

**The decision and reasons of the Regulatory Assessor for the case of Mr Barry Thomas Rothwell FCCA and ROTMCH Ltd (trading as Rothwell McHugh) referred to him by ACCA on 26 August 2025**

**Introduction**

1. ROTMCH Ltd (trading as Rothwell McHugh) and Propacc Management Limited are the incorporated sole practice of ACCA member, Mr Barry Thomas Rothwell FCCA. I have considered a report, including ACCA's recommendation, together with related correspondence, concerning Mr Rothwell's conduct of audit work.

**Basis and reasons for the decision**

2. I have considered all of the evidence in the booklet sent to me, including related correspondence and the action plan prepared and submitted by the firm since the monitoring visit.
3. In reaching my decision, I have made the following findings of fact:
  - a The firm has been the subject of seven audit quality monitoring visits;
  - b The first review to the firm was carried out during April 2007. The outcome of this review was unsatisfactory, and the compliance officer informed the firm of serious deficiencies in audit work on two of the three files reviewed which had resulted in audit opinions not being adequately supported by the work performed and recorded.
  - c At the second monitoring review held during January 2010 the compliance officer found serious deficiencies in audit work which had resulted in audit opinions not being adequately supported by the work performed and recorded. As a consequence, after the visit in January 2010, the matter was referred to the Regulatory Assessor.
  - d At the March 2010 meeting, the Regulatory Assessor ordered that Mr Rothwell be required to:

- I have all future audit work on four clients, selected by the Practice Monitoring Department, reviewed by a training company before reports are signed, such training company being subject to ACCA approval.
  - li notify ACCA within six weeks of the date of written notification of this decision of the identity of the training company referred to in I. above.
  - lii be subject to an accelerated monitoring visit before 31 March 2012 at a cost to the firm of £900 and £250 for each additional qualified audit principal.
  - liv note that failure to make the necessary improvements in the level of compliance with auditing standards and with the requirements of any regulators by that time will jeopardise his and his firm's continuing audit registration.
- e At the third monitoring visit held during May 2012, it was found that the firm had improved the standard of its audit and regulatory work, and the firm was therefore released from the conditions imposed by the Regulatory Assessor. However, some deficiencies were found and reported to the firm in June 2012. The firm acknowledged receipt of the report in a letter dated August 2012 and provided an action plan detailing the action that the firm intended to take in order to rectify the deficiencies found.

The firm was however referred to Professional Conduct due to non-compliance with the Regulatory Assessor's order in regard to hot file reviews on one client.

- f At the fourth review, which was carried out during September 2014, the compliance officer found that the firm had failed to maintain the standard of its audit work from the previous visit in May 2012 and it was for this reason that Mr Rothwell was referred to the Admissions and Licencing Committee for removal of licence.
- g In March 2015 the case was presented to the Admissions and Licencing Committee, the Committee was not satisfied that ACCA had established on the balance of probabilities the breaches alleged, to include the breach of GPR 16(1)(a) and therefore the Committee declined to make any order in relation to either Mr Rothwell's audit qualification or his firm's auditing certificate.

- h The fifth review was conducted during December 2016. The overall outcome of the review was satisfactory, with all four files reviewed being of a satisfactory standard. However, some deficiencies were found and reported to the firm in January 2017. The firm acknowledged receipt of the report in a letter dated February 2017 and provided a response on the recommended future action required to be taken by the firm.
- i The sixth review was conducted during May 2021. The overall outcome of the review was satisfactory, with all three files reviewed being of a satisfactory standard. However, some deficiencies were found and reported to the firm in June 2021. The firm acknowledged receipt of the report in a letter dated July 2021 and provided a response on the recommended future action required to be taken by the firm.
- j At the seventh review, conducted during June 2025, the compliance officer found that the firm had made little effective improvement to its procedures. The firm's procedures were not adequate to ensure that it conducts all audits in accordance with the International Standards on Auditing (Ireland) (ISAs). As a result, on the two files examined, the audit opinion was not adequately supported by the work performed and recorded.
- k Mr Rothwell provided an action plan following the third, fifth, and sixth reviews: these action plans have not proven effective in Mr Rothwell reaching and sustaining a satisfactory standard of audit work.
- l the firm has failed to achieve a satisfactory outcome at a seventh review in spite of the advice and warning given at previous reviews and by the Committee.
- m The firms have subsequently relinquished their auditing certificates and Mr B T Rothwell has relinquished his responsible individual status and has been issued with a general practising certificate.

### **The decision**

4. I note that Mr Rothwell has relinquished his practising certificate with audit qualification and his firm's auditing certificate. On the basis of the above I have decided pursuant to Authorisation Regulations 7(2)(f), 7(3)(b) and 7(4) that any future re-application for audit

registration by Mr Rothwell, or by a firm in which he/she is a principal, must be referred to the Admissions and Licensing Committee, which will not consider the application until:

- A. He has provided an action plan, including appropriate audit related CPD, which ACCA regards as satisfactory, setting out how Mr Rothwell intends to prevent a recurrence of the previous deficiencies and,
- B. Following the date of this decision, passed the advanced audit and assurance paper of ACCA's professional qualification.

### **Publicity**

- 5. Authorisation Regulation 7(6) indicates that all conditions relating to the certificates of Mr Rothwell and his firm made under Regulation 7(2) may be published as soon as practicable, subject to any directions given by me.
- 6. I have considered the submissions, if any, made by Mr Rothwell regarding publicity of any decision I may make pursuant to Authorisation Regulation 7(2). I do not find that there are exceptional circumstances in this case that would justify non-publication of my decision to impose conditions and/or the omission of the names of Mr Rothwell and his firm from that publicity.
- 7. I therefore direct pursuant to Authorisation Regulation 7(6)(a), that a news release be issued to ACCA's website referring to Mr Rothwell and his firm by name.

**David Sloggett FCCA**  
**Regulatory Assessor**  
**13 February 2026**