Think Ahead ACCA

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: **Miss Grace Tynan**

Heard on: **Wednesday, 26 August 2026**

Location: **Remotely by Microsoft Teams**

Committee: **Mr David Tyme (Chair)**
Mr Kalwant Grewal (Accountant)
Mr Nigel Pilkington (Lay)

Legal Adviser: **Miss Juliet Gibbon**

Persons present and capacity: **Mr Ryan Ross (Case Presenter on behalf of ACCA)**
Miss Grace Tynan (Student)
Miss Nicole Boateng (Hearings Officer)
Ms Joy Julien (ACCA Appointments Board)

Outcome: **Allegations 1, 2, 3, 4, 5, 6a, 6b, 6c, 6d and 9a (Misconduct) proved**

Sanction: **Severe Reprimand**

Costs: **Ordered to pay a contribution to ACCA's costs in the sum of £1,000.00.**

PRELIMINARY

1. The Disciplinary Committee ("the Committee") convened to hear allegations of misconduct made against Miss Grace Tynan. The hearing was conducted remotely through Microsoft Teams. The Committee had a Bundle of papers numbered pages 1 to 94, a Tabled Additionals Bundle, numbered pages 1 to 8, and a Service Bundle, numbered pages 1 to 20. During Miss Tynan's evidence she provided the Committee with a character reference from her employer. At the sanctions stage the Committee was provided with detailed and simple costs schedules by ACCA and a completed Statement of Financial Position by Miss Tynan.

2. Mr Ryan Ross represented ACCA. Miss Tynan attended the hearing but was not represented.

APPLICATION FOR PART OF THE HEARING TO BE HELD IN PRIVATE

3. Mr Ross made an application, on behalf of Miss Tynan, for parts of the hearing to be held in private when reference is made to Miss Tynan's health or family life.

4. The Committee accepted the advice of the Legal Adviser, who referred it to Regulation 11(1)(a) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014, as amended.

5. The Committee determined that parts of the hearing where reference is made to Miss Tynan's [PRIVATE]. It considered that Miss Tynan's right to privacy outweighed the public interest in holding all of the hearing in public.

ALLEGATIONS

Miss Grace Tynan, an ACCA student:

1. On or around 5 October 2024 accepted a personal loan of £8,000 from Person A, a non-audit client of her employer, Firm A in breach of their internal polices and rules for Professional Conduct.

2. On or around 11 November 2025 altered a work paper reference in relation to the loan received from Person A to conceal the nature and/or recipient of the loan from Firm A.

3. On or around 14 November 2025 gave false and misleading responses to questions regarding the loan transaction and/or denied accepting a loan from a client when asked by Firm A.

4. In the Annual Declaration Form 2025/26, gave false and misleading responses regarding the loan transaction and personal relationship with Person A.

5. By reason of the conduct in Allegation 1, Miss Tynan failed to comply with R112.1 of the fundamental principle of professional objectivity and/or R115.1(c) of the fundamental principle of professional behaviour (as applicable in 2024).

6. In respect of Allegations 2 - 4, Miss Tynan was dishonest in that she sought to represent that:

   a. The loan transaction was not connected to her, when this was not true.

   b. She sought to conceal the true nature of the transaction from Firm A.

   c. She denied knowledge of the transaction when asked to provide information by a Partner of Firm A.

   d. She failed to disclose receipt of a loan from a client when asked in Firm A's Annual Declaration Form 2025/26.

7. In the alternative, on the same facts, in respect of the conduct referred to in Allegations 2-4, Miss Tynan failed to demonstrate integrity.

8. In the further alternative the conduct referred to in Allegations 2-4 was reckless.

9. By reason of any or all of her conduct set out above, Miss Tynan is:

   a. Guilty of misconduct pursuant to Bye-law 8(a)(i), or

   b. In the alternative, liable to disciplinary action pursuant to Bye-law 8(a)(iii) in respect of Allegation 1.

BACKGROUND

6. Miss Tynan was admitted as a student of ACCA on 20 September 2022. She has been employed as a Trainee Accountant employed with Firm A since September 2019.

7. Miss Tynan self-referred herself to ACCA on 01 December 2025. In her letter to ACCA, Miss Tynan stated the following:

"*I am writing to self-report a matter in line with ACCA's ethical requirements. I am doing so proactively, as I fully recognise the importance of transparency, integrity, and accountability as a trainee accountant.*

Summary of the matter

In October 2024, during a period of severe personal difficulty, I accepted a personal loan from a non-audit client of my firm, who is also a long-standing personal friend. I did not realise at the time that accepting a personal loan from a client required disclosure under my firm's policies or the ACCA Code of Ethics, as I considered it a private matter between friends.

I subsequently saw the loan appear in the client's company bank account rather than my friend's personal account, which shocked me and caused considerable *embarrassment. Out of worry and confusion, I amended the working paper reference, not to conceal the transaction permanently, but to allow time to speak with the partner in charge and properly disclose the matter. I did not intend to mislead or gain any personal advantage, and I have since repaid a significant portion of the loan and continue to repay the remaining balance of* [PRIVATE].

The matter was then identified by a colleague and reported internally. I fully cooperated with the investigation. Following a disciplinary process, my employer issued me a final written warning, taking into account my long service, historical performance character, cooperation, and the personal circumstances surrounding the incident.

[PRIVATE]

I deeply regret not handling the matter correctly and earlier particularly as the firm has always provided support to its employees.

Reflection and learning

This incident has been a serious learning experience. I now fully understand:

- *that any personal financial dealings with clients must be disclosed, regardless of the informal or personal nature of the relationship;*

- *that transparency is essential in maintaining trust in the profession;*

- *that even unintentional actions can give rise to ethical risks.*

- *that my primary duty as an ACCA trainee is to uphold professional standards and act in the public interest, even in challenging personal circumstances. I am committed to applying this understanding in all future professional matters, ensuring that transparency, accountability, and integrity guide my actions.*

I have taken steps to ensure this will never happen again, including:

- *Seeking regular guidance on ethical matters,*
- *Reviewing ACCA's Code of Ethics and my firm's policies in detail*
- *Proactively disclosing any circumstances that could give rise to perceived conflicts.*

Request for guidance

I am reporting this matter myself because I want to ensure I act in accordance with ACCA's standards. I sincerely hope that ACCA will consider the genuine personal difficulties I was facing, the lack of any intention to benefit improperly, my cooperation, and my commitment to learning from this incident.

I would be grateful for any guidance on any further steps required and am willing to provide any additional information.

Thank you for your time and understanding".

8. The matter was referred to ACCA's Investigation Team. A Senior Investigations Officer ("SIO") wrote to Miss Tynan on 28 January 2026 asking her to provide further information. Miss Tynan replied on 10 February 2026 stating the following in response to the questions asked by the SIO:

   Miss Tynan replied to the SIO on 10 February 2026 stating the following in response to the questions asked:

   "*I have not directly undertaken any work for the client since April 2025. However, I was indirectly involved by assisting with the training and support of junior colleagues who were completing work for the client.*
   Appropriate safeguards were in place for all clients. All correspondence and work with which I and anyone else does, for all clients, is subject to review by a manager

and subsequently by a partner before being finalised and issued to the client. This review process also applies to emails sent to clients. In addition, staff rotation was maintained to ensure that responsibility for the client did not rest with a single individual, thereby reducing the risk of familiarity threats.

Since November 2025, I have been formally removed from the engagement and have had no further professional involvement with the client, nor will I have any going forward.

[PRIVATE] *and am not undertaking work for any clients at this time.*

Evidence of repayments from my online banking are attached, showing monthly repayments of [PRIVATE].

9. Miss Tynan enclosed copies of all relevant documentation including evidence of the repayments and documentation relating to Firm A's disciplinary investigation, including the outcome letter confirming a final written warning.

10. Miss Tynan also stated:

"*I would like to emphasise that the loan was a personal arrangement with an individual who was a longstanding friend, and at the time I did not believe this would impair my professional judgement,* [PRIVATE].

However, I fully acknowledge the importance of maintaining both independence and the appearance of objectivity in accordance with ACCA's ethical principles.

Since this matter was raised, I have reflected carefully on the circumstances and recognise that, regardless of intent, such arrangements can create a perceived threat to objectivity. I have cooperated fully with my employer throughout their investigation and complied with all measures put in place, including my removal from the client engagement.

I remain committed to upholding the highest professional and ethical standards in my work and will ensure that greater care is taken in the future to identify and avoid situations that could give rise to similar threats".

11. An email from a partner at Firm A, dated 14 November 2025, was included in the documentation provided by Miss Tynan. It stated that they had spoken to Miss Tynan and asked her what the transactions were in Person A's account. She had responded that she was unaware of the transactions and that they should ask Person A.

12. There was a further email from another partner, also dated 14 November 2025, which stated that they had spoken to Person A and they said that they had offered and made a loan to Miss Tynan for [PRIVATE]. The email also stated that Person A had informed the partner that Miss Tynan had not wanted to take the loan, but they had insisted as they wanted to help her. Person A also told the partner that they did not want Miss Tynan to get into trouble because of the loan.

13. A disciplinary hearing took place on 19 November 2025 in relation to Miss Tynan accepting a loan from a client. The allegations against Miss Tynan were:

    1. *In breach of our internal policies and rules for Professional Conduct and in accordance with Institute of Chartered Accountants Code of Ethics, you have secured a personal loan from [Person 1] and did not disclose this.*

    2. *You have failed to disclose the loan from [Client A]. This is despite us sending, and you completing an annual declaration to us.*

    3. *When the transaction was questioned, you stated you were unaware of the transaction to [a partner].*

    4. *To try and cover up the loan you altered the transaction to change the reference from '[PRIVATE]'.*
    5. *You have breached the trust and confidence that needs to exist between us where you have breached our policies and ICAEW Code of Ethics, failed to*

disclose the loan, sought to cover up the loan and denied any knowledge of the loan to [a partner].

14. Miss Tynan admitted all of the allegations at her disciplinary hearing and all the allegations were found proved on the basis of her admissions. Miss Tynan was issued with a Final Written Warning with conditions. The letter stated:

The conditions of the Final Written Warning are that you:

- *Self-report yourself to the ACCA and give an honest account of what happened and accept its findings (if you are struck off we will not be able to continue your employment);*

- *Are required to have strong supervision which means you lose the flexibility you currently have; no work from home and no flexi hours. We need you to be in the office where we can listen in to phone calls and closely monitor your work;*

- *Are not able to send any e-mails or written communication of any form to clients without a review from a Senior, Partner or Manager and they must be (and remain) copied in on all communication;*

- *Are not allowed to speak to any clients without a Senior, Partner or Manager being included in the call; and*

- *Are removed from doing any work directly or indirectly for [Person A], including any of their companies or their family's companies*.

15. The letter stated:

"*These conditions will apply for the remainder of your training, when we will review whether we have sufficient trust restored in you to re-introduce some flexibility and/or responsibility*".

16. The SIO wrote to Miss Tynan again by email on 16 February 2025 asking her for further information. Miss Tynan replied on 17 February 2026 stating:

"*The amendment was made in November 2025 as this is when I first discovered the loan had been made from a company bank account, whilst assisting/ training a junior colleague who was preparing working papers, for the company annual financial statements.*

I saw the loan in the client's company bank statements within the working papers, which [PRIVATE] *I amended the working paper reference, not to conceal the transaction permanently, but to allow time to speak with the partner in charge and properly disclose the matter, once I had become aware of it*" *(sic)*.

17. Miss Tynan sent written representations for the Independent Assessor to consider as follows:

"*I would like to request that the independent assessor takes into consideration the mitigating circumstances shown in my initial self-report email to the ACCA … within the 'Report of disciplinary and allegations bundle')* [PRIVATE].

[PRIVATE]

I would never intentionally be dishonest or deceitful as that is not the type of person I am.

I have been with my firm for over 6 years and until this situation I had never breached any rules or regulations, or been involved in any kind of disciplinary action.

All members of my firm know me and my character extremely well and also know how much my job and ACCA membership mean to me, [PRIVATE] *are the reasons my employment was not terminated, which I am extremely grateful for as not only do I love my job,* [PRIVATE].

[PRIVATE].

For these reasons and more, I would like to assure you and the ACCA that this will never happen again.

Please let me know if you would like me to provide character references to support and assist with your review".

18. Miss Tynan completed a Case Management Form ("CMF") in which she admitted all of the Allegations.

19. The allegations were read out by the Hearings Officer at the start of the hearing. Miss Tynan made admissions to Allegations 1, 2, 3, 4, and 5 and the Chair announced the facts of those allegations proved, in accordance with Regulation 12(3)(c).

20. Mr Ross presented the background to the case to the Committee.

ORAL EVIDENCE OF MISS TYNAN

21. Miss Tynan gave oral evidence to the Committee. She told the Committee that she had never intended to be dishonest or to lack integrity or act recklessly. She just panicked having noted the loan was referenced in the paperwork for the client's accounts. She explained that she had acted in the way she did due to her lack of understanding of procedures and not having sufficient knowledge. [PRIVATE]**.**

22. Miss Tynan informed the Committee that she had wanted to give an explanation to the managing partner before other people in the Firm found out about the loan. She said that when she saw the loan on the client's work papers she had [PRIVATE] and had subsequently denied the existence of the loan to a partner on the telephone because she had wanted to inform the managing partner of Firm A of the loan transaction before she told anyone else. Miss Tynan stated that she didn't want to make any excuses for her actions but said that they had not been intentional. She told the Committee that she had not realised that she needed to

disclose the loan in her Annual Declaration Form because it had been a personal loan from a friend, who also happened to be a client of Firm A.

23. Miss Tynan told the Committee that her membership of ACCA was very important to her and that [PRIVATE]. She said that she made ‘silly’ decisions on the spur of the moment. She said that she was not trying to hide anything and thought that she was doing the right thing in terms of Firm A. She said she had not considered ACCA’s ethical standards. She did not consider herself to be a dishonest person.

24. Miss Tynan was cross-examined by Mr Ross, and questions were put to her by the Committee. Miss Tynan reiterated that she had wanted to inform the managing partner of the loan transaction before anyone else and that is why she had not disclosed knowledge of it when asked by another partner about it over the telephone. She said her behaviour had not been calculated. She confirmed that she had not realised that she had to disclose the loan from Person A on the Annual Declaration Form. She accepted that she had ‘lied’ to the partner over the phone, but she did so in order to disclose the loan transaction to the managing partner before anyone else. She said that ˙she wasn’t being intentionally dishonest. Miss Tynan stated that [PRIVATE].

25. Miss Tynan stated that she loved her job and Firm A. She said she was disappointed in herself and held her hands up to her conduct. Miss Tynan said that she hadn’t been trying to ‘pull the wool over anyone’s eyes’. She borrowed a sum of money from Person A, who was a friend and a client of Firm A which was paid into her personal account. She repaid it in instalments from her personal account to Person A’s personal account. She was unaware at the point of obtaining the loan that it would appear in the client’s work paper at Firm A. Miss Tynan said that she thought that she was doing the right thing, but she wasn’t and the situation had been ‘a huge learning curve’ for her. Miss Tynan said that she hadn’t been aware of all of Firm A’s internal policies, but she accepted that she should have. She said she was aware of ACCA’s ethical standards, but not in sufficient detail. She confirmed that she had completed her CPD requirements with ACCA that included an ethics component; she had completed Firm A’s training, which included ethics and professional skills and had received guidance on ethics related matters. Miss

Tynan reiterated that she had made poor decisions and had let everyone down, including herself. She told the Committee that she now understands why a loan from a client must be disclosed.

SUBMISSIONS ON DISHONESTY AND MISCONDUCT

26. Mr Ross invited the Committee to categorise the allegations found proved as dishonest. He referred the Committee to the test for dishonesty as set out in the case of *Ivey v Genting Casinos* (UK) Ltd t/a Crockfords [2017] UKSC 67 ('Ivey'). Mr Ross referred the Committee to Miss Tynan's conduct in altering the work paper; informing a partner that she was unaware of the loan and not giving details of the loan on the Annual Declaration Form. He submitted that it was obvious that Miss Tynan knew what she was doing as she was trying to 'buy time' in order to speak to the managing partner and, by so doing, she was concealing the fact of the loan.

27. Mr Ross submitted that based on all the evidence before it, both oral and documentary, the Committee could be satisfied that Miss Tynan knew that what she was doing was dishonest and her conduct would be considered dishonest by the standards of ordinary decent people. In the alternative Mr Ross submitted that Miss Tynan had failed to demonstrate integrity or her conduct had been reckless.

28. Mr Ross referred the Committee to Bye-law 8(c) and the case of *Roylance v The GMC* [2000] 1 AC 311 ('Roylance'). He submitted that Miss Tynan's conduct fell short of the standards expected of a student of ACCA. He referred the Committee to the fact that Miss Tynan was up-to-date with her ethical training and submitted that one would have expected her to be honest and up-front when confronted with the situation.

29. Miss Tynan referred to the character reference provided on her behalf by an Assistant Manager with Firm A. She told the Committee that 'this whole situation is not something I'd ever do with any intention'. Miss Tynan invited the Committee to take her good character and mitigating circumstances into account when reaching its decision on the disputed facts and misconduct.

DECISION ON DISHONESTY AND MISCONDUCT

30. The Committee accepted the advice of the Legal Adviser. It noted that although Miss Tynan had admitted all of the allegations on her CMF, she had denied Allegations 6a, 6b, 6c and 6d at the start of the hearing. The Committee was satisfied, however, that in altering the client's work paper, Miss Tynan had sought to represent that the loan transaction was not connected to her; she had also sought to conceal the true nature of the loan transaction from her employer; she had denied knowledge of the loan transaction when asked to provide information about it by a partner of Firm A and she had failed to disclose receipt of the loan from Person A when completing Firm A's Annual Declaration Form for the period 2025/26.

31. The Committee went on to consider whether Miss Tynan's actions in respect of Allegations 2 to 4 had been dishonest. It noted Miss Tynan's oral and written evidence that she had panicked and altered the client's work paper in order to avoid the embarrassment of other employees finding out about her difficult financial and personal difficulties. It also noted that she had denied any knowledge of the loan to a partner of the Firm because she had wanted to inform the managing partner of Firm A of the loan transaction before anyone else found out about it.

32. The Committee determined, however, that whilst Miss Tynan's actions were likely to have been as a result of her initial panic at seeing her name on the client's work paper and her wish to inform the managing partner of Firm A before anyone else, she had clearly acted dishonestly in attempting to conceal the loan transaction. In relation to Miss Tynan's failure to disclose receipt of the loan from Person A when asked on Firm A's Annual Declaration Form, the Committee determined that she had deliberately failed to put details of the loan from Person A, a client of the firm, on the form and had, therefore, acted dishonestly.

33. The Committee was satisfied on the balance of probabilities that Miss Tynan would have known that her conduct as set out in Allegations 6a, 6b, 6c and 6d was dishonest and, in accordance with the Ivey test, it concluded that Miss Tynan's

conduct would also be considered to be dishonest by the standards of ordinary decent people.

34. The Committee, therefore, found Allegations 6a, 6b, 6c and 6d proved on the balance of probabilities.

Allegation 9 – Misconduct Found

35. The Committee went on to consider if the facts found proved in relation to Allegations 1, 2, 3, 4, 5, 6a, 6b, 6c and 6d amounted to misconduct. It took into account the definition of misconduct provided in Bye-law 8c and the test for misconduct as set out in the case of Roylance.

36. In the Committee's view, Miss Tynan's dishonest conduct undermined the integrity of ACCA as a regulator of students and had brought discredit to her, the Association and the accountancy profession.

37. Accordingly, the Committee found that Miss Tynan's conduct fell short of the standards expected of a student of ACCA and amounted to misconduct.

SUBMISSIONS ON SANCTION AND COSTS

38. Mr Ross did not invite the Committee to impose a specific sanction. He referred the Committee to ACCA's 'Guidance for Disciplinary Sanctions' and, in particular, section E2 which provides specific guidance on dishonesty cases.

39. Mr Ross reminded the Committee that the purpose of a sanction is not to be punitive, although it may have that effect, and that any sanction must be proportionate and strike a balance between the public interest and Miss Tynan's ability to continue practising as a student of ACCA.

40. In terms of aggravating features, Mr Ross referred to there being multiple breaches by Miss Tynan, including breaches of Firm A's policies; ACCA's Fundamental Principle of Objectivity and ACCA's Fundamental Principle of Professional

Behaviour. Mr Ross also invited the Committee to find that Miss Tynan's initial attempt to cover things up to be an aggravating feature of the case. In terms of mitigating features, Mr Ross referred to Miss Tynan's engagement with ACCA; her self-referral to ACCA; her reflection, insight and apology and her positive good character.

41. Mr Ross invited the Committee to direct that it is in the public interest for the order to have immediate effect if it considers that removal from the student register is the appropriate sanction.

42. In respect of costs, Mr Ross referred the Committee to the two costs schedules. He submitted that the costs claimed by ACCA of £5,525.50 had been reasonably incurred but he accepted that the Committee would need to take account of Miss Tynan's limited financial means, as set out in her completed Statement of Financial Means. Mr Ross, on behalf of ACCA, accepted that what was set out in the statement was genuine and bona fides.

43. Miss Tynan told the Committee that to be excluded from membership of ACCA would be devastating to her. She said that membership of ACCA meant a lot to her. She also told the Committee that [PRIVATE]. She stated, however, that she understood the seriousness of her situation and had to accept the consequences of her actions.

SANCTION AND REASONS

44. In reaching its decision on sanction, the Committee considered the submissions made by Mr Ross and Miss Tynan. The Committee referred to the Guidance for Disciplinary Sanctions issued by ACCA and bore in mind the fact that the purpose of a sanction was not to punish Miss Tynan, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct and that any sanction it imposed must be proportionate. The Committee accepted the advice of the Legal Adviser.

45. When deciding on the appropriate sanction, the Committee carefully considered the aggravating and mitigating features of the case.

46. The Committee considered that Miss Tynan's misconduct involved the following aggravating features:

    a. She should have been aware that accepting a loan from a client of Firm A was in breach of Firm A's internal policies and rules for professional conduct.

    b. She had initially attempted to cover up the fact of the loan transaction from Person A from her employer.

    c. She was in a position of trust at Firm A.

47. The Committee considered that the mitigating features in the case were as follows:

    a. At the relevant time [PRIVATE].
    b. Miss Tynan had made early admissions both to her employer and ACCA and had fully cooperated during both investigations.
    c. Miss Tynan has demonstrated good insight, genuine remorse and has apologised for her conduct.
    d. Miss Tynan had no previous disciplinary findings recorded against her and was of previous good character.
    e. Miss Tynan has made regular loan repayments to Person A and did not benefit financially from her dishonest conduct.
    f. There is no evidence of any client harm.
    g. Robust safeguards have been put in place by her employer who wishes to continue to employ Miss Tynan if she is not removed from ACCA's student register.

48. The Committee determined that Miss Tynan's acceptance of the loan from a client and her dishonest misconduct were serious.

49. The Committee went on to consider what, if any, was the appropriate and proportionate sanction to impose in this case. It did not consider that it would be appropriate, or in the public interest, to take no further action or to order an admonishment in a case where a student of ACCA had acted dishonestly in the workplace.

50. The Committee then considered whether to reprimand Miss Tynan. The guidance indicates that a reprimand would be appropriate in cases where the misconduct is of a minor nature; there appears to be no continuing risk to the public and there has been sufficient evidence of an individual's understanding; together with genuine insight into the misconduct found proved. The Committee did not, however, consider that Miss Tynan's misconduct was of a minor nature. Accordingly, the Committee concluded that a reprimand would not adequately reflect the seriousness of the misconduct in this case.

51. The Committee next considered whether a severe reprimand would adequately reflect the seriousness of the case. The guidance indicates that such a sanction would usually be applied in situations where the conduct is of a serious nature but where there are particular circumstances of the case, or mitigation advanced, which satisfies 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. The guidance suggests that this sanction may be appropriate where most of the following factors are present:

    a. The misconduct was not intentional and no longer continuing.
    b. Evidence that the conduct would not have caused direct or indirect harm.
    c. Insight into failings.
    d. Genuine expression of regret/apologies.
    e. Previous good record.
    f. No repetition of failure/conduct since the matters alleged.
    g. Rehabilitative/corrective steps taken to cure the conduct and ensure future errors do not occur.
    h. Relevant and appropriate references.
    i. Co-operation during the investigation stage.

52. The Committee considered that almost all of the factors for a severe reprimand were present in Miss Tynan's case. She had admitted the majority of the allegations and whilst her misconduct had been intentional, it was no longer continuing; her misconduct had not caused any direct or indirect harm; she has shown good insight into her failings; she has a previous good record; there has been no repetition since the matters alleged; rehabilitative/corrective steps have been taken by Miss Tynan in that she has undertaken self-learning in relation to ethics and professional behaviour; she has provided a very positive reference from her employer, who deemed her conduct to be 'out of character' and she had fully co-operated with ACCA during the investigation stage. [PRIVATE].

53. The Committee noted that ACCA provides specific guidance on the approach to be taken in cases of dishonesty, which is regarded as a particularly serious matter, even when it does not result in direct harm and/or loss, because it undermines trust and confidence in the profession. The Guidance states that the courts have consistently supported the approach to exclude members from their professions where there has been a lack of probity and honesty and that only in exceptional circumstances should a finding of dishonesty result in a sanction other than exclusion.

54. The Committee considered all the mitigating features of the case. It also took into account the fact that Miss Tynan's dishonest misconduct had occurred as a result of her initial panic upon seeing reference to the loan transaction in her name in Person A's work papers for one of their company's accounts. Prior to this she had believed that the loan of [PRIVATE] had been a personal loan from Person A's personal account, to which she was making the monthly loan repayments. The Committee accepted Miss Tynan's explanation that she had concealed reference to her name on the client's work paper in order to avoid the embarrassment of other employees seeing it and finding out about [PRIVATE]. The Committee also noted that Miss Tynan had dishonestly given a false response to her manager when asked about the loan because she wanted to inform the managing partner of the Firm about the loan first. It also noted that Miss Tynan had not benefitted financially from her dishonest conduct and that she has been making regular repayments of the loan to Person A. [PRIVATE] but remains employed by Firm A.

It is clear that although she had acted as she did, her employer had retained confidence in her because she had been allowed to continue working for Firm A.

55. The Committee considered all of the above and determined that the mitigation provided was remarkable and exceptional and in all the circumstances the sanction of removal from the student register would not be a proportionate sanction. The Committee was of the view that a severe reprimand was the appropriate and proportionate sanction that would adequately reflect the seriousness of Miss Tynan's dishonest misconduct and take account of the remarkable and exceptional mitigation presented by her.

56. The Committee therefore ordered that Miss Tynan shall be severely reprimanded.

DECISION ON COSTS AND REASONS

57. The Committee was provided with two schedules of costs. ACCA applied for costs in the sum of £5,525.50 in respect of the investigation against Miss Tynan and the hearing.

58. The Committee had a detailed statement of financial information and supporting documentation from Miss Tynan which sets out [PRIVATE]**.**

59. The Committee was satisfied that the costs sought by ACCA were appropriate and had been reasonably incurred. It determined, however, that the costs claimed should be reduced to reflect Miss Tynan's [PRIVATE].

60. The Committee determined that, in all the circumstances, it would be fair and proportionate to order Miss Tynan to pay a contribution to ACCA's costs in the sum of £1,000.00.

ORDER

i. Miss Grace Tynan shall be severely reprimanded.

ii. Miss Grace Tynan shall pay a contribution to ACCA's costs in the sum of £1,000.00.

Mr David Tyme
Chair
26 August 2026