

## HEARING

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

#### REASONS FOR DECISION

<b>In the matter of:</b>	<b>Miss Jinhua Chang</b>
<b>Heard on:</b>	<b>Friday, 25 April 2025</b>
<b>Location:</b>	<b>Remotely via Microsoft Teams</b>
<b>Committee:</b>	<b>Ms Kathryn Douglas (Chair) Mr Ryan Moore (Accountant) Mr Geoff Baines (Lay)</b>
<b>Legal Adviser:</b>	<b>Miss Helen Gower</b>
<b>Persons present and capacity:</b>	<b>Mr Mazharul Mustafa (ACCA Case Presenter) Miss Mary Okunowo (Hearings Officer)</b>
<b>Summary:</b>	<b>Allegations 1(a), (b), (c), 2, 3(a), (b), (c), (d), and 5 proved. Exclusion from membership with immediate effect.</b>
<b>Costs:</b>	<b>£2,000 to be paid by Miss Chang to ACCA.</b>

#### INTRODUCTION

1. The Disciplinary Committee (“the Committee”) convened to consider allegations against Miss Jinhua Chang (‘Miss Chang’). Miss Chang was not present and was not represented. ACCA was represented by Mr Mustafa. The papers before the Committee consisted of a main bundle numbered 1-266, an “additional” bundle numbered 1-22, a separate bundle numbered 1-85, and a service bundle numbered 1-14.

## **PRELIMINARY MATTERS**

### **SERVICE OF PAPERS**

2. The Committee first considered whether the appropriate documents had been served in accordance with the Complaints and Disciplinary Regulations 2014 ('the Regulations'). The Committee took into account the submissions made by Mr Mustafa on behalf of ACCA and it also took into account the advice of the Legal Adviser.
3. The service bundle included the Notice of Hearing dated 25 March 2025, thereby satisfying the 28-day notice requirement, which had been sent to Miss Chang's email address as it appears on the ACCA register. The Notice included correct details about the time, date, and remote venue of the hearing, it also notified Miss Chang of the option to attend the hearing by telephone or video-link, and to be represented if she wished. Additionally, the Notice provided details about applying for an adjournment and the Committee's power to proceed in her absence if considered appropriate. A delivery receipt dated 25 March 2025, confirming delivery of the Notice, was also provided.
4. The Committee also had sight of an email dated 24 April 2025 from ACCA's hearing officer to Miss Chang which contained a link to enable Miss Chang to join the hearing if she wished to do so.
5. The Committee, having considered the relevant documents, was satisfied that Notice had been served in compliance with the Regulations.

### **PROCEEDING IN ABSENCE**

6. Having concluded that proper notice had been served in accordance with the Regulations, the Committee went on to consider whether to exercise its discretion to proceed in the absence of Miss Chang. It noted that on 17 November 2024 Miss Chang completed a case management form in which she stated that she did not intend to attend the hearing or be represented and was content for the Committee to proceed with the hearing in her absence.
7. The Committee was of the view that Miss Chang had voluntarily absented herself and that her attendance was unlikely to be secured by an adjournment. The Committee carefully balanced Miss Chang's interests against the wider

public interest and concluded that it was in the interests of justice that the matter proceed expeditiously notwithstanding the absence of Miss Chang.

## **ALLEGATIONS**

Jinhua Chang ('Miss Chang'), at all material times an ACCA trainee,

1. On or about 30 October 2022 in relation to her ACCA Practical Experience Training Record caused or permitted a third party
  - a) To register Person A as her practical experience supervisor and further,
  - b) To approve in Person A's name 37 months of qualifying experience and further,
  - c) To approve in Person A's name, her nine performance objectives.
2. Whether by herself or through a third party applied for membership to ACCA on or about 19 November 2022 and in doing so purported to confirm in relation to her ACCA Practical Experience training record she 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 7: Prepare external financial reports
  - Performance Objective 9: Evaluate investment and financing decisions
  - Performance Objective 13: Plan and control performance
  - Performance Objective 22: Data analysis and decision support
3. Miss Chang's conduct in respect of the matters described above was:
  - a) In relation to Allegation 1a), dishonest, in that Miss Chang knew her supervisor, Person A, had been falsely registered as her practical experience supervisor.

- b) In relation to Allegation 1b), dishonest in that Miss Chang knew her supervisor, Person A, had not approved her qualifying experience.
  - c) In relation to Allegation 1c), dishonest in that Miss Chang knew Person A had not approved her nine performance objectives.
  - d) In relation to Allegation 2, dishonest in that Miss Chang knew she had not achieved all or any of the performance objectives as described in the corresponding performance objective statements or at all.
  - e) In the alternative, any or all of the conduct referred to in Allegations 1 and 2 above demonstrates a failure to act with integrity.
4. In the further alternative any or all of the conduct referred to in Allegations 1 and 2 above was reckless in that:
- a) Miss Chang failed to ensure that her Practical Experience training Record was approved in all material respects by her practical experience supervisor.
  - b) Miss Chang paid no or insufficient regard to ACCA's requirements to ensure that the statements corresponding with the performance objectives referred to in Allegation 2 accurately set out how each objective had been met.
5. By reason of her conduct, Miss Chang is guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all of the matters set out at 1 to 4 above.

#### **BRIEF BACKGROUND**

8. Miss Chang was admitted as an affiliate member of ACCA on 18 April 2022. She was admitted as a full member on 24 November 2022 following an application for membership submitted on or about 19 November 2022.

9. Part of the requirement of becoming an ACCA member, in addition to passing the relevant exams, is the completion of practical experience. ACCA's practical experience requirement ('PER') is a key component of the ACCA qualification.
10. ACCA's PER is designed to develop the skills needed to become a professionally qualified accountant. There are two components to the PER:
  - Completion of nine performance objectives ('POs'). Each PO includes a statement of 200 to 500 words, in which the trainee explains how they have achieved the objective. They should, therefore, be unique to that trainee. The PO must be signed off by a practical experience supervisor ('PES'), who must be a qualified accountant recognised by law in the relevant country and/or a member of an IFAC body. They must have knowledge of the trainee's work in order to act as a PES. The PES is typically the trainee's line manager, though if their line manager is not suitably qualified, they can nominate an external supervisor provided the external supervisor has sufficient connection with the trainee's place of work.
  - Completion of 36 months practical experience in accounting or finance related roles, verified by a PES. The period of practical experience may be verified by a non-IFAC qualified line manager.
11. Those undertaking the PER are known as trainees. The trainee's progress towards the PER is recorded in their PER Training Record. The Training Record is completed using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal.
12. In support of her application for membership, Miss Chang submitted a PER Training Record to ACCA on or around 30 October 2022. This record stated that Miss Chang obtained her experience of 37 months between 20 April 2018 to 07 June 2021 in the role of [REDACTED] employed by Company B. The Supervisor details for Miss Chang appear to confirm that Person A registered on 30 October 2022 as her 'IFAC qualified line manager'. Following a request from Miss Chang, Person A appeared to approve Miss Chang's time/experience and all her POs on 30 October 2022.
13. Miss Chang's application for membership was granted on 24 November 2022.

14. During 2023 it came to the attention of ACCA's Professional Development Team that the practical experience supervisors registered to 91 ACCA trainees, shared one of three email addresses despite the names of such supervisors being different. It would not be expected for a supervisor to share an email address with any other supervisor or person.
15. Further analysis of this cohort of 91 trainees revealed the following:
  - Most of these trainees were registered with ACCA as resident in China.
  - Although 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.
  - Of these 91 trainees, the earliest date a supervisor with one of these three emails addresses is recorded as approving a trainee's PER training record was August 2021 with the latest date being March 2023.
16. A review was carried out by ACCA's Professional Development Team. It noted that Person A registered with one of the three common email addresses shared amongst this cohort of 91 cases. The registration details for Person A included what purports to be Person A's CICPA membership card. The membership number of this card has been uploaded by many supervisors who share one of the three common email addresses and is not the same as the membership number provided by Person A.
17. The analysis of Miss Chang's POs showed that none of her PO statements appeared to be first in time, and that all were identical or significantly similar to the PO statements contained in the PER training record of other ACCA trainees from this cohort.
18. The matter was referred to ACCA's Investigations Team. A member of that team sent an email to Miss Chang's registered email address on 08 March 2024. Attached to the email was a letter which set out the complaint and requested that Miss Chang respond to a number of questions.
19. Miss Chang replied by e-mail on 16 March 2024. She provided documents in Mandarin which included two contracts of employment with Company B and a

list of qualified Certified Public Accountants registered to Company B for 2023, which named Miss Chang and Person A.

20. In her responses Miss Chang confirmed that she was employed by Company B for the period referred to in her PER training record and confirmed that her supervisor for this period was Person A. She was unable to provide evidence because she resigned from Company B and has no 'correspondence' records and has changed her mobile phone.
21. In relation to a question about her PO statements and whether they were copied from others Miss Chang stated:

*"I had no idea how to finish membership application and my PO statements. It is very regretful to find a third party helps and guides me to complete the membership application. I need to apologize for this. the third party provided wrong details about my supervisor , as for CICPA registration number, which should be [number] ( as attachment 5) and [their] email address should be [email address].*

22. ACCA's Investigating Officer wrote to Miss Chang on 21 March 2024 with further enquiries and Miss Chang responded on 03 April 2024. The following are some of the questions followed by Miss Chang's responses.

Q *"In response to my question number 6 which asked you why all your PO statements were identical or significantly similar to others, you stated 'I had no idea how to finish membership application and my PO statements. It is very regretful to find a third party helps and guides me to complete the membership application.' Given our response,*

- i) Please explain how you found this third party.*
- ii) Please provide the name of the third party*
- iii) Please provide the contact details for the third party, including email, telephone number, postal address.*
- iv) Please provide a copy of the third party's website/marketing material if they have one.*
- v) Please advise me whether you paid the third party a fee. If you did, please advise me of the fee you paid and provide me with a copy of your payment receipt.*

vi) *Please explain why you did not seek advice from ACCA. If you did seek advice at any point from ACCA, please provide me with evidence of that advice.*"

A: *"I found the third party from Taobao, and the name called [REDACTED] seeing the website's screenshot as attachment 1. I paid the third party a fee, you could check the copy of my payment as attachment 2. I had to finished the membership application as soon as possible since I got a job as an [REDACTED], as a result, I did not seek advice from ACCA rather than find the third party to help me immediately because this is a quicker way to do so" [sic]*

Q: *"Your response to my question numbered 6, as referred to above, suggests the third party you found also assisted you by providing template statements to support each of your performance objectives and hence why they are the same other ACCA trainees. Do you accept this? If not, how do you explain your statements are similar to other ACCA's trainees but which are later in time than those other ACCA trainees."*

A: *"I accept that the third party may use template statement downloaded from one website to help me complete my PO but I did not know that my PO was template statements and eventually similar to other ACCA trainees. Those other ACCA trainees possibly also find a third party to assist them just like me."*

Q: *"Please provide me with any evidence, for example WeChat messages/emails, where the third party 'helps and guides' you to complete your membership application, including evidence of the third party assisting you with the statements supporting your performance objectives."*

A: *"The third party used my ACCA account number and password to log in my ACCA and finish my PO online, they let me check all of the statements before submitting the application, so I checked my PO statements they written and thought that the descriptions of those statements align with my work experiences as a [REDACTED] (the Taobao messages as attachment 4), but I really did not know those statements were copied from others".*

Q: *"You state, 'the third party provided wrong details about my supervisor' and you then refer to the correct CICPA registration number and email address for your supervisor. Your supervisor should have registered with ACCA and in doing so would have been in a position to approve your POs in your PER*



*training record. However, you appear to be stating that it was the third party who registered on behalf of your supervisor and given the third party provided a different email address (presumably their own) it was in fact that third party who approved your PO statements. Please confirm if my understanding is correct. If not, please explain."*

*A: "When I applied ACCA membership I have already resigned from [Company B] for almost one year. It is inconvenient to contact my supervisor to help me approve my PO since we haven't been in touch for a long time and she also has a poor English. It is true that the third party registered with ACCA on behalf of my supervisor because I did not know that my supervisor needs to register with ACCA account. Actually, I was not familiar with the details of membership application process although I did research about related application information online. The third party only let me to provide them with my company name, working period and my supervisor's name (as attachment 4). they did not get any other details from me such as supervisor's CICPA registration number and email address. In fact, I could provide them with those details above". [sic]*

*Q: "Please advise who uploaded your PO statements to your PER training record. If it was you, why did you not realise the statements were not a description of your own experience? Alternatively, did you provide the third party with your ACCA login and password, and it was the third party who uploaded the PO statements and then approved them."*

*A: "I did provide the third party with my ACCA login and password and it was the third party who uploaded the PO statements and then approved them."*

23. On 17 November 2024 Miss Chang completed a case management form in which she admitted Allegations 1, 2 and 3(a), (b) and (c). Miss Chang denied allegation 3(d).

## **DECISION ON FACTS AND REASONS**

24. The Committee accepted the advice of the Legal Adviser and considered the submissions of Mr Mustafa. The Committee noted the content of Miss Chang's case management form but considered that it was insufficient for the Committee to be confident that she wished to make formal admissions. The

Committee considered the content of the case management form together with Miss Chang's communications with ACCA as part of the evidence.

25. The Committee considered the documents before it, the submissions of Mr Mustafa on behalf of ACCA and the advice of the Legal Adviser. The Committee bore in mind that the burden of proving an allegation rests on ACCA and the standard to be applied is proof on the balance of probabilities.

Allegation 1(a), (b) and (c)

26. The Committee found Allegation 1(a) proved by the documentary evidence together with Miss Chang's admission.
27. The Committee noted the documentary evidence provided by Miss Chang, which included an exchange of messages between herself and the third party. Miss Chang was invited by the third party to provide the details of Person A and she was informed by the third party that no contact would be made with Person A. The exchange of messages demonstrated that Miss Chang had an understanding of the methodology for her application for membership to ACCA employed by the third party. She was complicit with the third party in providing her log-in details and relevant information to enable her membership application to be completed.
28. The Committee reviewed Miss Chang's PER Training Record together with her responses to ACCA. Within Miss Chang's PER Training Record, Person A was described as Miss Chang's "IFAC qualified line manager" and was therefore her practical experience supervisor. In her responses to ACCA Miss Chang acknowledged that she provided her password and log in details to enable the third party to access her MyACCA account, and that the third party registered with ACCA "*on behalf of*" Person A.
29. This information recorded in Miss Chang's PER training record was false because Person A had not supervised Miss Chang in accordance with ACCA's requirements and this is admitted by Miss Chang.
30. The Committee found Allegation 1(b) proved by the documentary evidence together with Miss Chang's admission. Miss Chang's PER training record records that Person A approved Miss Chang's time/experience of 37 months.

Miss Chang has acknowledged within her responses to ACCA that the third party approved her time/experience and that Person A was not involved.

31. The Committee found Allegation 1(c) proved by the documentary evidence together with Miss Chang's admission. Miss Chang's PER training record recorded that Person A had approved all Miss Chang's nine POs. In her responses to ACCA Miss Chang stated that the third party allowed her to review the template PO statements before they were submitted. Miss Chang also confirmed that a third party was responsible for the approval of her nine POs. This information within the PER training was false because Person A had not approved the nine POs.

#### Allegation 2

32. The Committee found Allegation 2 proved by the documentary evidence together with Miss Chang's admission.
33. Miss Chang's PER training record included statements in respect of POs 1, 2, 3, 4, 5, 7, 9, 13, and 22. Miss Chang's PO statements have been compared to those of the other trainees within the cohort. None of the statements were first in time and their content was strikingly similar to the wording of the PO statements of other individuals within the cohort of 91 trainees. Each trainee's practical experience should be unique to them and the possibility of recording exactly or nearly exactly the same as another trainee is not plausible. In addition, Miss Chang has stated that all nine PO statements were provided to her by the third party.
34. Miss Chang has admitted that the third party may have used template statements from a website, and the Committee concluded that the PO statements had been copied from those of other trainees, either by Miss Chang or by a third party acting on her behalf.

#### Allegation 3 (a), (b), (c), (d), and (e)

35. The Committee noted that within her case management form Miss Chang admitted Allegations 3(a), (b) and (c), but denied Allegation 3(d).

36. The Committee considered the allegation of dishonesty in light of the test set out in the case of *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67.
37. The Committee was satisfied that Miss Chang must have known what ACCA's training requirements are. They are widely published, and relevant webinars are available in Mandarin. Miss Chang also stated in her responses to ACCA that she had conducted her own research on-line in relation to membership application. To the extent that Miss Chang suggested in her responses to ACCA that she did not understand the process or how to complete her application for ACCA membership, the Committee decided that these assertions were not credible.
38. The Committee was also satisfied that the information in Miss Chang's PER training record with Person A's details was provided by Miss Chang to enable a third party to complete her application for membership to ACCA. Miss Chang knew that Person A had not supervised her in accordance with ACCA's requirements and knew that Person A had not registered as her practical experience supervisor. Miss Chang has admitted in the various responses she provided to ACCA that Person A's registration as her supervisor was false.
39. Miss Chang also knew that Person A had not approved her qualifying experience. Miss Chang had instructed and paid a third party to act on her behalf to complete her PER training record and she knew that Person A had no involvement. Miss Chang also knew that Person A had not approved her nine performance objectives. Miss Chang admits these matters within her responses to ACCA.
40. The Committee inferred that Miss Chang's actions were intended to deceive ACCA into believing that she had been appropriately supervised. There is no doubt that this would be regarded as dishonest by ordinary and honest people. Having found that both limbs of the test in *Ivey v Genting Casinos* were satisfied, the Committee therefore found Allegation 3(a), (b) and (c) proved.
41. The Committee was also satisfied that Miss Chang knew that she had not achieved any of the nine performance objectives as described in the performance objective statements within her PER training record. Miss Chang said she had read and checked the statements and she knew that those statements were completed by the third party or obtained by the third party.

She knew that the statements were not in her own words and that she had not completed the required PER in the way described.

42. The Committee inferred that Miss Chang's actions were intended to deceive ACCA into believing that the PO statements described her own experience. Again, there is no doubt that this would be regarded as dishonest by ordinary and honest people. The Committee therefore found Allegation 3(d) proved.
43. Having found Allegation 3(a)-(d) proved, it was not necessary for the Committee to consider Allegations 3(e) or 4 which were alleged in the alternative.

### **Allegation 5**

44. The Committee accepted the advice of the Legal Adviser. It had regard to the partial definition of misconduct in Regulation 8(c), together with the guidance in the cases of *Roylance v GMC* [2000] 1 AC 311 and *Nandi v GMC* [2004] EWHC 2317.
45. Having found the facts proved in Allegations 1, 2 and 3(a)-(d), the Committee then considered whether they amounted to misconduct. The Committee considered that Miss Chang had sought the assistance of a third party to complete her PER training record which provided false information about Person A, her time/experience and provided false PO statements to allow her to qualify as a member of ACCA. This dishonest behaviour demonstrated a complete disregard for ACCA's membership process and allowed Miss Chang to become a member of ACCA when she was not qualified to be so. Such behaviour seriously undermines the integrity of the membership process and the standing of ACCA. It brings discredit upon Miss Chang, the profession and ACCA. The Committee considered this behaviour to be very serious and the Committee was in no doubt that it amounted to misconduct.
46. The Committee therefore found that the matters set out in 1, 2, and 3(a)-(d) amounted to misconduct.

### **SANCTION AND REASONS**

47. In reaching its decision on sanction, the Committee took into account the submissions made by Mr Mustafa. The Committee referred to the Guidance for

Disciplinary Sanctions issued by ACCA and had in mind the fact that the purpose of sanctions was not to punish Miss Chang, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct, and that any sanction must be proportionate. The Committee accepted the advice of the Legal Adviser.

48. When deciding on the appropriate sanction, the Committee carefully considered the aggravating and mitigating features in this case.
49. The Committee considered the misconduct involved the following aggravating features:
  - A deliberate planned enterprise for personal benefit at the expense of the public and the profession;
  - No evidence of insight into the seriousness of the allegation and its impact on the reputation of the profession;
  - Potential risk of an adverse impact on employers and/or clients.
50. The Committee considered the misconduct involved the following mitigating features:
  - The absence of any previous disciplinary history with ACCA (the Committee gave this factor limited weight because Miss Chang was relatively near the start of her career);
  - Miss Chang's admissions and her full co-operation with ACCA's investigation;
  - Miss Chang's apology and expression of remorse.
51. The Committee did not think it appropriate, or in the public interest, to take no further action or order an admonishment in a case where a member had disregarded the membership requirements and acted dishonestly in connection with her PER.
52. The Committee then considered whether to reprimand Miss Chang. The guidance indicates that a reprimand would be appropriate in cases where; the

misconduct is of a minor nature, there appears to be no continuing risk to the public, and there has been sufficient evidence of an individual's understanding, together with genuine insight into the conduct found proved. The Committee did not consider Miss Chang's misconduct to be of a minor nature and there was no evidence of her understanding of the consequences of her dishonest behaviour. ACCA's Guidance indicates that dishonest behaviour is considered to be very serious. The Committee concluded that a reprimand would not adequately reflect the seriousness of the misconduct in this case.

53. The Committee then considered whether a severe reprimand would adequately reflect the seriousness of the case. The guidance indicates that a severe reprimand would usually be applied in situations where the conduct is of a serious nature but where there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public and there is evidence of the individual's understanding and appreciation of the conduct found proved. The Committee considered that none of these criteria were met and that a severe reprimand would not adequately reflect the seriousness of Miss Chang's behaviour, nor protect the public.
54. The Committee considered the ACCA guidance on the approach to be taken in cases of dishonesty which is said to be regarded as a particularly serious matter because it undermines trust and confidence in the profession. The guidance also states that the public is entitled to expect a high degree of probity from a professional who has undertaken to abide by a code of ethics. The reputation of ACCA and the accountancy profession is built upon the public being able to rely on a member to do the right thing in difficult circumstances.
55. The Committee considered that Miss Chang's behaviour involved a number of features referenced in ACCA's guidance in relation to exclusion. In particular the conduct involved: dishonesty; abuse of the trust placed in Miss Chang by ACCA; there was no evidence that Miss Chang had developed understanding and insight into the seriousness of the acts and their consequences; the potential for an adverse impact on the public; conduct over a period of time; and serious departure from professional standards. The Committee also considered that there was nothing exceptional in Miss Chang's case that would warrant a lesser sanction than exclusion from membership. Miss Chang's dishonesty, coupled with the absence of any evidence demonstrating Miss Chang's understanding of the seriousness of her behaviour and any steps taken to remediate her conduct are fundamentally incompatible with her

continued membership. The Committee concluded that the only appropriate and proportionate sanction was exclusion.

56. The Committee considered that the circumstances of this case did not require an order restricting Miss Chang's right to apply for re-admission beyond the normal minimum period.

## **COSTS AND REASONS**

57. ACCA applied for costs in the sum of £6,629. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the hearing. A simplified breakdown was also provided.
58. The Committee was satisfied that ACCA was entitled to claim its costs. The Committee considered that the costs of ACCA's investigation were reasonably and proportionately incurred. The Committee considered it appropriate to make a deduction to the amount claimed having regard to the reduced hearing length.
59. Miss Chang has submitted documents relating to her financial position, which the Committee has considered. The financial details considered were as follows. [PRIVATE].
60. [PRIVATE]. Having considered ACCA's Cost Guidance, the Committee decided to exercise its discretion to make a reduction to the costs that Miss Chang would be required to pay [PRIVATE].
61. In all the circumstances, the Committee exercised its discretion when determining the amount Miss Chang should be expected to pay. Taking account of a deduction for the reduced hearing length and a reduction on the basis of Miss Chang's [PRIVATE], the Committee considered that it was reasonable and proportionate to award ACCA's costs in the amount of £2,000.

## **EFFECTIVE DATE OF THE ORDER**

62. The Committee determined that it would be in the public interest for the order to take immediate effect in light of the fact that Miss Chang is potentially able to practise as an ACCA qualified accountant having gained that qualification dishonestly. Therefore, pursuant to Regulation 20(1)(b) the order excluding Miss Chang from membership will take effect immediately.



**Ms Kathryn Douglas**  
**Chair**  
**25 April 2025**