

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Miss Loh Pui Loong

Heard on: Friday, 30 May 2025

Location: Remotely via Microsoft Teams

Committee: Mr Andrew Gell (Chair)
Mr George Wood (Accountant)
Ms Diane Meikle (Lay)

Legal Adviser: Mr David Marshall

**Persons and
capacity:** Ms Michelle Terry (ACCA Case Presenter)
Ms Anna Packowska (Hearings Officer)

Summary: Removed from student register

Costs: £6,000

1. The Committee heard an allegation of misconduct against Miss Loong. Ms Terry appeared for ACCA. Miss Loong was not present and not represented.
2. The Committee had a main bundle of papers containing 268 pages, a separate bundle containing 83 pages, an Additional bundle of 7 pages and a service bundle containing 16 pages.

PROCEEDING IN ABSENCE

3. The Committee was satisfied that Miss Loong 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 30 April 2025 to an email address notified by Miss Loong to ACCA as an address for all correspondence. That was 30 days ago.
4. On 21 May 2024, at the beginning of the investigation, Miss Loong replied to a letter from ACCA asking a number of questions about the case. However she had not replied to a subsequent letter from ACCA seeking clarification of her answers. As far as the panel was aware there had been no communication from her since 21 May 2024. The numerous emails from ACCA had apparently been received. A telephone call to her in January 2025 was not answered. The Committee noted that two days before this hearing, the Hearings Officer again attempted to phone Miss Loong on the number she had registered with ACCA. On this occasion, the call was answered. However, when the Hearings Officer introduced herself the call dropped. She tried again but there was no answer. The Committee concluded that after her initial response, Miss Loong had decided not to engage further with the investigation or the subsequent hearing. It concluded that Miss Loong had deliberately chosen not to exercise her right to be present.
5. The Committee determined to proceed in Miss Loong's absence.

ALLEGATION(S)/BRIEF BACKGROUND

6. Miss Loong was registered as an ACCA Student on 22 February 2010. At the relevant time she had not yet passed all her ACCA exams but was gaining practical experience in accountancy, as she was entitled to do. Such a person is commonly referred to as an ACCA trainee. To obtain full membership a trainee must pass all ACCA's exams and 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.

7. 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.
8. 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.
9. 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:

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
10. ACCA launched an investigation into the practical experience claimed by the 91 students. Miss Loong was one of them. She had named Person A as her IFAC qualified supervisor and given an email address which was one of the three listed above. Following the conclusion of the investigation, Miss Loong faced the following allegations:

Schedule of Allegations

Loh Pui Loong ('Miss Loong'), at all material times an ACCA trainee:

- 1. Purported to confirm in relation to her ACCA Practical Experience training record she had achieved the following Performance Objectives:*
 - *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*
- 2. Miss Loong's conduct in respect of the matters described in Allegation 1 above was:*
 - a) Dishonest in that Miss Loong knew she had not achieved all or any of the performance objectives referred to in Allegation 1 above as described in the corresponding performance objective statements or at all.*

b) In the alternative, any or all of the conduct referred to in Allegation 1 above demonstrates a failure to act with Integrity.

3. In the further alternative to Allegations 2a) and 2b) above, such conduct was reckless in that Miss Loong paid no or insufficient regard to ACCA's requirements to ensure that the statements corresponding with the performance objectives referred to in Allegation 1 accurately set out how each objective had been met.

4. Failed to co-operate with ACCA's Investigating Officer in breach of Complaints and Disciplinary Regulation 3(1) in that she failed to respond fully or at all to any or all of ACCA's correspondence dated,

a) 26 June 2024

b) 30 July 2024

c) 15 August 2024

d) 29 August 2024

5. By reason of her conduct, Miss Loong is:

a) 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; in the alternative in respect of Allegation 4 only;

b) Liable to disciplinary action pursuant to bye-law 8(a)(iii).

DECISION ON FACTS/ALLEGATION(S) AND REASONS

11. There was no oral evidence at the hearing. Ms Terry 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.

Allegation 1

12. It was a matter of record that by 28 January 2023 Miss Loong's Practical Experience training record stated that she had achieved the eight POs listed in the Allegation. **The Committee found Allegation 1 proved.**

13. Ms Terry submitted, and the Committee accepted, that the sole purpose of a student creating a Professional Experience training record is to apply for membership once the other requirements for membership have been satisfied. The Committee bore that in mind when considering the next allegation

Allegation 2

14. 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 Loong for all 8 of the POs in question was Person A. However, there was strong evidence from ACCA that Person A was not IFAC qualified:
- (a) Person A's email address was one of those which was common to many alleged supervisors going under many different names.
 - (b) Person A 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. However the membership number was not one acknowledged by CICPA. Furthermore the membership number on the card was different from the membership number stated for Person A. 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.
15. Miss Loong responded to questions about her supervisor on 21 May 2024. She stated clearly and without reservation that Person A was **not** IFAC qualified. She was Miss Loong's employer and had been since July 2015. However she was not a professional accountant. Miss Loong stated that her intention was that when she had passed all her ACCA exams she would approach the company's auditor (who was qualified) to approve her achievement of the POs. She failed to answer questions about how and why Person A had been named

when not qualified.

16. Miss Loong submitted PO statements in support of each of the 8 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 8 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 Loong's practical experience.
17. 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 chose to submit the documents (or arrange for them to be submitted in her name) in order to provide the basis for a future membership application. The Committee had no doubt that this conduct was dishonest by the standards of ordinary decent people.
18. **The Committee found allegation 2(a) proved.** It did not have to consider the alternative allegations 2(b) or 3.

Allegation 4

19. As stated above, Miss Loong responded to an initial request for information on 21 May 2024. ACCA had two questions arising from her response. The Committee considered that these were appropriate and justified. This supplementary request for information was made on 26 June 2024 and three reminders were sent as set out in the Allegation. There was no response of any kind from Miss Loong, despite it being pointed out that ACCA's Regulations required her to respond. The Committee concluded that Miss Loong had failed to co-operate with ACCA's Investigating Officer. **The Committee found allegation 4 proved.**

Allegation 5: misconduct

20. The Committee considered that Miss Loong's dishonesty was a very serious matter. It was a preliminary step in a process designed to lead to becoming a

Member without having to demonstrate her competence. Her conduct fell far below the standards expected. **The Committee was satisfied that her actions amounted to misconduct.**

21. The Committee also regarded Miss Loong's failure to cooperate with the investigation as a very serious matter. ACCA was investigating a course of conduct being pursued by many students, not just Miss Loong, and needed to know as much as possible in order to restore the integrity of its qualification system. **The Committee was satisfied that Miss Loong's conduct in this respect also amounted to misconduct.**

SANCTION(S) AND REASONS

22. The Committee considered what sanction, if any, to impose in light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify aggravating and mitigating factors.
23. It first considered the question of insight. Miss Loong had shown no insight at all. She did not accept that she had done wrong. In her single response to ACCA she sought to confuse and distract rather than to inform. She appeared to blame others for the situation, namely her employer Person A and the Company Auditor.
24. The misconduct found was extremely serious. As well as the absence of insight and remorse, aggravating factors were her premeditation and her planning to gain full membership illegitimately.
25. In mitigation, she had no previous disciplinary findings against her, having been a registered student for about ten years.
26. The Committee was quite satisfied that a sanction was required in this case. It considered the available sanctions in order of seriousness.
27. 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'. Preparing false evidence for a future membership

application cannot be described as a minor matter. Nor can failing to cooperate with the investigation.

28. 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.
29. The Committee considered that Miss Loong's dishonest conduct and failure to cooperate were fundamentally incompatible with remaining as an ACCA student and that the minimum sanction it could impose was removal from the student register.
30. A student 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. Her status as a partly qualified student gave her little opportunity to harm the public. If Miss Loong were to apply for readmission her application would be scrutinised by the Admissions and Licensing Committee.

COSTS AND REASONS

31. Ms Terry applied for costs totalling £6,567. Ms Terry accepted that the hearing today would take less time than had been estimated so some reduction might be appropriate.
32. 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.
33. Miss Loong had not submitted a statement of financial position. ACCA was unable to provide any information about her means. The committee was

therefore not able to consider a reduction based on limited means.

34. Allowing for the reduced hearing time the Committee assessed the costs at £6,000.

EFFECTIVE DATE OF ORDER

35. Miss Loong was currently an ACCA student. The Committee did not consider that she could present a significant risk to the public during the period before this order came into effect. The Committee did not consider that it was necessary to order immediate removal. This order will take effect at the normal time.

ORDER

36. The Committee ordered as follows:
- (a) Miss Loh Pui Loong shall be removed from the student register of ACCA.
 - (b) Miss Loh Pui Loong shall pay a contribution to ACCA's costs assessed at £6,000.

Mr Andrew Gell
Chair
30 May 2025