Solicitors Regulation Authority

Gabbitas Robins

The Old House, West Street, Marlow , SL7 2LS
Recognised body
471979

Control of practice *Date: 4 June 2026*

Decision - Control of practice

Outcome: Condition

Outcome date: 4 June 2026

Published date: 19 June 2026

Firm details

No detail provided:

Outcome details

This outcome was reached by SRA decision.

Decision details

1. Agreed outcome

1.1 Gabbitas Robins (the firm), a recognised body authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation of its conduct:

a. it is fined £11,008,

b. to the publication of this agreement, and

c. it will pay the costs of the investigation of £600.

2. Summary of Facts

2.1 We carried out an investigation into the firm following an Inspection by our Anti-Money Laundering (AML) Proactive Supervision Team.

2.2 Our Inspection and subsequent investigation identified areas of concern in relation to the firm's compliance with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017), the SRA Principles [2019] and the SRA Code of Conduct for Firms [2019].

2.3 Regulations 28(12) and 28(13) of the MLRs 2017 require firms to take steps to identify the money laundering and terrorist financing risks posed by a particular customer (or 'client') and matter – a client and matter risk assessment (CMRA). None of the nine files reviewed at Inspection contained a CMRA completed at the material time of the transaction.

2.4 Furthermore, in six of nine files reviewed, the firm failed to conduct ongoing monitoring (scrutiny of transactions) including, where necessary, the customer's source of funds, pursuant to Regulation 28(11)(a) of the MLRs 2017. Based on our supervisory work and analysis, we consider that source of funds (SoF) enquiries were necessary on these transactions. However, on Inspection there was insufficient scrutiny or no evidence of the client's SoF documented on file.

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017 it breached:

a. Principle 2 of the SRA Principles [2019] – which states you act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

b. Paragraph 2.1(a) of the SRA Code of Conduct for Firms [2019] – which states 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.

c. Paragraph 3.1 of the SRA Code of Conduct for Firms [2019] – which states that you keep up to date with and follow the law and regulation governing the way you work.

4. Why a fine is an appropriate outcome

4.1 The SRA's Enforcement Strategy sets out its approach to the use of its enforcement powers where there has been a failure to meet its standards or requirements.

4.2 When considering the appropriate sanctions and controls in this matter, the SRA has considered the admissions made by the firm and the following mitigation:

a. the firm has taken steps to promptly rectify its failings and additional recent files reviewed demonstrated adequate CMRA and SoF checks being made,

b. the firm has cooperated with the AML Proactive Supervision and AML Investigation teams, and

c. there is no evidence of harm to clients having taken place.

4.3 The SRA considers that a fine is the appropriate outcome because:

a. the conduct showed a disregard towards statutory and regulatory obligations and had the potential to cause harm by failing to have a compliant AML control environment in place, which left the firm susceptible to money laundering (and/or terrorist financing),

b. it was incumbent on the firm to meet the requirements set out in the MLRs 2017. The firm failed to do so. The public would expect a firm of solicitors to comply with its legal and regulatory obligations, and

c. the agreed outcome is a proportionate outcome to the public interest because it creates a credible deterrent to others. The issuing of a sanction signifies the risk to the public, and the legal sector, which arises when solicitors do not comply with AML legislation and their professional regulatory rules.

4.4 Rule 4.1 of the Regulatory and Disciplinary Procedure Rules states that a financial penalty may be appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in the legal services provided by authorised persons. There is nothing within this Agreement that conflicts with Rule 4.1 of the Regulatory and Disciplinary Rules and on that basis, a financial penalty is appropriate.

5. Amount of the fine

5.1 The amount of the fine has been calculated in line with the SRA's published guidance on its approach to setting an appropriate financial penalty (the Guidance).

5.2 We have assessed the nature of conduct in this matter as more serious (score of three). This is because the conduct has

been observed over a high percentage of files reviewed and therefore demonstrates a pattern of misconduct. The firm was directly responsible for complying with the legislation and failed to have sufficient regard to warning notices and guidance published by the SRA, demonstrating recklessness.

5.3 The harm, or risk of harm is assessed as being medium (score of four). This is because, although there was no evidence of any direct loss to any client, the failure to appropriately risk assess clients and their matters and understand client's SoF put the firm at greater risk of being used to facilitate money laundering and/or terrorist financing. The firm confirmed approximately half of their business comes from conveyancing work which, as highlighted in our sectoral risk assessment, is a high-risk area.

5.4 The 'nature' of the conduct and the 'impact of harm or risk of harm' scores add up to a score of seven. This places the penalty in Band C, as directed by the Guidance.

5.5 We and the firm agree a financial penalty in the lower part of the band. This is in consideration of the size and nature of the firm, and that no evidence of harm has been demonstrated.

5.6 Based on the evidence the firm has provided of its annual domestic turnover for the most recent tax year, this results in a basic penalty of £13,760.

5.7 The SRA considers that the basic penalty should be reduced to £11,008. This reduction reflects the mitigation set out in paragraph 4.2 above.

5.8 The firm does not appear to have made any financial gain or received any other benefit because of its conduct. Therefore, no adjustment is necessary to remove this, and the financial penalty remains at £11,008.

6. Publication

6.1 Rule 9.2 of the SRA Regulatory and Disciplinary Procedure Rules states that any decision under Rule 3.1 or 3.2, including a Financial Penalty, shall be published unless the circumstances outweigh the public interest in publication.

6.2 The SRA considers it appropriate that this agreement is published as there are no circumstances that outweigh the public interest in publication, and it is in the interest of transparency in the regulatory and disciplinary process. The firm agrees to the publication of this agreement.

7. Acting in a way which is inconsistent with this agreement

7.1 The firm agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

7.2 If the firm denies the admissions, or acts in a way which is inconsistent with this agreement, the conduct which is subject to this agreement may be considered further by the SRA. That may result in a disciplinary outcome or a referral to the Solicitors Disciplinary Tribunal on the original facts and allegations.

7.3 Denying the admissions made or acting in a way which is inconsistent with this agreement may also constitute a separate breach of principles 2 and 5 of the Principles and paragraph 7.3 of the Code of Conduct for Solicitors, RELs and RFLs.

8. Costs

8.1 The firm agrees to pay the costs of the SRA's investigation in the sum of £600. Such costs are due within 28 days of a statement of costs due being issued by the SRA.