's case was not that employment within a local authority was incapable of demonstrating what an application of this kind required. He accepted that a sustained period of unimpeachable work in a council legal department, in the course of which specific regulatory or ethical issues had arisen and of which the employer was able to give independent evidence of good ethical decision-making consistent with the standards applying in a regulated environment, could in principle suffice. His submission was that this was not the evidence before the Tribunal.

34. *SRA Position on References*

34.1 Counsel submitted that Mr Parkin, Ms Potts, Mr McNab and the client referees primarily spoke to competence, clarity, administrative orderliness, conduct or professionalism in general terms, rather than addressing the specific ethical issues behind the Section 43 Order. However, his main point was that competence was not the reason for the original Section 43 Order. The issue was not whether the Applicant was capable or competent in the work described, but whether the evidence demonstrated rehabilitation in respect of the professional conduct and ethical concerns that led to the Order. Counsel said that they did not.

35. *Non-Disclosure of the Section 43 Order*

35.1 Counsel placed particular reliance on the matters which emerged in answer to questions from the Tribunal, namely that the Applicant had not disclosed the existence of the Section 43 Order to her recruitment agency, to the managers at the Council, or to the referees upon whose evidence she relied, and that it appeared she had likewise not disclosed it in connection with the judicial mentoring scheme. He made clear that the Respondent did not contend that the Applicant was under a legal obligation to make such disclosure. His submission was that a person who genuinely understood her failings, was remorseful and had insight into what had gone wrong would have wished to disclose it and would certainly have done so before relying upon her employer's references in proceedings before a professional disciplinary tribunal. It was not enough, he submitted, to say in effect "I was not asked, so I did not tell."

35.2 Counsel submitted that the non-disclosure had two consequences. First, it was itself indicative of a lack of insight. Secondly, it substantially undermined the references. The referees were unaware of the Order, unaware of the conduct which led to it and, it appeared, unaware that their references, prepared for a different purpose, were being deployed before the Tribunal at all. They were therefore in no position to engage with the questions of professional conduct and ethics which the Tribunal had to consider, and their evidence went to competence rather than to rehabilitation. The same applied to the Judicial Academy reference: the findings of lack of integrity and of undermining the administration of justice would plainly be relevant to any aspiration to judicial office, yet nothing in the evidence concerning the mentoring scheme addressed them, apparently because those concerned did not know of them.

36. *SRA Position on Professional Development*

36.1 The Applicant's professional development did not sufficiently address the conduct which led to the Section 43 Order being imposed. Judicial mentoring and the selected CILEX programmes did not demonstrate insight or learning in respect of the original failings.

36.2 The Respondent also raised concern as to whether the Applicant's course supervisors or programme providers knew of the Section 43 Order, particularly in light of her use of the surname *Hadley*.

37. *SRA Position on Name Change*

37.1 The SRA's Answer initially raised concern that the Applicant appeared on the Solicitors Register as Gillian Margaret Walker but used Gillian Margaret Hadley professionally and suggested that this could obscure the existence of the Section 43 Order from members of the public or prospective employers searching under the name Hadley. However, Counsel accepted the explanation that the name change arose from divorce and stated that there was nothing inappropriate about that. However, he maintained that the issue remained somewhat relevant to the weight to be placed on references and to whether referees were aware of the Applicant's regulatory history.

The Applicant's Response to the SRA's Concerns

38. In her written and oral submissions in response, the Applicant criticised the SRA's treatment of the evidence. The SRA had not alleged any breach of the Order, had identified no disciplinary concerns and had pointed out no evidence of present risk. The sole issue was whether the Order remained necessary for the protection of the public, and *Ali* required the evidence to be considered in the round rather than discounted item by item.

39. In relation to Equilaw, she submitted that it was unfair for the SRA to place limited weight on work undertaken in conditions which the SRA itself had approved, particularly where she had complied with every condition imposed.

40. In relation to the Council role, she submitted that the SRA did not challenge the seniority of her position or the responsibility attached to it and did not explain why the same litigation work would be relevant evidence of rehabilitation if undertaken within an SRA-recognised body but of little or no relevance when undertaken in a local authority legal department. The City of Doncaster Council was not, in any event, her direct employer; her employer was the umbrella company. Local government, she submitted, is governed by statute and is, if anything, subject to stricter regulation than private practice. She pointed to her repeated contract extensions, to the trust placed in her in the conduct of litigation, and to the fact that for two and a half years she had undertaken complex litigation work in circumstances where the restrictions of the Section 43 Order did not apply. That, she submitted, was itself pivotal evidence of rehabilitation.

41. The Applicant also relied on her correspondence with the SRA in April 2025. When she sought guidance as to the evidence required to support a future revocation application, the SRA referred generally to rehabilitation and compliance with regulatory obligations and did not indicate that employment in an SRA-recognised body would later become a central issue.

42. *Name Change, Disclosure and Transparency*

42.1 The Applicant addressed the SRA's concerns arising from the fact that she appears on the Solicitors Register under the name Gillian Margaret Walker but now used the name Gillian Margaret Hadley for professional purposes. She had used only two names: her married name, under which the Order was made, and her maiden name, to which she reverted following divorce. She provided her recruitment agency with details of both names, together with her passport in the name Walker and her driving licence in the name Hadley, and the agency's compliance department, which was thereby in a position to carry out its own checks, raised nothing. She would gladly have answered any question about the Order had one been asked via the agency, but she had been under no obligation to volunteer it, and there was no lack of transparency.

42.2 The SRA had, moreover, been aware of the circumstances surrounding the name change since at least November 2024. When the point was raised in its letter dated 13 November 2024, she provided an explanation, and the investigation was closed on 10 March 2025. As to the Judicial Academy programme, CILEX, the organisation through which she had accessed it, had been aware of the Section 43 Order from the day it was made in December 2020 and had nonetheless permitted her to enroll; there had accordingly been no concealment in that respect either. The allegation that she *"plainly tends to conceal"* the existence of the Order was serious, unsupported, and inconsistent with the evidence of disclosure, and the SRA had identified no actual example of a member of the public being misled.

42.3 Finally, the Applicant observed that paragraph 21 of the Respondent's Answer accepted that a period of five years and three months was a significant period which might, on its face, be a supportive factor.

The Tribunal's Decision

43. The Tribunal carefully considered all of the evidence before it, the submissions of both parties, and the applicable legal framework. The Tribunal reminded itself that this was not a rehearing of the original proceedings and that the question was not whether the findings made in December 2020 were correct, nor whether the Section 43 Order ought originally to have been imposed. The issue was whether, applying the test in *SRA v Ali*, it remained necessary in all the circumstances for the regulatory control imposed by the Section 43 Order to continue.

44. The Tribunal accepted that a significant period of time had elapsed since the Order was made. It also accepted that there had been no suggestion of any breach of the Order, no further disciplinary findings and no evidence of competence concerns arising from the Applicant's subsequent employment. The Tribunal accepted that the Applicant had been engaged in responsible legal and quasi-legal work since the Order was imposed, including her work with Equilaw and, more recently, her role with the City of Doncaster

Council. The Tribunal further accepted that she had undertaken professional development and had sought to advance her career in a lawful and constructive manner.

45. The Tribunal did not accept the Respondent's submission that rehabilitation could only be demonstrated through employment within an SRA-regulated practice. The Tribunal considered that rehabilitation can, in principle, be demonstrated through a range of professional environments. Nor did the Tribunal regard the Applicant's use of her maiden name following divorce as inherently problematic. The Tribunal accepted the explanation provided in relation to the change of name and did not consider that, of itself, it demonstrated any attempt to mislead.

46. However, the Tribunal considered that the original misconduct was serious. In particular, allegations 1.3 and 1.4 concerned conduct which struck at the administration of justice and involved findings relating to integrity and the treatment of witnesses in litigation. These were not matters of mere technical non-compliance. They involved the exercise of professional judgment in circumstances where the Applicant's desire to advance her client's interests had led her to cross important ethical boundaries.

47. The Tribunal was therefore required to assess whether the evidence demonstrated sufficient rehabilitation and insight in relation to those underlying concerns. In the Tribunal's judgment, that evidence fell short of what was required.

48. The Tribunal accepted that the references relied upon spoke positively of the Applicant's competence, diligence, commitment and professionalism. However, the Tribunal attached limited weight to much of that material when considering the specific issues that had led to the imposition of the Section 43 Order. A significant number of the referees were unaware of the Applicant's regulatory history and were therefore not in a position to address whether she had demonstrated rehabilitation in respect of the ethical and professional conduct concerns arising from the original findings.

49. Indeed, the Tribunal was concerned by the Applicant's decision to rely upon references in support of these proceedings without ensuring that the referees understood the context in which those references would be deployed. The Tribunal considered that this revealed a continuing deficiency in professional judgment. While the Tribunal did not regard the conduct as dishonest or motivated by any intention to mislead, it considered that it demonstrated a lack of appreciation of why transparency and informed consent were important in circumstances where the references were being relied upon as evidence of rehabilitation before a professional disciplinary tribunal.

50. The Tribunal also considered that the Applicant had not sufficiently demonstrated insight into the specific nature of the misconduct which gave rise to the Order. Whilst she accepted the findings made by the Tribunal in 2020 and acknowledged that the Order was properly in place, the Tribunal was not satisfied that she had demonstrated a clear understanding of the underlying ethical failings identified in those proceedings or the steps she had taken to ensure that similar issues could not arise again. The evidence before the Tribunal demonstrated professional advancement and competence. It did not demonstrate, to the extent required, rehabilitation in relation to the concerns regarding judgment, integrity and the administration of justice which lay at the heart of the original findings.

51. The Tribunal accepted that the absence of further misconduct over a substantial period was a factor in the Applicant's favour. However, the Tribunal concluded that the evidence as a whole did not yet provide sufficient assurance that the level of regulatory control imposed by the Section 43 Order was no longer necessary.

52. In reaching that conclusion, the Tribunal bore firmly in mind that a Section 43 Order is protective and not punitive. The Tribunal was not seeking to punish the Applicant for past misconduct, nor to prevent her from continuing the professional activities currently open to her. Rather, the Tribunal was required to determine whether the protections afforded by the Order remained necessary in the public interest.

53. Having considered all of the evidence, the Tribunal concluded that there remained a residual risk arising from the concerns identified above. The Tribunal was not satisfied that the Applicant had yet demonstrated the degree of rehabilitation, insight and ethical reflection necessary to justify the removal of the regulatory safeguards imposed by the Order.

54. Accordingly, the Tribunal was not satisfied that the Applicant had demonstrated that the Section 43 Order was no longer necessary. The application for revocation was therefore refused and the Order was confirmed.

Costs

55. *The Respondent's Application for Costs*

55.1 Counsel for the Respondent applied for the Respondent's costs of and occasioned by the application. He submitted that the application had been unsuccessful; that it had been properly scrutinised, carefully considered and, in the event, successfully opposed by the regulator; and that, whilst costs do not invariably follow the outcome of a hearing before this Tribunal, this was an appropriate case for the SRA to recover its costs in the usual way.

55.2 Two statements of costs were before the Tribunal. The first, dated 5 May 2026 and filed with the Answer, set out the costs of Mr Mohammed Dangor, Legal Adviser at the SRA, at an hourly rate of £130.00, in the total sum of £1,313. The second, an updated statement filed and served on the morning of the hearing, totaled £9,269. Counsel explained that the difference comprised a further £156 in respect of the Legal Adviser's time and was otherwise almost entirely attributable to Counsel's brief fee, together with VAT, in the sum of £7,800.

55.3 Counsel accepted that the Tribunal's directions required statements of costs to be filed five working days in advance of the hearing and that the updated schedule had not been filed in accordance with that direction. He apologised, explaining that the omission was the result of an administrative oversight in the course of finalising the skeleton argument.

55.4 He submitted that this was an appropriate case for the SRA to instruct external counsel: it was a second application, it was not the most straightforward of cases, and it raised questions as to what is required to demonstrate rehabilitation. As to the late service, he submitted that the first schedule contained no estimate of future costs and no entry in respect of the hearing; that the Applicant, who conducts litigation herself and knew from the skeleton argument and from previous correspondence that external counsel had been instructed, would have appreciated that counsel's fees would be claimed closer to the hearing; and that the additional costs ought not therefore to have come as a complete surprise. He indicated that, if the Applicant would be prejudiced by the cost's application being determined at the hearing, the Respondent was open to the question of costs being dealt with at a later date, including on written submissions. In answer to a question from Mr Sheikh, Chair, Counsel confirmed that he was of approximately 14 years' call.

55.5 Dr Richards observed that nothing on the face of the first schedule indicated that a further schedule was to come, and that the Applicant's own statement of costs had been of broadly comparable quantum to that first schedule, whereas the schedule served on the morning of the hearing was several times greater. In answer to his questions as to whether the late service should be reflected in the quantum of any award, given that the Applicant had been deprived of a realistic opportunity to consider the substantially enlarged claim, to seek advice upon it, or to consider withdrawing the application so as to limit her exposure to costs, as she had done on a previous occasion, Counsel accepted that the Applicant would not have known the total figure in time to consider whether to withdraw the application and that it would be fair to take that into account if the Applicant said that she would have done so, although he invited the Tribunal not to speculate on that question.

56. *The Applicant's Response on Costs*

56.1 The Applicant told the Tribunal that she had first seen the updated schedule at about 8.00am on the morning of the hearing, some two hours before it commenced, and that the increase of almost £8,000 had taken her by surprise. She had complied with the Tribunal's directions as to the filing of her own statement of costs; the Respondent had not. She invited the Tribunal either to disallow the Respondent's costs or to reduce them substantially. She further submitted that there had been duplication of work, in that there was a significant overlap between the background material prepared for the 2024 application and that deployed, in substantially the same terms, in the present application. She could not say what she would have done had she seen the additional £8,000 in good time, although she would probably have obtained advice. In brief response, Counsel for the Respondent submitted that, although the outcome of the SRA's consideration of each application might appear similar, each application was considered independently, and work had been done to consider the fresh application.

Tribunal's Decision on Costs

57. The Tribunal considered the issue of costs after determining the substantive application. The Applicant's application for revocation having been unsuccessful, the starting point was that the Respondent was entitled to recover its reasonable costs of and incidental to the proceedings.

58. The Respondent sought costs totalling £9,269. The Tribunal noted that this figure comprised previously claimed internal costs of £1,313, further SRA costs of £156 and Counsel's fees and VAT totalling £7,800.

59. The Tribunal accepted that it was reasonable for the Respondent to defend the application and that it was entitled to obtain legal representation. The Tribunal did not consider it appropriate to go behind the Respondent's decision to instruct external Counsel. The application concerned the revocation of a longstanding Section 43 Order and required consideration of rehabilitation, insight, risk and public confidence. The Respondent was entitled to present its case in the manner it considered appropriate and the Tribunal accepted that Counsel had assisted in its presentation.

60. However, the Tribunal was concerned by the manner in which the revised costs claim was presented. The costs schedule contained within the papers identified costs in the sum of £1,313. The substantially increased claim, which included Counsel's brief fee and VAT amounting to £7,800, was not served until the morning of the hearing. The Tribunal considered this very unsatisfactory. The Applicant appeared without representation and was afforded little realistic opportunity to consider the significantly enlarged claim, obtain advice upon it, or assess the financial implications of continuing with the application. Whilst the Tribunal accepted that the late service appeared to result from administrative oversight rather than deliberate conduct, the prejudice caused to the Applicant remained a relevant consideration.

61. The Tribunal also considered the issue of proportionality. Whilst the application was important to both parties, it remained a single-day hearing concerning a review of whether a Section 43 Order should continue in force. The issues were relatively confined and largely fact sensitive. The Tribunal was not persuaded that the total costs claimed were proportionate to the nature, complexity and duration of the proceedings. In particular, the Tribunal considered that the Counsel's brief fee claimed was at the higher end of what might reasonably be expected in a case of this type.

62. The Tribunal further took into account the circumstances of the parties. The Respondent is a substantial regulatory body with access to considerable resources. The Applicant represented herself throughout the proceedings. Whilst that fact could not displace the ordinary principle that costs should follow the event, it was nevertheless relevant when determining what level of costs was reasonable and proportionate, particularly where the Applicant had not been given timely notice of the full extent of the Respondent's claim.

63. The Tribunal carefully considered what level of costs would be fair in all the circumstances. It accepted that the Respondent had successfully resisted the application and had plainly incurred genuine costs in doing so. The Tribunal was therefore satisfied that a substantial costs order remained appropriate. Equally, the Tribunal considered that there should be a meaningful consequence flowing from the late service of the revised costs schedule and that the Applicant should not be required to bear the entirety of a significantly increased claim that had only been disclosed immediately before the hearing.

64. Standing back and considering the matter as a whole, the Tribunal concluded that an award of the full amount sought would not be fair or proportionate. Conversely, the Tribunal did not consider it appropriate to make only a modest reduction, as that would fail properly to reflect the prejudice arising from the late service of the revised schedule. The Tribunal therefore determined that a substantial reduction was required.

65. The Tribunal concluded that costs fixed in the sum of £5,000 represented a fair, balanced and proportionate outcome. That figure properly reflected the Respondent's success in the proceedings and its entitlement to recover a significant proportion of its costs, whilst also recognising the late service of the revised costs schedule, the disadvantage caused to an unrepresented Applicant, and the Tribunal's concerns regarding the proportionality of the overall costs claimed. The Tribunal was satisfied that £5,000 represented a reasonable contribution towards the costs actually incurred by the Respondent without producing an unjust result.

66. Accordingly, the Tribunal ordered that the Applicant pay the Respondent's costs of and incidental to the application, such costs being fixed in the sum of £5,000.

Statement of Full Order

67. The Tribunal ORDERED that the application of GILLIAN MARGARET WALKER now HADLEY for revocation of a S43 Order be REFUSED and it further Ordered that the Applicant do pay the costs of and incidental to the response to this application fixed in the sum of £5000.00.

Dated this 15th day of July 2026
On behalf of the Tribunal

U Sheikh

U Sheikh
Chair