

## HEARING

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

**In the matter of:** Miss Hanyu Zhang

**Heard on:** Tuesday, 14 April 2026

**Location:** Remotely using Microsoft Teams

**Committee:** Mr Tom Hayhoe (Chair)  
Ms Sue Gallone (Accountant)  
Dr Jackie Alexander (Lay)

**Legal Adviser:** Mr David Marshall

**Persons present  
and capacity:** Ms Michelle Terry (ACCA Case Presenter)  
Miss Nicole Boateng (Hearings Officer)  
Miss Hanyu Zhang (Student)  
Ms Junling Gao (Interpreter)

**Summary:** Severe reprimand

**Costs:** £600

1. The Committee heard an allegation of misconduct against Miss Zhang. Ms Terry appeared for ACCA. Miss Zhang was present and represented herself with the aid of an interpreter.
2. The Committee had a main Bundle of papers containing 169 pages, an Assessor's Report of 22 pages and a Service Bundle containing 28 pages. The Service Bundle also contained a considerable amount of material concerning

Miss Zhang's financial position. During the course of the hearing ACCA added an Additional Bundle of 7 pages which contained screenshots of Miss Zhang's bank balance.

### **PRELIMINARY MATTERS**

3. In the Case Management Form Miss Zhang had requested that her case be heard in private '*because my case involves sensitive personal financial information*'. At the start of the hearing, the Chair explained that the normal procedure was that sensitive personal information is not made public. Miss Zhang stated that she did not wish to make an application for the hearing to be in private.
4. Ms Terry applied to amend the Allegations to add the following words to paragraph 6(ii) as follows:

(ii) *In respect of Allegations 1 to 3 liable to disciplinary action pursuant to Bye-law 8(a)(iii).*

5. Miss Zhang did not object. The Committee was satisfied that this was a technical amendment which could not prejudice Miss Zhang. It allowed the amendment.

### **ALLEGATION(S)/BRIEF BACKGROUND**

6. Miss Zhang became a student of ACCA on 13 June 2024. On 5 September 2025 she sat ACCA's Financial Management (FM) exam. This was a conventional examination taken in an exam centre with invigilators. During the course of the exam the invigilators suspected that Miss Zhang was using a mobile phone, contrary to the Examination Regulations. When challenged, she initially denied cheating but the invigilators found a mobile phone concealed in her clothing and the matter was referred for investigation. Miss Zhang then changed her position and fully accepted the allegations against her. She cooperated fully and promptly throughout the investigation. She explained that she was using the phone to access 'a non-internet-connected AI model on my

phone'.

7. Miss Zhang faced the following allegations, as amended:

### **Schedule Of Allegations**

Miss Hanyu Zhang, a student of ACCA, in respect of her centre-based Financial Management (FM) exam taken on 5 September 2025 ('the Exam'):

1. Was in possession of and/or used an unauthorised item, namely a mobile phone during the Exam, contrary to Exam Regulation 5(a) and/or 5(b) and thereby sought to gain an unfair advantage in the Exam and/or a future exam within the meaning of Exam Regulation 6(b).
2. Further to Allegation 1, possessed, used or attempted to use, unauthorised materials, namely written material relevant to the syllabus being examined, contained on the said unauthorised item, contrary to Exam Regulation 4 and thereby sought to gain an unfair advantage in the Exam and/or a future exam within the meaning of Exam Regulation 6(a).
3. Further to Allegations 1 and/or 2, by using the mobile phone during the Exam to access the said unauthorised materials, engaged in irregular conduct designed to assist her in the Exam contrary to Exam Regulation 10.
4. Miss Zhang's conduct in respect of any or all of the above was dishonest, in that:
  - a) She was in possession of and/or used an unauthorised item, namely a mobile phone which she had hidden about her person during the Exam; and/or:
  - b) She intended to use or used an unauthorised item, namely a mobile phone, to access unauthorised materials, namely written material relevant to the Exam syllabus, to gain an unfair advantage for

herself in the Exam.

5. In the alternative, on the same facts, in respect of the conduct referred to in Allegations 1 to 3, failed to demonstrate integrity.
6. By reason of any or all of her conduct, Miss Hanyu Zhang is:
  - (i) Guilty of misconduct pursuant to Bye-law 8(a)(i); or in the alternative:
  - (ii) In respect of Allegations 1 to 3 liable to disciplinary action pursuant to Bye-law 8(a)(iii).
8. At the start of the hearing, Miss Zhang formally admitted all the allegations and the Chair announced that the facts alleged in allegations 1, 2, 3 and 4 had been found proved. Miss Zhang accepted that she was guilty of misconduct but that was a matter for the Committee to decide.

#### **FINDING ON MISCONDUCT**

9. After retiring to consider, the Committee found that Miss Zhang was guilty of misconduct as set out in Allegation 6(i). Dishonestly using a mobile phone during an ACCA examination was a deplorable act for a student. Allegation 6(ii) was in the alternative so did not have to be considered.

#### **SANCTION(S) AND REASONS**

10. Having found the facts proved, the Committee considered what sanction, if any, to impose in light of its findings. It had regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify aggravating and mitigating factors.
11. The finding against Miss Zhang was self-evidently a very serious one. Exam cheating can never be justified. It was aggravated by her initial attempt at denial and concealment, but that was very short-lived. Ms Terry submitted that Miss

Zhang's conduct involved premeditation and planning. Clearly Miss Zhang must have taken a decision to take her phone into the exam with her but the Committee accepted that this may not have been a long-planned act. This is considered further in relation to mitigation. One of the invigilators had felt that it was suspicious that she wore a 'thick coat in such hot weather'. However, Miss Zhang said that the examination room was air-conditioned and cold. The Committee was not satisfied that her coat was evidence of planning.

12. In mitigation, Miss Zhang had no previous disciplinary findings against her, but she had only been an ACCA student for about 15 months at the time of the exam. More significant were the circumstances leading up to this exam. She told the Committee, and it accepted, that this was the second exam she was scheduled to sit. She took one exam the previous day. There had been no incidents in relation to that exam or any other. She said that she had spent the whole summer holiday from June to August preparing for exams. She felt that her exam on 4 September had gone well (no results have been released). [PRIVATE] In an email of 2 October 2025 she said she was *'deeply ashamed and remorseful for my behaviour. My actions showed a complete disregard for the rules that uphold the integrity of the ACCA examinations, and I have let myself down. I have reflected deeply on this incident and I have learned a profound lesson about the absolute importance of professionalism and integrity.'* She reiterated this throughout her comments during the investigation and at the hearing.
13. Miss Zhang produced evidence that she had completed an online course, 'Professional Responsibility and Ethics for Accountants'. She told the Committee that this had altered her view of the ACCA qualification. Previously she had regarded it simply as a route to a well-paying job. Now she understood the responsibilities and obligations of a professionally-qualified accountant.
14. Miss Zhang produced a reference from an academic referee who had taught her and acted as her university mentor. The reference spoke of her *'absolute integrity'* and *'high sense of responsibility'*. The reference stated: *'I firmly believe that this lapse was an isolated incident under extreme pressure'* and contrary to her true nature.

15. The Committee was satisfied that Miss Zhang's misconduct required a sanction. The Committee considered the sanctions of admonishment and reprimand but concluded that these would be inadequate to mark the seriousness of Miss Zhang's actions. The Committee next considered the sanction of severe reprimand. The Guidance says that this sanction can be applied:

*'In situations where the conduct is of a serious nature but there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public, and there is evidence of the individual's understanding and appreciation of the conduct found proved.'*

16. The Committee considered the suggested factors carefully. The misconduct was clearly intentional, although it could be regarded as reckless rather than calculated. Most of the factors were present in this case and the degree of insight, remorse and rehabilitation was unusually high for a student in these circumstances. However, it was not enough to find most of the suggested factors for a severe reprimand. The Committee also had to decide whether a severe reprimand would be a *sufficient* sanction. Miss Zhang had admitted to dishonesty which is a very serious matter for a professional accountant or an aspiring one.
17. The Committee reminded itself of section E.2 of the Guidance for Disciplinary Sanctions. Although there is no tariff for sanctions, the Committee was well aware that removal from the student register would be the most common outcome in an exam cheating case. The Committee considered this balance very carefully, bearing in mind that it is required to impose the minimum sanction necessary to meet the public interests it is here to serve. On balance, the Committee concluded that the unusually high level of mitigation in this case was 'so remarkable or exceptional' as to make severe reprimand a sufficient sanction.

## **COSTS AND REASONS**

18. Ms Terry applied for costs totalling £8,052. She acknowledged that the costs estimated for today's hearing might need to be reduced because it had concluded more quickly than expected. The Committee took into account ACCA's Guidance for cost orders.
  
19. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to a contribution to its costs. The Committee noted the time spent and was satisfied that the rates claimed were reasonable, subject to a reduction to the time allowed for today's hearing. However, the critical factor in the assessment of costs in this case was not the time incurred (assessed at UK prices) but the ability of the student to pay. Miss Zhang gave detailed information about her circumstances in China and her and her family's means. She produced evidence of the amount held in her bank account. [PRIVATE]. It considered that an appropriate contribution to costs in light of her representations would be £600. The Committee recognised that even that sum would be a significant burden and it hopes that ACCA will be able to agree a payment schedule over a period.

## **EFFECTIVE DATE OF ORDER**

20. This order will take effect at the normal time, at the expiry of the appeal period.

## **ORDER**

21. The Committee ordered as follows:
  - (a) Miss Hanyu Zhang shall be severely reprimanded.
  
  - (b) Mr Miss Hanyu Zhang shall make a contribution to ACCA's costs of £600.

**Mr Tom Hayhoe**  
**Chair**  
**14 April 2025**