

Craig Baylis

Solicitor

123784

[Agreement Date: 24 June 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 24 June 2025

Published date: 26 June 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Kingsley Napley LLP

Address(es): 20 Bonhill Street, London, EC2A 4DN

Firm ID: 500046

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Mr Baylis, a solicitor formerly of Kingsley Napley LLP ('the Firm'), agrees to the following outcome to the investigation of his conduct by the Solicitors Regulation Authority ('the SRA'), namely that:

- a. Mr Baylis is fined £3,500
- b. This agreement shall be published
- c. Mr Baylis will pay the costs of the investigation of £300.

2. Summary of Facts

2.1 Mr Baylis was formerly a salaried partner at the Firm. Mr Baylis represented an individual, Client A.

2.2 Between 20 December 2021 and 13 July 2022, Client A made six transfers, totalling £15,350, into the Firm's office account. Mr Baylis subsequently authorised the transfer of these monies from the Firm's



office account to the Firm's client account, and subsequently to an account in the name of a third party, Person B. The purpose of the transfers was to facilitate mortgage payments on behalf of Client A. There was no underlying legal transaction which would have necessitated the payment of the funds through the Firm's client or office accounts. Client A was not charged fees and did not suffer financial loss.

2.3 The Firm reported the matter to the SRA on 17 August 2022, and Mr Baylis left the Firm on 19 October 2022.

3. Admissions

3.1 Mr Baylis makes the following admissions which the SRA accepts:

- a. Between 20 December 2021 and 13 July 2022, Mr Baylis caused or allowed the Firm's client account to be used to receive and pay out client monies in the sum of £15,350 in circumstances where there was no underlying legal transaction, and in doing so breached Rule 3.3 of the SRA Accounts Rules (2019).

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 taken into account the admissions made by Mr Baylis and the following mitigation which he has put forward:

- a. There was no direct financial benefit to Mr Baylis.
- b. Mr Baylis has no previous adverse regulatory history.
- c. Mr Baylis has cooperated with the investigation.

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

- a. Causing or allowing a solicitors' firm's client account to be used to provide a banking facility to a client is objectionable in itself. It carries with it inherent risks irrespective of whether the client was engaged, or was attempting to engage, in improper or unlawful activity.
- b. The breach involved a series of payments through the Firm's client account over a period in excess of six months.
- c. The prohibition on allowing a solicitor's client account to be used to provide a banking facility to a client is well established and it would reasonably be expected that a solicitor be aware of the prohibition. The SRA has maintained a Warning Notice on its website on the improper use of a client account as a banking facility since 18 December 2014.



4.4 A fine is appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in legal services provided by authorised persons because a lesser sanction would not adequately address the seriousness of the misconduct or provide a credible deterrent to others. A financial penalty therefore meets the requirements of rule 4.1 of the Regulatory and Disciplinary Procedure Rules.

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 Having regard to the Guidance, the SRA and Mr Baylis agree that the nature of the misconduct was more serious because the misconduct arose as a result of recklessness or gross negligence and formed part of a limited pattern of misconduct. The Guidance gives this type of misconduct a score of three (3).

5.3 The SRA considers that the impact of the misconduct was medium because it caused, or had the potential to cause, moderate less or impact. The Guidance gives this level of impact a score of four (4).

5.4 The nature and impact scores add up to seven (7). The Guidance indicates a broad penalty bracket of between 16% and 49% of Mr Baylis' gross annual income is appropriate.

5.5 In deciding the level of fine within this bracket, the SRA has considered the mitigation at paragraph 4.2 above which Mr Baylis has put forward:

5.6 On this basis and taking into account the particular facts of the case, the SRA considers that it is appropriate to impose a financial penalty towards the lower end of the bracket which appropriately addresses the seriousness of the misconduct, including the factors outlined above. The SRA considers a basic penalty towards the bottom of the bracket to be appropriate.

5.7 Based on the evidence Mr Baylis has provided of his gross annual income for the most recent tax year, this results in a basic penalty of £19,200.

5.8 Mr Baylis co-operated with the SRA throughout the investigation and made early admissions. The SRA has considered this, alongside financial and other evidence provided by Mr Baylis, and considers that the basic penalty should be reduced to £3,500.

5.9 Mr Baylis does not appear to have made any financial gain or received any other benefit as a result of his conduct. Therefore, no

further adjustment is necessary to remove this and the amount of the fine is £3,500.

6. Publication

6.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. Mr Baylis agrees to the publication of this agreement.

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

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

7.2 If Mr Baylis 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

Mr Baylis agrees to pay the costs of the SRA's investigation in the sum of £300. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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