



**Sarah Heine**  
**Employee**  
**7025962**

**[Employee-related decision Date: 3 October 2023](#)**

**Decision - Employee-related decision**

Outcome: Control of non-qualified staff (Section 43 / Section 99 order)

Outcome date: 3 October 2023

Published date: 12 October 2023

**Firm details**

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

Name: Fragomen LLP

Address(es): 1st Floor, 95 Gresham Street, London EC2V 7NA

Firm ID: 459836

**Outcome details**

This outcome was reached by SRA decision.

**Decision details**

**Agreed outcome**

1.1 Sarah Heine (Ms Heine), a former employee of Fragomen LLP (the Firm), agrees to the following outcome to the investigation of her conduct by the Solicitors Regulation Authority (SRA):

- a. to the SRA making an order under section 43 of the Solicitors Act 1974 (a section 43 order) in relation to Sarah Heine that, from the date of this agreement:
  - i. no solicitor shall employ or remunerate her in connection with their practice as a solicitor
  - ii. no employee of a solicitor shall employ or remunerate her in connection with the solicitor's practice
  - iii. no recognised body shall employ or remunerate her
  - iv. no manager or employee of a recognised body shall employ or remunerate her in connection with the business of that body
  - (v) no recognised body or manager or employee of such a body shall permit her to be a manager of the body



- v. no recognised body or manager or employee of such body shall permit her to have an interest in the body except in accordance with the SRA's prior permission
- b. to the publication of this agreement
- c. she will pay the costs of the investigation of £300.

## **Reasons/basis**

### **2. Summary of facts**

2.1 Ms Heine was employed from 23 November 2021 to 26 May 2022, as an Immigration Coordinator within the Coordination team of the Firm. Between 30 March 2022 and 19 May 2022, she took pictures of four documents supplied by the Firm's corporate clients, three of which included a photograph. The images, with added inappropriate commentary, were later uploaded to her personal Twitter account where she had over 400 followers. The account stated her job title and the name of Firm who employed her. Although, the data had been partially redacted, in some instances the individuals could be identified, and their photographs were visible.

### **3. Admissions**

3.1 Sarah Heine makes the following admissions which the SRA accepts:

- a. On dates between 30 March 2022 and 19 May 2022, she shared the confidential information on four occasions from client files on her personal social media account and posted inappropriate comments about each.
- b. That the above conduct is a breach of:
  - i. Section 6.3 of the SRA Code of Conduct for Firms 2019
  - ii. Principle 2 of the SRA Principles 2019

The above breaches involve conduct which means that it is undesirable for Ms Heine to be involved in a legal practice.

### **4. Why a section 43 order is appropriate**

4.1 The SRA's Enforcement Strategy and its guidance on how it regulates non-authorised persons, sets out its approach to using section 43 orders to control where a non-authorised person can work.

4.2 When considering whether a section 43 order is appropriate in this matter, the SRA has taken into account the admissions made by Ms Heine and the following mitigation which she has put forward:

- a. she has deactivated her social media account and no longer participates in work group chats



- b. has undertaken extra sensitivity training which has been provided by her current employer
- c. she has no intention for the foreseeable future to seek employment within legal practice
- d. she has apologised for her actions, and shown insight and remorse in relation to the conduct and breaches
- e. she made her current employer, who are not involved in legal practice, aware of her conduct and received guidance and support from them.

4.3 The SRA and Ms Heine agree that a section 43 order is appropriate because:

- a. Ms Heine is not a solicitor.
- b. Ms Heine's conduct in relation to that act makes it undesirable for her to be involved in a legal practice.
- c. Ms Heine has cooperated with the SRA investigation.

4.4 Ms Heine's conduct makes it undesirable for her to be involved in a legal practice because she shared confidential information relating to four of the Firm's corporate clients on her personal social media account and posted inappropriate comments about each. An employee of a solicitor should have known it was not appropriate to share client information on social media and should not have made inappropriate comments on it.

## **5. Publication**

5.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory process. Ms Heine agrees to the publication of this agreement.

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

6.1 Ms Heine agrees that she will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

## **7. Costs**

7.1 Ms Heine 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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