

## HEARING

**ADMISSIONS AND LICENSING COMMITTEE OF THE ASSOCIATION  
OF CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

**In the matter of:** Mr Muhammad Ismail

**Heard on** Wednesday, 17 September 2025

**Location:** Remotely via Microsoft Teams

**Committee:** Mr Tom Hayhoe (Chair)  
Ms Nimra Syeda (Accountant)  
Mr Andrew Skelton (Lay)

**Legal Adviser:** Mr Alastair McFarlane

**Persons present  
and capacity:** Mr Mazharul Mustafa (ACCA Case Presenter)  
Ms Sofia Tumburi (Hearings Officer)

**Outcome:** Application to re-admit to ACCA student register granted  
with further directions

1. The Committee had before it a main bundle numbered pages 1-76 and a Service Bundle, numbered pages 1-41.
2. ACCA was represented by Mr Mustafa. Mr Muhammad Ismail ('Mr Ismail') attended but was not represented.

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## **BACKGROUND AND APPLICATION HISTORY**

3. ACCA has received an application by Mr Ismail to be re-admitted as a Member of ACCA following a Disciplinary hearing on 29 March 2022 and 21 April 2022 when he was excluded from membership. ACCA opposes the application.
4. Mr Ismail became an ACCA member on 31 July 2017. On 21 April 2022 Mr Ismail's membership was administratively ceased following the Disciplinary Committee hearing on 29 March 2022 and 21 April 2022.
5. Regulation 3(a) of ACCA's Membership Regulations provides that an ACCA trainee cannot become a member of ACCA until they have completed three years of approved work experience, in accordance with ACCA's Practical Experience Requirement. Trainees must achieve the requisite number of "Essential" and "Technical" Performance Objectives ('PO') by gaining experience and completing a personal statement for each PO, which are signed off by the trainee's Practical Experience Supervisor ('PES').
6. Mr Ismail was identified as one of fifty-two ACCA trainees who submitted or caused to be submitted to ACCA that some or all of their practical experience training had been supervised by Person A (the PES), including at times when Person A was not qualified, and further in doing so submitted one or more performance objective ('PO') statements that were identical or near identical, to one or more of Person A's other trainee's PO statements or the same or similar to Person A's own PO statements which they included when completing their own training in 2016.
7. ACCA's investigation concluded that Person A had not worked closely with Mr Ismail and was not familiar with Mr Ismail's work, such that he would be permitted to act as Mr Ismail's supervisor and that these facts should have been or were known by Mr Ismail. Further Person A couldn't have been Mr Ismail's supervisor when working at Company Z during the period claimed (a total of 37 months between [PRIVATE], because Person A didn't become an ACCA member and therefore able to supervise trainees, until after [PRIVATE], and this was after Mr Ismail ceased working at Company Z.

8. In summary, the Disciplinary Committee found proved that Mr Ismail had committed misconduct in that he had been dishonest as an ACCA trainee in submitting his Practical Experience Training Record which stated that he had met various Performance Objectives when he had not.
9. At the Disciplinary Committee hearing on 29 March 2022 and 21 April 2022, the Committee found the allegations to be particularly serious. It decided that Mr Ismail had been complicit in colluding with Person A and was entirely aware that he was participating in an arrangement which enabled him to qualify as a member of ACCA illegitimately and improperly. The Committee found this was dishonest behaviour that undermined public confidence in the integrity of ACCA's membership process. Further, the Committee was not satisfied that Mr Ismail felt and/or expressed genuine remorse about his conduct or demonstrated meaningful insight into the seriousness of his actions.
10. Mr Ismail was excluded from ACCA membership and ordered to pay £5,000 costs to ACCA. Mr Ismail successfully appealed the costs order. On 29 April 2022 the Chair decided that the application should be allowed based on new information provided. The order of costs in the sum of £5,000 made in favour of ACCA, on 21 April 2022, was replaced by an order of costs totalling £100.
11. Mr Ismail's disciplinary costs have since been cleared and paid in full to ACCA.

#### **FIRST APPLICATION FOR READMISSION – NOVEMBER 2023**

12. In June 2023, Mr Ismail submitted an application to be readmitted to ACCA's membership register. This application was determined and refused by the A&L Committee in November 2023.
13. In his application Mr Ismail explained the circumstances which led to his removal from ACCA membership. He stated:

*'My supervisor was not fulfilling the criteria defined by ACCA of being my supervisor at the time of applying ACCA membership, i was misguided by [them] during my work. I regret my careless behaviour...My performance objectives were misused and plagiarized since it was under the possession of my supervisor and [they] was supervising many people... The problem was that*

*i never ready [sic] the guidelines provided at the ACCA website for ACCA members before the disciplinary committee hearing'.*

14. Among other submissions, Mr Ismail stated:

*'...I regret what has happened and take full responsibility for my actions and I am sorry for that...'*

15. In his oral submissions before the November 2023 Committee Mr Ismail submitted that he could supply proof that he has completed the PER and that, if necessary, he would seek an adjournment so that such information could be provided to the Committee. Mr Ismail offered to share his screen to prove that he had fulfilled the PER.
16. Mr Ismail also stated that he disagreed with the reasons for the Disciplinary Decision in that he continued to blame Person A although he accepted that he too was at fault. However, Mr Ismail denied that he acted dishonestly.
17. Mr Ismail asked for an adjournment if the Committee considered it necessary so that he could provide information to show he had since completed the PER.
18. The November 2023 A&L Committee refused Mr Ismail's application to be readmitted as a member as they decided that Mr Ismail had failed to satisfy the requirement regarding 'general character and suitability' both to be an ACCA member or to be an ACCA registered student due to the seriousness of the matters found proved by the Disciplinary Committee which included Mr Ismail having acted dishonestly, alongside this Committee's finding that Mr Ismail lacked insight into his past misconduct.
19. Further, the Committee was also concerned that Mr Ismail had not even considered that it was necessary to provide this as part of his application particularly since the Disciplinary Committee hearing was all about the PER not being valid and that had resulted in his removal from the membership register. The Committee considered that without any proof as to Mr Ismail having completed the PER, Mr Ismail could not be admitted as a member. It considered the fact that he wished to show his screen to prove his PER demonstrated his lack of appreciation about the importance of the PER and the

need to evidence it fully. The Committee was therefore not persuaded that an adjournment was in either Mr Ismail's interest or the public interest. The Committee was not persuaded that an adjournment could meet the concerns it had about Mr Ismail's insight into his past misconduct or about his 'general character and suitability'.

## **SECOND APPLICATION FOR RE-ADMISSION**

20. On 11 November 2024, Mr Ismail made his second application for readmission. In his application, Mr Ismail explains the circumstances which led to his removal from ACCA membership. He stated:

*'I submitted my experience and performance objectives for approval to a supervisor who was, at the time, an active ACCA member. Additionally, without my knowledge, the supervisor altered the performance objectives I initially provided, filing a version that included plagiarized content. The supervisor had direct access to my ACCA's submission system, which allowed [them] to make these unauthorized changes. However, I later learned that this supervisor was not authorized to endorse these credentials for the purpose of ACCA membership verification.'*

*At the time of my submission, I did not possess firsthand knowledge of the specific procedural requirements for obtaining ACCA membership. Regrettably, I acted in good faith but with an unintentional degree of negligence, relying solely on the guidance provided by my supervisor, who I believed was appropriately authorized to validate my experience. This lack of direct understanding led to an unintended breach of compliance with ACCA's code of ethics.'*

21. When asked by ACCA why he believes that in similar circumstances in the future the conduct wouldn't be repeated and/or he will not commit a similar breach of ACCA rules, Mr Ismail stated:

*'I am confident that, if faced with similar circumstances in the future, I will not commit a similar breach of ACCA code of ethics and rules due to the valuable lessons I have learned from this experience. This situation has instilled in me a heightened awareness of the critical importance of fully understanding and'*

*adhering to all procedural requirements set forth by ACCA. I now recognize the need to personally verify the credentials and authorization of any individuals involved in the endorsement or approval of professional submissions.[sic] ...'*

22. When asked why he should be readmitted as an ACCA member, Mr Ismail stated:

*'I believe that I should be re-admitted as a member of ACCA based on my commitment to uphold and strengthen the values and ethical standards set by ACCA. This experience has not only deepened my respect for ACCA's rigorous compliance requirements but has also reinforced my dedication to the professional standards expected of its members. I am eager to demonstrate that I have taken meaningful steps to ensure that any future actions on my part will be fully compliant and reflect the integrity required of an ACCA professional.'*

*In an effort to take corrective action, I have rewritten the performance objectives, reflecting my current experience and learnings, which are attached with my re-admission application. Additionally, I am submitting my updated job experience for review, having obtained approval for both the revised performance objectives and work experience from my line manager, a Chartered Accountant and member of the ICAI, an IFAC-recognized professional body.'*

*Since my exclusion, I have taken time to critically reflect on the situation and have gained a clearer understanding of the importance of thorough procedural knowledge and personal accountability. I have actively engaged in furthering my knowledge of ACCA's guidelines to prevent any recurrence and am committed to continuous improvement in both my professional and ethical standards. I have also implemented more robust checks in my professional practices to ensure compliance with regulatory expectations.'*

23. Further, in his application Mr Ismail expressed his attitude towards the removal, stating:

*'At the time of my membership removal, I experienced a range of emotions, from initial surprise to a sense of regret, as I had believed that I was following the appropriate procedures. While I had acted in good faith, I acknowledge that*

*a lack of complete understanding and due diligence contributed to the circumstances surrounding my exclusion. I have since reflected extensively on the situation and have come to recognize the importance of fully comprehending and personally verifying all procedural requirements in professional matters.*

*In an effort to take corrective action, I have rewritten the performance objectives, reflecting my current experience and learnings, which are attached with my re-admission application. Additionally, I am submitting my updated job experience for review, having obtained approval for both the revised performance objectives and work experience from my line manager, a Chartered Accountant and member of the ICAI, an IFAC-recognized professional body.'*

24. Mr Ismail is currently employed by Company B as an [PRIVATE]. He has been in their employment since [PRIVATE] and is responsible for 'overseeing and optimizing the record-to report processes within the corporate office'. Mr Ismail also provided email correspondence to this Committee from the Associate Director of Finance at Company B approving his performance objectives.

### **ACCA'S SUBMISSIONS**

25. Mr Ismail illegitimately qualified as an ACCA member in July 2017. The allegations, as proven, against Mr Ismail were particularly serious, involving behaviour that was dishonest, demonstrated a disregard for ACCA's membership process and raises public interest concerns.
26. ACCA contended that the reputation of the accountancy profession is built upon the public being able to rely on a member and/or professional who has undertaken to abide by a code of ethics and do the right thing in difficult circumstances, "It is a cornerstone of the public value which an accountant brings." Therefore, a finding of dishonesty, that is directly related to obtaining membership, is behaviour that is fundamentally incompatible with being an ACCA member because it undermines the trust and confidence the public have in the profession.

27. ACCA submitted that there is considerable importance in the public knowing that, save for in the most exceptional circumstances, they are dealing with members and potential members of a profession who have never been guilty of any dishonesty at all. Therefore, in cases of behavioural misconduct such as dishonesty, public confidence will be a stronger factor in weighing any decision regarding readmission. If allowing an individual to return to the register can undermine the public's trust in the profession, readmission is unlikely to meet the overarching objective.
28. ACCA submitted that Mr Ismail obtained ACCA membership by colluding with another to submit PO statements that were not his own. Mr Ismail cannot be readmitted to that original position as it was obtained through dishonest means. It is ACCA's position that based on the dishonesty findings, readmission is not compatible with ACCA's overarching objectives, upholding the reputation and confidence in the profession, and protecting the public.
29. Although Mr Ismail has been sanctioned for his misconduct and has demonstrated some insight into the seriousness of this conduct in his reflection on his actions, ACCA contended that Mr Ismail has demonstrated little evidence of having taken any rehabilitative steps since the Disciplinary proceedings and has not provided adequate references in support of his application. In the absence of this information, ACCA are unable to determine Mr Ismail's suitability or character.
30. ACCA reminded the Committee of the observations of Sir Thomas Bingham MR (as he then was) in *Bolton v Law Society* [1994] 1 WLR 512, 519:

*"...On applying for restoration after striking off, all these points may be made, and the former solicitor may also be able to point to real efforts made to reestablish himself and redeem his reputation. All these matters are relevant and should be considered. But none of them touches the essential issue, which is the need to maintain among members of the public a well-founded confidence that any solicitor whom they instruct will be a person of unquestionable integrity, probity and trustworthiness. Thus it can never be an objection to an order of suspension in an appropriate case that the solicitor may be unable to reestablish his practice when the period of suspension is past. If that proves, or appears likely to be, so the consequence for the individual and*



*his family may be deeply unfortunate and unintended. But it does not make suspension the wrong order if it is otherwise right. The reputation of the profession is more important than the fortunes of any individual member. Membership of a profession brings many benefits, but that is a part of the price.”*

31. ACCA noted that Mr Ismail has offered expressions of regret and lengthy reflections on his past misconduct but ACCA submitted that he has shown little appreciation for the impact of his conduct on other members and potential members of the profession who have approached their practical training honestly and legitimately.
32. Therefore, it was ACCA's position that Mr Ismail has not demonstrated that he has been sufficiently rehabilitated to no longer be considered a risk to the public and uphold the integrity of the accounting profession if he once again becomes an ACCA student.

#### **MR ISMAIL'S SUBMISSIONS**

33. Mr Ismail relied on his detailed written Application for re-admission and his detailed response to ACCA's written submissions set out in an email dated 08 August 2025. In addition, Mr Ismail also gave oral evidence to the Committee and subjected himself to cross-examination by ACCA.
34. Mr Ismail indicated to the Committee that he accepted that he had been dishonest as the Disciplinary Committee had found, expressed his sincere remorse and explained about the in-house training and courses he has undertaken in relation to ethics. He indicated that he understood the significance of such a serious finding on the reputation of the profession. He submitted that there had been no further ethical concerns raised by his employers. In effect, he had “evolved” as a person and as a professional since his dishonest conduct eight years ago and maintained that he was now a fit and proper person to become a student member of ACCA. He had also prepared new PO statements for ACCA and submitted these.
35. In addition, Mr Ismail called his manager, Person B, who gave oral evidence to the Committee as a character witness for Mr Ismail.

## **DECISION ON APPLICATION AND REASONS**

36. The Committee referred to The Chartered Certified Accountants Membership Regulations 2014 (amended 01 January 2025 (MR) and in particular MR3, MR7, MR9 and MR14. It took into consideration the Guidance produced by ACCA entitled: Admissions and Licensing Committee Guidance (01 January 2019), Guidance for Regulatory Orders (01 January 2025).
37. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the burden of establishing that Mr Ismail meets the eligibility requirements for membership or student membership is on Mr Ismail.
38. The Committee was satisfied that Mr Ismail discharged the burden upon him to meet those eligibility requirements and in particular, that he had shown that he had the “general character and suitability” to be admitted as a student member of ACCA. Its reasons are as follows.
39. The Committee had specific regard to the underlying facts and surrounding circumstances of the disciplinary matter found proved which led to his exclusion. It noted that it was a very serious case of dishonestly obtaining membership. The Committee specifically considered the public interest and the maintenance of public confidence in the profession and the maintaining of proper standards of conduct when asking itself whether Mr Ismail has discharged the burden upon him to show that he is now fit to be a student member.
40. The Committee was impressed with the oral evidence given to it by Mr Ismail. It found him to be a candid witness attempting to assist the Committee in its task. The Committee accepted that Mr Ismail had today provided an unequivocal acceptance of his dishonesty in 2017. It found he had expressed genuine remorse and had now demonstrated appropriate insight into the significance of that dishonesty and its impact on the profession and the public perception of the profession. The Committee further accepted that he had undertaken relevant courses (both discretionary and mandatory) into ethics and that he had a proper understanding of the unacceptability of his original conduct.

41. The Committee accepted Mr Ismail's understanding and appreciation of his past failings and any genuine expression of remorse and put the impressive evidence from his character witness into the balance. The Committee noted that the misconduct occurred some eight years ago (although the disciplinary hearing only took place three years ago) and was of the view that the risk of the repetition of any such behaviour was very low. It found that Mr Ismail now has sufficient insight into his past conduct and that he understood the seriousness of his past misconduct.
42. The Committee noted that honesty and integrity go to the heart of an accountant's practice and are a fundamental tenet for membership of ACCA. The Committee was persuaded that Mr Ismail had now discharged the burden of proof regarding his 'general character and suitability' to be admitted to the student register of ACCA.
43. Accordingly, the Committee made the following directions:
- i. Mr Ismail's application to be readmitted to the ACCA student register is granted.
  - ii. The Committee directs that a full reassessment being made of the newly submitted POs.

**Mr Tom Hayhoe**  
**Chair**  
**17 September 2025**