

## HEARING

# DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

## REASONS FOR DECISION

**In the matter of:** Miss Yi Li

**Heard on:** Tuesday, 8 July 2025

**Location:** Remotely via Microsoft Teams

**Committee:** HH Suzan Matthews KC (Chair)  
Dr David Horne (Accountant)  
Ms Caroline Robertson (Lay)

**Legal Adviser:** Mr David Marshall

**Persons present  
and capacity:** Mr Mazharul Mustafa (ACCA Case Presenter)  
Miss Nicole Boateng (Hearings Officer)

**Summary:** Removed from affiliate register with immediate  
effect

**Costs:** £7,455

1. The Committee heard an allegation of misconduct against Miss Li. Mr Mustafa appeared for ACCA. Miss Li was not present and not represented.
2. The Committee had a Main Bundle of papers containing 326 pages, a Separate Bundle containing 92 pages, an Additional Bundles of 36 pages and a Service Bundle containing 19 pages.

## **PROCEEDING IN ABSENCE**

3. The Committee was satisfied that Miss Li had been served with the documents required by Regulation 10(7) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 in accordance with Regulation 22. The required documents were contained in the papers before the Committee. There was evidence that they were sent by email on 9 June 2025 to an email address notified by Miss Li to ACCA as an address for all correspondence. That was 29 days ago.
4. Miss Li had communicated with ACCA throughout the investigation, making it clear that she denied the allegations and intended to appear at this hearing. She completed a Case Management Form on 4 February 2025 to that effect. However, later emails from ACCA to her went unanswered. The Notice of Hearing and associated documents were delivered by email on 9 June 2025 but there was no response. On 1 July 2025 the Hearings Officer telephoned Miss Li to ask if she would be attending her hearing. Miss Li avoided a direct answer to that question. She asked the Hearings Officer to put the question in an email. That was done the same day. There was no answer to that email or to reminders on 4 and 7 July. The Committee concluded that Miss Li had changed her mind about attending the hearing. It concluded that Miss Li had deliberately chosen not to exercise her right to be present and that an adjournment would not result in her attending on a future date. It was in the public interest to proceed.
5. The Committee noted that the last thing ACCA knew about Miss Li's location was that she was working in New Zealand. The hearing was therefore listed to start at 08:00, which would be 19:00 in New Zealand. If she had attended, the hearing would have had to take place over two days to ensure that the hours were reasonable for someone attending from New Zealand. ACCA had allowed for that. Miss Li had not objected to these arrangements for her hearing and the Committee considered that they were reasonable under the circumstances.
6. The Committee determined to proceed in Miss Li's absence.

## **PRELIMINARY APPLICATIONS**

7. In her Case Management Form, Miss Li raised two matters. Firstly, she answered 'yes' to the question [REDACTED] She said, [REDACTED] In the event, she did not give any further details and did not provide any [REDACTED] evidence. The Committee considered that Miss Li could have addressed this issue with the Hearings Officer during the phone call of 1 July 2025 if she had wished to pursue it.
8. Secondly, Miss Li indicated that she wanted 'all of my case' to be heard in private. The reasons she gave included that:
  - (a) *'discussing certain aspects in a public forum may cause undue distress or embarrassment to myself and potentially others involved'*
  - (b) *'Public disclosure of the details of my case may negatively affect my personal and professional reputation, especially in relation to my ongoing career.'*
9. Under Regulation 11 of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 hearings of the Disciplinary Committee shall be conducted in public unless the Committee is satisfied that the particular circumstances of the case outweigh the public interest in holding the hearing in public. The concerns identified by Miss Li apply to almost every registrant attending an ACCA hearing. Miss Li had not identified any particular circumstances of her case which justified departing from the rule that hearings are held in public. The Committee made no order in relation to privacy.

## **ALLEGATION(S)/BRIEF BACKGROUND**

10. Miss Li was registered as an ACCA Affiliate on 1 August 2014. An Affiliate is a person who has passed the ACCA exams but has not yet demonstrated sufficient practical experience to be accepted as a Member. Persons who have not yet gained membership are also known as trainees, whether or not they

have not passed all the exams.

11. To obtain full membership an affiliate or trainee must demonstrate at least 36 months' practical experience. This is done by the trainee recording relevant practical experience in that trainee's Practical Experience Requirement (PER) training record. This is done using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal. 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 that this is a description of their own experience, the statement should be unique to them. Through the online tool, the trainee then requests their practical experience supervisor to approve that PO.
12. In addition to approval of their POs, the trainee must ensure that 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 practical experience supervisor. This means the same person can and often does approve both the trainee's time and achievement of the POs. 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 and also must be familiar with the trainee's work.
13. Once all nine POs have been approved by the trainee's practical experience supervisor (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.

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. The three email addresses were as follows:
- Email 1
  - Email 2
  - Email 3
15. ACCA launched an investigation into the practical experience claimed by the 91 students. Miss Li was one of them. Person A was registered as her 'non IFAC qualified Line Manager' with an email address from the three listed above. Miss Li registered Person B as her 'IFAC qualified Line Manager' with another email address from the three listed above.
16. Following the conclusion of the investigation, Miss Li faced the following allegations:

### **Schedule of Allegations**

Yi Li ('Miss Li'), at all material times an ACCA trainee:

1. On or about 15 January 2023 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 20 months of qualifying experience.
2. On or about 15 January 2023 in relation to her ACCA Practical Experience Training Record caused or permitted a third party

- a) To register Person B as her practical experience supervisor and further,
- b) To approve in Person B's name 31 months of qualifying experience and further,
- c) To approve in Person B's name her nine performance objectives.

3. Whether by herself or through a third party applied for membership to ACCA on or about 15 January 2023 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 6: Record and process transactions and events
- Performance Objective 9: Evaluate investment and financing decisions
- Performance Objective 13: Plan and control performance
- Performance Objective 22: Data analysis and decision support

4. Miss Li's conduct in respect of the matters described above was:

- a) In relation to Allegation 1 a) and /or 2a), dishonest in that Miss Li knew her supervisors, Person A and/ or Person B, had been falsely registered as her practical experience supervisors.
- b) In relation to Allegations 1b) and / or 2b), dishonest in that Miss Li knew her supervisors, Person A and/ or Person B, had not approved her qualifying experience.

- c) In relation to Allegation 2c), dishonest in that Person B had not approved her nine performance objectives.
  - d) In relation to Allegation 3, dishonest in that Miss Li 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, 2 and 3 above demonstrates a failure to act with Integrity.
5. In the further alternative any or all of the conduct referred to in Allegations 1, 2 and 3 above was reckless in that:
- a) Miss Li failed to ensure that her Practical Experience Training Record was approved in all material respects by her practical experience supervisors.
  - b) Miss Li paid no or insufficient regard to ACCA's requirements to ensure that the statements corresponding with the performance objectives referred to in Allegation 3 accurately set out how each objective had been met.
6. By reason of her conduct, Miss Li 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 5 above.

#### **DECISION ON FACTS/ALLEGATION(S) AND REASONS**

17. There was no oral evidence at the hearing. Mr Mustafa relied on the documents in the Bundle. The evidence included witness statements from the Professional Development Manager with the Professional Development team, part of the Quality and Recognition department. In the Case Management Form Miss Li stated that she did not require these witnesses to attend the hearing.

#### **Allegation 1**

18. On the basis of the records there was no doubt that Person A had been registered as Miss Li's practical experience supervisor and that 20 months of qualifying experience had been approved in Person A's name. The email address given for Person A on registration was not genuine but was one of the three used repeatedly in this batch of 91 suspect cases. That strongly indicated that a third person, not Miss Li nor Person A, had registered Person A and approved the time.

19. Miss Li stated in the Case Management Form:

*"I personally registered Person A as my practical experience supervisor based on my genuine understanding that they were eligible and authorized to supervise my ACCA Practical Experience Record (PER). At no point did I instruct or allow any third party to do so on my behalf.*

*The 20 months of qualifying experience recorded in my PER was based on my actual work experience. I did not arrange or permit any third party to approve this experience in Person A's name. Any approval made was done in good faith and in accordance with my understanding of the ACCA PER requirements at the time."*

20. However, Miss Li made no secret of the fact that she had paid an agent to establish the PER for her. In her email dated 27 March 2024 she said:

*"I met this supervisor through Chinese social media. [They] promised that [they] can be my remote supervisor and all I need to provide is my past work experience, including my job title, Job description, my manager's name and contact number, and also 800 yuan as a commission fee. Therefore, I submitted with my past two work experience, ..."*

21. When asked for the name of this agent she claimed not to know but she provided evidence in the form of screenshots in Mandarin. She said: *'These images are proof of the online PER advertisement, the money I paid for it, and [their] social media account.'*



22. The Committee was satisfied, on the balance of probabilities, that Allegation 1 was proved.

### **Allegation 2**

23. In relation to Person B, again the email address given was not genuine. Furthermore, to support the claim that Person B was an IFAC qualified Accountant a purported copy of that person's membership card for the Chinese Institute of Certified Public Accountants (CICPA) was produced. This was the same image of a membership card that had been used in many of the other 91 cases. It bore the membership number [REDACTED]. That was not the same as the number stated for Person B. The fact that these crucial details were false but the same as in many other of the 91 cases, strongly indicated that a third party had arranged the entry of the details on ACCA's system.
24. Again, in the Case Management Form Miss Li denied the allegations, using very similar wording. However, she did not explain how this was consistent with her earlier submissions that she had employed an agent. If she had registered Person B herself, she did not explain how or why she submitted the same false details as had been used in many other cases.
25. The Committee was satisfied, on the balance of probabilities, that Allegations 2(a) and (b) were proved.
26. As to Allegation 2(c), the nine performance objectives approved by Person B were each evidenced by Performance Objective Statements. It was clear from ACCA's analysis that each of the nine statements was copied from earlier statements made by other trainees. Miss Li's wording was either identical, or strikingly similar, to wording submitted earlier by other trainees. There was no plausible explanation of how Miss Li could have falsified her practical experience record in this way unless a third party had been involved.
27. The Committee was satisfied, on the balance of probabilities, that Allegation 2(c) was proved.

28. The Committee found Allegation 2 proved.

**Allegation 3**

29. It is not in doubt that Miss Li applied for membership to ACCA on or about 15 January 2023 and in doing so purported to confirm in relation to her ACCA Practical Experience Training Record she had achieved the nine Performance Objectives listed.
30. The Committee found Allegation 3 proved.

**Allegations 4(a) to (d)**

31. ACCA published a PDF booklet entitled 'PER – Practical Experience Requirements' which gave detailed guidance about the requirements for PER and how to satisfy them. It was published in English, but students take all their exams in English and are expected to be competent in the English language. The guidance made clear that the achievement of each PO had to be approved by 'a qualified Accountant recognised by law in [the trainee's] country and/or a member of an IFAC body'. That person had to 'have knowledge of your work'. The supervisor relied on by Miss Li for all nine of the POs in question was Person B. However, there was strong evidence from ACCA that Person B was not IFAC qualified:
- (a) Person B's email address was one of those which was common to many alleged supervisors going under many different names.
  - (b) Person B was said to be a member of the Chinese Institute of Certified Public Accountants (CICPA). A membership number was given, and a copy of a membership card was provided. Furthermore the membership number on the card was different from the membership number stated for Person B. The copy membership card supplied was the same as used by many other alleged supervisors. The name and photograph on the card were pixelated and illegible.

32. In relation to Allegation 4(a) Miss Li must have known that Persons A and B had not supervised her work and could not be registered as supervisors. Such practical experience as she had undertaken was completed some years earlier and, as she explained to ACCA, she was not in touch with the supervisors involved and could not get evidence of what she had done. Persons A and B were therefore falsely registered. Her actions were dishonest by the standards of ordinary decent people. In relation to Allegation 4(b) Miss Li must have known that Persons A and B could not approve her qualifying experience.
33. In relation to Allegation 4(c) and (d), Miss Li submitted PO statements in support of each of the 9 POs. The guidance document stated; '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' Disciplinary Committee.' Each of the 9 statements was identical, or very similar, to statements previously provided by other candidates. The Committee studied the wording of these statements and was satisfied that the similarities could not be coincidental. It concluded that the PO statements were not genuine statements of Miss Li's practical experience.
34. Each of these points led the Committee to conclude that neither her alleged supervisor nor her claimed practical experience were genuine. She must have known that at the time but nevertheless the documents were submitted as the basis for her membership application. The Committee had no doubt that this conduct was dishonest by the standards of ordinary decent people.
35. The Committee found Allegations 4(a) to (d) proved. It did not have to consider the alternative allegations in 4(e) or 5.

### **Allegation 6: Misconduct**

36. The Committee considered that Miss Li's dishonesty was a very serious matter. It was intended to gain her membership of ACCA without having to demonstrate her experience in a structured accountancy role and therefore without having to demonstrate her competence. Her conduct fell far below the standards

expected. The Committee was satisfied that her actions amounted to misconduct.

### **SANCTION(S) AND REASONS**

37. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify aggravating and mitigating factors.
38. It first considered the question of insight. Miss Li had shown no insight at all. She did not accept that she had done wrong. She did not accept that ACCA's rules had an important purpose, namely the protection of the public.
39. The misconduct found was extremely serious. As well as the absence of insight and remorse, aggravating factors were her premeditation and planning to gain full membership illegitimately.
40. In mitigation, she had no previous disciplinary findings against her, having been an affiliate for about ten years.
41. The Committee was quite satisfied that a sanction was required in this case. It considered the available sanctions in order of seriousness.
42. The Committee first considered the sanctions of admonishment and then reprimand but the guidance made it clear that these were not sufficient. For reprimand, the guidance states 'This sanction would usually be applied in situations where the conduct is of a minor nature and there appears to be no continuing risk to the public'. Applying for membership on the basis of false evidence cannot be described as a minor matter.
43. The Committee next considered the sanction of severe reprimand. The guidance states that this sanction would usually be applied in situations where the conduct is of a serious nature but 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. Those elements were not present in this case. The Committee went through the list of suggested factors in the guidance. Apart from previous good character, hardly any of the factors supporting a severe reprimand was present. A severe reprimand would not be sufficient to mark the seriousness of the misconduct in this case.

44. The Committee considered that Miss Li's dishonest conduct was fundamentally incompatible with remaining as an ACCA Affiliate and that the minimum sanction it could impose was removal from the Affiliate register.
45. An Affiliate who has been removed can normally apply to be re-admitted after one year. The Committee considered whether to extend this period but decided that it was not necessary. If Miss Li were to apply for readmission her application would be scrutinised by the Admissions and Licensing Committee.

#### **COSTS AND REASONS**

46. Mr Mustafa applied for costs totalling £11,544.50. Mr Mustafa accepted that the hearing today would take less time than had been estimated so a reduction would be appropriate. He left it to the Committee's judgement.
47. The Committee was satisfied that the proceedings had been properly brought, and that ACCA was entitled in principle to its costs. The Committee considered that the time spent, and the sums claimed were reasonable, subject to any reduction for the length of hearing time and to a further point that was specific to Miss Li's case.
48. As already mentioned, Miss Li was believed to be in New Zealand so in a time zone 11 hours different from the UK. Even with a very early start (by UK time) it would not be fair for hearing days to last more than a few hours. While most ACCA cases can be concluded in one day of hearing time, that would not have been possible in this case, simply because of the time difference. ACCA is an international regulator and tries hard to treat all registrants fairly regardless of their language, culture or location. For example ACCA will provide an Interpreter when requested and does not claim the costs of the interpreter. The

Committee felt that in this case the costs allowed for the second day were due to the time difference with New Zealand rather than the complexity of the case. The Committee determined to exclude those costs from its assessment.

49. Taking these two factors into account the Committee reduced the assessed costs to £7,455.
50. Miss Li had submitted a Statement of Financial Position. [Private] She made no attempt to explain how she lived under these circumstances and provided no evidence of any kind to substantiate her figures. The Committee was not prepared to accept them. It made no reduction on the basis of her means.
51. The Committee awarded costs of £7,455.

#### **EFFECTIVE DATE OF ORDER**

52. Miss Li was currently an ACCA affiliate. She was entitled to become a full ACCA Member subject only to demonstrating the necessary experience. This put her in a strong position to hold herself out as a professional accountant. The Committee considered that she could present a significant risk to the public during the period before this order came into effect. It was therefore necessary to order immediate removal.

#### **ORDER**

53. The Committee ordered as follows:
  - (a) Miss Yi Li shall be removed from the affiliate register of ACCA with immediate effect.
  - (b) Miss Yi Li shall pay a contribution to ACCA's costs assessed at £7,455.

**HH Suzan Matthews KC**  
**Chair**  
**8 July 2025**