

## HEARING

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

#### REASONS FOR DECISION

<b>In the matter of:</b>	<b>Ms Memory Mudzi</b>
<b>Heard on:</b>	<b>Tuesday, 9 December 2025</b>
<b>Location:</b>	<b>Remote link via Microsoft teams</b>
<b>Committee:</b>	<b>Mr Andrew Gell (Chair) Ms Sue Gallone (Accountant) Mr Andrew Skelton (Lay)</b>
<b>Legal Adviser:</b>	<b>Mr Alastair McFarlane</b>
<b>Persons present and capacity:</b>	<b>Mr James Halliday (Case Presenter on behalf of ACCA) Miss Nicole Boateng (Hearings Officer)</b>
<b>Outcome:</b>	<b>Exclusion from membership with immediate effect and costs awarded to ACCA in the sum of £5,800</b>

1. ACCA was represented by Mr Halliday. Ms Mudzi did not attend and was not represented. The Committee had before it a Bundle of papers, numbered pages 1 – 214, and a Service Bundle numbered pages 1 – 19.

#### SERVICE

2. Having considered the Service Bundle, the Committee was satisfied that notice of the hearing was served on Ms Mudzi in accordance with the Complaints and Disciplinary Regulations 2014 ("CDR").

## PROCEEDING IN ABSENCE

3. The Committee noted the submissions of Mr Halliday and accepted the advice of the Legal Adviser.
4. The Committee reminded itself that the discretion to proceed in absence must be exercised with the utmost care and caution. The Committee noted that following the service of the Notice of Hearing on 10 November 2025, there was no response to the notice from Ms Mudzi. The Committee noted that Ms Mudzi had returned a partially completed Case Management Form dated 27 October 2025 in which she stated that she did not intend to attend the hearing. She explained that it was in her best interest *"to bring the matter to closure"* and stated: *"My sincere apology that I am not available, happy to have the hearing proceed in my absence, as already mentioned above"*. She also explained that [PRIVATE].
5. The Hearings Officer telephoned Ms Mudzi on 1 December 2025 to her telephone number registered with ACCA. Ms Mudzi answered and confirmed that she would not be attending the hearing. In an email dated 7 December 2025 Ms Mudzi stated: *"I can confirm that I'm not able to attend"*.
6. The Committee was mindful of the observations of Sir Brian Leveson in *Adeogba v. General Medical Council [2016] EWCA Civ 162* as to the burden on all professionals subject to a regulatory regime to engage with the regulator both in relation to the investigation and the ultimate resolution of allegations made against them. The Committee specifically considered the issue of fairness to Ms Mudzi of proceeding in her absence, but also fairness to the ACCA and the wider public interest in the expeditious discharge of the Committee's function. The Committee was satisfied that Ms Mudzi had voluntarily waived her right to attend the hearing. She had not sought any adjournment, and the Committee was not persuaded that any adjournment was likely to secure her attendance at a future date. She has not submitted any [PRIVATE] evidence confirming that she could not attend, but she had submitted that [PRIVATE]. The allegations were serious, involving dishonesty and, if proven, a risk to the public.
7. The Committee was satisfied that Ms Mudzi has been given every opportunity

to engage and participate in the proceedings and has decided not to do so. Accordingly, in all the circumstances, the Committee was satisfied that it was in the public interest to proceed in the absence of Ms Mudzi.

## **ALLEGATIONS**

Ms Memory Mudzi (Ms Mudzi), an ACCA Member:

1. Between January 2024 and 20 February 2024, during her employment with Firm A in its audit team preparing workpapers, copied signatures of others from planning specialist documentation and pasted them onto completion specialist documentation that she then uploaded onto the audit file.
2. Between January 2024 and February 2024 included outdated and/or duplicated narrative on documentation uploaded to an audit file.
3. In respect of Allegation 1 above her conduct was dishonest because she falsified the signatures of others onto the completion specialist documentation.
4. In the alternative, in respect of Allegation 1 above, Ms Mudzi failed to demonstrate integrity.
5. In respect of Allegation 2 Ms Mudzi failed to demonstrate Competence and Due Care.
6. In respect of Allegations 1 and/or 2 above, Ms Mudzi was reckless in that she failed to have any or sufficient regard for the need to ensure that documentation was accurate.
7. By reason of any or all of the conduct above Ms Mudzi is:
  - a) Guilty of Misconduct pursuant to bye-law 8(a)(i); or in the alternative:
  - b) Liable to disciplinary action pursuant to bye-law 8(a)(iii).

## BACKGROUND

8. Ms Mudzi became an ACCA member on 12 February 2016 and a Fellow on 12 February 2021. She holds an ACCA practising certificate and Audit [PRIVATE].
9. Ms Mudzi was employed by 'Firm A' from June 2023 and at the material time she was as an [PRIVATE], assigned to work in audit in January 2024.
10. The Audit Director and Audit Manager conducted an overall review of the audit file. This included review of two workpapers that had been prepared and placed on the audit file by Ms Mudzi. These papers appeared to have been signed by two Data and Analytics specialists.
11. A review of these documents identified that they were recorded as being prepared by Ms Mudzi and that they were not accurate as the signatures were not from February 2024. 'Firm A' records that as a result review notes were left on the file for Ms Mudzi to address.
12. The documents are referred to as [PRIVATE] and [PRIVATE] in the 'Firm A' documentation. It was later noted that in addition to issues with the signatures the documents included narrative that related to the prior year audit which was no longer relevant to the 2023 audit.
13. An email sent on 20 February 2024 and copied to Ms Mudzi noted these issues, requesting that the incorrect workpapers be reissued. One of the 'signatories' of the workpaper replied to this email on 21 February 2024 stating that they did not recall signing the [PRIVATE] and that they believed that the workpaper contained a screenshot of their Docusign signature from another workpaper, and that this had been pasted into [PRIVATE] prior to its being uploaded.
14. This matter was escalated within 'Firm A' and on 23 February 2024 Ms Mudzi was suspended with immediate effect pending investigation.
15. Ms Mudzi is recorded as having a conversation with a Manager at 'Firm A' on 21 February 2024. Ms Mudzi is noted as saying *'she created two separate Word documents (using last year's) and then for the signature part, she went into the*

*[PRIVATE] section of the 2023 file and copied and pasted the [relevant signatures] (separately) from the planning documents into the Incorrect WPs'... she wasn't instructed to copy the signatures by anyone, she did it by mistake'.*

16. An audit of Ms Mudzi's laptop was undertaken by 'Firm A'. In relation to [PRIVATE] the following was observed dated 19 February 2024:

*16.1. Accessed the audit file;*

*16.2. downloaded the [PRIVATE] Word document containing relevant signature;*

*16.3. saved document to Desktop;*

*16.4. changed date from 31 December 2022 to 31 December 2023;*

*16.5. Renamed document as [PRIVATE]; and*

*16.6. Accessed another document, created a snip of the signature and added it to the document saved on her laptop.*

17. In relation to [PRIVATE] on 20 February 2024:

*17.1. Created a copy of the word document she created on 19 February [PRIVATE] and saved it on her Desktop;*

*17.2. renamed it [PRIVATE]; and*

*17.3. accessed another document, created a snip of the signature and then added it to the document saved on her desktop [PRIVATE]*

18. 'Firm A's record of the investigation states that Ms Mudzi gave the following account in relation to the preparation of the Incorrect WPs:

- She could not recall specifically [how she prepared the Incorrect WPs], but thinks she looked through the [PRIVATE] section of the audit file and pulled out the specialist workpapers from year end 2023, which contained the relevant signatures dated October 2023.*

- *She didn't remember copying and pasting any signatures onto the specialist workpapers.*
- *She did remember rolling forward a workpaper from October 2023 to what she was doing in February 2024 and then editing it so that she could compare some of the items from the previous year. [Ms Mudzi] said she did not remove the signatures at that time, as the documents were intended to be working documents/templates so she could edit them. When the [Investigating Officer] asked [Ms Mudzi] a second time whether she copied and pasted any signatures, [Ms Mudzi] said that she didn't as both documents were Word documents and both had already been signed.*
- *She opened the documents (she thinks two separate documents signed and dated October 2023) and put them on the desktop of her computer. [Ms Mudzi] thinks she may have renamed them incorrectly as [PRIVATE] documents. [Ms Mudzi] says she now realises that the documents she downloaded and used as templates were the incorrect documents.*
- *[Ms Mudzi] said...she knew the Incorrect WPs weren't finalised and therefore left a review note on the audit file (around 7-8pm on 20 February 2024) saying something along the lines of "To be updated with final report / once final report from specialist received".*
- *No record of the file note was found during the audit of Ms Mudzi's laptop and the Manager had not recollection of Ms Mudzi stating that the documents weren't finalised or that she had added a review note to the file.*

19. Ms Mudzi further stated that:

- *This was the first assignment she had done since joining 'Firm A' where specialist workpapers were required.*
- *She admits she made a mistake by uploading the incorrect workpaper onto the audit file.*

- *She mistakenly picked the Specialist Workpaper, rather than the specialist Evaluation Workpaper.*
  - *At the time she prepared the Incorrect WPs she did not ask any clarification questions on what she needed to do, as she didn't feel as though she needed to. It is only since she's been informed that the documents were incorrect that she's realised she made a mistake.*
20. Firm A's record of the Disciplinary Panel meeting of 1 May 2024 records Ms Mudzi as stating:

*'She admitted that she had made a mistake and those were genuine mistakes. The first mistake, she worked in the specialist work paper when she was supposed to be working in the specialist evaluation paper, those are two different types of working papers. All along the paper [Ms Mudzi] made her comments and picked from prior issues where were raised, she did not completely delete them but edited them, saying that she would re-look at them to see when the evaluation working paper, when the final report has come because the specialist produce a final report on their findings and her task was to summarise the scope and the finding against the audited objective. So, by mistake, [Ms Mudzi] started working in the specialist work paper, as if she is reporting as s specialist herself until she got to the end.'*

*'The other mistake was that [Ms Mudzi] admitted she copied and pasted the planning signatures that was on the file, her intention was to say, 'I need the signature here updated by the end of the report'. She was aware that the specialist should have their signatures and they should be the latest signature. That is how [Ms Mudzi] prepared the working evaluation paper but that was the wrong working paper, that is why she went to the extent of thinking this requires a signature but if she had noticed it on time, she would not have bothered to go that far because the evaluation working paper does not need signing off and she did submit it on the file'.*

*Ms Mudzi was asked '...Why copy and paste the signature, rather than just waiting for the signatures that you needed?' Ms Mudzi is recorded as responding 'that there was not any reason, but when she done it, she said to herself that 'I need to make sure that I remember', but everything was messed*

*up as she was working on the wrong paper, that is what prompted her to say 'this needs to be signed off'*

21. On 19 November 2024 ACCA's Senior Investigations Officer wrote to Ms Mudzi and on 2 December 2024 Ms Mudzi responded to their questions as follows:

*'Do you agree that the workpaper was not in fact signed by the signatories? – Yes'*

*'Do you agree that baring amendment to the date, attachment of an incorrect signature snip and addition of the sentence 'The specialist's report for findings and conclusions have been attached on WP' the workpaper was incorrectly rolled forward from prior year? – Yes'*

*'The conversation and emails to the incorrect work papers was conducted midnight 20 Feb 2024. Because I had not intended to make this mistake, I was not aware of anything until the following day, 21 February 2024 when I stepped into the office. Without a time for me to sit, I was called by the Manager and I went for a chat. That is when [they] narrated the midnight conversations to me, I then realised there was a mistake on the file. I asked [them] what I needed to do to correct the work papers, to which [they] assured me "Nothing" because all the work papers had been deleted from the section. As we were viewing the audit file on the [PRIVATE] system, and the correct work papers were also there, the section was thus amended. At this point she mentioned to me that Person A had concluded that it was forgery and we would hear from Person A the way forward. I met Person A in the office and it was work as usual, creating a moment of [PRIVATE] for me.'*

*'I rolled over an incorrect WP for a specialist, the section I was working on, evaluating the specialist's audit evidence. In the process, I concluded an incorrect WP, inadvertently copying and pasting the specialist's signature, instead of evaluating the specialist's work, I completed it.'*

*'I didn't realise the mistake, and in the mix up of WPs I filed off the wrong and correct WPs. I didn't have a reason to act dishonestly, I recall putting up a self-review note to revisit the WP and update it, assuming I would get the correct WP. This was a mistake which I noticed when I got in the office the next day and the Manager too my through'.*

*'I really felt and observed on my end that I am enduring a [PRIVATE], and the way everything is being handled to this end.'*

*'...To my surprise, I got in the office without knowledge of Tue 20 Feb evening latest developments only to be told by the Manager that Person A had mentioned "forgery". That was a shocker and I was [PRIVATE], having also been enthusiastically putting effort to complete my assignment. Of all the specialists sections I was working in, more than 6, I did not mess up in all the specialists WPs that I evaluated.'*

*'...I am a fellow member of ACCA, who have been with other [PRIVATE] firms in [PRIVATE] and have not met such environment. [PRIVATE].'*

*'I do not have any record any allegations warranting investigations for a record, given how I professionally handled my work even in the past. I am a member in good standing, actively advocating the better of the brand in any way possible and in the best way that I could. Within the firm I was nominated for internal monthly departments prizes based on my contribution in the quality of the work in Dec 2023, [PRIVATE]. I was also in the process of learning the firm specific audit methodology, all in less than 1 year.'*

*'I felt my case was aggravated to ensure that [PRIVATE], without adequate support within the workplace. I still feel I deserved a lighter sentence from my employer, in light of all the contributions I made in the workplace, as part of the on-boarding exercise. There is proof that [PRIVATE] in the workplace, and that encounter affected me in the very process to this end. I have the conviction that the whole process was a tool to deliver a predetermined end, [PRIVATE].'*

## **ACCA's SUBMISSIONS**

22. ACCA submitted the allegations were capable of proof on the documentary evidence before the Committee and Allegation 1 could be proved by Ms Mudzi's admission in the Case Management Form.
23. ACCA's primary case was that the falsification of signatures on audit documentation was dishonest conduct (Allegation 3). As an alternative to dishonesty ACCA alleged a lack of integrity (Allegation 4).

24. In relation to including outdated and/or duplicated narrative on documentation uploaded to an audit file (Allegation 2) ACCA contended this amounted to a failure to demonstrate competence and care (Allegation 5).
25. ACCA invited the Committee to regard Allegation 6 – an allegation of recklessness in respect of the conduct in both Allegations 1 and 2 as a further alternative.
26. ACCA contended that the conduct reached the threshold for misconduct. There was an alternative liability to disciplinary action (Allegation 7).

### **MS MUDZI'S SUBMISSIONS**

27. In the Case Management Form in relation to Allegation 1 Ms Mudzi said:

*“ I admit to wrongfully committing Allegation 1 in error, and oversight”*

28. In relation to Allegation 2 Ms Mudzi said:

*“I do not admit to Allegation 2, it appears here for the first time and it was subject to review, which beyond that level, could be changed, amended or updated. I mentioned that I did put a self-review note to revisit that after discussion with my immediate supervisor, which thing did not happen considering how the events turned against me,*

*There was no time warded to me after the reviews, I felt I suffered workplace [PRIVATE] on Allegation 2, The immediate manger to this work paper did not review and sign off the work papers, and she left a review for discussion the following day. But the director to this engagement did not follow the review protocols, which I my observation, appears they were waiting and on the look-out for my downfall. I don't know why the director reviewed the work that was not reviewed by the manager or where the manager had left issues for discussion, I felt [PRIVATE]”*

29. Ms Mudzi did not address Allegations 3 to 7 in the Case Management Form.

30. It was clear to the Committee that Ms Mudzi denied that she was dishonest but accepted that she had made mistakes. Her position was also variously set out in her responses to Firm A's investigation and into ACCA's questions as detailed in the paragraphs above.

## **DECISION ON ALLEGATIONS AND REASONS**

31. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the burden of proving the case was on ACCA and had regard to the observation of Collins J in *Lawrance v General Medical Council* on the need for cogent evidence to reach the civil standard of proof in cases of dishonesty. The standard of proof to be applied throughout was the ordinary civil standard of proof, namely the 'balance of probabilities'. The Committee reminded itself to exercise caution in relation to its reliance on documents.
32. The Committee heard that there had been no previous findings against Ms Mudzi and accepted that it was relevant to put her good character into the balance in her favour. The Committee directed itself to disregard completely the finding of the firm's investigation into Ms Mudzi's conduct.

### **Allegation 1**

Between January 2024 and 20 February 2024, during her employment with Firm A in its audit team preparing workpapers, copied signatures of others from planning specialist documentation and pasted them onto completion specialist documentation that she then uploaded onto the audit file.

33. This allegation was admitted by Ms Mudzi and the Committee was satisfied that it was proved by virtue of her admission in accordance with CDR Regulation 12 (3).

### **Allegation 2**

Between January 2024 and February 2024 included outdated and/or duplicated narrative on documentation uploaded to an audit file.

34. This allegation was not admitted by Ms Mudzi. The Committee was satisfied on the documentation before it and on what Ms Mudzi stated to her firm and to ACCA that it has been proved that she did include outdated and duplicated narratives on the audit file that she uploaded. The Committee noted that she accepted that she did "roll forward" a working paper from the previous year in the course of the firm's investigation and in response to ACCA indicated that it was a "*mistake*". There is only a factual element alleged in Allegation 2 and accordingly the Committee was satisfied that this allegation was proved.

### **Allegation 3**

In respect of Allegation 1 above her conduct was dishonest because she falsified the signatures of others onto the completion specialist documentation.

35. This allegation was denied by Ms Mudzi.
36. The Committee asked itself whether Ms Mudzi's conduct in falsifying the signatures of others onto specialist audit documentation was dishonest. The Committee asked itself what Ms Mudzi's belief was as to the facts - what was her state of mind as to the facts at the time.
37. Ms Mudzi accepted that false signatures were "snipped" from another document and pasted into the audit file. Her explanation was that she did this as she was putting in some markers in order to indicate where she needed to update the signatures at a later stage.
38. The Committee rejected Ms Mudzi's explanation as implausible. She was an experienced accountant, if not an experienced auditor, and a Fellow of the ACCA. The Committee considered that there were lots of simpler and more appropriate ways to remind herself that she needed to get it signed a fresh and considered it unlikely that she went to so much trouble to find other signatures and cut and paste them into the documentation as place-holders. It considered that she had not given a plausible, credible or likely account for her actions. It was satisfied that she knew it was wrong. The Committee considered it significant that she had denied doing this initially. While it did not need to speculate as to her motive, it was satisfied that she knew her

actions were wrong and that she was not doing her work as she ought to have done it.

39. Given its finding as to her state of mind that she knew it was wrong the Committee was satisfied that this would be considered dishonest by the standards of ordinary decent people. Accordingly, it was satisfied that Allegation 3 was proved.

#### **Allegation 4**

In the alternative, in respect of Allegation 1 above, Ms Mudzi failed to demonstrate integrity.

40. The Committee did not need to consider this allegation as it was an alternative.

#### **Allegation 5**

In respect of Allegation 2 Ms Mudzi failed to demonstrate Competence and Due Care.

41. Given its finding in Allegation 2 the Committee went on to consider whether this amounted to a failure to demonstrate competence and due care. The Committee was satisfied that ACCA's members are under an obligation to demonstrate competence and due care and that practitioners were required to act diligently and in accordance with technical and professional standards. The Committee was satisfied that putting old documentation into a current audit file was an obvious failure of diligence. Accordingly, the Committee was satisfied that Allegation 5 was proved.

#### **Allegation 6**

In respect of Allegations 1 and/or 2 above, Ms Mudzi was reckless in that she failed to have any or sufficient regard for the need to ensure that documentation was accurate.

42. The Committee did not need to consider this given its findings and the approach it was invited to take by ACCA to treat this allegation as an alternative.

### **Allegation 7**

By reason of any or all of the conduct above Ms Mudzi is:

- a) Guilty of Misconduct pursuant to bye-law 8(a)(i); or in the alternative:
- b) Liable to disciplinary action pursuant to bye-law 8(a)(iii).

- 43. The Committee next asked itself whether the admitted and proved allegations rendered Ms Mudzi guilty of misconduct.
- 44. The Committee had regard to the definition of misconduct in Bye-law 8(c) and the assistance provided by the case law on misconduct. It was satisfied that Ms Mudzi's actions brought discredit on her, the Association and the accountancy profession. It was satisfied that dishonestly falsifying signatures in all documentation was deplorable conduct and reached the threshold of seriousness for misconduct. Her conduct therefore had the potential to cause harm to the public and undermine public confidence in the profession. The Committee was also satisfied that the failure to act with competence and due care by inserting out of date and duplicated information in an audit file was a very serious matter given the importance of audits, and therefore also reached the threshold for misconduct.
- 45. In the light of its judgment on misconduct, no finding was needed upon liability to disciplinary action. Accordingly, it was satisfied that Allegation 7(a) was proved and did not consider the alternative of Allegation 7(b).

### **SANCTIONS AND REASONS**

- 46. The Committee noted its powers on sanction were those set out in Regulation 13(1). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate. It accepted the advice of the Legal Adviser.

47. The Committee considered that the conduct in this case was very serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour.

48. The Committee identified the following mitigating factors:

- Ms Mudzi was of good character with no previous disciplinary record.
- She had made one admission.

49. The Committee identified the following aggravating factors:

- This was deliberate misconduct that was initially denied.
- Potential for harm to the public from incorrect audits.
- Conduct undermines the reputation of the profession.
- There was a lack of insight particularly as to an appreciation of the seriousness of dishonesty to the profession.

50. The Panel noted Ms Mudzi's submissions concerning her [PRIVATE] state but noted that no [PRIVATE] evidence had been provided in support of this and there was no evidence that it was operative at the time of the misconduct. Given the Committee's view of the seriousness of Ms Mudzi's conduct, it was satisfied that the sanctions of No Further Action, Admonishment and Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. The conduct could not be described as of a minor nature sufficient to justify a Reprimand. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the Guidance were not present and that there was a continuing risk to the public, given Ms Mudzi's lack of insight. The Committee reminded itself that it was dealing with a case of dishonesty. It had specific regard to Section E2 of the Guidance in relation to dishonesty and was mindful of the case law to the effect that dishonesty lies at the top of the spectrum of misconduct. It also considered the factors listed at C5 of the Guidance that may justify exclusion. The Committee noted that among other factors, dishonesty, an abuse of

position/trust and a serious departure from standards were all present here. The Committee was satisfied that her dishonest behaviour was fundamentally incompatible with Ms Mudzi remaining on the register of ACCA and considered that the only appropriate and proportionate sanction was that she be excluded from membership.

## **COSTS AND REASONS**

51. ACCA claimed costs of £6,813 and provided a Schedule of costs. The Committee had regard to ACCA's guidance on costs and the submissions of both parties. It noted Ms Mudzi had not provided a statement of means although she had indicated [PRIVATE], but she chose not to provide a financial statement or supporting evidence. The Committee decided that it was appropriate to award costs in this case, and considered the costs claimed to be reasonably incurred. The Committee considered it appropriate to make some reduction in the costs given the fact that the case took less time today. It concluded that given the information before it, the proportionate and appropriate amount of costs was £5,800. Accordingly, it ordered that Ms Mudzi pay ACCA's costs in the amount of £5,800.

## **EFFECTIVE DATE OF ORDER**

52. The Committee was satisfied that an immediate order was necessary in the interests of the public. This was because Ms Mudzi was a member, had behaved dishonestly and accordingly there was a risk to the public if the order was not made immediate.

**Mr Andrew Gell**  
**Chair**  
**9 December 2025.**