

**Hetts Johnson Whiting**  
**11 Bigby Street, Brigg, North Lincolnshire , DN20**  
**8EP**  
**Recognised body**  
**324576**

[Agreement Date: 4 June 2025](#)

## **Decision - Agreement**

Outcome: Regulatory settlement agreement

Outcome date: 4 June 2025

Published date: 10 June 2025

## **Firm details**

### **Firm or organisation at time of matters giving rise to outcome**

Name: Hetts Johnson Whiting

Address(es): 11 Bigby Street, Brigg, North Lincolnshire, DN20 8EP

Firm ID: 324576

## **Outcome details**

This outcome was reached by agreement.

### **Decision details**

#### **1. Agreed outcome**

1.1 Hetts Johnson Whiting (the Firm), a recognised body, agrees to the following outcome to the investigation of its conduct by the Solicitors Regulation Authority (SRA):

- a. it is rebuked
- b. to the publication of this agreement
- 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 receipt of information regarding two attempts to register a charge in favour of a client of the firm.



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

2.3 It was identified that the firm submitted documents to His Majesty's Land Registry (HMLR), in order to register charges against two properties, without applying sufficient scrutiny to the customer due diligence (CDD) evidence received via a third party, pursuant to Regulation 28(2) and Regulation 39(1) of the MLRs 2017.

2.4 Both attempts to register the charges resulted in requisitions from HMLR, owing to inconsistencies in the identity evidence provided for two individuals named on the charges.

2.5 In September 2023, the firm requested certified copies from its client of the identity documents, following the HMLR requisition letters stating invalid documents had been sent.

2.6 The firm's client responded to ask if it was possible to resubmit the application and potentially get a different member of staff at HMLR to assess the application. While the firm advised its client this would not likely be successful, it should have raised a red flag and indicated that its client appeared to be attempting to bypass the HMLR process, and therefore further scrutiny of the identity documents was required.

2.7 The firm's client provided identity documents for one individual, which appear to have been certified by a solicitor in October 2023. However, the passport photograph appears to be that of another individual. Despite this, the firm submitted the documents to HMLR. This was also rejected as being invalid.

2.8 The firm advised its client that identity documents should be certified by a qualified person such as a solicitor, accountant or financial adviser. However, the firm's client appeared unable or unwilling to arrange this and asked the firm if it could certify the documents itself. After the firm advised it was unable to certify the identity documents itself, its client provided copies of the documents certified by its office manager. Again, despite this, the firm submitted the documents to HMLR, and these were also rejected as being invalid.

2.9 Upon inspection of the identity documents provided, it is clear (without requirement of any forensic expertise application) there are inconsistencies in the passport and driving licence photographs and signatures of the two individuals. However, the firm does not appear to have sufficiently scrutinised the documents or picked up the inconsistencies, instead repeatedly submitting them to HMLR only for them to be rejected every time.



2.10 The firm had conduct of the matter referred to above. The firm failed to apply adequate scrutiny of identification documents, which had the potential to cause harm and impact to the reputation of the profession. The firm should have done more but did not do so, and had it not been for HMLR rejecting the documents, it is uncertain if any wrongful registration would have taken place.

### **3. Admissions**

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017 it has 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 – 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.

### **4. Why a written rebuke 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 The SRA considers that a written rebuke is the appropriate outcome because:

- a. Although there is no evidence of harm having occurred, failure to adequately scrutinise CDD evidence is reckless, and the circumstances exposed the firm to the risk of fraud or money laundering.
- b. It was in the public interest for the firm to ensure compliance with money laundering legislation. It failed to adequately do so by acting in potential transactions with red flag indicators of fraud or money laundering, and as such diminished the trust the public placed in it. It happened on more than one occasion, even after the firm's client had suggested resubmission of the same inconsistent documents.
- c. While we consider there is a low risk of repetition, we consider that some public sanction is required to uphold public confidence in the delivery of legal services. We do not consider that any less serious sanction or outcome would be appropriate to protect the public and the public interest.

### **5. Publication**



5.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. Hetts Johnson Whiting agrees to the publication of this agreement.

## **6. Acting in a way which is inconsistent with this agreement**

6.1 Hetts Johnson Whiting agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

6.2 If Hetts Johnson Whiting 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.

6.3 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 3.2 of the Code of Conduct for Firms.

## **7. Costs**

7.1 Hetts Johnson Whiting 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.

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