

HEARING

**DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS**

REASONS FOR DECISION

In the matter of: **Mr Chuan Liu**

Heard on: **08 April 2025**

Location: **Remotely via Microsoft Teams**

Committee: **HH Suzan Matthews KC (Chair)**
 Ms Fiona MacNamara (Accountant)
 Ms Sue Heads (Lay)

Legal Adviser: **Mr Robin Havard (Legal Adviser)**

**Persons present
and capacity:** **Ms Hena Patel (ACCA Case Presenter)**
 Ms Lauren Clayton (ACCA Hearings Officer)

Summary **Allegations 1(a), (b) & (c), 2(a) (b) & (c) & 4 were found
proved.**
 **Sanction – Exclusion from membership of ACCA with
immediate effect**

Costs: **£6,000**

PRELIMINARY APPLICATIONS

SERVICE OF PAPERS

1. The Committee had considered the following documents: a Hearing Bundle (pages 1 to 327); an Additional Bundle (pages 1 to 29); a bundle of documents relating to the complaint against Mr Liu (pages 1 to 40), and a Service Bundle (pages 1 to 20). The Committee had listened carefully to the submissions made by Ms Patel and also considered legal advice, which it had accepted.
2. The Committee had read the letter dated 11 March 2025 sent from ACCA by email to Mr Liu. It had noted the subsequent emails sent to him with the necessary link and password to enable him to gain access to the letter and the documents relating to this hearing.
3. The Committee was satisfied that such emails had been sent to Mr Liu's registered email address in accordance with regulation 22 of the Complaints and Disciplinary Regulations 2014 as amended ("CDR"). The Committee had noted that the emails had been delivered successfully. CDR22(8) stipulated that, when a notice has been sent by email, it is deemed to have been served on the day it was sent.
4. The emails and the documents to which Mr Liu had access also contained the necessary information in accordance with CDR10.
5. Consequently, the Committee decided that Mr Liu had been properly served with Notice of the proceedings.

PROCEEDING IN ABSENCE

6. On 15 March 2025, Mr Liu sent two emails to ACCA. In the first email, he outlined his financial and personal circumstances, and attached a document from his current employer with details of his income.
7. In the second email, he stated, *"I'm sure I won't participate. I have received the file you sent."*

8. On 23 March 2025, in response to an email from ACCA asking him whether he consented to the hearing proceeding in his absence, Mr Liu stated, *“yes, I confirm that I am content for the committee to proceed in my absence.”*
9. On 7 April 2025, ACCA sent Mr Liu the link to enable him to join the hearing via Microsoft Teams in the event that he changed his mind. Mr Liu had not joined the hearing.
10. The Committee considered that ACCA had done everything possible to enable Mr Liu to attend the hearing. However, he had made it clear in his emails of 15 and 23 March 2025 that he did not wish to do so and that he was content for the hearing to proceed in his absence. This was consistent with the responses he had provided in the Case Management Form (“CMF”) he had completed and returned to ACCA in November 2024 in which he confirmed that he would not be in attendance and that he consented to the hearing taking place in his absence.
11. The Committee concluded that Mr Liu was aware of today's hearing, which he could have joined by telephone or video link. However, based on his responses, the Committee found that Mr Liu had voluntarily absented himself.
12. The Committee was also satisfied that, taking account of the seriousness of the allegations, it was in the public interest to proceed. The Committee did not consider that any benefit would be derived in adjourning the hearing and no such application had been made.
13. Finally, the Committee considered that it was in a position to reach proper findings of fact on the written evidence presented to it by ACCA, and that it would take account of the written responses Mr Liu had provided in the course of the investigation.
14. The Committee ordered that the hearing should proceed in the absence of Mr Liu.

ALLEGATIONS

Schedule of Allegations

Mr Chuan LIU ('Mr Liu'), at all material times an ACCA trainee:

1. Applied for membership to ACCA on or about 18 January 2022 and in doing so purported to confirm in relation to his ACCA Practical Experience Training Record:
 - a) His Practical Experience Supervisor in respect of his practical experience training in the period from 28 September 2018 to 2 May 2020 was Person A when Person A did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all.
 - b) His Practical Experience Supervisor in respect of his practical experience training in the period from 8 May 2020 to 8 October 2021 was Person B when Person B did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all.
 - c) He had achieved all or any of the following Performance Objectives:
 - Performance Objective 1: Ethics and professionalism
 - Performance Objective 2: Stakeholder relationship management
 - Performance Objective 3: Strategy and innovation
 - Performance Objective 4: Governance, risk and control
 - Performance Objective 5: Leadership and management
 - Performance Objective 6: Record and process transactions and events
 - Performance Objective 7: Prepare external financial reports
 - Performance Objective 19: Collect and evaluate evidence for an audit or assurance engagement
2. Mr Liu's conduct in respect of the matters described in Allegation 1 above was,
 - a) In respect of Allegation 1a), dishonest, in that Mr Liu sought to confirm his Practical Experience Supervisor, Person A, did supervise his practical experience training in accordance with ACCA's requirements or otherwise which he knew to be untrue.

- b) In respect of Allegation 1b), dishonest, in that Mr Liu sought to confirm his Practical Experience Supervisor, Person B, did supervise his practical experience training in accordance with ACCA's requirements or otherwise which he knew to be untrue.
 - c) In respect of Allegation 1(c), dishonest in that Mr Liu knew he had not achieved all or any of the performance objectives as described in the corresponding performance objective statements or at all.
 - d) In the alternative, any or all of the conduct referred to in Allegation 1 above demonstrates a failure to act with Integrity.
3. In the further alternative to Allegations 2a), 2b) and or 2c) above, such conduct was reckless in that Mr Lui paid no or insufficient regard to ACCA's requirements to ensure:
- a) His practical experience was supervised;
 - b) His Practical Experience Supervisor, being Person B, was able to personally verify the achievement of the performance objectives he claimed and/ or verify they had been achieved in the manner claimed;
 - c) That the performance objective statements referred to in paragraph 1(c) accurately set out how the corresponding objective had been met.
4. By reason of his conduct, Mr Liu is guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at 1 to 3 above

DECISION ON FACTS, ALLEGATIONS AND REASONS

15. As stated above, and in reaching its decisions with regard to the allegations, the Committee had considered the following documents: a Report of Disciplinary Allegations and Evidence Bundle (pages 1 to 327); an Additional Bundle (pages 1 to 29); a Bundle of documents relating to the complaint against Mr Liu (pages 1 to 40), and a Service Bundle (pages 1 to 20). The Committee had listened carefully to the submissions made by Ms Patel and considered legal advice, which it had accepted.

ALLEGATIONS 1(a), (b) & (c)

BACKGROUND

16. On 17 January 2022, Mr Liu was admitted as an Affiliate.
17. On 20 January 2022, Mr Liu was admitted as a member of ACCA.
18. Allegations 1(a), (b) and (c) concern the conduct on the part of Mr Liu in relation to the completion of his practical experience training which is a prerequisite to applying for full membership of ACCA.
19. It is alleged that Mr Liu sought to mislead ACCA in respect of the persons who supervised his work during his training and the content of eight of his Performance Objectives.
20. In reaching its findings of fact in respect of allegations 1(a), (b) and (c), the Committee had considered carefully, and accepted, the evidence of the following witnesses:
 - (i) Karen Watson, a Senior Administrator in ACCA's Member Support Team as contained in a statement dated 20 October 2022, and
 - (ii) Linda Calder, Manager of ACCA's Professional Development Team, as contained in a statement dated 21 May 2024 and a supplemental statement dated 8 August 2024.
21. Whilst, for the reasons summarised below, Mr Liu denied the allegations being made against him, none of the above evidence had been challenged by Mr Liu.
22. The Committee had also considered the content of the documents provided by ACCA in support of its case, all of which were consistent with the written evidence of the witnesses.
23. Finally, the Committee had read, and taken account of, the written responses provided by Mr Liu.

THE PROCESS TO ACQUIRE RELEVANT PRACTICAL EXPERIENCE

24. The following sets out the process Mr Liu would have been required to follow, as detailed by Ms Calder in her statement.

25. The following abbreviations have been used:

PER – Practical Experience Requirement;

PES – Practical Experience Supervisor;

PO – Performance Objective.

26. Upon an ACCA student completing all their ACCA exams, they become an ACCA affiliate. However, in order to apply for membership, they are required to obtain at least 36 months' practical experience in a relevant role ('practical experience'). It is, and was at the material time, permissible for some or all of that practical experience to be obtained before completion of ACCA's written exams.

27. A person undertaking practical experience is often referred to as an ACCA trainee, being the term used to describe Mr Liu's status in the allegations, ACCA's report, and the supporting evidence bundle.

28. An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement (PER) training record which is completed using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal.

29. As part of their practical experience, each trainee is required to complete nine performance objectives (POs) under the supervision of a qualified accountant. An accountant is recognised by ACCA as a qualified accountant if they are a qualified accountant recognised by law in the trainee's country and or a member of an IFAC body (International Federation of Accountants). Once a trainee believes they have completed a PO, they are required to provide a statement in their PER training record describing the experience they have gained in order to meet the objective. Given this is a description of their own experience, the statement should be unique to them. Through the online tool, the trainee then requests that their PES approves that PO.

30. In addition to approval of their POs, the trainee must ensure their employment where they have gained relevant practical experience (being a minimum of 36 months) has been confirmed by the trainee's line manager who is usually also the trainee's qualified PES. This means the same person can, and often does, approve both the trainee's time and achievement of POs.
31. If the trainee's line manager is not qualified, the trainee can nominate a supervisor who is external to the firm to supervise their work and approve their POs. This external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor.
32. Once all nine POs have been approved by the trainee's PES (whether internal or external) and their minimum 36 months of practical experience has been approved, the trainee is eligible to apply for membership, assuming they have also passed all their ACCA exams and successfully completed ACCA's Ethics module.
33. POs and ACCA's exams are closely linked so that the knowledge and techniques the trainee develops through their studies, are relevant in their workplace. The tasks and activities a trainee will be asked to demonstrate in the POs are also closely related to the type of work they will undertake on a regular basis in an accounting or finance role.
34. Each PO comprises 3 parts; (i) a summary of what the PO relates to; (ii) 5 elements outlining the tasks and behaviours a trainee must demonstrate to be able to achieve the PO; and (iii) a 200- to 500-word concise personal statement in which a trainee must summarise how they achieved the PO.
35. In total, a trainee is required to complete nine POs. The POs numbered 1 to 5 are compulsory. There are then a number of option 'Technical' POs from which the trainee needs to choose four. ACCA recommends to trainees that they choose the technical POs that best align to their role so that it is easier to achieve the PO. In that regard the ACCA's requirements as published in the 2019 guide, and subsequently, explain the following:

'The performance objectives you choose should be agreed with your practical experience supervisor. You should consider the following points when selecting which performance objectives to target...

Match any business objectives you have been set at work with the performance objectives. This will allow you to work towards your business objectives and your PER at the same time.'

36. In their personal statement for each PO, a trainee needs to provide a summary of the practical experience they gained. They must explain what they did, giving an example of a task. They must describe the skills they gained which helped them achieve the PO and they must reflect on what they have learned, including what went well or what they would have done differently.
37. A trainee's personal statement for each PO must be their own personal statement that is unique to them and their own experience. This has been consistently referred to in ACCA's published guides which Ms Calder exhibits to her statement. Trainees must not therefore use a precedent or template or another trainee's personal statement, which would undermine the PER training record element of the ACCA qualification. The 2019 published guide concludes:

'Your situation and experience are unique to you, so we do not expect to see duplicated wording, whether from statement to statement, or from other trainees. If such duplication occurs, then it may be referred to ACCA's Disciplinary Committee.'

38. ACCA's PER guides are available online in China. Although the Guides are printed in English, all Chinese trainees will have taken their exams in English and therefore it would follow that they have a reasonable command of the English language. Ms Patel confirmed that the guides are also available in Mandarin.
39. A "PES" means a qualified accountant who has worked closely with the trainee and who knows the trainee's work. As stated, 'Qualified accountant' means a member of an IFAC (International Federation of Accountants) member body and/or a body recognised by law in the trainee's country.
40. A PES is usually the trainee's line manager. However, where the trainee's manager is not IFAC qualified, the trainee can appoint an external supervisor who is. In that regard, ACCA's PER guide as exhibited to Linda Calder's statement states:

'If ... your organisation does not employ a professionally qualified accountant who can sign-off your performance objectives then you could ask an external accountant or auditor who knows your work, to be your practical experience supervisor and work with your line manager to sign off your objectives.'

41. Trainees must enter their PES's details using their ACCA MyExperience online recording tool which generates an invitation to their nominated supervisor to act as their PES. If the supervisor accepts that invitation, the supervisor is required to record their details using the same recording tool.
42. All PESs have to be registered with ACCA.
43. Information had been obtained from one of ACCA's China offices in China about the support given to ACCA trainees in China.
44. ACCA's Customer Services Team in China email all ACCA affiliates in China inviting them to regular webinars provided by ACCA staff who can advise on the PER process.
45. The Committee had been provided with a list of webinars (translated using Google translate) relating to ACCA's membership application process dated from 14 December 2016 to 27 August 2022. There are a number dated in 2019 including one dated 30 May 2019. The details include reference to:

'...Record 36 months of accounting-related work experience in myACCA, and complete 9 Performance Objectives, which will be confirmed online by your Supervisor...'

46. These are live webinars and therefore trainees can ask ACCA staff based in China any questions they may have.
47. The webinar details refer to encouraging affiliates to join the ACCA WeChat group of their regional service group and provides details how to join. All the webinars listed include the same details about these WeChat groups. 'WeChat' is a social media app available globally but used extensively in China. In these WeChat groups, ACCA trainees can ask ACCA China staff questions including in the PER process.

48. In addition to the WeChat groups, ACCA China uploads to its WeChat platform articles relevant to the ACCA membership process. The trainees had access to a list of those articles (translated using Google translate). This includes an article *'How to become an ACCA Member Series 1/ Practical Experience Requirement (PER) Quick Guide'*, dated 15 January 2020. The article refers to a mentor, which is the same as a supervisor. Under the heading *'Find a mentor'* the article states in particular:

'Your experience must be under the supervision of a mentor to count towards PER. You must find a mentor with real work experience to monitor and confirm your work hours and performance goals...'

49. Under the heading *'Determine performance goals'* the article states in particular:

'You have to choose which performance goals to accomplish, here are some points to keep in mind:

You need to complete 9 performance goals, including all 5 core goals and any 4 technical goals;

Work with your practical experience mentor to develop a plan to achieve performance goals;

Choose technical goals that are relevant to your day-to-day work, as they are easier to achieve....'

50. The Committee was satisfied, therefore, that there was significant information available to Mr Liu to enable him to understand fully the process relating to ACCA's PER and the training that was involved.

THE ACCA'S INVESTIGATION

51. During 2023 it came to the attention of ACCA's Professional Development Team that the PESs registered to 91 ACCA trainees, shared one of three email addresses despite the names of such supervisors being different. It was said by Ms Calder, and the Committee found, that it would not be expected for a supervisor to share an email address with any other supervisor or person.

52. In the course of its investigation, ACCA discovered, on further analysis of this cohort of 91 trainees, the following common features.
53. During the period the PESs (most of whom claimed to be IFAC qualified line managers) approved the POs for these 91 trainees, (being between August 2021 and March 2023), the requirement was for IFAC qualified supervisors to record the name of their IFAC member body and their membership number issued by that body. Most of the IFAC qualified line managers within this cohort of 91 trainees claimed to be members of the Chinese Institute of Certified Public Accountants ("CICPA"), an IFAC body, and, as required, went on to provide their membership number.
54. Although not compulsory at the time, most of these supervisors also went on to upload what they claimed was their CICPA membership registration card.
55. Despite these supervisors providing different membership numbers when registering, the vast majority uploaded the same registration card with the same membership number. However, this membership number did not match any of the CICPA membership numbers provided by those claiming to act as supervisors.
56. Furthermore, the Committee had considered the copy registration card exhibited to Ms Calder's statement and noted that the name recorded in this CICPA membership registration card was pixelated and therefore unidentifiable, as was the photograph.
57. Most of these trainees were registered with ACCA as resident in China.
58. Although the PER process stipulates that each statement supporting a PO should be a description of a trainee's experience and therefore unique, many of such statements within this cohort of 91 trainees were the same. ACCA submitted that these ACCA trainees had therefore copied their PO statements from others.
59. Of these 91 trainees, the earliest date a supervisor with one of these three email addresses was recorded as approving a trainee's PER training record was in August 2021, with the latest date being in March 2023.

60. Consequently, all 91 trainees were referred to ACCA's Investigations Team. Mr Liu was one such trainee.
61. Before considering the training record of Mr Liu, the Committee made the following findings in respect of his application for membership. In doing so, it relied on the statement of Ms Watson who, in turn, relied on the documentation on ACCA's database.
62. Ms Watson stated, and the Committee found, that once an application is received, this is recorded in ACCA's PROD database by an automated process. Ms Watson exhibited to her statement the record for Mr Liu's application for membership. However, this did not record when Mr Liu's membership application was received. ACCA's records had been searched and the only evidence of Mr Liu's application was a record on ACCA's CEC system relating to Mr Liu. It stated that, on 18 January 2022, a 'Membership – Application Enquiry' was made and that this was 'Resolved' by being 'Accepted'. The previous day, ACCA's records showed Mr Liu had been admitted to the affiliate register so the earliest he could have applied for membership would have been after that date. On 20 January 2022, being two days after his application, ACCA records showed he was admitted to membership.

THE PRACTICAL EXPERIENCE REQUIREMENT (PER) TRAINING RECORD FOR MR LIU

63. Based on the documentation provided in the main bundle, the Committee made the following findings.
64. A copy of the PER training record for Mr Liu claimed that he obtained his experience while employed by two firms.

COMPANY A

65. The first firm was Company A where he was employed from 28 September 2018 to 2 May 2020 in the role of Financial Management Department.
66. In red text in Mr Liu's PER training record, the Committee noted that 19 months of relevant practical experience had been claimed, which related to the period of employment referred to in the paragraph immediately above.

67. In this role, the PER training record referred to a single supervisor, Person A, who was recorded as authorised to approve Mr Liu's experience / time claim only. In that regard, Mr Liu requested that Person A approve his experience/time claim on 8 October 2021 and the Committee noted that Person A approved Mr Liu's experience/time claim later that day on 8 October 2021.
68. Furthermore, the Supervisor details for Mr Liu record that Person A registered on 8 October 2021 as Mr Liu's 'non IFAC qualified line manager'. This was the reason why Person A was only authorised to approve Mr Liu's time and not his POs.
69. The Supervisor details also record that Person A registered with one of the three common email addresses.
70. In relation to this issue, the Committee had been provided with sample extracts of supervisor details for other ACCA Trainees whose supervisors' names were different but whose email addresses were the same as those of Mr Liu's apparent supervisor, Person A.

COMPANY B

71. The PER training record recorded the second firm where Mr Liu was employed was Company B. The record suggested that he commenced employment with Company B on 8 May 2020 until 8 October 2021 in the role of "Operating Department, Investment Banking Division".
72. As in the case of Company A, in the PER training record, in red text, 17 months of relevant practical experience had been claimed, which related to the period of employment referred to in the paragraph immediately above. This, plus the time claimed while employed at Company A of 19 months, totalled 36 months, representing the minimum requirement of 36 months' relevant experience.
73. The Supervisor details for Mr Liu recorded that Person B registered on 8 October 2021 as his 'IFAC qualified line manager'.
74. As Mr Liu's purported IFAC qualified line manager, Person B was authorised to approve both Mr Liu's time/experience and all his POs. Person B did so, as recorded in Mr Liu's PER. Indeed, the Committee noted that Mr Liu requested

Person B to approve his time/experience of 17 months on 10 October 2021 and Person B appeared to do so on the same day i.e. 10 October 2021.

75. On the same date, 10 October 2021, Mr Liu requested that Person B approve all of his nine POs; again, Person B appeared to do so on the same date, 10 October 2021.
76. As in the case of Person A, the Supervisor details also record that Person B registered with one of the three common email addresses shared amongst this cohort of 91 cases, albeit not the same email address used by Person A.
77. In support of that finding, the Committee had been provided with a bundle of documents with sample extracts of supervisor details for other ACCA Trainees whose supervisors' names were different but whose email addresses were the same as those of Mr Liu's apparent supervisor, Person B.
78. Mr Liu had also relied on the registration details provided by his apparent supervisor, Person B. They included the common email address and also the supervisor CICPA membership number. These registration details refer to 'Attachments' beneath which was reference to 'CPA' being 'Certified Public Accountant'. The attachment purported to be the supervisor's CICPA membership card. However, although the name had been pixelated, the membership number is visible, which was not the same as the membership number provided by Mr Liu's supervisor, Person B.
79. As referred to in Ms Calder's statement, the Committee found that this CICPA membership card had been uploaded by many supervisors who shared one of the three common email addresses.

ANALYSIS OF MR LIU'S PO STATEMENTS AS CONTAINED IN HIS PER TRAINING RECORD COMPARED WITH THOSE OF OTHER ACCA TRAINEES BEING PART OF THIS COHORT.

80. Based on Linda Calder's evidence and the documentation to include the guidance available to trainees, the Committee found that all PO statements should be unique to the individual trainee and must not be copied from other trainees or from templates as this undermined the PER training record element of the ACCA qualification.

81. Where PO statements are the same or significantly similar to the PO statements of any other trainees, the Committee was satisfied that this would suggest, at the very least, that the trainee had not met the objective in the way claimed or possibly at all and the practical experience claimed had not been supervised by a PES, who would or should have knowledge of the trainee's work.
82. In carrying out this analysis, the Committee noted that ACCA had been careful to record the PO statement for any one PO which was first in time, on the basis this statement may be original and therefore written by the trainee based on their actual experience, unless there was evidence suggesting otherwise.
83. The 'first in time date' was the date the trainee requested that their IFAC qualified line manager approve the PO in question within their PER. This was on the basis that as soon as the PO narrative had been uploaded to the PER, the trainee would have then requested approval. In most of the cases within this cohort, the supervisor approved the POs on the same day or, if not, very soon thereafter.
84. In relation to Mr Liu the analysis revealed, and the Committee found, that:
- (i) One of his PO statements was first in time, namely PO18, and
 - (ii) Eight of his PO statements, being for POs 1 to 7 and 19, were identical, or significantly similar, to the PO statements contained in the PER records of other ACCA trainees from this cohort and which pre-dated those of Mr Liu's.
85. The following statements submitted by Mr Liu were the same, or effectively the same, as the trainees identified below:
- PO1 – Trainee 1;
 - PO2 – Trainee 2;
 - PO3 – Trainees 2, 3, 4, 5 & 6;
 - PO4 – Trainee 1;
 - PO5 – Trainee 1;
 - PO6 – Trainees 1;
 - PO7 – Trainees 2, 4, 5, 6 & 7;
 - PO19 – Trainee 8.

MR LIU'S RESPONSES IN RELATION TO ALLEGATIONS 1(a), (b) & (c)

86. As Mr Liu had not attended this hearing, the Committee considered that it was appropriate to set out in some detail the responses provided by Mr Liu in the course of the investigation.
87. On 22 March 2024, ACCA sent an email to Mr Liu, attached to which was a letter setting out the background and asking Mr Liu a series of questions in relation to his PER training record. Having been sent a reminder, on 8 April 2024, Mr Liu sent two emails to ACCA. As well as responding to the questions, he also attached a number of documents, to include documents which suggested that he had been employed by Companies A and B as outlined above.
88. By way of explanation, Mr Liu stated as follows:

'I carefully read the complaint. Here's my explanation regarding the similarity in performance obligation (PO) content: In China, we often have tutorial templates and communication groups for PO. Due to the similarity in job content, homogeneity is sometimes unavoidable. Additionally, internet privacy in China is poor, which increases the likelihood of your information being leaked and circulated widely, potentially leading to widespread sharing of content. This is likely a reason for the similarity in PO content. However, as far as I know, many topics and reports have their own templates and tutorials, which could also contribute to similarities.'

'As for supervisors Person B and Person A, I couldn't obtain their current contact information. It's been almost three years since I applied for membership, over four years since I left Company A, and two years since I left Company B. Both supervisors were close to retirement when I joined, and in China, colleague relationships are often transient. Once we're no longer colleagues, it's difficult to obtain former colleagues' contact information, especially considering they are now retired. It's unreasonable and practically impossible for me to trace back three to five years to previous employers. I'm not a historian or an investigator, and former employers are often reluctant to cooperate with ex-employees. Our relationship wasn't as cordial as one might expect. If you had contacted me within a year of my membership application and before my

resignation, it would have been easier for me to obtain this information. However, given the passage of time, it's extremely challenging. I've already resigned from those two companies and returned my laptop, so my access to company records is limited. I hope you understand my difficulties and challenges. Indeed, retired supervisors have no obligation or necessity to assist me. It's not beneficial for them, and I can only provide the records I have access to. I'll do my best to satisfy your requirements. Once colleagues retire or move on to different jobs, relationships between former colleagues can become distant...'

89. On 10 April 2024, Mr Liu sent a further email. In this email, he explained why he had not responded more quickly to the email from ACCA dated 22 March 2024. He went on to provide further explanations regarding his PER training record:

'2. I confirm that Person B as my line manager from 8 May 2020, but at present, I have already resigned, and Person B has retired. We have lost contact now. Three years is a long time, and a lot has changed...'

'6 ...In China, our job tasks tend to be highly homogeneous, and the guidance content in teaching materials is also very similar. With the gradual improvement of SOPs and systems, many behaviors and descriptions become quite similar, especially in the field of auditing.... I don't think such descriptions should be classified as copying. My expression is broad and common sense, but this does not imply that common sense and common knowledge expressions are copied....'

'8. Since I left Company A four years ago, I've lost contact and communication with Person A under covid 19 wide spread background. Company A is my former former former employer, and all communication information is on the company computer, which was returned to the company when I resigned. I mean, tracing back four years is extremely difficult. I am not an authoritative investigative agency and lack the means for coercive enforcement. There is no legal way for me to obtain someone else's privacy information or assist in doing so. I believe such a request is highly unreasonable.'

'9. ... In the age of the internet, privacy is often compromised. In China, there are serious issues with information leaks through mobile apps. I have lost my

phone and laptop before, and sometimes information is leaked to the public and training institutions through regular app usage. This is one of the reasons for the high similarity. I cannot fully prevent my information and personal privacy from being leaked...’.

90. The Committee had also taken into account the content of Mr Liu’s email of 4 July 2024 which broadly repeated his earlier responses in terms of what he had to say in respect of his PESs and also the submission of the PO statements.

COMMITTEE’S CONCLUSIONS IN RESPECT OF ALLEGATIONS 1(a) & (b)

91. In respect of allegations 1(a) and (b), the Committee was satisfied, on the balance of probabilities, that neither Person A nor Person B had fulfilled the role of Mr Liu’s PES as envisaged by PER.
92. In any event, Mr Liu’s PES details at Company A record Person A as his, “*non-IFAC qualified line manager*” and therefore Person A could not have acted as his PES for the 19 months he claimed as part of his 36 months of his qualifying experience.
93. Furthermore, the email address used by Person A was the same as the one used by other differently-named supervisors.
94. As for Person B, whilst this person was described as Mr Liu’s “IFAC qualified line manager”, the Committee found:
- (i) as in the case of Person A, the email address of Person B was shared with other differently-named supervisors.
 - (ii) the CICPA membership number provided to ACCA by Person B contained a membership number which was different from the CICPA membership number as contained in the CICPA membership card uploaded by Person B, and
 - (iii) the CICPA membership card uploaded by Person B had been used by many purported supervisors using a common email address.
95. There was no evidence at all of any contact taking place between Mr Liu and Persons A and B throughout his training at Companies A and B as would be

expected if Persons A and B had been acting as his supervisor as shown on Mr Liu's PER.

96. As stated in the PER booklet, one of the three components of PER is to, *"regularly record your PER progress in your online My Experience record, which can be accessed via myACCA."* As stated, there was no such evidence.
97. The Committee had considered carefully the explanations provided by Mr Liu and had not found them to be credible. The fact that he suggested that both supervisors were close to retirement and that he suggested he did not have a close relationship with them was not persuasive. He had not produced any evidence at all that he had been supervised. Even if he no longer possessed the laptop he would have used at Companies A and B, there was no evidence that he had attempted to contact either Person A or Person B. There was also no suggestion that he had contacted either Company A or Company B to attempt to obtain any evidence that may have existed to support his claims. Finally, there was no evidence at all that Mr Liu had recorded his PER progress in his online MyExperience record, which can be accessed via myACCA.
98. To summarise, in reaching its finding, the Committee had taken account of the following:
- (a) there was no documentary evidence at all of any contact between Mr Liu and Persons A and B, such as supervision notes, meeting notes, file reviews, text messages, appointments, or emails concerning work undertaken by Mr Liu when at Companies A and B;
 - (b) for the reasons set out above (and below in respect of his POs), the Committee found that the explanations put forward by Mr Liu lacked credibility;
 - (c) there were serious concerns in relation to the genuineness of Persons A and B as Mr Liu's supervisors as outlined above.
99. For these reasons, the Committee found, on the balance of probabilities, that, on 18 January 2022, Mr Liu applied for membership of ACCA and in doing so purported to confirm in relation to his ACCA Practical Experience Training Record:

- a) His Practical Experience Supervisor in respect of his practical experience training in the period from 28 September 2018 to 2 May 2020 was Person A when Person A did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all, and
- b) His Practical Experience Supervisor in respect of his practical experience training in the period from 8 May 2020 to 8 October 2021 was Person B when Person B did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all.

100. The Committee therefore found, on the balance of probabilities, allegations 1(a) and (b) proved.

COMMITTEE'S CONCLUSIONS IN RESPECT OF ALLEGATIONS 1(c)

101. Similarly, the Committee found, on the balance of probabilities, that, when Mr Liu applied for membership on 18 January 2022, he purported to confirm in relation to his ACCA Practical Experience training record that he had achieved POs 1 to 7 and 19 when he had not done so in the manner described.

102. The Committee did not find Mr Liu's explanations credible. It was not plausible that the reason the wording of his PO statements were identical or significantly similar to those of other trainees was as a result of problems with the internet in China. His additional explanation that, "*our job tasks tend to be highly homogeneous, and the guidance content in teaching materials is also very similar*" was also not credible. They did not explain why his PO statements were the same as other trainees' statements which predated his. It also ignored the requirement that PO statements must be unique to the trainee.

103. It was not credible that trainees would have undergone exactly the same work experience and then expressed it in effectively identical terms, including spelling mistakes. The Committee was satisfied that the wording was taken from some sort of template and that it represented a pattern of behaviour, repeated in respect of all eight of Mr Liu's POs which were particularised in this allegation.

104. The Committee was satisfied that this was a clear abuse of the process of validation and no weight could be placed on the description of the experience gained as described in the statements.
105. The Committee had found that Mr Liu had deliberately submitted PO statements which were identical, or practically identical, to the PO statements of other trainees, when Mr Liu knew they could not accurately reflect the work that he had undertaken. As a result, when he applied for membership to ACCA on or about 18 January 2022, he purported to confirm in relation to his ACCA Practical Experience training record that he had achieved POs 1 to 7 and 19 by using PO statements taken from a template.
106. On this basis, the Committee found allegation 1(c) proved.

ALLEGATIONS 2(a), (b) & (c)

107. In reaching its decision on whether Mr Liu had acted dishonestly, it had relied on the test for dishonesty as prescribed by the Supreme Court in the case of *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.
108. The Committee had considered the entirety of the facts it had found in respect of allegations 1(a), (b) and (c) as they all supported a finding that Mr Liu had gained membership of ACCA via improper means.
109. The Committee had also taken into consideration the response Mr Liu had provided to allegations 2(a) to (c) in the CMF, which was as follows:

“Thirdly, I will now begin to explain these issues. I don’t know if adding information at this time will increase ACCA’s punishment on me, but I believe it is a real thing. I remember now, and I have an obligation to clarify this matter with ACCA, which may be beneficial for ACCA to investigate this matter. I reject accusations of dishonesty, but I acknowledge my carelessness. The opposite meaning of integrity is deception, but in this incident, I did not actively deceive ACCA. This matter stems from my carelessness:

1. I have already replied in the first accusation that my work experience and two superiors are genuine. At that time, I was supervised by these two superiors

and reported my work to them. Although it is difficult to obtain evidence, I have made every effort to provide the evidence I can, such as the labor contract. There is no deception or concealment here

2、 When applying for membership, I found a netizen to help my two superiors complete the certification work. The problem may lie in this stage, but I can no longer find any records related to that time.”

110. Later in that same document, Mr Liu wrote as follows:

“2、 In my previous response, I forgot a fact. After recalling it, I have decided to supplement it to ACCA. My two superiors are relatively old and not good at English. When they helped me, they encountered many difficulties. At that time, I was not familiar with applying for membership, so I found a enthusiastic netizen on Baidu Tieba who helped me and guided the two superiors in their operations.

Perhaps the duplicate emails were caused by his guidance on the operations of these two superiors. I am not sure if he directly assisted my superiors, but I can confirm that I did not pay him. He once gave me a set of templates to modify according to my own work, and it is possible that I uploaded the wrong version during the upload process In my previous email, I said: I did not upload template statements to my PER training record. The PO descriptions in my record were not copied from others. This statement is true. I have written a set of POs myself, otherwise, in my previous response, I would not have been able to match every PO with my work experience.”

111. The Committee did not find his explanation to be credible. Mr Liu was now suggesting that the inaccuracies in his application for membership was due to carelessness. However, the Committee had found that there was substantial information available to him regarding the process that he needed to follow to enable him to apply for membership. This included his ability, and a requirement, to regularly update his progress and experience on his online MyExperience which he could have accessed via myACCA.

112. Taking account of the extent of the information available to Mr Liu to enable him to appreciate the requirements of the PER process, it was not credible for Mr Liu to suggest that he had not familiarised himself with that process, nor was it

credible that he thought that what he had done could in any way be proper and compliant.

113. With regard to allegations 1(a) and (b), the Committee found, on the balance of probabilities, that, at the time his application for membership was submitted, he knew that his claim that Person A and Person B had supervised him properly and in accordance with the PER throughout the period of experience claimed was not true.
114. As stated, there was no evidence produced of any contact between him and Persons A and B. The Committee noted that Persons A and B registered as Mr Liu's supervisor on 8 October 2021 and 10 October 2021 respectively. In respect of Person A, this was approximately 17 months after he left Company A.
115. The Committee also took into consideration the findings in relation to Persons A and B using email addresses common to a number of other purported supervisors and the findings that the membership number provided for Person B was not the same as the membership number on the CICPA membership card that was relied upon.
116. In respect of all POs, on 10 October 2021, Mr Liu requested Person B to approve his experience. Person B purported to do so on the same day. This was two days after he had left Company B.
117. In the circumstances, the Committee was satisfied that Mr Liu knew that it was wrong for him to register Person A and Person B as his supervisors. He knew that at no stage had he been supervised by Persons A and B, as required by the rules.
118. Further, in respect of allegation 1(c), the Committee had found that Mr Liu had failed to write the statements in support of POs 1 to 7 and 19 in his own words. He had simply used words used by others and therefore there was no guarantee that the description would match in any way his practical experience. The Committee was satisfied that he knew that he had not achieved the performance objectives in respect of POs 1 to 7 and 19 in the manner described in the statements he had submitted.

119. The Committee did not accept Mr Liu's explanation contained in the CMF that he had written out statements in his own words but had then mistakenly uploaded the versions which were identical to other trainees as outlined above and which Mr Liu indicated had been supplied to him by a third party.
120. The Committee was satisfied that, by the standards of ordinary decent people, the entirety of the conduct outlined above would be considered to be dishonest.
121. Consequently, the Committee found allegations 2(a), (b) and (c) proved.

ALLEGATION 2(d)

122. On the basis that this allegation was pleaded in the alternative to allegations 2(a), (b) and (c), the Committee made no finding in respect of it.

ALLEGATION 3(a), (b) & (c)

123. On the basis that this allegation was pleaded in the alternative to allegation 2(a), (b) and (c), the Committee made no finding in respect of it.

ALLEGATION 4

124. Taking account of its findings, that Mr Liu had acted dishonestly, the Committee was satisfied that he was guilty of misconduct. Such conduct fell far below the standards expected of an accountant and member of ACCA, and could properly be described as deplorable. It put at risk the integrity of the entire process of becoming a member of ACCA. This had profound consequences for the reputation of ACCA. In the Committee's judgement, it brought discredit to Mr Liu, the Association and the accountancy profession.
125. The Committee found Allegation 4 proved.

SANCTION AND REASONS

126. The Committee considered what sanction, if any, to impose taking into account all it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions, and the principle of proportionality. It had listened to submissions from Ms Patel, and to legal advice from the Legal Adviser, which it accepted.

127. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate to conclude the case with no order.
128. The Committee was mindful of the fact that its role was not to be punitive and that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.
129. The Committee considered whether any mitigating or aggravating factors featured in this case.
130. The Committee accepted that there were no previous findings against Mr Liu. There was no evidence of any other mitigating factors in this case. Whilst the Committee recognised that there was no obligation for him to do so, the Committee had not heard from Mr Liu at the hearing nor had it received any references or testimonials.
131. As for aggravating features, on the basis of the Committee's findings, it had been established that Mr Liu's behaviour had been dishonest and the steps Mr Liu had taken involved a level of sophistication, planning and collusion with others, particularly in relation to the submission of his application for membership, to include eight false PO statements. His actions were designed to deceive his regulator.
132. The Committee noted that, whilst engaging with the process, Mr Liu had not shown any insight into his actions. The Committee was also not satisfied that Mr Liu had shown genuine remorse. The Committee was concerned that Mr Liu's dishonest conduct was to enable him to derive a personal benefit.
133. There was also a risk that Mr Liu would have gained qualification as an accountant without the necessary competence or experience. In this way, he could have caused harm or had an adverse impact on members of the public.
134. The Committee concluded that neither an admonishment nor a reprimand would adequately reflect the seriousness of the Committee's findings.

135. The Committee then considered whether a severe reprimand would be an appropriate sanction. Again, taking account of the seriousness of its findings, the Committee did not consider that a severe reprimand would be sufficient or proportionate. There was no evidence to suggest that Mr Liu had a proper understanding and appreciation of the conduct found proved.
136. Mr Liu had been found to have acted dishonestly in his conduct. The Committee was also concerned that, based on its findings, the objective of his dishonest conduct was to gain an unfair advantage over those who had approached their practical training in an honest way. Due to the lack of legitimate evidence regarding his training, he had become a member when he may not have been competent to hold such a position. Therefore, this was conduct on Mr Liu's part which had led to his achieving a level of success to which he was not entitled and which was not merited. In this way, as stated, he presented a risk to the reputation of ACCA and the accountancy profession. It meant that he also presented a risk to the public.
137. In the Committee's judgement, Mr Liu's overall conduct was fundamentally incompatible with being a member of ACCA and risked undermining the integrity of ACCA membership. The Committee adopted the Guidance which stated that the reputation of ACCA and the accountancy profession was built upon the public being able to rely on a member to do the right thing in difficult circumstances. It noted this was a cornerstone of the public value which an accountant brings.
138. The Committee had considered whether there were any reasons which were so exceptional or remarkable that it would not be necessary to exclude Mr Liu as a member of ACCA but could find none.
139. The Committee concluded that the only appropriate, proportionate and sufficient sanction was to order that Mr Liu shall be excluded from membership of ACCA.

COSTS AND REASONS

140. The Committee had been provided with a simple costs schedule (page 1) and a detailed costs schedule (pages 1 and 2). It had taken account of the document entitled Guidance for Costs Orders 2023.

141. The Committee concluded that ACCA was entitled to be awarded costs against Mr Liu, all allegations, including dishonesty, having been found proved. The amount of costs for which ACCA applied was £6,404. Taking account of the nature of the case, the Committee did not consider that the costs incurred were unreasonable, although the hearing had taken less time than estimated.
142. Mr Liu had provided the Committee with a schedule of his financial means when returning his CMF in November 2024 together with a document purported to be from his employer at that time. When he wrote to ACCA on 15 March 2025 in response to the Notice of Proceedings, he attached a new document from an employer [PRIVATE].
143. In the absence of any further information, the Committee was not satisfied that Mr Liu had adequately explained his current financial position and was not prepared to rely on what he had produced.
144. In the circumstances, the Committee was not prepared to reduce the amount claimed by ACCA other than to reflect the fact that today's hearing had taken less time than estimated.
145. In all the circumstances, the Committee exercised its discretion when determining the amount Mr Liu should be expected to pay. Taking account of what had been said by Ms Patel, the Committee considered that it was reasonable and proportionate to award ACCA costs in the reduced amount of £6,000.

EFFECTIVE DATE OF ORDER

146. The Committee decided that it was necessary, and in the interests of the public, for this order to take immediate effect.
147. In reaching its decision, the Committee took account of the fact that Mr Liu had obtained his ACCA membership by dishonest means and the Committee had no way of knowing if Mr Liu is continuing to hold himself out as a member of ACCA.
148. Therefore, as stated, the Committee concluded that it was in the interests of the public for the order to take immediate effect.

HH Suzan Matthews KC
Chair
8 April 2025