

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Miss Jieqi Xu

Heard on: Wednesday, 29 October 2025

Location: Remotely via MS Teams

Committee: Mr Maurice Cohen (Chair)
Ms Fiona MacNamara (Accountant)
Dr Jackie Alexander (Lay)

Legal Adviser: Mr Alastair McFarlane

**Persons present
and capacity:** Ms Kimberly Clifton (Case Presenter)
Ms Anna Packowska (Hearings Officer)

Summary: Exclusion from membership with immediate
effect Costs awarded to ACCA in the sum of
£6,500.00

1. ACCA was represented by Ms Clifton. Miss Xu did not attend and was not represented. The Committee had before it a bundle of papers, numbered pages 1-278, a separate bundle, numbered pages 1-58, an

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Additional bundle, numbered pages 1-48, and a service bundle numbered pages 1-19.

SERVICE

2. Having considered the service bundle, the Committee was satisfied that notice of the hearing was served on Miss Xu in accordance with the Complaints and Disciplinary Regulations 2014 ("CDR").

PROCEEDING IN ABSENCE

3. The Committee noted the submissions of Ms Clifton and accepted the advice of the Legal Adviser.
4. The Committee reminded itself that the discretion to proceed in absence must be exercised with the utmost care and caution. The Committee noted that following the service of the Notice of Hearing on 1 October 2025, there was no response to the notice from Miss Xu. It further noted that there had been no communication from Miss Xu since an email of 27 May 2024. She confirmed her email address to which all communications and documentation were sent.
5. The Hearings Officer sent chasing emails to Miss Xu's e-mail address on 27 and 28 October 2025 in attempts to ascertain if Miss Xu would be attending. The Hearings Officer also attempted to telephone Miss Xu on two occasions on 28 October 2025 to her telephone number registered with ACCA. The calls were not answered and there was no opportunity to leave a voicemail. The Hearings Officer sent the hearing link by email on 28 October 2025. Again, there was no response.
6. The Committee was mindful of the observations of Sir Brian Leveson in *Adeogba v. General Medical Council* [2016] EWCA Civ 162 as to the

burden on all professionals subject to a regulatory regime to engage with the regulator both in relation to the investigation and the ultimate resolution of allegations made against them. The Committee specifically considered the issue of fairness to Miss Xu of proceeding in her absence, but also fairness to the ACCA and the wider public interest in the expeditious discharge of the Committee's function. The Committee was satisfied that Miss Xu had voluntarily waived her right to attend the hearing. The Committee was not persuaded that any adjournment was likely to secure her attendance at a future date. The allegations were serious, involving dishonesty and, if proven, a risk to the public.

7. The Committee was satisfied that Miss Xu has been given every opportunity to engage and participate in the proceedings and has decided not to do so. Accordingly, in all the circumstances, the Committee was satisfied that it was in the public interest to proceed in the absence of Miss Xu.

ALLEGATIONS

Jieqi Xu ('Miss Xu'), at all material times an ACCA trainee:

- 1. Applied for membership to ACCA on or about 19 January 2022 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 7: Prepare external financial reports**

- **Performance Objective 18: Prepare for and plan the audit and assurance process**
- **Performance Objective 19: Collect and evaluate evidence for an audit or assurance engagement**
- **Performance Objective 20: Review and report on the findings of an audit or assurance engagement**

2. Miss Xu's conduct in respect of the matters described in Allegation 1 above was:

a) Dishonest in that Miss Xu 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 Xu 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. By reason of her conduct, Miss Xu is guilty of misconduct pursuant to ACCA byelaw 8(a)(i) in respect of any or all the matters set out at 1 to 3 above.

BACKGROUND

- 8. Miss Xu became an ACCA affiliate on 17 July 2017 and a member on 27 January 2022.**

9. Upon an ACCA student completing all their ACCA exams, they become an ACCA affiliate. However, in order to apply for membership, they are required to obtain at least 36 months' practical experience in a relevant role ('practical experience'). It is permissible for some or all of that practical experience to be obtained before completion of ACCA's written exams.
10. A person undertaking practical experience is often referred to as an ACCA trainee being the term used to describe Miss Xu's status in the allegations, the report and the supporting evidence bundle.
11. An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement training record (PER), which is completed using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal.
12. 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 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.
13. In addition to approval of their POs, the trainee must ensure 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 supervisor. This means the same person can and often does approve both the trainee's time and achievement of 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.

14. 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.
15. 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]
16. 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.
17. Consequently, all 91 trainees were referred to ACCA's Investigations Team. Miss Xu is one such trainee.
18. ACCA's case against Miss Xu is that in her Practical Experience training record she had purported to confirm that she achieved the Performance Objectives 1, 2, 3, 4, 5, 7, 18, 19 and 20 when she had not done so. They had been copied from other students and this was dishonest. There were alternatives of a failure to act with integrity and recklessness.

ACCA'S SUBMISSIONS

Allegation 1

19. ACCA relied on the following:
- Linda Calder's (Manager of ACCA's Professional Development Team) statements which describe ACCA's Practical Experience Requirements. These include that a trainee's personal statement for each PO must be their own personal statement that is unique to them and their own experience. This has been consistently referred to in ACCA's published guides which Ms Calder exhibits to her statement. Trainees must not therefore use a precedent or template or another trainee's personal statement, which would undermine the PER

training record element of the ACCA qualification. The 2019 published guide concludes:

'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's Disciplinary Committee.'

- Miss Xu's completed PER training record which was completed on or about 18 January 2022 which then permitted Miss Xu to apply for membership which she did on 19 January 2022. Miss Xu was subsequently admitted to membership on 27 January 2022;
- Miss Xu's Supervisor details which records Person A was her 'IFAC qualified line manager', and therefore her practical experience supervisor;
- Miss Xu's PER training record which records Person A approved Miss Xu's time/ experience of 77 months;
- Miss Xu's PER training record which records that she requested her IFAC qualified line manager, Person A, to approve all her PO's on 18 January 2022 (being the date Miss Xu would have uploaded to her PER training record the statements supporting each of her POs) and that these were all approved by Person A the same day;
- That all nine of Miss Xu's PO statements are the same as many other trainees, all of which pre-date the statements of Miss Xu suggesting at the very least, she had not achieved the objectives in the way claimed or possibly at all.

- ACCA's analysis of Miss Xu's submitted PO statements. ACCA has been careful to record the PO statement for any one PO which was first in time, on the basis this statement may be original and therefore written by the trainee based on their actual experience, unless there is evidence suggesting otherwise.
- The 'first in time date' is the date the trainee requested that their IFAC qualified line manager 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. In most of the cases within this cohort, the supervisor approved the PO's on the same day or if not very soon thereafter.
- In relation to Miss Xu the analysis revealed:

None of her PO statements were first in time; and Nine of her PO statements were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort.

Allegation 2 (a) - Dishonesty

20. ACCA's primary case was that Miss Xu was dishonest as she knew she had not achieved nine POs as described in the corresponding performance objective statements.
21. Where PO statements are the same or significantly similar to the PO statements of any other trainees, this would suggest at the very least, the trainee has not met the objective in the way claimed or possibly at all. That further, the practical experience claimed, has not been supervised by a practical experience supervisor, who would or should have knowledge of the trainee's work.

22. The extensive advice available online as to how an ACCA trainee must complete their PER makes it clear the statements supporting their POs have to be written by trainees in their own words and as such must be unique. ACCA contended that it is not credible that Miss Xu was unaware her POs had to be in her own words and describe the experience she had actually gained to meet the relevant Performance Objective. In applying for ACCA membership, it is submitted Miss Xu claimed to have achieved nine PO's with the use of supporting statements which she knew had not been written by her and therefore knew she had not achieved the PO's as described in these statements or at all. ACCA therefore submitted this conduct would be regarded as dishonest by the standards of ordinary decent people.

Allegation 2 (b) – Integrity

23. In the alternative, ACCA submitted that if the conduct of Miss Xu is not found to be dishonest, the conduct demonstrates a failure to act with integrity.

Allegation 3 – Recklessness

24. ACCA submitted in the further alternative that Miss Xu's conduct was reckless in the ordinary sense of the word in that Miss Xu in not having any or sufficient regard to the matters referred to above must have appreciated the risk (which it was unreasonable in the circumstances for her to take) that she had not completed the practical experience element of her training correctly and was therefore ineligible for membership.

Allegation 4 – Misconduct

25. ACCA submitted that Miss Xu's conduct whether dishonest or lacking integrity or reckless was sufficiently serious to reach the threshold for misconduct.

MISS XU'S SUBMISSIONS

26. Miss Xu made email responses to ACCA's investigation. In her email dated 3 April 2024 Miss Xu provided several attachments evidencing that she was employed by the firm referred to in her PER training record and that Person A was her supervisor. Her full response was as follows:

"1. I'm employed by Company A from 2 March 2015. Here provided the cover, front page and last page of my contract(attachment 1, 2& 3)

My badge and business card (attachment 4)

The pay slip in company system (attachment 5-9), the system updated in 2020, so the earlier ones can not be updated.

The bank statement sampled from 2019 to 2024 (attachment 10-21, the app of bank only provide the bank statement for last 5 years).

I'm sorry that it's in Chinese, the 康乐保（中国）医疗用品有限公司 is Company A

2. Person A is not my line manager for this entire period. Person A came to the company since Oct 2015, Person A is my line manager since then.

3. Person A is my line manager since Oct 2015, and Person A assessed my work, knew the type of my work and the quality of my work.

4. Person A is my line manager, the PER lasted a long time and it's complex for Person A to finish the approve day by day. So I asked her only need to do that all-in-one day to reduce the complexity.

*5. Here provide the emails from Person A about our daily work, it's an ongoing supervision and existed in our daily communication. I provided some samples of the email list, as it's business email, I can't provide them all and need to hide some information.
(attachment 22-31)*

6. I'm really sorry about this but I don't know why.

*7. May be I have some misunderstanding about the ACCA guide, but I think I am supervised by Person A.
I need to apologize again for the workload I brough. Thank you.*

Best Regards

Jocelyn Xu

徐洁琪”

27. Miss Xu stated Person A was her supervisor from October 2015 rather than March 2015 as referred to in her PER training record. With this correction the total period of qualifying experience would amount to about 70 months and therefore still well in excess of the minimum period of 36 months.
28. In response to the question as to why her PO statements were the same as those of many other trainees and which predated hers, Miss Xu stated:

'I'm really sorry about this but I don't know why'.

29. ACCA's investigating officer emailed Miss Xu on 23 May 2024 with further enquiries including asking her about why she was unable to explain her PO statements were the same as others. In her response she repeated she did not know the reason. ACCA's investigating officer asked Miss Xu again for a fuller explanation in an email of 2 July but she did not respond.

DECISION ON ALLEGATIONS AND REASONS

30. The Committee accepted the advice of the Legal Adviser. The standard of proof to be applied throughout was the ordinary civil standard of proof, namely the balance of probabilities. It reminded itself of Collins J's observations in Lawrance v. GMC [2015] EWHC 581(Admin) to the effect that in cases of dishonesty, cogent evidence was required to reach the civil standard of proof.
31. The Committee heard that there had been no previous findings against Miss Xu and accepted that it was relevant to put her good character into the balance in her favour.

DECISION ON FACTS

32. The Committee accepted the advice of the Legal Adviser. It noted the submissions of Ms Clifton for ACCA. It reminded itself that the burden of proof was on ACCA alone and that Miss Xu's absence added nothing to ACCA's case.

Allegation 1

Applied for membership to ACCA on or about 19 January 2022 and in doing so purported to confirm in relation to her ACCA Practical Experience training record she had achieved the Performance Objectives 1,2,3,4,5,7,18,19 and 20.

33. The Committee was satisfied on the balance of probabilities that this allegation was established by ACCA's documentary evidence. Miss Xu applied for membership and her application for membership did purport to confirm that she had achieved the Performance Objectives listed in Allegation 2. Accordingly, Allegation 1 was proved.

2. Miss Xu's conduct in respect of the matters described in Allegation 1 above was:

a) Dishonest in that Miss Xu 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.

34. The Committee next asked itself whether the proven conduct in Allegation 1 was dishonest.
35. In accordance with the case of *Ivey v Genting Casinos (UK) Ltd T/A Crockfords* [2017] UKSC67 the Committee first considered what Miss Xu's belief was, as to the facts.
36. The Committee examined the POs submitted and was satisfied that they were identical or significantly similar to those submitted by other trainees in the cohort and, as none of them was the first in time, concluded that they must have been copied. None of Miss Xu's PO statements were the first in time. Given this, it considered it far more

likely than not that the POs were not unique to her and she would have known that.

37. The application for membership was submitted by Miss Xu. The Committee was satisfied that she would have known that she had not achieved the performance objectives as described in the performance objective statements, since those POs were copies of PO statements from other students or were templates and not reflective of her own experience. At no stage did Miss Xu assert that she had completed all nine POs and their accompanying statements.
38. The Committee considered it significant that when asked why her PO statements were the same as many other trainees, which pre-dated hers, she only stated: *"I'm really sorry about this but I don't know why"*. The Committee considered it more likely than not that Miss Xu deliberately submitted her PO statements in an attempt to subvert ACCA's system and fraudulently gain membership to which she was not entitled.
39. The Committee accepted that there was manifold guidance as to the PER system published and online and the Committee had little doubt that Miss Xu would have been aware of those requirements. The Committee accepted that ACCA's guidance as to its requirements was widely available and that there was also extensive advice available in both English and Mandarin as to the requirements. This makes it clear the statements supporting their POs have to be written by trainees in their own words and as such must be unique.
40. The Committee acknowledged the requirement is that the PO statements must be unique to her and in her own words. Miss Xu's submissions are copies of other statements. The Committee was of the view that she could not have believed that what she did was an

honest act. Given all the guidance, the Committee was satisfied that it is not credible that Miss Xu was unaware of the requirement that her POs had to be in her own words and describe the experience she had actually gained to meet the relevant Performance Objectives. It found that Miss Xu knew that the POs were not her own work as she had not written them and therefore that she had not achieved the POs, as described in these statements. She had provided no evidence that she had achieved the POs claimed at all.

41. The Committee in the circumstances inferred that the more likely scenario was that Miss Xu was taking a short cut to membership. In the circumstances the Committee was satisfied that Miss Xu knew that it was wrong to purport to confirm that she had achieved them in the manner recorded. The Committee rejected any other basis such as mistake or carelessness or recklessness as not credible. Applying the second limb of *Ivey v Genting Casinos (UK) Ltd T/A Crockfords*, the Committee was satisfied that this conduct was dishonest according to the standards of ordinary decent people, who would expect trainee accountants to comply with ACCA's requirements and submit such important documents in their own words. Accordingly, it was satisfied that Allegation 2 a) was proved.

Allegations 2 b) - Integrity and 3 – Recklessness

42. Given the Committee's findings in relation to Allegation 2 a) it did not consider the alternatives of Allegations 2 b) or 3.

Allegation 4

By reason of her conduct, Miss Xu is guilty of misconduct pursuant to ACCA byelaw 8(a)(i) in respect of any or all the matters set out at 1 to 3 above.

43. The Committee next asked itself whether by submitting a fraudulent PER, Miss Xu was guilty of misconduct.
44. The Committee had regard to the definition of misconduct in Bye-law 8(c) and the assistance provided by the case law on misconduct. To dishonestly seek to gain membership was, in the Committee's judgment, deplorable conduct. It was satisfied that Miss Xu's actions brought discredit on herself, ACCA and the accountancy profession. It was satisfied that her conduct undermined one of the fundamental tenets of the profession – to be honest and trustworthy. Her conduct enabled Miss Xu to secure membership to which she was not entitled to it and her conduct undermined the reputation of the profession. Therefore, the Committee was satisfied that Miss Xu's conduct had reached the threshold for misconduct.

SANCTIONS AND REASONS

45. The Committee noted its powers on sanction were those set out in Regulation 13(1). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate. It took account of Ms Clifton's submissions.
46. The Committee accepted the advice of the Legal Adviser.
47. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour. The dishonest behaviour was serious. Trust and honesty are fundamental requirements of any professional. Dishonesty by a member of the accountancy profession undermines its reputation and public confidence in it.

48. The aggravating factors the Committee identified were:

- The behavior was pre-planned and designed to deceive her regulator for personal benefit
- Professional membership was fraudulently obtained with a potential risk of harm to the public
- The serious impact on the reputation of the profession
- No evidence of insight shown into the impact on the profession and public of such conduct.

49. The only mitigating factor the Committee identified was:

- A previous good character with no disciplinary record

50. Given the Committee's view of the seriousness of the misconduct, it was satisfied that the sanctions of No Further Action, Admonishment, Reprimand and Severe Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the guidance were not present. It also considered the factors listed at C5 of the Guidance that may justify exclusion. The Committee noted that among other factors, dishonesty and an abuse of trust were present here. Any sanction which would allow a dishonest member who obtained membership fraudulently to remain a member would fail to protect the public.

51. The Committee reminded itself that it was dealing with a case of dishonesty. It had specific regard to Section E2 of the Guidance in relation to dishonesty and was mindful of the case law to the effect that dishonesty lies at the top of the spectrum of misconduct. The Committee was satisfied that her dishonest behaviour was fundamentally incompatible with Miss Xu remaining on the register of

ACCA and considered that the only appropriate and proportionate sanction was that she be excluded from membership.

COSTS AND REASONS

52. ACCA claimed costs of £7,221 and provided a detailed schedule of costs. The Committee noted Miss Xu has not provided a statement of means. The Committee decided that it was appropriate to award costs to ACCA in this case and considered that the sum claimed by them was a reasonable one in relation to the work undertaken but made a reduction as the hearing lasted less time than anticipated. There were bank statements submitted by Ms Xu at one stage but this appears to have been to prove her employment and did not assist the Committee as to her current full financial position. There is nothing to say what her income is today. ACCA is entitled to its costs. Accordingly, the Committee considered that the sum of £6,500 was appropriate and proportionate. It ordered that Miss Xu pay ACCA's costs in the amount of £6,500.

EFFECTIVE DATE OF ORDER

53. The Committee was satisfied that an immediate order was necessary in the interests of the public. This was because Miss Xu was a member, had obtained her membership fraudulently and accordingly there was a risk to the public if the order was not made immediately.

Mr Maurice Cohen
Chair
29 October 2025