

## HEARING

**DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF  
CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

<b>In the matter of:</b>	<b>Ms Shravani Santosh Kalamkar</b>
<b>Heard on:</b>	<b>Friday, 07 March 2025</b>
<b>Location:</b>	<b>Remotely via Microsoft Teams</b>
<b>Committee:</b>	<b>Ms Valerie Paterson (Chair) Mr Ryan Moore (Accountant) Ms Deborah Fajoye (Lay)</b>
<b>Legal Advisor:</b>	<b>Mr David Marshall</b>
<b>Persons present</b>	
<b>And capacity:</b>	<b>Mr Stuart Brady (ACCA Case Presenter) Miss Sofia Tumburi (Hearings Officer) Ms Shravani Santosh Kalamkar (Student)</b>
<b>Observers</b>	<b>Ms Sarah Mutesi (ACCA Investigations Officer)</b>
<b>Summary:</b>	<b>Removed from student register with immediate effect</b>
<b>Costs:</b>	<b>£1,000</b>

## ACCA



+44 (0)20 7059 5000



info@accaglobal.com

[www.accaglobal.com](http://www.accaglobal.com)

The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom

1. The Committee heard an allegation of misconduct against Ms Kalamkar. Mr Brady appeared for ACCA. Ms Kalamkar was present and represented herself.
2. The Committee had a Main Bundle of papers containing 74 pages, a Tabled Additional Bundles Bundle of 8 pages and a Service Bundle containing 29 pages.

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

3. Ms Kalamkar became a student of ACCA on 17 February 2021. On 10 March 2023 she sat ACCA's Financial Management (FM) exam. This was a remotely invigilated exam which Ms Kalamkar took in a place of her choosing. No concerns were reported by the invigilator at the time so the video recording which would have been taken of the exam would have been destroyed some time ago.
4. On or about 21 May 2024 there was a Disciplinary Committee hearing concerning another student. In the course of that hearing a photograph of an ACCA exam question came to ACCA's attention. ACCA says that following an investigation it has established that the photograph is of a question in the exam that Ms Kalamkar took on 10 March 2023. Ms Kalamkar faced the following allegations:

#### Allegation 1

Miss Kalamkar, an ACCA student, during ACCA's remotely invigilated Financial Management exam on 10 March 2023:

1. Used an unauthorised item during the exam, to take a photograph of an exam question.
2. Caused or permitted the photograph referred to in Allegation 1 to be shared with a person or persons unknown.
3. By reason of the matters referred to above in respect of allegations 1 and or 2, Miss Kalamkar is in breach of one or more of:
  - a) Exam Regulation 5a
  - b) Exam Regulation 5b

c) Exam Regulation 14

4. Miss Kalamkar's conduct referred to at allegations 1 – 2 above,

a) Was dishonest in that she took the photograph referred to in order to obtain an unfair advantage in her exam and/or caused or permitted the photograph to be shared, whether directly or otherwise to give an unfair advantage to another ACCA student in their exam, or in the alternative

b) Demonstrates a failure to act with integrity.

5. By reason of their conduct Miss Kalamkar's is:

a) Guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at in Allegations 1 –2 above; in the alternative in respect of Allegation 3;

b) Liable to disciplinary action pursuant to bye-law 8(a)(iii) for breach of the aforementioned Exam Regulations.

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

5. In her Case Management form dated 25 November 2024 and again at the start of the hearing Ms Kalamkar admitted all the allegations in full and expressed her remorse. The Chair announced that allegations 1, 2, 3, 4(a) and 5(a) had been found proved.

6. ACCA did not call any oral evidence. It relied on a witness statement from an Exam Production Technician at ACCA who demonstrated that the photographs obtained by ACCA must have been of Ms Kalamkar's exam because they showed Ms Kalamkar's unique exam access code number. Even without the admission, the Committee would have had no doubt that the photograph in question was taken during Ms Kalamkar's exam, which she was required to take in a closed room with no other person present. She would have been required to demonstrate this to the remote invigilator. Again, even without the admissions the Committee would have found on the balance of probabilities

that Ms Kalamkar took the photograph and shared it in some way.

7. Ms Kalamkar said that she had not yet 'cleared' [passed] any ACCA exams yet. Her exam history showed that she had attempted ACCA exams at least six times. Ms Kalamkar said that her failure to make progress in her ACCA career was causing her extreme anxiety, particularly since her parents had been financing it. She said that having decided to pursue ACCA 'she had no plan B'. She said that this 'mental toll' led her into wrongdoing.

Allegation 5(a): 'By reason of her conduct Miss Kalamkar is: (a) Guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at in Allegations 1 –2 above; in the alternative in respect of Allegation 3;

8. The Committee was satisfied that Ms Kalamkar's conduct amounted to serious misconduct. Photographing and sharing exam questions undermined the integrity of ACCA's exams and its system of professional qualification. It is not clear whether Ms Kalamkar benefited personally from her actions but even if she did not, that did not affect the seriousness of her actions.
9. The Committee found that Ms Kalamkar was guilty of misconduct.

Allegation 5(b): 'By reason of her conduct Miss Kalamkar is: (b) Liable to disciplinary action pursuant to bye-law 8(a)(iii) for breach of the aforementioned Exam Regulations.

10. This was an alternative to the allegation of misconduct so the Committee did not have to consider it.

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

11. Having found all the significant facts proved, the Committee considered what sanction, if any, to impose light of its findings. It had regard to ACCA's Guidance for Disciplinary Sanctions (2024). It first sought to identify mitigating and aggravating factors.
12. Ms Kalamkar had no previous disciplinary findings made against her in the short period that she had been a registered student prior to the exam in

question. She had fully cooperated with the investigation. Although she initially denied any wrongdoing, she later made full admissions and expressed some remorse. These were mitigating factors, although not strong ones. However Ms Kalamkar had not demonstrated any real understanding of why her misconduct was so serious. The Committee considered that she had failed to demonstrate real insight.

13. There were aggravating factors. Taking the phone into the exam and using it required some premeditation and planning. It was also a breach of trust. Although examinations are usually taken under the supervision of an invigilator, the fundamental basis of an exam is that the candidate is trusted not to cheat or enable others to cheat. This kind of exam misconduct has the potential to undermine the integrity of the exam system and the validity of qualifications obtained from ACCA. Even if Ms Kalamkar passed the exam on her own merits, sharing the question could have enabled another student to cheat.
14. The Committee was satisfied that the misconduct required a sanction. The Committee considered the sanctions of admonishment and reprimand but concluded that these would be wholly inadequate to mark the seriousness of Ms Kalamkar's actions. The Committee next considered the sanction of severe reprimand. The Guidance says that this sanction can 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.*

15. There is no evidence of insight in this case. While Ms Kalamkar deeply regretted her actions, she was perhaps more concerned about the consequences for herself, particular the liability to pay costs. Since she had not demonstrated insight, the Committee could not be satisfied that she would not repeat exam misconduct. Further the breach was so serious that this sanction would not be sufficient at this time.
16. The next relevant sanction was removal from the student register. For the reasons already given the misconduct was very serious and the Committee was satisfied that Ms Kalamkar's conduct was incompatible with remaining registered as a student of ACCA. Removal was the minimum sanction it could

impose.

17. Ms Kalamkar will be entitled to apply for readmission after one year. Mr Brady submitted that it was not necessary to extend this period and the Committee agreed. If Ms Kalamkar does apply she will have to persuade the Admissions and Licensing Committee that she has learnt the relevant lessons, has taken steps to ensure that there will be no repetition, and has become a fit and proper person to be registered with ACCA. That is sufficient to protect the public.

### **COSTS AND REASONS**

18. Mr Brady applied for costs totalling £6,807.50.
19. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to a contribution to its costs. The Committee was satisfied that the time spent and the rates claimed were reasonable, although if it had awarded as claimed it would have made a reduction to the time estimated for today's hearing.
20. The Committee considered Ms Kalamkar's ability to meet an order for costs of that magnitude. It proceeded on the basis that any order for costs, or enforcement proceedings, would be made against Ms Kalamkar personally. Her parents' financial circumstances were not relevant. Ms Kalamkar provided a statement of means which showed that she had no earnings or other income and no significant assets. She was not working. She gave evidence to the Committee. She was cross-examined and answered questions from the Committee. She said that she lived with her parents at their expense. They also met her day to day expenses. They had financed her substantial ACCA costs and she felt guilty about that. She was currently considering whether she should discharge her moral obligations by pursuing a different course of study or by obtaining a full-time job. She felt her parents had already done more than enough for her and they had another child to support.
21. The Committee concluded that it was necessary to order her to pay a contribution to ACCA's costs but it would be quite impossible for her to pay anything like the sum claimed. The Committee assessed her contribution at £1,000 which would still be a significant burden on Ms Kalamkar.

## **EFFECTIVE DATE OF ORDER**

22. The Committee considered whether the order should have immediate effect. The Committee took into account that if the order did not have immediate effect Ms Kalamkar would be able to hold herself out as an ACCA student and might have the opportunity to take more ACCA exams, giving an opportunity for further photographs to be taken. The Committee concluded that there would be a significant risk to the public and that the order should have immediate effect.

## **ORDER**

23. The Committee ordered as follows:
- (a) Ms Shravani Santosh Kalamkar shall be removed from the student register with immediate effect. (She will be entitled to apply for readmission after one year.)
  - (b) Ms Kalamkar shall make a contribution to ACCA's costs of £1,000.

**Ms Valerie Paterson**  
**Chair**  
**07 March 2025**