

HEARING

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

In the matter of: Miss Yanjie Mu

Heard on: Wednesday, 28 May 2025, Wednesday, 06 August 2025 and
Thursday, 02 October 2025

Location: Heard remotely by MS Teams

Committee: Ms Colette Lang (Chair)
Mr Abdul Samad (Accountant)
Ms Victoria Smith (Lay)

Legal Adviser: Mr Andrew Granville Stafford

Persons present

and capacity: Miss Yanjie Mu (Affiliate Member)
Mr Yali Quan (Interpreter)
Ms Michelle Terry (ACCA Case Presenter)
Miss Mary Okunowo (Hearings Officer)

Summary: Allegations 1(a), 1(b), 1(c), 2, 3(e) and 5 proved.
Severe reprimand.

Costs: £500.00 awarded to ACCA.

ACCA

+44 (0)20 7059 5000



info@accaglobal.com

www.accaglobal.com

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

PRELIMINARY

1. The Disciplinary Committee of ACCA ('the Committee') convened to consider a report concerning Miss Yanjie Mu.
2. The Committee had before it a bundle of documents (129 pages), three additional bundles (87 pages, 84 pages and 3 pages) and a service bundle (17 pages).
3. The hearing was originally listed for one-day. It was not possible to conclude the hearing on 28 May 2025, and it was adjourned part-way through the evidence of ACCA's witness, Ms Calder. The hearing resumed on 06 August 2025, prior to the resumption, the Committee was provided with a transcript of the proceedings on the first day (37 pages) and a further service bundle. The hearing was further adjourned and concluded on 02 October 2025. Prior to that resumption, the Committee was provided with a transcript of the previous hearing (46 pages) and a further service bundle.
4. Miss Mu, who is resident in [PRIVATE], attended the hearing on each day and was assisted by an interpreter.

APPLICATION

5. At the outset of the hearing, Miss Mu applied for her case to be heard in private. She told the Committee that this was on the basis that she did not want to be assessed by people who do not know her. She also said that it was because she had asked the investigator if she could attend other disciplinary hearings, to familiarise herself with the procedure, but this request was refused. It would be unfair, she submitted, for her to be excluded from other hearings but the public be allowed to attend her hearing.
6. The application was opposed by Ms Terry on behalf of ACCA. She submitted that the reasons advanced by Miss Mu in support of the application did not justify departing from the normal rule that hearings of this nature are held in public.
7. Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ('CDR') gives the Committee a discretion to hear all or part of a case in private if it is satisfied that the particular circumstances of the case outweigh the public interest in holding the hearing in public.
8. In the Committee's view, though it was concerning that Miss Mu had not been able to attend a hearing, nonetheless she had not provided any reason which

outweighed the public interest in an open hearing, or which would justify holding all or part of the hearing in private. The Committee therefore refused this application.

ALLEGATIONS AND BRIEF BACKGROUND

9. Miss Mu was admitted as an Affiliate Member of ACCA on 25 July 2015. The allegations against her were as follows:

Yanjie Mu ('Miss Mu'), at all material times an ACCA trainee:

- 1) On or about 05 February 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 59 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 05 February 2023 and in doing so purported to confirm in relation to her ACCA Practical Experience training record she had achieved 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 Mu's conduct in respect of the matters described above was: -
 - a) In relation to Allegation 1 a), dishonest in that Miss Mu 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 Mu knew her supervisor, Person A, had not approved her qualifying experience.
 - c) In relation to Allegation 1 c), dishonest in that Miss Mu knew Person A had not approved her nine performance objectives.
 - d) In relation to Allegation 2, dishonest in that Miss Mu 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 Mu failed to ensure that her Practical Experience training Record was approved in all material respects by her practical experience supervisor.
 - b) Miss Mu 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 Mu 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.
10. Part of the requirements of becoming an ACCA member, in addition to passing the relevant exams, is the completion of practical experience. ACCA's practical experience requirement ('PER') is a key component of the ACCA qualification.
11. ACCA's PER is designed to develop the skills needed to become a professionally qualified accountant. There are two components to the PER:
- Completion of nine performance objectives ('POs'). Each PO includes a statement of 200 to 500 words, in which the student explains how they have achieved the objective. They should, therefore, be unique to that student. The PO must be signed off by a practical experience supervisor who must

be a qualified accountant recognised by law in the relevant country and/or a member of an IFAC body. They must have knowledge of the student's work in order to act as a Practical Experience Supervisor ('PES'). The PES is typically the student's line manager, though if their line manager is not suitably qualified, they can nominate an external supervisor provided the external supervisor has sufficient connection with the trainee's place of work.

- Completion of 36 months practical experience in accounting or finance related roles, verified by a supervisor. The period of practical experience may be verified by a non-IFAC qualified line manager.
12. Those undertaking the PER are known as trainees. The trainee's progress towards the PER is recorded online in their PER Training Record.
 13. In support of her application for membership, Miss Mu submitted her PER Training Record to ACCA on or around 05 February 2023. She stated she had worked for Company C from 10 January 2015 to 20 December 2019, a period in excess of the minimum requirement of three years. Her role was described as 'Finance'.
 14. Miss Mu's PER Training Record names her supervisor, Person A, as her IFAC qualified line manager. Person A verified Miss Mu's period of employment and her nine POs on 05 February 2023.
 15. However, Miss Mu's application for membership was not approved by ACCA.
 16. 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. This was surprising, given that names of the supervisors were different, and it would be expected that each supervisor would have their own email address. The email address given in the PER training record for Miss Mu's supervisor, Person A, was one of those three addresses.
 17. An applicant is required to upload evidence of the qualifications of their PER supervisor. Person A was said to be a member of the Chinese Institute of Certified Public Accountants, which is an IFAC approved accountancy body. However, the membership number given for Person A on the PER did not match the number on the copy of the membership ID card submitted with the application. Further, the photograph on the ID card had been pixellated, which ACCA submitted was suspicious. In fact, it transpired that Person A was not a member of an IFAC body.

18. A PO statement should be unique as it must reflect the trainee's personal experience. Further analysis showed that many of the PO statements submitted by these 91 trainees, including Miss Mu, were identical to each other.
19. In relation to Miss Mu, all nine of her PO statements were identical or strikingly similar to other trainees in the cohort of 91. ACCA's case was eight of Miss Mu's nine POs were the same or very similar to at least five other trainees. The other one, PO5, was identical or significantly similar to two other trainees.
20. None of Miss Mu's PO statements were first in time, meaning that her POs must have been copied from those previously submitted by other trainees.
21. On 28 March 2024, ACCA's Investigations Team emailed Miss Mu, setting out its concerns about her PER. She replied on 02 April 2024. She provided evidence of her employment with Company C. She confirmed that Person A was her line manager with whom she worked closely, but that Person A was not IFAC qualified. She stated:

'with verbal consent of my line manager, I sought for the third party as IFAC Qualified-External supervisor who had CPA certificate and knew my work. I checked the membership application guide again and found that I might fill wrong information about my supervisor. I left the name of my line manager with the email address of the third party. At that time, I didn't find the button to 'add another supervisor', only buttons shown like 'add new employer' or 'save and send invite'. So I left the mismatched information and clicked 'save and send invite' button...'

22. In relation to her POs, she said:

'...There were no ACCA trainees around me to discuss. So I had to search the information online about how to write the PO statement. I did get some templates online and application experience sharing online. I mentioned that ACCA only required broad description of each performance objective that achieved in related workplace. Although everyone's job is not exactly the same, we were all doing financial related jobs. Many of the problems we faced in the work were in fact similar. So I referred to the templates which illustrate the same issue I faced in my workplace.'

23. There was further correspondence between ACCA and Miss Mu, in response to requests from the Investigations Team for clarification. In an email on 30 May

2024, Miss Mu admitted that she did not know the name of the person who approved her PER training record. In a further email on 02 June 2024, she said:

- 'i) I provided lots of my information to the third party to make [them] know me. It includes my name, workplace, work time, my line supervisor's name and contact information. However, I did not give the third party my ACCA login and password. I just leave the third party's email address in the system and sent an invitation.*
- ii) All I did was submit the invitation in the system. I did not know very well about how the verification process is. In my understanding at that time, as I got the agreement of my line supervisor, the qualified third party would contact my line supervisor to verify whether I meet the PO statements and the third party would give responses to ACCA. In my side, I just need to submit the invitation and waited the results whether the PO statements were approved. I did give the contact information of my line supervisor to the third party and get the approvals, so I did not doubt how it was really verified and whether they really contact my line supervisor. In my understanding, the third party approved my PO statements on behalf of my line supervisor with agreement and it meet the requirements of ACCA.'*

24. In a further email on 26 August 2024, Miss Mu said:

'When I applied, I used the mind of an employee, not a student. At work, we can use technical tools such as AI or readily available data to efficiently complete our work. We don't need to check the repetition rate when we make a working document. I thought that was also the nature of the application. Because I didn't need to get a grade like in university. what I need was to get my supervisor's verification. My supervisor also would not know what other people put in their application to their supervisors. Therefore, as long as the templates describe the fact what happened in my work experience, I believed my supervisor would approve them. I didn't know this would involve plagiarism. Otherwise, I would have asked for PO exemptions. I didn't need to take the unnecessary risk.

. . . When I applied, I thought [REDACTED] acted as the role of guarantor. My experience and my supervisor were real. These could be easily checked by contacting my employer through official method such as the contact info on the official website or directly contacting my manager. [Person A] would do so in a professional capacity to verify my application. It would be like background investigation what guarantee companies would do. I have to admit I did not show

prudence during the application process. If ACCA need me to find someone else who fits the bill, I can find others.'

25. Following receipt of the report to the Independent Assessor, Miss Mu wrote to ACCA again on 09 October 2024. In relation to her use of an external supervisor, Miss Mu said:

' . . . the system is designed for more than one supervisor to be registered. However, I did give evidence showing that the interface did not allow it. Maybe it should be entered in another web interface. I emphasized this because I want the independent assessor to know that the ACCA interface did mislead me and gave me wrong indication especially ACCA allowed the external party to do verification and automatically sent approvement to me. At this situation, my feeling was that leaving my line managers name and the external party's email made sense because the external party would contact my line manager to do the verification. The external party approved it on behalf of the line manager. When I realized the misunderstanding, I did contact you directly and requested assistance.'

26. In relation to Miss Mu's POs, she said:

'When I emphasize the PO exemptions, I did not mean [Company C] was ACCA approved employer. I mean [Company D] was the approved employer. I did not record it because I thought template PO statements were acceptable and the experience in [Company C] was enough for the application. To make the independent assessor know it could at least make the person know I did not use the templates on purpose. 'PO statements must be written by the trainee in their own words' was the content what I explained I missed because it was at the end part of the guidelines. I didn't find it out until I re-read the guidelines carefully.'

27. In a further email on 10 January 2025, Miss Mu said that an external supervisor is entitled to verify her POs based on the judgment of her line manager, Person A. Whether her POs were properly approved depends on whether the third party contacted Person A. It was not her responsibility to ensure an IFAC qualified supervisor acts honestly.

28. ACCA submitted that Miss Mu had admitted that she engaged an unknown third party to essentially deputise for her line manager and act as her practical experience supervisor. She had failed to provide any details of the identity of the third party. The third party did not know her and was not, ACCA submitted, in a

position to verify her work experience. She had also admitted to finding PO templates online and using them.

29. ACCA's case was that, in the circumstances, Miss Mu provided false information for the purpose of obtaining membership of the Association and, further, that she was aware that the information she was providing was false. This was done, it was submitted, in order to mislead ACCA and lead it to accept her work experience had been verified by a qualified accountant who was able to approve her work experience.
30. ACCA called Ms Linda Calder, Professional Development Manager at ACCA, to give evidence. She told the Committee that she is responsible for PER implementation. She explained the PER system to the Committee. She confirmed that a line manager who was not IFAC qualified was permitted to sign off the time element of the PER experience. However, the PO experience requirements must be signed off by an IFAC qualified accountant.
31. In answer to questions from Miss Mu, Ms Calder confirmed that a PER Supervisor who signs off the trainee's experience must be in a position to validate the quality of that experience. That is usually a line manager who works with the trainee on a day-to-day basis. An external supervisor should have, at least, a business relationship with the trainee's employer. However, they may not work with the trainee on a day-to-day basis but will have access to the trainee's work on a regular basis. This could be an external accountant or auditor or a consultant, provided they work with the trainee's employer. A person who does not work with the employer, therefore, would not be a suitable external supervisor.
32. Ms Calder also confirmed that ACCA has a remote PER Supervisor programme. She said there was 'extra governance' built into it. A remote supervisor must be an ACCA member who has gone through specific training on that role. The trainee must complete a questionnaire to determine eligibility for the programme. The internal supervisor must give permission for the trainee to join the programme, and the remote supervisor must be given permission to access the trainee's work. Any trainee under this programme will have their application for membership audited before it is granted.
33. She told the Committee that this programme did not commence until October 2023. Prior to that there was a pilot programme in place, but it was not available to trainees globally and it was not advertised on ACCA's website.

34. Ms Calder was taken to a data extract of the information contained in Miss Mu's PER Training Record. It shows that Person A's relationship with Miss Mu is recorded as 'IFAC qualified line manager(O)(T)'. This would have been selected from a drop-down list. The other options were 'Non-IFAC qualified line manager', 'IFAC qualified internal supervisor', 'Non-IFAC qualified external supervisor'. There are, she said, notes online in the 'recording tools' with definitions of each of these designations.
35. Ms Calder told the Committee that this information would either have been entered by Miss Mu herself, or by someone using her log-in details. She also said that Miss Mu would have been able to see that this was recorded on her Training Record, even if she did not enter it herself. The nominated supervisor could amend the details submitted by the trainee prior to being registered as a supervisor, but once registered it is not possible to change the details.
36. Ms Calder was asked by the Committee whether any of the guidance documents in relation to PER would have told a trainee that it is their responsibility to check that any external supervisor has contacted their line manager before their training record is submitted, and she replied 'probably not in so many words'.

MEMBER'S CASE

37. Miss Mu completed her Case Management Form ('CMF') on 19 November 2024.
38. She admitted Allegation 1(a) but disputed Allegations 1(b) and 1(c). She said:
- 'My expectation was that the Person A could contact my line manager to do verification in a professional method, work with my line manager to sign off my objectives, not himself, making it fit the guidance 'If.....your organisation does not employ a professionally qualified accountant who can sign-off your performance objectives then you could ask an external accountant or auditor who knows your work, to be your practical experience supervisor and work with your line manager to sign off your objectives.' '*
39. She admitted Allegation 2 in its entirety. She denied Allegation 3 in its entirety and stated:
- 'My line manager was agree with me that [they] could cooperate the verification of my POs with the external party I found. If the person A did not contacted my line manager, it should not count me as dishonest or failure to act with integrity. Person*

A did not doing [their] duty. It should count [they are] dishonest and failure to act with integrity. I should be the victim. During this process, ACCA did not give me any relevant information to allow me to supervise. Instead, ACCA informed me that my verification has been passed successfully.'

40. Miss Mu denied Allegation 4 and stated:

'It should not be my responsibility to ensure my training record was approved appropriately. ACCA should provide appropriate method and gave the external party instruction how they should did it. What I did was click the invite button. ACCA did not ask me to supervise the verification process and did not give any information to do so in the system. I couldn't monitor what the person A did through the system, just waited to get results that whether my verifications were approved. If there was something wrong or not clear in my POs, ACCA should contacted me about it and I could revise it or applied for PO exemptions. I never heard any application has only one chance. ACCA should give applicants the opportunity to learn while applying. Otherwise, no one dares to apply for ACCA members. Just like at work, no one can guarantee that the problems encountered are learned in advance. Most of them are learned while dealing with unknowns. I did not notice the PQs should be in my words and the external supervisors should have business relationship with my company (this requirements also did not emphasized in the guideline). However, I told ACCA the first time I knew it and proposed that I can make up for it. Before the investigation, I also asked ACCA about my application many times, but no one told me and just asked me to wait.'(sic)

41. At the outset of the hearing the allegations were read, and Miss Mu maintained her admissions and denials as set out above.
42. Miss Mu gave oral evidence to the Committee. She accepted that she may not have complied with ACCA's requirements in respect of her membership application, but pointed out that she was a trainee, applying for the first time, and should not be judged by 'gold standard'. She accepted that many trainees had used the same POs and that many of them did not have the necessary experience. ACCA's concerns were therefore, she said, understandable. However, she emphasised to the Committee that she had the appropriate training and experience and had no need to 'violate ethics' to gain membership.
43. Her understanding was that she needed three things: an IFAC qualified accountant, someone who had worked closely with her and someone who knew

her work. Her line manager, Person A, met the second and third of those requirements, but not the first.

44. She therefore searched online for someone who would meet the first of those requirements. She accepted that she had filled in the Training Record. It named Person A as her supervisor, but the email address was for the third party.
45. Miss Mu told the Committee that she was only able to name one supervisor on the Training Record, and so she entered the name of her line manager. She was not aware that there was a requirement, where an external IFAC qualified supervisor is used, that there must be a business relationship between that person and her employer.
46. She accepted that she did not know the third party who acted as the external supervisor and indeed did not even know if it was a man or a woman. Her understanding, however, was that to act as an external supervisor, it was not necessary that she should know them. They would add their details to the Training Record, and it would be their responsibility to verify with her line manager, Person A, that she had the necessary qualifications and experience. It was, she said, ACCA's responsibility to verify that the external supervisor was indeed IFAC qualified. She was adamant that she did not pay the third party to provide this assistance. She would not do so, she said, because she had a 'golden employer exemption' by virtue of her employment with Company D, through which she could have obtained ACCA membership.
47. Miss Mu told the Committee that she chose nine POs to support her application. She accepted that she had used a template, but she said that did not mean she had not achieved the objective or that she was being dishonest. The templates she chose were not selected randomly. She had to consider, she said, whether her supervisor would approve them. The PO statements were, she commented, very general. She accepted that she had not provided any examples of her work to the third party, but they had the means to contact her line manager to verify her experience.
48. In answer to questions from the Committee, Miss Mu said that she searched online to see how other people draft PO statements. She found some and sent them to the third party. The third party also sent some PO statements to her. This, she said, gave her 'some scope', and she made her choice. At that stage, her line manager had not seen her PO statements. She sent them to the third party. Her understanding was that the third party and her line manager would sign off the statements together.

49. She told the Committee that she found the third party by searching online for 'ACCA supervisor'. Her communications with the third party were through their website. She no longer has a copy of those communications because when she left the employment of Company D in July 2023, she returned her laptop. She provided the third party with the contact details of her line manager and told her line manager that the third party may contact them. However, she did not check with either the third party or her line manager to see if they had communicated with each other.
50. In her closing submissions, Miss Mu said that essentially, she was unfamiliar with the application process and that, essentially, she had been cheated without realising it.

DECISIONS ON ALLEGATIONS AND REASONS

51. The Committee considered the documents before it, the oral evidence of Ms Calder and Miss Mu, the submissions of Ms Terry on behalf of ACCA and of Miss Mu on her own behalf, and the advice of the Legal Adviser. The Committee bore in mind that the burden of proving an allegation rests on ACCA and the standard to be applied is proof on the balance of probabilities.

Allegation 1

52. Miss Mu admitted Allegation 1(a) and the Committee found that allegation proved on the basis of her admission.
53. In relation to Allegation 1(b), the Committee had regard to Miss Mu's PER Training Record. This showed that Person A had approved 59 months of qualifying experience. Miss Mu told the Committee in her oral evidence that she gave an unknown third party access to her PER Training Record, through her passwords and access logons. She did this by sending the unknown person an invite through the Portal, using their email address. Miss Mu accepted that she did not give access to Person A. Therefore, it follows that it must have been the unknown third party who approved the qualifying experience in Person A's name.
54. Further, a screenshot of her Experience Log Records shows that the email address of the supervisor claiming to be Person A is one of the three email addresses that were used by 91 ACCA trainees despite the names of each of their supervisors being different. The Committee accepted that it is not credible or plausible that a supervisor would share an email address with any other person.

55. The Committee therefore found that, by allowing the third party to log into her training record, Miss Mu caused or permitted that person to approve her qualifying experience in Person A's name.
56. The same applies in respect of the approval of Miss Mu's nine POs. They were approved by a third party in Person A's name as a result of Miss Mu allowing them access to her PER Training Record.
57. The Committee therefore found Allegations 1(a), 1(b) and 1(c) proved.

Allegation 2

58. Miss Mu admitted Allegation 2 and the Committee found that allegation proved on the basis of her admission.

Allegation 3

59. The Committee considered Allegations 3(a), (b) and (c), all of which alleged dishonesty, together. The essence of these allegations was that Miss Mu dishonestly applied for membership of ACCA, representing that Person A was her supervisor when she knew that the third party had in fact signed off her qualifying experience and POs in Person A's name.
60. The Committee carefully considered Miss Mu's oral evidence. She came across to the Committee as intelligent and capable. Her account was, in the Committee's view, both cogent and consistent. The Committee found that she had been truthful in her evidence.
61. The Committee was satisfied, on the basis of that evidence, that Miss Mu had made two genuine mistakes. One was in relation to her misunderstanding of the ACCA guidance as to who could act as a supervisor. The second was that she believed the third party she engaged would complete the registration and approval process in accordance with ACCA's guidance.
62. Miss Mu had understood, correctly, that if Person A was not able to act as her supervisor, because they were not appropriately qualified to do so, she could engage a third party to approve her qualifying experience and POs. What she failed to appreciate was that an external supervisor must have a business relationship with Person A. However, the Committee accepted Miss Mu's evidence that this was a genuine error due to having failed to properly read the guidance.

Therefore, the Committee does not find that she knowingly undertook dishonest behaviour when she engaged the third party.

63. The Committee accepted that Miss Mu had regarded the third party as a facilitator. She thought that the third party would liaise with Person A to ensure that Person A would appropriately register as her PER Supervisor, approve her qualifying experience and approve her nine POs.
64. In those circumstances, the Committee did not find that Miss Mu was dishonest in the manner alleged in Allegation 3(a), (b) and (c).
65. In relation to Allegation 3(d), Miss Mu's evidence, which the Committee accepted, was that she had actually achieved the nine POs. However, she accepted that she had not achieved them as described in the POs that were submitted as part of her PER Training Record.
66. Miss Mu accepted in her evidence that she searched online for templates to use for her POs. She said in answer to the Committee's questions:

'I searched the website and tried to see how other people drafted the PO statement. Some of the members who had been admitted to ACCA would share their statements online. I also asked a third party where they could approve their statements, because they were professional.'

67. The following exchanges then took place:

'CHAIR: So you sent the fully drafted objectives to the third party and asked them to approve them?

MISS MU: Some of them, yes.

. . .

CHAIR: So some of the templates came from the third party.

MISS MU: Yes. They gave me some scope. I made my choice.'

68. The Committee accepted Miss Mu's explanation that she had drafted her POs, utilising available material to assist her. It also accepted her evidence that the POs she submitted accurately reflected her actual experience. Her belief was that the third party would then ratify these with her supervisor before they were submitted.
69. Though this was a flawed process, the Committee did not find it to be dishonest conduct. The Committee found that Miss Mu genuinely believed the process she followed was acceptable. In those circumstances, she was not dishonest

notwithstanding her acceptance that she had not achieved the POs as described in her PER Training Record.

70. The Committee therefore found Allegations 3(a), 3(b), 3(c) and 3(d) not proved.
71. The Committee went on to consider the alternative in Allegation 3(e), which alleged that the conduct found proved in Allegations 1 and 2 constituted a lack of integrity.
72. The Committee considered the guidance on allegations of acting without integrity given by the Court of Appeal in *Wingate & Evans*. It denotes the higher standards which society expects from professional persons and which the professions expect from their own members.
73. The Committee was satisfied that Miss Mu had fallen short of those standards. Given that the purpose of her PER Training Record was to obtain membership of a professional body, there was a heavy onus on her to ensure that she rigorously and properly complied with the application process.
74. It was clear to the Committee that she did not do so. She failed to follow the guidance in two ways: first, in that she failed to read and understand the guidance as published by ACCA; and second that she decided to outsource the completion of her PER to an unknown third party. She made various assumptions as to that person's professionalism which were not in fact justified.
75. Therefore, the Committee found Allegation 3(e) proved.

Allegation 4

76. As Allegation 4 was an alternative to Allegation 3, there was no need for the Committee to consider it.

Allegation 5

77. Having found allegations 1(a) to (c), 2, and 3(e) proved, the Committee considered whether this conduct amounted to misconduct.
78. The Committee bore in mind that misconduct has been described by the courts as a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. It also bore in mind that the falling short must be a serious one.

79. On balance, the Committee found that the proven conduct amounted to misconduct. Of significance, the conduct in question related to an application to become a member of a professional body. Though the Committee accepted Miss Mu's evidence as to what happened and why it happened, nonetheless it should not have happened. Effectively, she abdicated responsibility for her application to an unknown third party. That is a serious falling short of what would be expected of an ACCA applicant.
80. It was therefore misconduct, rendering Miss Mu liable to disciplinary action under Bye-law 8(a)(i).
81. The Committee therefore found Allegation 5 proved.

SANCTION AND REASONS

82. The Committee considered what sanction, if any, to impose taking into account ACCA's Guidance for Disciplinary Sanctions ('GDS') and the principle of proportionality. The Committee bore in mind that the purpose of a sanction was not punitive but to protect the public, maintain confidence in the profession and declare and uphold proper standards of conduct and behaviour.
83. In mitigation, the Committee took into account that Miss Mu had co-operated with the investigation and the disciplinary process, albeit such would be expected from a member in any event. It also took into account that no previous findings had been made against Miss Mu, although that had to be balanced against the fact she has only been a student or affiliate member for a short period.
84. The Committee considered that the only aggravating factor was that conduct of this nature potentially undermines public confidence in ACCA's qualifications system and trust in the profession generally.
85. Having found that Miss Mu's actions amounted to a lack of integrity, taking no further action was clearly not appropriate. The Committee therefore considered the available sanctions in ascending order of seriousness.
86. The conduct in question was too serious for an admonishment.
87. The Committee considered the GDS in relation to a reprimand. It states that this sanction is appropriate when the conduct is of a minor nature. The Committee did not consider this misconduct was minor in nature. Furthermore, there was no early and genuine acceptance of misconduct.

88. The Committee was of the view that the appropriate and proportionate sanction was a severe reprimand. It considered that most of the indicative factors in the GDS in relation to this sanction were met. The misconduct was not intentional and is no longer continuing. She has shown insight and regret. She has a previous good record. Miss Mu has taken rehabilitative and corrective steps, and she co-operated with the investigation. There is in the Committee's view little or no risk of repetition.
89. Further, the next most severe sanction is removal from the affiliate register. Miss Mu's passing of the ACCA exams (pre-requisite of being an affiliate member) was not challenged by ACCA. Therefore, removing her status of affiliate will not be proportionate in these circumstances.
90. Therefore, the Committee made an order under CDR 13(5)(b) of the Disciplinary Regulations severely reprimanding Miss Mu.

COSTS AND REASONS

91. ACCA applied for costs in the sum of £7,468.50. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the hearing. The Committee noted that the schedule was prepared prior to the first day of hearing, and it had not been amended to add the costs associated with the second and third days.
92. The Committee found that there was no reason in principle not to make an order for costs in ACCA's favour, given that the allegation of misconduct has been proved. It accepted that the costs claimed were properly incurred.
93. The Committee was provided with information about Miss Mu's financial circumstances. [PRIVATE].
94. The Committee considered that it was just and reasonable for Miss Mu to pay some of the costs. [PRIVATE], it determined that the appropriate order was that Miss Mu pay costs to ACCA in the sum of £500.

EFFECTIVE DATE OF ORDER

95. The order will come into effect from the date of expiry of the appeal period, namely after 21 days from service of this written statement of the Committee's reasons for its decision, unless Miss Mu gives notice of appeal in accordance with the Appeal Regulations prior to that.

Colette Lang
Chair
02 October 2025