

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr John Taremeredzwa

Heard on: Wednesday, 25 June 2025

Location: Remotely via Microsoft Teams

Committee: Ms Valerie Paterson (Chair)
Ms Nimra Syeda (Accountant)
Mr Geoffrey Baines (Lay)

Legal Adviser: Ms Giovanna Palmiero

**Persons present
and capacity:** Mr Ryan Ross (Case Presenter on behalf of ACCA)
Miss Mary Okunowo (Hearings Officer)

Summary Severe Reprimand.

Costs: £2,000.00

INTRODUCTION

1. The Disciplinary Committee ("the Committee") convened to hear allegations of misconduct against Mr John Taremeredzwa ("Mr Taremeredzwa").
2. Mr Ryan Ross ("Mr Ross") presented the case on behalf of the Association of Chartered Certified Accountants ("ACCA").
3. Mr Taremeredzwa did not attend and was not represented.

4. The Committee had confirmed that it was not aware of any conflicts of interest in relation to the case.
5. In accordance with Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 (amended in 2024) ('CDR'), the hearing was conducted in public.
6. The hearing was conducted remotely via Microsoft Teams.
7. The Committee was provided with, and considered in advance, the following documents:
 - (i) A Report & Hearing Bundle with pages numbered 1-61.
 - (ii) A Service Bundle with pages numbered 1-24.
 - (iii) A Tabled Additional bundle with pages numbered 1-5.
 - (iv) An unredacted copy of page 12 of the Report & Hearing Bundle was provided to the Panel by ACCA, at the Panel's request.
 - (v) Cost Schedules were provided to the Committee at the sanction stage.

PRELIMINARY APPLICATIONS

SERVICE OF PAPERS

8. The Committee was informed that Mr Taremeredzwa had been served with a notice of today's hearing, together with the necessary papers via electronic mail on 27 May 2025.
9. The Committee was satisfied that a notice had been sent to Mr Taremeredzwa's registered email address in accordance with Regulation 22 of the CDR. The Committee noted that the email had been delivered successfully. The Committee had regard to Regulation 22(8) of the CDR which stipulates that, when a notice has been sent by email, it is deemed to have been served on the date, the email was sent. Accordingly, the Committee was satisfied that Mr Taremeredzwa had been given at least 28 days' notice along with the necessary information required in accordance with Regulation 10 of the CDR.

11. The Committee decided that Mr Taremeredzwa had been properly served with Notice of today's hearing.
12. The Committee was informed that ACCA's Hearings Officer ("HO") called Mr Taremeredzwa twice on 23 June 2025, on the telephone number provided on his ACCA registration, to request confirmation as to whether he would be attending the hearing. This call was unsuccessful in reaching Mr Taremeredzwa as there was only a disconnected tone and there was no opportunity to leave a voice message. This attempted telephone call was followed up with an email which was sent on the same date the telephone call was made. Mr Taremeredzwa did not respond to this email.
13. The Committee noted that from the documentation provided, that on 05 June 2025, 11 June 2025, 20 June 2025 and 24 June 2025, the HO emailed Mr Taremeredzwa regarding whether he would be attending this hearing. The emails were sent to Mr Taremeredzwa's registered email address. The Committee further noted that there was no response to any of these emails.
14. The Committee was satisfied that all reasonable steps to encourage Mr Taremeredzwa to attend the hearing had been taken. The Committee was satisfied that the emails had been sent to the email address on ACCA's register and that there was a record of the emails having been delivered successfully. The Committee noted that Mr Taremeredzwa had been given sufficient notice of the hearing, and he had been notified that if he did not attend the hearing, then the Committee could proceed with the hearing in his absence. The Committee concluded that Mr Taremeredzwa was aware of today's hearing and had voluntarily absented himself from this hearing and had not engaged with the process.
15. The Committee was satisfied that taking the seriousness of the allegations into account, it was in the public interest to proceed expeditiously. The Committee did not consider that any benefit would be obtained by adjourning the hearing and in any event no such application had been made by Mr Taremeredzwa who had failed to engage with the process.

ALLEGATIONS

16. Mr John Taremeredzwa, a registered student of the Association of Chartered Certified Accountants ("ACCA"):

- 1) On 19 March 2024, Mr Taremeredzwa submitted or caused to be submitted an ACCA Professional Level Certificate dated December 2015 (“Certificate”) purportedly from ACCA to Person A (“Person A”) which was false.
- 2) Mr Taremeredzwa’s conduct at allegation 1) above, was:
 - a) Dishonest, in that he knew the document he submitted or caused to be submitted to Person A was false; or in the alternative:
 - b) Such conduct demonstrates a lack of integrity.
- 3) Contrary to Regulation 3 (1) of the Complaints and Disciplinary Regulations 2014 (as amended in 2024), Mr Taremeredzwa, failed to co-operate with the investigation of a complaint in that he failed to respond to any or all of ACCA’s correspondences dated:
 - a) 20 August 2024
 - b) 05 September 2024
 - c) 24 September 2024
- 4) By reason of the conduct described in any or all of the matters set out at allegation 1, 2, and 3, Mr Taremeredzwa 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)

BRIEF BACKGROUND

16. On 23 December 2010, Mr Taremeredzwa became registered as a student member with ACCA
17. In June 2012, Mr Taremeredzwa sat the P1 – Governance, Risk and Ethics exam and achieved a [PRIVATE].

18. In June 2012, Mr Taremeredzwa sat the P2 INT – Corporate Reporting (International) and achieved [PRIVATE].
19. In December 2012, Mr Taremeredzwa sat the P3 – Business Analysis exam and achieved [PRIVATE].
20. In June 2014, Mr Taremeredzwa sat the P7 INT – Advanced Audit and Assurance (International) exam and achieved [PRIVATE].
21. On 19 March 2024, Mr Taremeredzwa is alleged to have submitted an email attaching the Certificate purportedly issued by ACCA dated December 2015 to Person A. The Certificate indicated that Mr Taremeredzwa had passed the following ACCA exams:
 - a. P1 – Governance, Risk and Ethics
 - b. P2 – Corporate Reporting
 - c. P3 – Business Analysis
 - d. P4 – Advanced Financial Management
 - e. P7 – Advanced Audit and Assurance
22. The Certificate also contained a typographical error at the bottom left-hand corner which stated “CERTIFICTE NUMBER”.
23. The email was allegedly sent from Mr Taremeredzwa’s registered email address which is [PRIVATE] to [PRIVATE] (non-registered email address) on 19 March 2024, which in turn was forwarded to Person A.
24. On 21 March 2024, Person A wrote to ACCA to verify the authenticity of the Certificate.
25. In order to obtain the Certificate, a student must first become an ACCA Affiliate. According to the Chartered Certified Accountants’ Membership Regulations 2014, Regulation 5, Mr Taremeredzwa must “...have passed or obtained exemptions from the ACCA Qualification examinations...” to become an ACCA Affiliate.
26. The Exam History Transcript dated 31 July 2024 (“Transcript”) indicated that Mr Taremeredzwa has not sat the Advanced Financial Management (AFM) exam or obtained an exemption.

27. On 20 August 2024, ACCA wrote to Mr Taremeredzwa outlining the allegations against him and questions were put to him for him to respond to by 03 September 2024.
28. On 23 August 2024, ACCA attempted to call Mr Taremeredzwa but there was no answer.
29. On 05 September 2024, ACCA wrote to Mr Taremeredzwa and requested a response by 19 September 2024.
30. On 10 September 2024, ACCA attempted to call Mr Taremeredzwa but there was no answer.
31. On 24 September 2024, ACCA wrote to Mr Taremeredzwa and requested a response by 01 October 2024.
32. ACCA's letters dated 20 August 2024, 05 September 2024 and 24 September 2024 were sent via ACCA's case management system, iCasework, to Mr Taremeredzwa's registered email address. On all 3 occasions, an additional email was also sent to Mr Taremeredzwa from Outlook, informing him that ACCA had sent him an encrypted email and if he did not receive the encrypted email, he should contact ACCA.
33. There was no response received from Mr Taremeredzwa until 31 October 2024, when he sent an email to ACCA.

ACCA PRELIMINARY APPLICATION REGARDING HEARSAY EVIDENCE

34. Mr Ross on behalf of ACCA, made a preliminary application to deal with the hearsay evidence in this case, which was the substantive evidence in ACCA's case against Mr Taremeredzwa.
35. Mr Ross submitted that the hearsay application was in relation to emails and a Certificate, referred to as pages 12 and 13 of ACCA's Report & Hearing Bundle. Mr. Ross informed the Committee that the email, the subject of the hearsay application, was received by ACCA from Person A. Mr Ross further submitted that Mr Taremeredzwa had purportedly sent this email chain and the Certificate, to Person A. Mr Ross further submitted that the email chain sent by

Mr Taremeredzwa enclosed a fraudulent ACCA certificate. Mr Ross stated that the email address of the sender of the fraudulent Certificate was the same email address registered with ACCA, as Mr Taremeredzwa's email address.

36. Mr Ross stated that the issue of the hearsay evidence was a two-stage process. Firstly, the Committee had to determine whether it was in the interests of justice to admit the hearsay evidence and secondly, if it was admitted, then the decision for the Committee was to consider what weight should be attached to it.
37. Mr Ross stated that it was prejudicial to ACCA, if the Committee did not admit this evidence as it would in effect put an end to the case, as it was decisive evidence. He submitted that Mr Taremeredzwa had been given prior notice of this evidence and had not challenged the evidence. He further submitted that Mr Taremeredzwa in his email to ACCA of 31 October 2024, had given an account that someone had taken control of his work email account, and the email enclosing the Certificate was fraudulent and malicious.
38. The Committee had to undertake a balancing exercise in determining whether the email chain and Certificate should be admitted in the interests of justice. Mr Ross stated that it would be prejudicial to ACCA and would frustrate the disciplinary process if the evidence were not to be admitted, and therefore it was in the interests of justice to do so.
39. The Committee asked Mr Ross for clarification as to whether Person A was known to ACCA or whether this was an anonymous referral to ACCA. Mr Ross confirmed that Person A was not an ACCA employee but was employed at the same organisation as Mr Taremeredzwa. The Committee sought clarification from ACCA as to the source of the evidence. Mr Ross stated that he was in possession of an unredacted copy of the email from Person A, and he was prepared to give this to the Committee. Mr Ross stated that Mr Taremeredzwa had already viewed this unredacted email during the investigation process. The Committee was not in possession of this unredacted email and it was not contained within the bundle.
40. Mr Ross also confirmed to the Committee that Person A had been contacted during the investigation process and they had been invited to assist ACCA but they had not responded to the request.

41. Mr Ross stated that whilst he was not making an application to serve the unredacted email upon the Committee as additional evidence, he was content for the Committee to have a copy, in order to assist them in their determination.
42. Mr Ross continued that Person A has not provided a witness statement, however it was not required in any event in this case, as a statement from Person A would not provide evidence of Mr Taremeredzwa's motive in submitting the false certificate and Person A could not make comment of any material value.
43. Mr Ross was asked by the Committee about the email from Mr Taremeredzwa received on 31 October 2024 and whether the contents of Mr Taremeredzwa's email had been put to Person A. He confirmed that the email from Mr Taremeredzwa had not been put to Person A.
44. Mr Ross further submitted that the email address of the sender of the email and Certificate to Person A was the same as a work email address used by Mr Taremeredzwa. Mr Ross stated that this email could be found in the bundle of evidence.
45. Mr Ross stated that he was in possession of a copy of the unredacted email from Person A and due to the same ending of the email address to Mr Taremeredzwa's work email address, he concluded that it was the work email address of both Person A and Mr Taremeredzwa.
46. The Legal Advisor referred to Regulation 10(4)(c) of the CDR whereby evidence should be admitted by ACCA prior to 21 days of the hearing and if evidence had not been submitted 21 days prior then it could only be admitted 'in exceptional circumstances and having regard to the public interest, any prejudice to the Association, and the overall interests of justice'.
47. The Committee was satisfied that it was in the interests of justice to have sight of the unredacted email of Person A, as this would show the Committee Person A's email address which was not visible on the redacted version in the bundle of evidence. The Committee was informed that Mr Taremeredzwa had received the unredacted version during the investigation of the case so was aware of it in its unredacted form.

48. The reasons that the Committee allowed the receipt of the unredacted email were that:
- Mr Taremeredzwa already had sight of the unredacted email during the investigation and had responded to it.
 - The redactions to the email were only made in order to protect the identity of Person A and,
 - The Committee would be assisted in expediting the hearing today if it had sight of it.
49. Mr Ross sent the unredacted email to the Committee.
50. In relation to ACCA's hearsay application the Committee took advice from the Legal Adviser who referred it to Regulation 12(2)(a) of the CDR and the principles for admission of hearsay evidence in disciplinary proceedings.
51. The Committee determined that the evidence of the email and the Certificate could be described as 'hearsay'. It was satisfied that Regulation 12 (2) of the CDR allows the Committee, "subject to the requirements of justice and fairness", to admit evidence "Whether or not that evidence would be admitted in a court of law". The CDR go on to add that the "Disciplinary Committee shall take into account the fact that any disputed oral evidence of a witness has not been tested in cross-examination when considering what weight, if any, should be attached to it".
52. The Committee also took into account the case law regarding the admissibility of hearsay, in particular the guidance referred to by the Legal Adviser as set out in the case of *Thorneycroft v Nursing and Midwifery Council* [2014] EWHC 1565 Admin.
53. The Committee determined that Person A's email was hearsay, and that hearsay evidence is inherently less reliable, hence the committee concluded that it would not be fair to admit the email and Certificate from Person A, as evidence. The Committee had particular regard to the following matters:

- a. The hearsay email from Person A was the sole and decisive evidence in respect of the allegations against Mr Taremeredzwa and that ACCA did not intend to rely upon any other evidence to prove the allegations.
 - b. Whilst Mr Ross submitted that Mr Taremeredzwa had not challenged the contents of Person A's email, the Committee found that he had. The Committee noted that in his email of 31 October 2024 to ACCA, Mr Taremeredzwa had stated that the email sent by Person A, was 'a fabrication and malicious',
 - c. As stated above, Mr Taremeredzwa has given reasons as to why Person A would fabricate the email statement. ACCA had not asked Person A to comment on the contents of Mr Taremeredzwa's email.
 - d. The Committee acknowledged that Mr Taremeredzwa was facing serious allegations of dishonesty and misconduct, and if proved in these proceedings, it could have a negative and serious adverse impact on Mr Taremeredzwa's professional standing and career.
 - e. The Committee was informed that Person A had been contacted by ACCA to assist with the case on one occasion. The Committee was informed that there had been no response from Person A, so ACCA could not put forward any good reason to the Committee as to why Person A had not responded to the email or why they would not assist.
 - f. Mr Ross was only aware of one email that ACCA sent to Person A for assistance.
 - g. The Committee accepted that Mr Taremeredzwa has been given prior notice of the unredacted email, and he had responded to this evidence in his email of 31 October 2024. Mr Taremeredzwa had denied sending the email and Certificate attachment and had given an explanation as to who he believed Person A was and why he had sent it to ACCA.
54. The Committee concluded that the email from Person A was the sole and decisive evidence against Mr Taremeredzwa in this case. It was satisfied that the reluctance of Person A to engage with ACCA, without explanation, undermined the credibility of the hearsay evidence.

55. The Committee did consider the need to balance the use of hearsay evidence against the regulators need to be able to proceed on referrals from whistle blowers and the public and take necessary action in such situations.
56. The Committee noted that the context of the submission of the fake Certificate was not known. There was no evidence before the Committee either to show that Person A was Mr Taremeredzwa's boss or that there was some benefit or gain to be made by Mr Taremeredzwa in submitting this Certificate to Person A.

ACCA SUBMISSIONS

57. In light of the Committee's decision to refuse the application to admit the hearsay evidence, Mr Ross did not 'formally concede' anything, but only informally conceded that there was no evidence to support Allegations 1 and 2.
58. Instead, Mr Ross focused on Allegations 3 and 4.
59. In respect of Allegation 3, Mr Ross submitted that Mr Taremeredzwa had failed to co-operate with the investigation of the complaint, in that he failed to respond to any or all of ACCA's letters dated 20 August 2024, 05 September 2024 and 24 September 2024.
60. Mr Ross drew the Committee's attention to ACCA's letters to Mr Taremeredzwa dated 20 August 2024 and 05 September 2024 regarding the complaint investigation and ACCA's reference to Mr Taremeredzwa's duty to co-operate in accordance with the CDR.
61. Mr Ross further submitted that ACCA's third letter to Mr Taremeredzwa dated 24 September 2024 enclosed a copy of two previous letters dated 20 August 2024, 05 September 2024.
62. Mr Ross conceded that Mr Taremeredzwa did eventually communicate with ACCA on 31 October 2024 but he submitted that this was not in response to ACCA's requests for further information nor was it in a timely manner.

Dishonesty

63. In relation to dishonesty, in *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67 at para 74, it was said:

“When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual’s knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the fact-finder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest.”

64. ACCA submitted that the conduct set out at Allegations 1 and 2 clearly amounts to dishonesty on the basis that Mr Taremeredzwa knew or ought to have known that the Certificate was false. It is further submitted such conduct would be regarded as dishonest by the ordinary standards of reasonable and honest people.

Integrity

65. In relation to integrity in the case of *Wingate and Evans v The Solicitors Regulation Authority* [2018] EWCA Civ 366, the Court of Appeal addressed what was required in professional disciplinary context by the standard of integrity. At paragraphs 95-97, Jackson LJ expressed the matter in a way that applied to regulated professions generally and said this:

“95. Let me now turn to integrity. As a matter of common parlance and as a matter of law, integrity is a broader concept than honesty

96. Integrity is a more nebulous concept than honesty. Hence it is less easy to define, as a number of judges have noted.

97. In professional codes of conduct, the term “integrity” is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members. The underlying rationale is that the professions have a privileged and trusted role in

society. In return they are required to live up to their own professional standards.”

66. If dishonesty is found not proved, the Disciplinary Committee should consider whether there has been a lack of Integrity, based on the same facts.

Misconduct

67. In relation to misconduct, in the case of *Roylance v. General Medical Council (No 2)* [2000] 1 AC 311, at p330, the Privy Council said:

“Misconduct is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety may often be found by reference to the rules and standards ordinarily required to be followed by a medical practitioner in the particular circumstances.”

68. Misconduct is a matter of judgment for a professional panel. It is ACCA's submission, that misconduct is made out if any or all the facts relied upon in support of allegations are found proved. This is on the basis that the conduct concerned in each of these allegations amounts to misconduct both individually and collectively having regard to bye-law 8(a)(i) and/or 8(a)(iii).

MR TAREMEREDZWA'S RESPONSE

69. During the investigation process, there was no response received from Mr Taremeredzwa in response to ACCA regarding the allegations. However, on 31 October 2024 he sent the following email:

“Good Sir/Madam

Sorry for the late response on the above allegations, it is unfortunate that i only got to know about these allegations today as i havent been accessing my personal emails since the commencement of the said investigations but in response to everything my response is that i never send the alleged fake certificate, the said email was my work email which was on my employer's machine and i suspect it was da [sic] doing of the new boss who started work [PRIVATE] to try and soil my name. Why would i sart sending my employer fake certificates in 2024 when i started working for that company [PRIVATE],i was never made aware of these allegations by the new boss, im only getting to

know of this now [PRIVATE] and they would from time to time take my laptop for their use, and i suspect this is when they fabricated that certificate because i wouldn't fabricate a certificate [sic] when i have a work file that they have in their possession with all my transcripts and exam results and history as we speak now, if i were to send a 'fake' certificate with an additional subject as alleged, when would i have passed this exam?, I suspect my new boss was behind all these fabrications and allegations, my phone number is [PRIVATE] i suspect i may have forgotten to update my number on the portal as I never got any of the said calls in the investigation officer's report."

DECISION ON ALLEGATIONS AND REASONS

70. The Committee considered ACCA's Bundle of evidence and the written submissions which were supplemented by Mr Ross orally. The Committee considered the legal advice from the Legal Adviser, which it accepted.
71. The Committee was aware that the burden of proving the facts was on ACCA. Mr Taremeredzwa did not have to prove anything, and the allegations could only be found proved if the Committee was satisfied on the balance of probabilities.

Allegation 1 - Not Proved

72. The Committee had to determine in respect of this allegation, whether Mr Taremeredzwa submitted or caused to be submitted an ACCA Professional Level Certificate dated December 2015 ("Certificate") purportedly from ACCA to Person A which was false.
73. In reaching its findings of fact in respect of Allegation 1, the Committee was aware that having refused to admit as hearsay evidence, Person A's redacted and unredacted email enclosing a Certificate, there was no evidence put before it to prove ACCA's case on a balance of probabilities.
74. In relation to Allegation 1 the Committee was satisfied that there was insufficient evidence on a balance of probabilities and the allegation was found not proved.

Allegation 2 (a) & 2 (b) – Dishonesty and Integrity-Not Proved

75. The Committee relied upon its findings of fact under Allegation 1 above in assisting with the determination of dishonesty and Integrity. Due to the lack of admissible evidence before it, there was no evidence to prove on a balance of probabilities that Mr Taremeredzwa had acted in the manner alleged.
76. The Committee therefore found Allegations 2(a) and 2(b) not proved on the balance of probabilities.

Allegation 3 – Fail to Engage - Found Proved

77. The Committee considered Allegation 3, which referred to the fact that Mr Taremeredzwa had not responded to three emails from ACCA, requesting information, during its investigation. The emails requesting information from Mr Taremeredzwa were dated 20 August 2024, 05 September 2024 and 24 September 2024. The Committee took account of the evidence that these emails were sent to Mr Taremeredzwa's email address as registered with ACCA.
78. The Committee noted that the emails sent to Mr Taremeredzwa on these dates attached a letter, and other documents, which clearly set out the complaint and requested that Mr Taremeredzwa respond to a number of questions within timescales.
79. The Committee further noted that ACCA's letters also referred to Complaints and CDR 3(1) requiring Mr Taremeredzwa to cooperate with the investigation by responding to the questions by the deadlines set by ACCA.
80. The Committee noted that there were delivery receipts for these emails from ACCA confirming that delivery was successful to Mr Taremeredzwa's email address. There was also evidence to support that the emails had also been opened by the recipient.
81. The Committee was not provided with any evidence showing the emails had 'bounced back' or not been successfully delivered.
82. The Committee was aware that Mr Taremeredzwa did respond to ACCA on 31 October 2024 by way of email.

83. The Committee concluded that Mr Taremeredzwa, as an ACCA student member, had a positive duty to cooperate with ACCA's investigation and on the balance of probabilities, the Committee was satisfied that Mr Taremeredzwa failed to cooperate with the investigation of the complaint. The Committee determined that Mr Taremeredzwa failure to co-operate fully and within the timescales required, was deliberate.
84. It is for the above reasons that the Committee concluded that Allegation 3, on the balance of probabilities, was found proved

Allegation 4 – Misconduct-Found Proved

85. In relation to Allegation 3, the Committee applied the test for misconduct, as per the case of *Roylance v General Medical Council* [2001] 1 AC 311, in which it was decided that '*Misconduct is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety may often be found by reference to the rules and standards ordinarily required to be followed by a ... practitioner in the particular circumstances.*'.
86. The Committee had found proved that Mr Taremeredzwa has not co-operated with the investigation by ACCA, his regulator. The Committee noted that if the regulator cannot conduct effective investigations into potential allegations against its members, then the regulator cannot uphold the proper standards, which directly impacts upon the reputation of the regulator as a whole.
87. In the Committee's judgement, Mr Taremeredzwa's failure to co-operate in Allegation 3 amounted to him being guilty of serious professional misconduct. The Committee determined that failing to co-operate with the regulator's investigation seriously undermines the protection of the public and the wider public interest including the integrity of the regulatory framework and the standing of ACCA. It brings discredit upon the profession and ACCA. The Committee considered Mr Taremeredzwa's behaviour to be serious, and the Committee was in no doubt that it amounted to misconduct.
88. The Committee had found that Mr Taremeredzwa's lack of engagement with his regulator was serious and fundamentally fell short of the standards required of a professional person, including an ACCA student member. Such conduct

fell far below the standards expected of a student member. In the Committee's judgement, it brought discredit to Mr Taremeredzwa, the Association and the accountancy profession and undermines the role of the regulator.

89. Having found Allegation 4(a) proved it was not necessary for the Committee to consider Allegation 4(b), which was alleged in the alternative.

SANCTION AND REASONS

90. In reaching its decision on sanction, the Committee considered the oral submissions made by Mr Ross on behalf of ACCA. Mr Ross made no submission as to the specific sanction to be imposed but referred to ACCA's Guidance for Disciplinary Sanctions (GDS) and particularly, the summary of the general principles. He confirmed that Mr Taremeredzwa had no other known previous disciplinary findings.
91. The Committee noted its powers on sanction were those set out in 13(4) of CDR for student members. It had regard to ACCA's GDS 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.
92. The Committee considered that conduct in this case was serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour. It was satisfied that engaging with the regulator is a fundamental requirement of any student member/accountant.
93. The Committee assessed the aggravating and mitigating features:

Aggravating features:

- Deliberately failed to cooperate for several weeks.

Mitigating features:

- There were no previous disciplinary findings against Mr Taremeredzwa.
- Mr Taremeredzwa did eventually have limited engagement with ACCA.

94. Given the Committee's view of the seriousness of Mr Taremeredzwa's conduct, it was satisfied that the sanctions of No Further Action, Admonishment and Reprimand were insufficient to highlight to the profession, and to the public, the gravity of the proven misconduct. The Committee determined that the undermining of the regulator's role in being able to fully investigate members frustrates the regulatory process. This was not an isolated incident and there was an extended period of non-engagement. The Committee had determined that this was deliberate behaviour which was not minor in nature. Mr Taremeredzwa's behaviour was in breach of his professional obligations.
95. In considering a Severe Reprimand, the Committee noted that most of the factors listed in the GDS were present and found that there was no continuing risk to the public and that the student had showed some limited insight and expressed an apology and reasons for his delayed engagement. The Committee was satisfied that there was no evidence provided that Mr Taremeredzwa's conduct caused harm to the public. There is also no record of any previous misconduct against Mr Taremeredzwa, and the Committee noted that he had apologised for his non-engagement and had demonstrated some limited insight.
96. The Committee considered the GDS on the approach to be taken for removal from the student register. It noted that the GDS 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 Committee regarded whether Mr Taremeredzwa's conduct was fundamentally incompatible with remaining on the register. The Committee was satisfied that this was not the case and deemed removal from the student register disproportionate in all the circumstances of the case. The Committee concluded that a Severe Reprimand was sufficient to mark the seriousness to the profession and the public.
97. The Committee ordered Mr Taremeredzwa to be Severely Reprimanded.

EFFECTIVE DATE OF ORDER

98. The Committee noted there was no application by ACCA for an immediate order. It weighed up the balance between providing for a period of appeal for the member and the interests of the public in requiring an immediate order to be imposed. The Committee was satisfied that there was no evidence to

suggest that an immediate order was necessary and noted that no interim order had been sought, hence it did not impose an immediate order.

COSTS AND REASONS

99. ACCA applied for costs in the sum of £6,132.00. The Committee was provided with a Schedule of Costs. The Committee considered the ACCA Guidance for Cost Orders. It was satisfied that the costs claimed were appropriate and reasonable but considered there should be a significant reduction due to the fact that the substantive allegations regarding alleged dishonesty were found not proved against Mr Taremeredzwa. The Committee noted that ACCA having made an unsuccessful hearsay application, “*informally conceded*” that ACCA was unable to prove the allegations of submitting a false certificate and dishonesty against Mr Taremeredzwa.
100. The Committee noted that despite being given the opportunity to do so, Mr Taremeredzwa did not provide any details of his means or provide any representations about the costs requested by ACCA. There was, therefore, no evidential basis upon which the Committee could make any reduction on this ground.
101. The Committee had in mind the principle that members against whom an allegation has been proven should pay the reasonable and proportionate cost of ACCA in bringing the case. This was because the majority of members should not be required to subsidise the minority who, through their own failings, have found themselves subject to disciplinary proceedings.
102. Accordingly, the Committee made an order for costs against Mr Taremeredzwa in the sum of £2,000.000.

Valerie Paterson
Chair
25 June 2025