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APPLICATION ON PAPERS

CONSENT ORDER CHAIR OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Baker Tilly Ireland Audit Limited**
Heard on:	**Thursday, 20 November 2025**
Location:	**Remotely via Microsoft Teams**
Chair:	**Ms Wendy Yeadon**
Legal Adviser:	**Ms Giovanna Palmiero**
Decision:	**Consent Order Approved and BTIA Ltd to be severely reprimanded and pay costs to ACCA in the sum of £7,237.50**

1. This matter has been referred to a Chair of the Disciplinary Committee of ACCA ("the Chair") pursuant to Regulation 8(8) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014, as amended ("the Regulations") for the Chair to determine, on the evidence before her, whether to approve or reject the Consent Order: Draft Agreement that has been agreed by ACCA and Ms Gail Ellis on behalf of Baker Tilly Ireland Audit Limited (BTIA).

2. The Chair had before her a bundle of papers, numbered pages 1-213 and a Referral to Consent Orders Chair Consent Order numbered pages 1-1

3. The Chair considered the proposed consent order in the absence of the parties and without a hearing in accordance with Regulation 8(9) of the Regulations.

4. The Chair was satisfied that BTIA was aware of the terms of the proposed consent order and noted that it was signed by Gail Ellis on behalf of BTIA on 05 November 2025.

5. The Chair noted the terms of the 'Consent Order: Draft Agreement' as follows:

The Association of Chartered Certified Accountants (ACCA) and Baker Tilly Ireland Audit Limited (BTIA) (the Parties), agree as follows:

Allegations

1. Baker Tilly Ireland Audit Limited (BTIA) admits the following:

Baker Tilly Ireland Audit Limited (BTIA), an ACCA Firm, who has held a Firms' Auditing Certificate (FAC) from 22 July 2024:

a) Between 21 August 2024 and 10 December 2024, accepted thirteen appointments as a statutory auditor and held out as being available to accept such appointments when Employee A at BTIA, had not been approved by the Association in breach of Regulation 2(1)(a) of Annex 2, Appendix 1 of the Global Practising Regulations (GPRs);

b) Failed to notify ACCA within 28 days that BTIA had accepted an appointment as a statutory audit firm to a Public Interest Entity (PIE), in breach of Regulation 13(2)(a) of Annex 2, Appendix 1 of the GPRs.

Sanction

2. That BTIA shall be severely reprimanded and shall pay costs to ACCA in the sum of £7,237.50.

BRIEF BACKGROUND

Allegation 1a

6. On 30 June 2024, BTIA became a registered ACCA firm, and on 22 July 2024 it was issued with a Firms' Auditing Certificate (FAC).

7. Regulation 2(1)(a) of Annex 2, Appendix 1 of the GPRs states no employee of an ACCA firm may accept/hold themselves out as being able to accept an appointment as a statutory auditor, unless they have obtained the approval of the Association.

8. On 27 September 2024, BTIA applied to ACCA to authorise Employee A as a statutory auditor by submitting an Audit Experience Form (AEF) on behalf of Employee A. At the date of writing, this application has not been approved by the Association.

9. During the course of a review by the Irish Auditing & Accounting Supervisory Authority (IAASA), it was discovered that Employee A had held out and accepted audit appointments, signing off 13 audit reports on behalf of BTIA, without having obtained ACCA's approval.

Allegation 1b

10. ACCA were separately informed by IASSA that the firm had accepted a PIE client. When ACCA's Authorisation Officer requested the Firm's response to IASSA's disclosure, they accepted that they had accepted a PIE client in November 2024, and they had not been '…aware of the requirement to notify ACCA in writing within 28 days…'.

DECISION AND REASONS

11. Under Regulation 8(8) of the Regulations the Chair must determine, on the evidence before her, whether it is appropriate to approve or reject the draft consent order or to recommend any amendments.

12. The Chair was satisfied that there was a case to answer and that the Investigating Officer had followed the correct procedure. The Chair considered the bundle of documents together with admissions and found Allegations 1(a), 1(b) and 2 proved. The Chair was also satisfied that BTIA actions and omissions amounted to misconduct and had brought discredit to Itself, the Association and the accountancy profession.

13. The Chair noted that under Regulation 8(12), she should only reject the signed consent order if she is of the view that the admitted breaches would, more likely than not, result in exclusion from membership.

14. The Chair considered the seriousness of the allegations and the public interest, which includes the protection of the public, the maintenance of public confidence in the profession, and the declaring and upholding of proper standards of conduct and performance. She balanced the public interest against BTIA's own interests.

15. In considering this matter the Chair accepted the advice of the Legal Adviser and paid due regard to the ACCA documents 'Guidance for Disciplinary Sanctions' and 'Consent Orders – Frequently Asked Questions'.

16. The Chair found the following to be aggravating factors:

- The conduct in respect of both allegations establishes a pattern of omissions in respect of the Firm's regulatory obligations which appear to demonstrate a reckless disregard of ACCA's regulations.

- In respect of Allegation 1a), signing off audit reports without obtaining ACCA's authorisation is a statutory offence. IASSA have advised ACCA the firm may have breached section 1467 Companies Act 2014, which is a category 2 offence, and the firm has been reported to the Corporate Enforcement Authority.

- In respect of Allegation 1b), BTIA provided a letter of engagement with a PIE client dated 01 November 2024 which should have been disclosed in its annual return. However, on 31 December 2024 the Firm submitted an inaccurate annual return to ACCA stating it had no PIE clients.

17. The Chair found the following to be mitigating factors:

- The Firm has fully co-operated with the investigation and regulatory process.

- The Firm has ultimately admitted their conduct has breached Regulations.

- The Firm has expressed regret that their conduct has breached the Regulations.

- There is no continuing risk to the public resulting from the Firm's breaches as far as ACCA is aware at the time of writing.

- The Firm has taken remedial action to minimise the risk that the matters raised by the allegations will re-occur.

18. The Chair was satisfied that the allegations admitted by BTIA would be unlikely to result in the firm's exclusion from membership of ACCA and that, under Regulation 8(12), there was no basis for her to reject the Consent Order.

19. The Chair paid due regard to ACCA's Guidance for Disciplinary Sanctions (updated 14 February 2024). She found the following factors in relation to the sanction of a severe reprimand were relevant in this case:

a. The firm has demonstrated a willingness to comply with directions and advice provided by ACCA.

b. Corrective steps have been taken by the Firm to ensure that there is no repeat of the misconduct.

c. There appears to have been no adverse consequence or harm to the public – the misconduct has not caused material distress, inconvenience or loss.

d. There has been early and genuine acceptance of the misconduct.

e. There is evidence or remorse and insight.

20. The Chair, having considered all the documentary evidence before her, was satisfied that the sanction of a severe reprimand was the appropriate and proportionate sanction in this case. The Chair noted that the Firm had agreed to pay ACCA costs in the sum of £7,237.50. The Chair, accordingly, pursuant to his powers under Regulation 8 of the Regulations, made an Order in the terms of the draft Consent Order.

ORDER

i. Baker Tilly Ireland Audit Ltd shall be severely reprimanded.
ii. Baker Tilly Ireland Audit Ltd shall pay costs to ACCA in the sum of £7,237.50

21. By virtue of Regulation 8(17) there is no right of appeal against this Order. The Order will, therefore, come into effect immediately.

Ms Wendy Yeadon
Chair
20 November 2025