

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr Liang Yang

Heard on: Wednesday, 19 August 2026

Location: Remote via Microsoft Teams

Committee: Mr Tom Hayhoe (Chair)
Mr Ryan Moore (Accountant)
Mr Samantha Lipkowska (Lay)

Legal Adviser: Mr Charles Apthorp (Legal Adviser)

**Persons present
and capacity:** Ms Hena Patel (Case Presenter on behalf of ACCA)
Ms Aimee Murphy (Hearings Officer)
Mr Liang Yang (Affiliate)

Summary: Allegations 1a and c, Allegations 2a and c, Allegation 4, found
proved

Sanction: Removal from Affiliate Register

Costs: £250

1. The Committee confirmed that it was not aware of any conflicts of interest in relation to the case.

2. In accordance with Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ("the Regulations"), the hearing was conducted in public.
3. The hearing was conducted remotely through Microsoft Teams.
4. ACCA was represented by Ms Hena Patel, Counsel. Mr Yang was in attendance assisted by an interpreter.

SERVICE OF PAPERS

5. The Committee considered the service bundle (1) with pages numbered 1- 24 in order to determine whether the Notice of Hearing ("the Notice") dated 21 July 2026 had been served in accordance with the provisions of the Complaints and Disciplinary Regulations 2014 (amended 2020) ("the Regulations")
6. The Notice had been sent to Mr Yang's registered email address held on file by ACCA and in the Committee's view complied with the other requirements of the Regulations.
7. The Committee was satisfied that this was effective service under the Regulations.
8. The Committee were provided with the following bundles: Hearing bundle (1-433), Separate Bundle (1-136), Service Bundle (1-24), Bundle 2 (1-4) and a financial bundle (1-100).
9. The Committee had read the papers prior to the hearing.

Schedule of Allegations

Liang Yang ('Mr Yang'), at all material times an ACCA trainee:

- 1) *Whether by himself or through a third party, applied for membership to ACCA on or about 17 October 2022 and in doing so purported to confirm in relation to his ACCA Practical Experience training record:*

- a) *His Practical Experience Supervisor (IFAC qualified external supervisor) in respect of his practical experience training in the period from 09 March 2019 to 17 October 2022 was Person A when Person A did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all*
- b) *His Practical Experience Supervisor (non IFAC qualified line manager) in respect of his practical experience training in the period from 9 March 2019 to 17 October 2022 was Person B when Person B did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all*
- c) *He had achieved all or any of 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 8: Analyse and interpret financial reports*
 - *Performance Objective 9: Evaluate investment and financing decisions*
 - *Performance Objective 11: Identify and manage financial risk*
 - *Performance Objective 13: Plan and control performance*

2) *Mr Yang's conduct in respect of the matters described above was:*

- a) *In relation to Allegation 1 a), dishonest in that Mr Yang sought to confirm his Practical Experience Supervisor was Person A and Person A supervised his practical experience training in accordance with ACCA's requirements or otherwise which he knew to be untrue*
- b) *In relation to Allegation 1 b), dishonest in that Mr Yang sought to confirm his Practical Experience Supervisor was Person B and Person B supervised his practical experience training in accordance with ACCA's requirements or otherwise which he knew to be untrue*

- c) *In relation to Allegation 1 c), dishonest in that Mr Yang knew he had not achieved all or any of the performance objectives referred to in Allegation 1 c) above as described in the corresponding performance objective statements*
 - d) *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), 2b) and 2c) above, such conduct was reckless in that Mr Yang paid no or insufficient regard to ACCA's requirements to ensure:*
- a) *His practical experience was supervised;*
 - b) *His Practical Experience Supervisor, Person A, was able to personally verify the achievement of the performance objectives he claimed and/or verify they had been achieved in the manner claimed;*
 - c) *That the performance objective statements referred to in paragraph 1c) accurately set out how the corresponding objective had been met;*
 - d) *His Practical Experience Supervisor, Person B, was able to personally verify he had achieved 43 months of relevant practical experience.*
- 4) *By reason of his conduct, Mr Yang 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 3 above.*

10. Mr Yang at the outset of the hearing denied each of the allegations.

BRIEF BACKGROUND

11. Mr Yang was registered as an ACCA affiliate, referred to here as a trainee, on the 17 October 2022.

12. Mr Yang after completing his exams is required to obtain at least 36 months of practical experience, which is recorded in his Personal Experience Requirement ("PER") training record. The record is completed using an online tool, 'MyExperience'.
13. 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
14. It is a requirement that the relevant practical experience is signed off by a qualified supervisor. In addition the description of the experience in the trainee's record should be unique to each trainee. Mr Yang's PER was compared to other trainees and were found to be similar or identical to other trainees.
15. It is an ACCA requirement that 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 practical experience supervisor. 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.
16. 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. It is also necessary that the trainees have also passed all their ACCA exams and successfully completed ACCA's Ethics module.
17. The PER training records of fifteen ACCA trainees, of which Mr Yang was one, were reviewed by ACCA's Professional Development Team. This review has revealed these fifteen trainees shared most of the same PO statements as each other and/or shared

the same supervisors. The PO statements for these fifteen trainees were approved between 11 August 2021 and 17 October 2022. It is a requirement of ACCA that 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.

18. The 2019 ACCA published guide states:

'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.'

19. On 17 October 2022, Mr Yang requested that Person A approve all of his nine PO's and Person A appeared to do so on the same day.
20. The Supervisor details for Mr Yang stated that Person B, registered on 17 October 2022 as his 'Non IFAC qualified line manager', was requested to approve his time/experience of 43 months on 17 October 2022 and Person B appeared to do so the same day.
21. As part of the investigation ACCA contacted Person A to check whether he had supervised 12 of the trainees. Person A initially confirmed that he had supervised each trainee as he had claimed in the on-line submissions. The ACCA investigator requested Person A sign consent forms to enable ACCA to approach the two firms he claimed to have worked at during the period of supervision.
22. Person A responded on 22 December 2023 advising he wished to resign from ACCA. He then went on to state:

"I did not read your email carefully, so I would like to correct some of the information. (Company A) is not the one you found, it's just a private organization I started with a few friends, but it's not officially registered, it just happens to overlap in the English name. (Company B) is also not officially registered, but a private organization set up by my friends and me. And both are no longer existing. I'm sorry that the above problems have caused trouble to your previous work, and considering that some of my behaviors are inappropriate, I decide to give up my ACCA membership, as I wrote at the beginning.'

23. Person A emailed the ACCA investigator on the 12 January 2024 stating:

'...After careful consideration, I would like to be honest with you:

- (1) I did not have any supervision over those trainees, as they were all recommended by acquaintances or contacted through other channels.*
- (2) I have not worked in any company either, as I am still unemployed to this day. The two companies mentioned in earlier emails are indeed unofficially-registered private organizations that I orally created with a few friends a long time ago, but are no longer exist for a long time and have no relation to this PER experience supervision. (I don't know if they happen to have the same name as real organizations in English or Chinese language, but considering that they were only established orally long long ago and have no connection to the outside and have no longer existed for a very long time, I can make sure that they have no influence on others.)*
- (3) Therefore, the whole thing is actually that those trainees or their representors contacted me through acquaintances or other channels, but I did not supervise their work. In the previous investigation phase, all the materials I provided to you were untrue, and I deeply apologize for this behavior.*

As I mentioned in my previous email, I voluntarily give up my ACCA membership in order to protect the public interest and comfort myself. Recently, my depression has recurred, so this has caused a strong mental distress for me. I hope you can draw a conclusion and inform me as soon as possible based on my truthful statement above. Appreciate much and look forward to your reply...'

24. The ACCA investigator sent further emails to Person A, however no further communications have been received from him to date.

25. The ACCA investigator sought further information from Person B regarding his management of trainees. He was requested to provide consent for ACCA to contact the firms at which he alleged he was employed and no response was received.

26. The statements in Mr Yang's PO statements contained in his PER record were compared with the other trainees in this cohort. In carrying out this analysis, 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.
27. In relation to Mr Yang the analysis showed that none of his PO statements were first in time and nine of his PO statements were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort. Mr Yang's PO1 PO3, PO4 and PO8, were similar or identical to five other trainees.

Response of Mr Yang

28. Mr Yang was contacted by ACCA investigations team and asked to respond to nine specific questions. On the 19 October 2023 he responded by email stating:

"1. The description of PO in my PER task is similar to that of many people. This may be because I met some problems when writing PO, and I did not know how to better reflect the content and value of my work. Therefore, I asked some domestic consulting institutions for help, and the counseling content given by these consulting institutions was similar to that of other students. This is probably the main cause of the problem

2.The signatory who helped me sign the PO, he may not abide by the principle of honesty and trustworthiness of financial personnel, he provided signatures for many people, which I did not know at all

My employer and working hours are true, and I can also provide appropriate certification materials. Through the content of this email, I have deeply realized my wrong decision. I have a request, could you help me withdraw the PO content of PER and the supervisor's signature? I will re-organize, write and submit the application. If you can help me withdraw the application and submit it again, I will be very grateful."

29. As Mr Yang had not responded to all nine numbered questions in ACCA's letter, a further encrypted email was sent to Mr Yang on 25 October 2023 with a copy of the letter and other documents attached to the previous email. In the covering email Mr Yang was

reminded of his obligation to cooperate by responding to all the questions in the letter and to do so by 08 November 2023.

30. Mr Yang responded on 08 November 2023 and stated:

"Because I was busy with work, I found this Person B, and I sent my resume and ACCA account information to him, and got rid of the writing of letting him complete the performance goal. Then he did not write the performance goals according to my resume, and he was in

Before submitting, I didn't notify me to see if my performance goals were reasonable. I am sorry for the stupid mistakes I committed. I should independently complete the writing of performance goals, submit, and should not leak the ACCA account to others."

31. Mr Yang was asked by ACCA's investigator to confirm by 27 April 2024 that Person A had not supervised his POs and that if it is asserted that he had supervised Mr Yang to provide evidence of this supervision. Mr Yang responded:

"I need to correct a problem with the content of your email. As I replied in the email before: Person A only acts as an external supervisor to authorize, not as my direct leader. He only authorized PO, not my work experience. I entrusted a third party unregistered personal consulting agency to handle my PO authorization, and I had an interview with the personal agency and provided my resume and all my work records. I was promised to relay my work and resume to my supervisor.

My work experience and hours are real and meet the requirements for membership. Since I am not familiar with the operation process of PER, the personal consulting agency that helped me did not deal with it according to my real situation, which led to this result, so I am very sorry.

I am not clear about the current professional situation of Person A, and there are no more supporting documents to support his supervision.

I hope ACCA can allow me to change my signature and rewrite my PO to meet the membership application criteria."

ACCA Submissions

32. Ms Patel referred to the written submissions and drew the Committee's attention to the analysis of the cohort of POs and the responses of Person A and B. Ms Patel also submitted that Mr Yang had admitted not being supervised by Person A and that Person B had not supervised him as his line manager. Ms Patel also referred the Committee to the responses of Mr Yang, Person A and the statement of ACCA's Professional Development Co-Ordinator, to which there were a number of relevant exhibits including a copy of the online PER tool.
33. Ms Patel made submissions on the issue of misconduct and referred the Committee to the case of Roylance and byelaw 8(a).

Mr Yang's evidence and submissions

34. Mr Yang gave evidence and was cross-examined. Mr Yang referred to documents he had provided to ACCA which were stamped with the company seal. Mr Yang also provided copies of the original draft POs which were admitted as Bundle 2 (pages 1 - 4).
35. Mr Yang gave evidence that Person A provided advice to his firm on investment several days per week and was an external adviser helping with his work. He went on to state that he didn't know why Person A had responded to ACCA denying that he had supervised him, he had made an earlier response stating he had supervised him. He suggested Person A may have made the later response out of anger. Mr Yang stated that he was unaware that Person A had supervised other trainees.
36. In respect of Allegation 1b Mr Yang stated that Person B was the Financial Director of the company, he had contact with him and Person B had line management responsibility for him. He stated that he had provided documents to prove this and referred the Committee to p.159 in the hearing bundle where there was a certificate stamped with the company stamp. The document set out his role at the Real Estate Company where he was employed.
37. In respect of allegation 1c the PO, Mr Yang gave evidence that he had drafted a version

of the PO from his own experience and he had submitted the drafts to Persons A and B for review. He went on to state that they had thought there was some problem with the words used. He stated that the contents reflects his work practice. Mr Yang also stated he had sought advice from ACCA in China and the customer service for the relevant procedure. He went on to state that before making the application to be a member he did not know Person A claimed to supervise other trainees and that he did not know that his PO statement submitted was similar or identical to other trainees. If he had done so he would have contacted ACCA in China for advice.

38. Mr Yang gave evidence that he had asked both Person A and B to '*make replies to ACCA*' and that he did not know why Person A had blocked him and that he had no way to challenge what he had said regarding his supervision. He also informed the Committee that he had used a third-party consulting firm to prepare the PER and had assistance from his line manager in responding to ACCA's investigation.
39. Mr Yang was cross examined by Ms Patel. Mr Yang was asked about his exams and his supervised practice. He stated that the nine POs submitted reflected his practice. He stated that the POs were reviewed by his supervisor prior to being submitted. Mr Yang was referred to ACCA's evidence from the Professional Development Co-ordinator at paragraph 21 of their statement which stated the supervisor is required to work closely the trainee and have direct experience or the PO. He confirmed that this was the case.
40. Mr Yang was referred to his response where he stated that he had consulted a domestic consulting institution. Mr Yang stated that when he made his replies to ACCA he composed the response in Chinese and the software translated it into English, which may have led to errors in translation. He stated he had sent his first drafts of the POs to his supervisors for feedback then submitted them on-line himself.
41. Mr Yang also stated he had approached Person B then discovered he was not IFAC qualified and then in revising his PO statements was referred to Person A. Ms Patel put to Mr Yang he was providing multiple accounts, which he denied. He also denied knowing that Person B was supervising other trainees and if he had been made aware of this he would have contacted ACCA to find out if he was suitable.
42. It was put to Mr Yang he had not been supervised by Person B. In his response he

explained that there were 8 persons in his department and he did the basic work. Person B was the head of department and he was assessed by him. In respect of the PO statements he stated in response to a question that the final version reflected more closely to his work and was in compliance with ACCA requirements.

43. Mr Yang denied he had been dishonest, lacked integrity or was reckless.

44. Both Ms Patel and Mr Yang made closing submissions.

DECISION ON FACTS/ALLEGATION(S) AND REASONS

45. The Committee considered all of the documentary evidence before it, the oral evidence of Mr Yang and the submissions of Ms Patel and of Mr Yang.

46. The Committee accepted the advice of the Legal Adviser, which included reference to the applicable burden and standard of proof.

Allegation 1a – proved

47. The Committee determined that there was evidence from Person A, the email to ACCA on the 12 March 2024, that he had not supervised Mr Yang's practical experience training in accordance with ACCA's requirements. The Committee noted that Mr Yang had confirmed that this was correct in his response to the ACCA investigator's questions in April 2024 and his account provided in oral evidence.

48. Accordingly, the Committee found Allegation 1a to be proved.

Allegation 1b - not proved

49. The Committee determined that there was no evidence that Person B had not acted as Mr Yang's practical experience supervisor. Mr Yang in his oral evidence relied upon the Certificate from his employer, at p.159. of the hearing bundle) and the evidence that Person B was the Financial Manager of the firm. The Committee noted and took into account that the certificate was considered in China to be good evidence of the contents.

50. The Committee considered that ACCA had a strong circumstantial case, but there was vagueness in the evidence and the Committee determined that ACCA had not proved its case on the balance of probabilities. In particular Person B was in a supervisory role at the firm, albeit not in direct immediate supervision of Mr Yang. But as head of department would have supervisory responsibilities and the extent to which they were exercised by Person B in respect of Mr Yang was unchallenged.
51. Accordingly, the Committee found Allegation 1b not proved.

Allegation 1c – proved

52. The Committee in finding Allegation 1c proved took into account that Mr Yang's PO statements were not first in time and, having reviewed them, concluded that they were strikingly similar and/or identical to other trainees alleged to have been supervised by Person A.
53. The Committee noted the PO statements provided by Mr Yang in Bundle 2 and noted the difference in those drafts and those submitted to ACCA by on behalf of Mr Yang to support his application to be a member and the evidence from Mr Yang of the amendments made to his PO statements. It therefore found that the POs submitted to ACCA as part of the application did not appropriately reflect the experience of Mr Yang.
54. Accordingly, the Committee found Allegation 1c to be proved.

Allegations 2a, and c

55. The Committee considered allegation 2a, b and c together as they formed part of the PER submission to ACCA prepared and submitted together. In reaching its determination the Committee took into account Mr Yang's response to ACCA's investigator where he stated that *"Person A only acts as an external supervisor to authorize, not as my direct leader. He only authorized PO, not my work experience. I entrusted a third party unregistered personal consulting agency to handle my PO authorization,"*.

56. In the Committee's view Mr Yang was aware of the ACCA requirements both as to supervision and content of PO Statements. Further that the PO statements being submitted to ACCA by a '*consulting agency*' were not his work, he was aware he had not been supervised by Person A.
57. Having determined Mr Yang's knowledge and state of mind at the relevant time the Committee determined by applying the standards of ordinary decent people that this conduct, applying to be a member of ACCA by submitting false PO statements which did not reflect his experience, was dishonest.
58. The Committee did not go on to consider allegation 2b as allegation 1 b was found not proved.
59. The Committee, having found allegations 2a, and c proved, did not consider allegations 3 a - d which were again put in the alternative.

MISCONDUCT AND LIABILITY TO DISCIPLINARY ACTION

60. In relation to Allegations 1a and c and 2a and c the Committee considered that Mr Yang's dishonest conduct undermined the process of the qualification to become a member of ACCA. This was in the Committee's view a serious breach of the regulations striking at the core role of the Regulator, to maintain standards and public confidence in the profession. In addition, this conduct brought discredit upon Mr Yang, the profession and undermined public confidence in the ACCA.
61. The Committee determined that using the POs of other trainees, submitting them to ACCA purporting to be his own work to obtain membership, was an act of serious dishonesty. In the Committee's view it was a breach of a fundamental expectation of the profession to be open and honest and undermined the protections put in place to protect the public.
62. The Committee found that allegations 1a and c and 2a and c taken together amounted to serious misconduct.
63. The Committee concluded that Mr Yang was liable to disciplinary action pursuant to bye-

law 8(a)(iii) in respect of allegations 1 and 2 and found misconduct proved in respect of Allegation 4.

SANCTION(S) AND REASONS

64. Ms Patel, the case presenter, made submissions on the appropriate and proportionate sanction. The Committee received advice from the Legal Adviser and in determining the appropriate and proportionate sanction considered the least restrictive sanctions first before moving onto the more serious ones.

ALLEGATIONS 1, 2 AND 4

65. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions (2026). It first sought to identify aggravating and mitigating factors.
66. In respect of mitigating factors Mr Yang had no previous disciplinary findings against him. That was a mitigating factor, although not a strong one given his status as an ACCA affiliate of less than 2 years standing. It also took account of his engagement in the investigatory process and his previous good character. In the Committee's view there was limited mitigation.
67. The Committee considered the aggravating factors in relation to these allegations. In the Committee's view it was an aggravating factor that there was limited evidence of remorse or insight into what the Committee considered to be serious breaches. It took into account that the dishonesty was a one off over a short period of time, but it was not a spur of the moment breach, as the conduct was premeditated. In addition, it was an aggravating factor that Mr Yang had sought to undermine the integrity of the application process to be a member and a deliberate course of conduct for personal benefit and has deceived his regulator to work as a professional accountant.
68. The Committee considered that the dishonesty was at the more serious end of the scale of dishonest conduct and that there was a continuing risk to the public.
69. The Committee took into account of section E2 of the ACCA Guidance for Disciplinary

Sanctions regarding findings of dishonesty.

70. The Committee considered that taking no further action or imposing an admonishment did not reflect the seriousness of the conduct and noted that there was limited evidence of insight.
71. In respect of a reprimand the Committee considered the dishonest conduct to be serious and not minor. Given the lack of significant insight the Committee considered that a Severe Reprimand was not a sufficient sanction as there was a continuing risk to public confidence, the potential risk of harm and the risk to validity of the ACCA qualification process.
72. The Committee considered the factors listed at C5.1 in the guidance. It noted that in addition to showing limited insight or remorse there was no reflection. The Committee also took into account the factual admissions made by Mr Yang.
73. The Committee took account of the guidance at E2.3 and concluded that there was no remarkable or exceptional mitigation presented by Mr Yang which would warrant anything less than exclusion from membership. It also took into account the importance of protecting the integrity of the profession's qualification process and therefore determined that the only proportionate sanction was to direct that Mr Yang be excluded from membership.

COSTS AND REASONS

74. Ms Patel applied for costs totalling £11,158.
75. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to its costs. The Committee also recognised that it needed to consider the principle that the majority of those paying ACCA's fees should not be required to subsidise the minority who, through their own misconduct, have found themselves subject to disciplinary proceedings. The Committee considered that the time spent, and the sums claimed were reasonable. It was not appropriate to make a reduction as the hearing had run for a full day. Therefore the reasonable costs are assessed to be £11,158.

76. There was information before the Committee about Mr Yang's means, which he stated were limited and that he had no savings. The Committee noted Mr Yang's statement of Financial Position, which showed he [REDACTED].
77. The Committee took account of paragraph 27 of the Guidance of Costs Orders and noted that a Statement of Financial Position had been provided. The Committee having considered the submissions and the Statement of Financial Position determined that a full order for costs would cause Mr Yang significant financial hardship. The Committee directed that he pay £250 towards ACCA's costs.

IMMEDIATE ORDER

78. Ms Patel invited the Committee to direct that the order come into effect immediately. She submitted it was necessary to protect the public and in the public interest and referred to the findings of the Committee in support.
79. The Committee considered it was not necessary for the order to come into effect immediately. The Committee concluded that there was no risk to the public and to the validity of ACCA's process due to Mr Yang's inability to hold himself out as member of the ACCA as he was not presently working.

ORDER

80. The Committee ordered as follows:
- (a) Mr Yang shall be excluded from the ACCA Register.
 - (b) Mr Yang shall make a contribution to ACCA's costs of £250.

Mr Tom Hayhoe
Chair
19 August 2026