

T G Baynes Solicitors

**Broadway House, 208 Broadway, Bexleyheath, Kent
, DA6 7BD**

Licenced body

046768

[Fined Date: 15 May 2025](#)

Decision - Fined

Outcome: Fine

Outcome date: 15 May 2025

Published date: 13 June 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: T G Baynes Solicitors

Address(es): Broadway House, 208 Broadway, Bexleyheath, Kent, DA6 7BD

Firm ID: 46768

Outcome details

This outcome was reached by SRA decision.

Decision details

The firm was fined for failing to ensure it had relevant documentation in place to prevent activities relating to money laundering and terrorist financing as required by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017).

Facts of the misconduct

The firm is an 'in scope' firm for the purposes of the MLRs 2017.

The SRA's anti-money laundering (AML) proactive supervision team carried out a desk-based review of the firm to assess its compliance with the MLRs 2017. In his outcome letter the AML Officer told the firm that he

had identified compliance failures and referred the matter to the SRA's AML investigation team.

The firm was provided with guidance and took steps to rectify the issues. It revised its AML policies, controls and procedures and its client and matter risk assessments so that they were compliant with the MLRs 2017 by June 2024.

Findings

It was found that:

Allegation One

Between 1 June 2018 and 31 May 2024, the firm failed to establish and maintain policies, controls and procedures (PCPs) to mitigate and manage effectively the risks of money laundering and terrorist financing, identified in any risk assessment (FWRA), pursuant to Regulation 19(1)(a) of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017), and/or regularly review and update them pursuant to Regulation 19(1)(b) of the MLRs 2017.

Allegation Two

Between 1 June 2018 and 13 June 2024, the firm failed to conduct client and matter risk assessments (CMRAs), pursuant to Regulation 28(12)(a) (ii) and Regulation 28(13) of the MLRs 2017.

In doing so, to the extent that the conduct took place between 1 June 2018 and 24 November 2019, the firm breached outcomes 7.2 and 7.5 of the SRA Code of Conduct 2011 and Principles 6 and 8 of the SRA Principles 2011, and to the extent that the conduct took place from 25 November 2019 onwards, the firm breached Principle 2 of the SRA Principles 2019 and Paragraphs 2.1(a) and 3.1 of the SRA Code of Conduct for Firms 2019.

Decision on sanction

It was decided that a financial penalty was an appropriate and proportionate sanction.

The firm was directed to pay a financial penalty of £63,869 and ordered to pay costs of £1,350.

This was because the firm's conduct was serious by reference to the following factors in the SRA Enforcement Strategy:

- The findings relate to breaches of the MLRs 2017, which protect the public from the serious consequences of money laundering and



terrorist financing. The associated risks were heightened given the high proportion of the firm's work that was 'in scope' of the MLRs 2017.

- The firm failed to have proper regard to the SRA's guidance and warning notices which explained what was required, the risks that failure to comply with AML requirements posed, and the regulatory consequences of failing to comply.
- Its conduct was a breach of its regulatory obligations which persisted for longer than was reasonable.
- The firm was responsible for its own conduct which was serious and had the potential to cause harm to the public interest and to public confidence in the legal profession.
- Any lesser sanction would not provide a credible deterrent to the firm, and others. A credible deterrent plays a key role in maintaining professional standards and upholding public confidence.

In view of the above, the firm's conduct was placed in conduct band C which has a financial penalty of 1.6% to 3.2% of annual domestic turnover. The firm's conduct was placed at band C1 (1.6% of annual domestic turnover).

The following mitigating factors were considered:

- The firm co-operated fully with the SRA's investigation.
- There was no evidence that harm had materialised as a result of the misconduct.
- The firm took steps to bring itself into compliance with the rules and now has fully compliant AML documentation in place.

The financial penalty was reduced by 30% in recognition of these factors.

SRA Standards and Regulations breached

SRA Principles 2011

Principle 6 You must behave in a way that maintains the trust the public places in you and in the provision of legal services.

Principle 8 You must run your business or carry out your role in the business effectively and in accordance with proper governance and sound financial and risk management principles.

SRA Principles 2019

Principle 2 You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

SRA Code of Conduct 2011

Outcome 7.2 You have effective systems and controls in place to achieve and comply with all the Principles, rules and outcomes and other requirements of the Handbook where applicable.

Outcome 7.5 You comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

SRA Code of Conduct for Firms 2019

Paragraph 2.1(a) You have effective governance structures, arrangements, systems and controls in place that ensure you comply with all the SRA's regulatory arrangements, as well as with other regulatory and legislative requirements, which apply to you.

Paragraph 3.1 You keep up to date with and follow the law and regulation governing the way you work.

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