

HEARING

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

In the matter of: Miss Yifan Wu

Heard on: Friday, 16 May 2025

Location: Remotely by Microsoft Teams

Committee: HH Suzan Matthews KC (Chair)
Mr Ryan Moore (Accountant)
Ms Caroline Robertson (Lay)

Legal Adviser: Ms Margaret Obi

**Persons present
and capacity:** Mr Samuel Irving (ACCA Case Presenter)
Miss Mary Okunowo (Hearings Officer)

Outcome: Allegations 1(a), 1(b), 1(c), 2, 3(a), 3(b), 3(c) and 3(d) found
proved.
The alternative charges were not considered.

Sanction: Removal from ACCA register with immediate effect.

Costs: Ordered to pay a contribution to ACCA's costs in the sum
of £6,653.50

Introduction

1. The Disciplinary Committee (“the Committee”) convened to hear allegations of misconduct against Miss Wu. The hearing was conducted remotely via Microsoft Teams. The Committee was provided with the following documents: (i) a main hearing bundle with pages numbered 1-278 (ii) a separate bundle numbered 1-82; (iii), an additional bundle numbered 1-27; and (iv) a service bundle numbered 1-14. At the sanction stage the Committee was provided with a Costs Schedule.
2. Mr Irving presented the case on behalf of ACCA. Miss Wu did not attend and was not represented.

Background

Application for ACCA Membership

3. Once an application for ACCA membership is received, this is recorded in ACCA’s database by an automated process. The record for Miss Wu confirms that her application was received on 01 November 2021. In response to Miss Wu’s application, ACCA emailed Miss Wu on 05 November 2021. Miss Wu was informed that her application could not be processed as she had yet to complete her Practical experience requirement. The email went on to state *‘To proceed with your application please have your time signed off by your supervisor and your performance objectives approved. I have attached a PER guide to this email for further assistance....’*
4. In an email dated 31 January 2023 Ms Wu stated she had now completed her practical experience (as well as all her exams and the ethics and professional skills module) and asked for help with her membership application. ACCA responded the same day noting that Miss Wu had submitted an online membership application on 05 November 2022 ‘but declined’. (It is not clear whether this was declined by ACCA or whether Miss Wu may have declined to proceed with her application.) In any event, ACCA’s email went on to ask Miss Wu to complete ‘the MA application’ and return it via email.

Practical Experience Requirement

5. An ACCA student becomes an ACCA affiliate upon completing all their ACCA exams. A person undertaking practical experience is often referred to as an ACCA trainee. To become a member of ACCA, a trainee must complete 36 months of supervised experience in a relevant role ('practical experience'). An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement (PER) training record which is completed using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal.
6. It is permissible for some or all of that practical experience to be obtained before completion of ACCA's written exams.

Performance Objectives

7. As part of their practical experience, each trainee is required to complete nine performance objectives (PO's) 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 this is a description of their own experience, the statement should be unique to them. Through the online tool, the trainee then requests that their practical experience supervisor approves that PO.

Practical Experience Supervisors

8. In addition to approval of their POs, the trainee must ensure their employment where they have gained relevant practical experience has been confirmed by the trainee's line manager who is usually also the trainee's qualified supervisor. This means the same person can and often does approve both the trainee's time and achievement of POs.
9. 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 PO's. This

external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor.

10. Once all nine PO's have been approved by the trainee's practical experience supervisor (whether internal or external) and their minimum 36 months of practical experience has been signed off, the trainee is eligible to apply for membership.

ACCA Investigation

11. 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.
12. The three email addresses were as follows:
 - PRIVATE
 - PRIVATE
 - PRIVATE
13. Further analysis of this cohort of 91 trainees confirmed the following:
 - Most of these trainees were registered with ACCA as resident in China.
 - Although each statement supporting a PO should be a description of a trainee's experience and therefore unique, many of such statements within this cohort of 91 trainees were the same. These ACCA trainees had therefore copied their PO statements from others.
 - Of these 91 trainees, the earliest date a supervisor with one of these three email addresses is recorded as approving a trainee's PER training record was August 2021 with the latest date being March 2023.
14. Consequently, all 91 trainees were referred to ACCA's Investigations Team. One of those trainees was Miss Wu.

Allegations

Miss Yifan Wu ('Miss Wu'), at all material times an ACCA trainee:

- 1) On or about 07 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 36 months of qualifying experience and further,
 - c) To approve in Person A's name her nine performance objectives.
- 2) Applied for membership to ACCA on or about 16 February 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 7: Prepare external financial reports
 - Performance Objective 9: Evaluate investment and financing decisions
 - Performance Objective 13: Plan and control performance
- 3) Miss Wu's conduct in respect of the matters described above was:
 - a) In relation to Allegation 1 a), dishonest in that Miss Wu knew her supervisor, Person A, had been falsely registered as her practical experience supervisor. b) In relation to Allegation 1
 - b) Dishonest in that Miss Wu knew her supervisor, Person A, had not approved her qualifying experience.
 - c) In relation to Allegation 1 c), dishonest in that Miss Wu knew Person A had not approved her nine performance objectives.

- d) In relation to Allegation 2, dishonest in that Miss Wu 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 and 2 above demonstrates a failure to act with Integrity.
- 4) In the further alternative any or all of the conduct referred to in Allegations 1 and 2 above was reckless in that:
 - a) Miss Wu failed to ensure that her Practical Experience training Record was approved in all material respects by her practical experience supervisor.
 - b) Miss Wu paid no or insufficient regard to ACCA's requirements to ensure that the statements corresponding with the performance objectives referred to in Allegation 2 accurately set out how each objective had been met.
- 5) By reason of her conduct, Miss Wu 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 4 above.

Response to the Allegations

- 15. Following referral of this matter to ACCA's Investigations Team, a member of that team sent an email to Miss Wu on 05 April 2024 attached to which was a letter, and other documents. The letter clearly set out the complaint and requested that Miss Wu respond to a number of questions by 19 April 2024. Shortly after this encrypted email was sent, an Outlook email was sent to Miss Wu on the same day asking her to check if she had received the encrypted email and if not to let ACCA know. On 17 April 2024, ACCA's China office sent a SMS text message to Miss Wu to advise that the above encrypted email had been sent to her and that she was to contact ACCA if she had not received the email.
- 16. Miss Wu emailed ACCA the same day (17 April 2024) advising she had received the text message but had only just read the email as it had gone to her 'spam'

account and requesting further time to respond. ACCA agreed to extend the deadline for a period of two weeks.

17. On 30 April 2024, Miss Wu emailed ACCA, with her response in which she stated, in particular:

'I am writing in deepest remorse to apologize for providing misinformation and experiences to apply for the membership. I realize that this was a grave mistake and unethical behavior (sic) that does not align with the principles and values promoted by the association. Firstly, I would like to share my experience. As you may be aware, the pandemic has had a significant impact on the economic situation, making it extremely challenging and difficult for me to secure a good job after graduation. ... Under the urgent need to alleviate my financial pressures, as a drowning man will clutch at a straw, I made the regrettable decision to accept help from a third party who said would help me in the application process and become a member as soon as possible. I realize that my decision back then was a grave mistake and I am truly sorry for that.

I understand that the Code of Ethics and Conduct not only applies to members but affiliates are also required to observe proper standards of conduct. I acknowledge the seriousness of my actions and the potential consequences they may bring. I am committed to rectifying my mistake by complying with corrective measures that may imposed by the association and ensuring that such behavior (sic) does not recur in the future... This has been a valuable lesson and wake-up call for me to strive to comply with the principle of integrity and be straightforward and honest in all professional and business relationships....'

18. ACCA acknowledged receipt of Miss Wu's email but advised that she had not answered each question in ACCA's letter. ACCA's email therefore went on to request that she did so. Miss Wu responded by requesting more time to respond given a period of public holidays. which ACCA agreed to this request.
19. On 13 May 2024, Miss Wu emailed ACCA with her response to each of ACCA's questions, including in particular the following.

"1..... Pls, see Attachment 1 for the cover of my employment contract and the most recent transaction detail for the wage received.

2. *[Person A] has been my line manager since the day I officially joined the company and continues in this role to this day.*

3. *[Person A] supervised my work from the following perspectives: (1) Understanding my work: My manager has a clear understanding of the nature of the work being carried out by me, including the specific tasks, processes, and objectives. (2) Regular communication: There is regular communication between my manager and me to discuss work progress, challenges, and any issues that may arise. (3) Quality control: My manager can assess the quality of the work produced by me, providing feedback and guidance where necessary to ensure the quality of my work. (4) Monitoring and review: My manager monitors my progress toward achieving the pre-set objectives and provides performance reviews.*

4. *[Person A] is my manager, but not sure if [they are] a qualified member as an IFAC member. To continue in the application process, I accepted help from a third party who said would help me in registering my supervisor process. After providing my work-related information, I am not familiar with how they complete the registration.*

5. *All communications between me and my manager were conducted through the company's intranet. Due to the professional ethics of banking practitioners, relevant laws and regulations, and the signing of a confidentiality agreement, they cannot be provided to any external individuals or organizations.*

6. *Due to the confidentiality agreement I signed, I am unable to disclose specific content, processes, or details about my work. This agreement restricts me from sharing certain information outside the company, ensuring that proprietary or sensitive data remains protected. Therefore, I have provided a general framework of my work to a third party that claimed to offer assistance to students applying for membership. They professed a deep understanding of the challenges faced by trainees and acknowledged the difficulty of finding a job that is entirely related to accounting in that economic environment. Should trainees wish to avail themselves of their consulting services, I was advised to share my ACCA account username and password to facilitate an evaluation of how they would guide my application process. Under their guidance, I shared the ACCA account, and they proceeded to complete the application and submission steps independently.*

7. As stated before, [Person A] is my line manager and supervises my work. However, there might be discrepancies between the company's policies or regulations and the ACCA guide."

20. ACCA sent an email to Miss Wu on 26 June 2024 with three further questions to which she responded on 09 July 2024. The first asked Miss Wu further questions about her employment to which she responded. Given her response, it would appear Miss Wu was employed by the firm referred to in her PER training record and for the period claimed. The second question comprised of a series of questions. These plus her responses are set out below:

"Question 2: You have stated 'I was advised to share my ACCA account username and password to facilitate an evaluation of how they would guide my application process. Under their guidance, I shared the ACCA account, and they proceeded to complete the application and submission steps independently.'

Based on your comment above and what ACCA has been told by other trainees, I believe the following has occurred You provided your ACCA login and password to a third party who you do not name.

Correct, and please see the name of the third party in the below response to Q3. You provided that third party with the name of your supervisor [Person A]. Correct.

The third party then registered in the name of your supervisor [Person A] - using the email address [REDACTED] being an email address shared by many other supervisors – as previously advised in ACCA's letter to you of 5 April 2024.

The third party uploaded template PO statements to your PER training record and hence why such statements are shared with other ACCA trainees as advised in ACCA's letter to you of 5 April 2024.

The third party approved your time and PO's in your PER training record in the name of your supervisor [Person A].

The third party then applied for membership in your name.

As for the above four descriptions, after reviewing your previous letter with evidence, I do think your descriptions make sense despite that I was previously unaware of registration in the name of my supervisor, the shared email address, or any approval thing. And it seems that the similarities between those training records might result from template PO statements, which my guess is in line with your perspective.

Question 3: 'Please provide me with the name of the third party together with any text messages, emails or any other communications you have had with this person' to which Miss Wu responded:

The online username of the third party is "[REDACTED]" and please see the screenshot as attachment-2 for the messages between me and the third party."

21. On 16 February 2023, Ms Wu sent an email attaching a signed MA declaration form. ACCA emailed Miss Wu on 19 February 2023, advising that her application had been selected for a practical experience audit. The outcome of the audit resulted in the issues which are the subject of this report. As a result, Miss Wu's application has not been processed, and she remains an ACCA affiliate.

Preliminary Applications

Private Hearing

22. The Committee noted that Miss Wu completed a case management form on 08 January 2025. Under the section of the form with the heading 'Private hearings' Ms Wu requested a private hearing on the basis of protection of her personal privacy, the potential reputational impact of a public hearing and her belief that the public interest can still be served without disclosing her identifying details.
23. Mr Irving opposed the request for a private hearing. He submitted that the reasons provided by Miss Wu are not ordinary examples for proceeding in private.
24. The Committee noted that the principle of open justice is fundamental to maintaining public confidence in regulatory and disciplinary proceedings. Hearings are ordinarily held in public to promote transparency, accountability, and fairness in ACCA processes. Reputational risk alone, particularly in professional conduct matters,

does not justify the exclusion of public scrutiny. Public interest demands that such proceedings be seen to be conducted fairly and openly. Furthermore, the Committee concluded that the public has a legitimate interest in knowing how allegations of professional misconduct are addressed. The Committee was not persuaded that a private hearing was necessary to protect the public interest or Miss Wu's rights.

25. The Committee determined that the hearing should proceed in public.

Proof of Service

26. The Committee considered whether the appropriate documents had been served in accordance with the Complaints and Disciplinary Regulations 2020 ("the Regulations"). The Committee considered the submissions made by Mr Irving, on behalf of ACCA, and also took into account the advice of the Legal Adviser.
27. The Committee was provided with a printout from ACCA's register confirming the email address that it holds on record for Miss Wu. The Committee was also provided with an email delivery receipt (timed at 09.06) which confirmed that the Notice of Hearing, dated 16 April, and the password for the enclosed documents had been sent to Miss Wu's registered email address on that date. The Notice of Hearing confirmed the date, time, and remote venue of the hearing. Miss Wu was informed of her right to attend the hearing and to be represented if she so wished. The Notice of Hearing also provided information about applying for an adjournment and the Committee's power to proceed in absence.
28. The Committee was satisfied that Miss Wu had been provided with 28 days' notice in accordance with Regulation 10.1.

Proceeding in Absence

29. Mr Irving, on behalf of ACCA, made an application for the hearing to proceed in Miss Wu's absence, as permitted by Regulation 10.7.
30. The Committee accepted the advice of the Legal Adviser.

31. The Committee determined that it was reasonable and in the public interest to proceed with the hearing for the following reasons:
- a. Miss Wu in the completed case management form confirmed that she did not intend to attend the hearing and was content for the hearing to proceed in her absence. In these circumstances, the Committee took the view that Miss Wu's non-attendance was voluntary and therefore a deliberate waiver of her right to participate in these proceedings remotely.
 - b. There has been no application to adjourn and no indication from Miss Wu that she would be willing to attend the hearing remotely on an alternative date. Therefore, re-listing this hearing would serve no useful purpose.
 - c. The Committee acknowledged that there may be some disadvantage to Miss Wu, in not being able to give evidence or make oral submissions. However, the Committee concluded that any disadvantage was significantly outweighed by the public interest in ensuring that the hearing is heard and concluded expeditiously.

ACCA Submissions

32. Mr Irving, on behalf of ACCA, took the Committee through the documentary evidence relied upon by ACCA. Mr Irving's primary submission was that allegations (1(a), 1(b), 1(c), 2(a), 3(a) – 3(e)) were all capable of being found proved.
33. Mr Irving invited the Committee to consider whether, if found proved, Miss Wu's alleged conduct amounts to misconduct.

Decisions and Reasons

Findings of Fact

34. The Committee was aware that the burden of proving the facts was on ACCA. Miss Wu did not have to prove anything, and the charges could only be found proved, if the Committee was satisfied, on the balance of probabilities.

35. In reaching its decision the Committee took into account the documentary evidence contained within the hearing bundle, as well as the oral submissions made by Mr Irving.
36. The Committee accepted the advice of the Legal Adviser. The Committee noted that following the Supreme Court decision in Ivey v Genting Casinos [2017] UKSC 67 the test for dishonesty is an objective test only. The Committee first had to determine Miss Wu's actual knowledge or belief and then determine whether her act or omission were, on the balance of probabilities, dishonest by the ordinary standards of reasonable and honest people.

Allegation 1 and 2 - FOUND PROVED (in their entirety)

37. Miss Wu's response referred to the third party she engaged applying for membership on her behalf in November 2021. However, this application was rejected by ACCA as Miss Wu had yet to complete her PER training record. The Committee was satisfied that a further application was submitted and accepted in January 2023 which was attached to an email dated 16 February 2023 from Ms Wu's own personal email address.
38. The Committee accepted the evidence of Person B, Senior Administrator in ACCA's Member Support Team. They provided a statement explaining ACCA's membership application process. They stated that once an application is received, this is recorded in ACCA's PROD database by an automated process. Person B exhibits to their statement a sample record. The corresponding record for Miss Wu records her application was received on 01 November 2021. The Committee also accepted the evidence of Person C. They described in their statement ACCA's Practical Experience Requirements. They explained that all PO statements should be unique and must not be copied from other trainees or from templates as this undermines the PER element of the ACCA qualification. The 'first in time date' is the date the trainee requested that Person A approve the PO in question within their PER. This is on the basis that as soon as the PO narrative had been uploaded to the PER, the trainee would have then requested approval from Person A. The Committee noted that none of Ms Wu's PO statements were first in time and nine of her PO statements were identical or significantly similar to the PO's contained in the PER training record of other trainees.

39. Miss Wu's Supervisor details record that Person A was her 'IFAC qualified line manager,' and therefore her practical experience supervisor. Her PER training record records that Person A approved Miss Wu's time/experience of 36 months and that Person A approved all Miss Wu's PO's. However, the Committee noted a number of discrepancies. Nine of Miss Wu's PO statements are the same as many other trainees, suggesting at the very least, she had not achieved the objectives in the way claimed or at all. The Committee also noted that the email address of Miss Wu's purported supervisor is shared with other differently named supervisors. Furthermore, the CICPA membership number provided to ACCA by Miss Wu's purported supervisor contains a membership number which is different from the CICPA membership number as contained in the CICPA membership card uploaded by Miss Wu's purported supervisor. That the CICPA membership card uploaded by Miss Wu's purported supervisor has been used by many purported supervisors using a common email address.
40. The Committee also took into account Miss Wu's admissions that she engaged a third party to whom she provided the name of her supervisor and her ACCA login and password. Within ACCA's PER online tool, the third party then registered in the name of Miss Wu's supervisor (who Miss Wu indicates was not IFAC qualified as required in order to approve POs). The third party uploaded template PO statements to Miss Wu's PER training record. The third party, in the name of Miss Wu's supervisor then approved both Miss Wu's time and POs in her PER training record.
41. Based on this evidence the Committee was satisfied that Person A did not supervise Ms Wu's practical experience training in accordance with ACCA's requirements. The Committee concluded that Ms Wu caused or permitted a third party to register and approve her qualifying experience and nine performance objectives. The Committee was also satisfied Ms Wu purported to confirm in relation to her ACCA Practical Experience Training Record that she had achieved all the Performance Objectives 1-7, 9 and 13. In reaching this conclusion the Committee took into account Ms Wu's admissions in relation to allegation 1(a), 1(b) and 1 (c) as set out in the case management form dated 08 January 2025.
42. For these reasons, Allegations 1 and 2 were found proved in their entirety.

Allegation 3 (Dishonesty in respect of Allegations 1 and 2) - FOUND PROVED

43. The Committee accepted the documentary evidence produced by ACCA which demonstrates that extensive advice online both in English and in Mandarin is provided in China on how an ACCA trainee must complete their PER. ACCA's Customer Services Team in China email all ACCA affiliates in China inviting them to regular webinars provided by ACCA staff who can advise on the PER process. The webinar encourages affiliates to join the ACCA WeChat group of their regional service group and provides details on how to join. The advice to ACCA trainees makes it clear that they must be supervised during their period of practical experience. It also makes it clear that statements supporting their PO's have to be written by trainees in their own words and as such must be unique.
44. Given the extensive advice available online, the Committee concluded that Miss Wu knew that her practical experience had to be supervised, that the statements supporting her PO's had to be in her own words and had to describe the experience she had gained to meet the relevant PO. The Committee also concluded that Miss Wu knew that she was required to submit evidence of her training as approved by her supervisor and that Person A had not supervised her work. Therefore, the submission of the PER was a deliberate and conscious attempt to circumvent the rules and regulations designed to ensure that only trainees that meet the high standards expected are able to become registered members of ACCA. Whether Miss Wu applied for membership or the third party she engaged did so on her behalf, in making that application Miss Wu claimed that her supervisor had approved her time/experience in her PER training record which she knew to be untrue. She also claimed to have achieved nine POs with the use of supporting statements which she knew she had not written and therefore knew she had not achieved the POs as described in these statements or at all. Ms Wu also knew that Person A had approved her PO's which she knew to be untrue and irrespective of the possibility (as she suggests) that her actual supervisor would not have been qualified to approve her POs in any event. This conduct was not negligent or by oversight; it was deliberate.
45. The Committee concluded that by the standards of ordinary and honest people Miss Wu's behaviour would be regarded as dishonest.

Allegation 5 - Misconduct

46. The Committee determined that Miss Wu's dishonest conduct was premeditated and persisted for a significant period as she must have been aware for some time that she was not complying with the ACCA training requirements. The Committee noted that the training requirements are designed to ensure, in the interests of protecting the public and trust and confidence in the profession, that only those that meet ACCA's high standards are admitted as members. Miss Wu put her own interests above the interests of the public and her obligations as an ACCA affiliate and, in so doing, significantly undermined the integrity of ACCA's membership process and the accountancy profession.
47. The Committee was satisfied that Miss Wu's dishonest conduct fell far below the standards expected of her and amounts to misconduct.

SANCTION AND REASONS

48. Mr Irving informed the Committee that there were no previous disciplinary findings against Miss Wu.
49. The Committee accepted the advice of the Legal Adviser who referred it to ACCA's Guidance for Disciplinary Sanctions. In considering what sanction, if any, to impose, the Committee bore in mind the principle of proportionality and the need to balance the public interest against Miss Wu's own interests. The purpose of any sanction is not meant to be punitive but to protect members of the public, maintain public confidence in the profession and ACCA and to declare and uphold proper standards of conduct and behaviour.
50. When considering the appropriate sanction, the Committee considered the aggravating and mitigating features of the case. The Committee considered that the only mitigating feature was that no previous disciplinary findings had been made against Miss Wu.
51. The Committee considered the following to be aggravating features:
- Miss Wu's dishonest actions were premeditated.

- Miss Wu had demonstrated no insight into the seriousness of her dishonest conduct and only limited insight into the impact of her behaviour on the profession.
 - Miss Wu's dishonest actions persisted for a significant period of time.
52. The Committee first considered taking no further action. The Committee concluded that, in view of the nature and seriousness of Miss Wu's conduct and behaviour, it would not be in the public interest to take no further action.
53. The Committee then considered an Admonishment. The Committee concluded that Miss Wu had not demonstrated any remorse or insight in relation to the Committee's finding of dishonesty. In any event, the Committee concluded that an Admonishment would be insufficient to mark the seriousness of Ms Wu's dishonesty and therefore would not uphold trust and confidence in the profession and the regulatory process.
54. The Committee went on to consider a Reprimand or a Severe Reprimand. It noted that such sanctions may be suitable if the member has proper insight into their failings or has expressed genuine remorse and where there was no continuing risk to the public; none of which applies to Miss Wu. The Committee concluded that the nature of Ms Wu's dishonesty, in deliberately seeking to undermine the very purpose of regulation in order to serve her own interests, was towards the higher end of the spectrum for misconduct of this type. Honesty and integrity are fundamental qualities expected from all accountants and therefore the absence of these qualities is fundamentally incompatible with continued registration as a member. Therefore, even a Severe Reprimand would undermine rather than uphold public trust and confidence in the profession and the regulatory process.
55. Having determined that a Severe Reprimand would be insufficient to address the nature and seriousness of Miss Wu's dishonesty the Committee determined that she should be removed from affiliate membership of ACCA. Removal is a sanction of last resort and should be reserved for those categories of cases where there is no other means of protecting the public or the wider public interest. The Committee concluded that Miss Wu's case falls into this category because of the serious nature of her misconduct which includes a breach of trust, the absence of insight, and the ongoing risk of repetition. The Committee noted that Miss Wu's actions had the potential to have an adverse effect on members of the public who would assume

that membership was based on having acquired the requisite knowledge and experience. The sanctions guidance states that the public is entitled to expect a high degree of probity from a member who has undertaken to abide by a code of ethics. The Committee took the view that members of the public, fellow affiliates, the wider profession, and ACCA would be appalled by the prospect of a member acquiring ACCA membership by deception.

56. The Committee concluded that a failure to exclude a member who had behaved in this way would seriously undermine public confidence in the profession and in ACCA as its regulator. The public needs to know it can rely on the integrity, ability, and professionalism of those who are members of ACCA.
57. The Committee had regard to the impact removal may have on Miss Wu, but concluded that her professional, personal, and financial interests were significantly outweighed by the Committee's duty to give priority to the significant public interest concerns raised by this case.
58. The Committee decided that the appropriate and proportionate sanction is removal.

COSTS

59. The Committee considered ACCA's application for costs in the sum of £6,653.50 as set out in the schedule of estimated costs that had been provided to Miss Wu.
60. The Committee concluded that it is appropriate to make an award for costs. The Committee was satisfied that the case had been properly brought, and that the costs were fair and reasonable.
61. The Committee concluded that the costs could not be reduced because although Miss Wu had provided a statement of her means no supporting evidence was provided. The Committee was satisfied that Miss Wu should be required to contribute to the costs of bringing these proceedings otherwise the entirety of the costs would be borne by the profession.

ORDER

1. Miss Wu shall be removed from ACCA register.

2. Miss Wu shall pay a contribution to ACCA's costs in the sum of £6,653.50.

EFFECTIVE DATE OF ORDER

62. Taking into account all the circumstances, the Committee decided that it was in the interests of the public for the order for exclusion to take immediate effect.
63. In reaching this conclusion the Committee was mindful that Miss Wu was admitted as a member by deception and has not demonstrated that she is qualified to be a member. This is subject to the order being varied or rescinded on appeal as described in the Appeal Regulations.

Suzan Matthews KC
Chair
16 May 2025