



## HEARING

### ADMISSIONS AND LICENSING COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

#### REASONS FOR DECISION

**In the matter of:** Mr Craig Edward James Moore

**Heard on:** Wednesday, 07 April 2021

**Location:** Remotely via ACCA offices, The Adelphi, 1-11  
John Adam Street, London, WC2N 6AU using  
Microsoft Teams

**Committee:** Mrs Kathryn Douglas (Chair),  
Mr Trevor Faulkner (Accountant),  
Mr Damian Kearney (Lay)

**Legal Adviser:** Mr David Marshall

**Persons present and capacity:** Mr Phillip Law (ACCA Case Presenter)  
Mr Theo Brooke (ACCA Hearings Officer)  
Mr Craig Edward James Moore (Member)

**Observers:** None

**Summary:** Mr Moore's auditing qualification and his  
company's auditing certificate suspended with  
immediate effect until conditions met

1. The Committee met to consider the eligibility for audit qualifications of Mr Moore and his firm following an unsatisfactory audit monitoring visit. Mr Law appeared for ACCA. Mr Moore was present and represented himself.
2. The Committee was provided with a main bundle containing 14 pages, a service bundle containing 15 pages, an additional bundle 1 containing two pages, and an additional

bundle 2 containing one page.

### **APPLICATION/BRIEF BACKGROUND**

3. Mr Moore has been a member of ACCA since November 2005 and a Fellow since November 2010. He practises as a sole practitioner through a company called PFG Accountants Limited. Mr Moore holds a practising certificate with audit qualification and his firm holds an auditing certificate.
4. On 15 October 2014, ACCA carried out an audit monitoring visit. The outcome was satisfactory, but the Compliance Officer considered that there were some deficiencies to be addressed. Mr Moore provided an action plan for rectifying these. Not long after that Mr Moore ceased to have any audit clients so there was no follow-up visit. By 2020 there was again an audit client. A second audit monitoring exercise was conducted by ACCA between 20 October and 03 November 2020 (remotely, due to COVID). The outcome was unsatisfactory. The Senior Compliance Officer considered that there were serious departures from the International Standards on Auditing (UK & Ireland) ('ISAs'), as set out in the report provided to the Committee.
5. ACCA applied to the Committee to consider the suitability of Mr Moore and his company to continue to hold auditing qualifications. It recommended that the Committee withdraw Mr Moore's audit qualification and his firm's auditing certificate and impose conditions on Mr Moore requiring him to pass a test of competence and attend a suitable practical CPD course before making any future reapplication for the audit certificates.

### **DECISION ON APPLICATION AND REASONS**

6. Mr Law submitted that the matters set out in the report demonstrated that Mr Moore and his firm had committed serious breaches of the ISAs in the conduct of the audit work. As a result, they were in breach of Regulation 13 of The Chartered Certified Accountants' Global Practising Regulations 2003, as amended. That in turn gave rise to a jurisdiction under Regulation 5(2) of The Chartered Certified Accountants' Authorisation Regulations 2014, as amended, to take action on their certificates.
7. Mr Law referred to ACCA's Regulatory Board Policy Statement & Regulatory Guidance Policy and submitted that unless there were exceptional circumstances, in a case such as this the Committee should follow ACCA's guidance to withdraw the auditing qualifications.

8. Mr Moore was asked if he accepted the content of the report and he answered '*essentially yes*'. He accepted that the standard of work was not acceptable. On the basis of this and of the report itself the Committee was satisfied that it had a discretion to consider whether Mr Moore and his company should continue to hold unrestricted audit qualifications.
9. Mr Moore made written and oral submissions, some of which the Committee agreed should be heard in private. The Committee found him to be completely open and honest and noted that he had cooperated fully with ACCA's process. He explained that he had taken on the audit in question at short notice and under some pressure. At almost exactly the same time some factors in his personal life had had a significant impact on his professional performance. He gave some information about this in private and also produced documentary evidence that he had sought professional help at this time. The Committee considered that these could be regarded as exceptional circumstances.
10. Mr Moore said that with hindsight he should have refused the audit appointment. He said that he had now identified a number of CPD courses which he intended to take, although he had not yet completed them. These would be self-study courses, without formal testing. He said he would be willing to undertake any other training which ACCA required and submit future work for hot or cold review. He outlined his plans for taking over another practice, which would mean that he would have qualified and experienced colleagues to turn to. However, it would also mean that the amount of audit work would increase substantially.
11. The Committee accepted that Mr Moore's intentions were good but it considered that he had underestimated what was required. The recent report indicated that his auditing skills were seriously deficient at present. He had clearly failed to bring his skills up to date when he took on a new audit client after a long absence from audit work. In his submissions to the Committee he had not shown that he had fully appreciated the need to take responsibility himself for ensuring his own competence. The Committee concluded that at present he could not be permitted to hold auditing qualifications. It would represent a potential risk to the public. To restore his skills would require a carefully considered plan of professional development, with objective testing of his practical skills. He could not develop such a plan in isolation but would need independent professional assistance.
12. The Committee considered that it would be disproportionate to withdraw his auditing qualifications altogether given the exceptional circumstances. The Committee was satisfied that the public could be adequately protected by suspending the qualifications

until certain conditions were met.

13. Mr Law submitted that if the Committee made an order it should have immediate effect. Mr Moore objected to that on the basis that it could cause him considerable inconvenience since he had an existing audit client. The Committee took the view that having found that at this time Mr Moore was not competent to conduct audits, its order should have immediate effect.
14. Under ACCA's rules all decisions of ACCA's Committees are published. However The Statutory Auditors and Third Country Auditors Regulations 2016 Regulation 6(3) provides that in certain circumstances the identity of a person sanctioned must not be published. One of these is that '*publication would cause disproportionate damage to any ... individual involved.*' Mr Moore argued that publication would prejudice his proposed merger or takeover. The Committee considered that the purpose of publication was to alert those who might be affected by the matters decided, and that publication would not be disproportionate.

#### **ORDER**

15. The Committee ordered that:
  - (a) The audit qualification to Mr Moore's practising certificate be suspended, and the audit certificate of PFG Accountants Limited be suspended, until the following conditions have been complied with to ACCA's satisfaction:
    - (i) In conjunction with a recognised training company, an audit qualified mentor, or ACCA itself, Mr Moore develops a Personal Development Plan. The purpose of the plan will be to address the shortcomings identified in the report of the audit monitoring visit conducted between 20 October 2020 and 03 November 2020;
    - (ii) Mr Moore satisfies ACCA of his competence in audit by passing a practically-based test or other test of competence acceptable to ACCA.
  - (b) This order shall have immediate effect.
  - (c) This decision will be published in the normal way.
16. The Committee considered that if Mr Moore regains his audit qualifications, a further

monitoring review at an early opportunity would be advisable.

**Mrs Kathryn Douglas**  
**Chair**  
**07 April 2021**