

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Mr Shahzaib Ahmed Khan
Heard on:	Friday, 13 February 2026
Location:	Remotely via Microsoft Teams
Committee:	Mrs Colette Lang (Chair) Ms Morenike Asaju (Accountant) Ms Caroline Robertson (Lay)
Legal Adviser:	Mr Matthew Kewley
Persons present and capacity:	Ms Joanna La Roche (ACCA Case Presenter) Ms Aimee Murphy (Hearings Officer)
Summary	Allegations 1, 2, 4 and 5(a) proved Exclusion from membership
Costs:	Mr Khan ordered to pay ACCA's costs in the sum of £6,620

INTRODUCTION

1. The Disciplinary Committee ("the Committee") met remotely to hear allegations against Mr Shahzaib Ahmed Khan ("Mr Khan"). Mr Khan was not present and was not represented at the hearing. ACCA was represented by Ms Joanna La Roche.

2. The Committee was provided with a hearing bundle consisting of 63 pages and a service bundle consisting of 19 pages.

PRELIMINARY MATTERS

Service of papers

3. The Committee first considered whether the Notice of Hearing had been served in accordance with regulations 10 and 22 of the Complaints and Disciplinary Regulations 2014 (“the Regulations”).
4. The Notice of Hearing was dated 16 January 2026. The Committee was satisfied that the Notice of Hearing contained all of the information required under regulation 10(b) of the Regulations.
5. The Committee noted that the Notice of Hearing and all relevant documents were sent to Mr Khan by email to his registered email address on 16 January 2026.
6. Under regulation 10(1)(b) of the Regulations a Notice of Hearing sent by email is deemed served on the day it is sent. The Committee was satisfied, therefore, that the 28 day notice period in regulation 10(1)(a) of the Regulations had been satisfied.
7. In all of the circumstances the Committee determined that the Notice of Hearing had been served in accordance with the relevant Regulations.

Proceeding in absence

8. In considering whether to proceed in the absence of Mr Khan the Committee reminded itself that the discretion must be exercised with the utmost care and caution. The Committee also reminded itself that in *General Medical Council v Adeogba* [2016] EWCA Civ 162 Sir Brian Leveson observed that there was a burden on all professionals subject to a regulatory regime to engage with the regulator in relation to the investigation and resolution of allegations.

9. The Committee noted that Mr Khan had not engaged with ACCA's investigation at any point. Mr Khan had been given multiple opportunities to engage with ACCA but had not done so. ACCA emailed Mr Khan on 21 January 2026, 03 February 2026 and 09 February 2026 to confirm that Mr Khan could attend the hearing by telephone or video link and that ACCA would meet the costs of an interpreter if needed. On 12 February 2026 ACCA sent Mr Khan the link to join the hearing. Mr Khan did not respond to ACCA. In all of the circumstances, the Committee was satisfied that Mr Khan had deliberately and voluntarily absented himself from the hearing.
10. The Committee considered whether an adjournment of the hearing was likely to secure Mr Khan's attendance on a future date. In circumstances where Mr Khan had failed to engage with ACCA the Committee was satisfied that there was no likelihood at all that an adjournment would secure Mr Khan's attendance in the future.
11. In considering the extent of any disadvantage in proceeding in Mr Khan's absence, the Committee noted that it had some information about Mr Khan's response to the allegations made during his employer's investigation.
12. The Committee considered that there was a general public interest in the expeditious disposal of regulatory proceedings and that hearings should take place within a reasonable timeframe. The allegations in this case date back to July 2023 and the complaint to ACCA was made on 8 April 2025.
13. In all of the circumstances, the Committee considered that it was appropriate to proceed in the absence of Mr Khan, particularly in light of his lack of engagement with the proceedings.

ALLEGATIONS

14. Mr Khan faced the following allegations:
 1. *Between 01 July 2023 and 30 November 2024 submitted false expenses claims to Firm A, being his then employer, amounting to approximately £29,552.25*

2. *By reason of the matters referred to in paragraph 1 above, was dishonest in that he knew the expenses claims he submitted were false and did not represent expenses to which he was entitled to receive reimbursement.*
3. *In the alternative, in respect of the conduct referred to in allegations 1 and 2 above has failed to demonstrate integrity.*
4. *Failed to co-operate with ACCA's Investigating Officer in breach of Complaints and Disciplinary Regulation 3(1) in that he failed to respond at all to any or all of ACCA's correspondence dated:*
 - a) *29 July 2025;*
 - b) *30 July 2025; and:*
 - c) *12 August 2025.*
5. *By reason of the above conduct Mr Khan is*
 - a) *Guilty of misconduct pursuant to bye-law 8(a)(i); or in alternative:*
 - b) *Liable to disciplinary action pursuant to bye-law 8(a)(iii).*

BACKGROUND

15. Mr Khan became a member of ACCA on 25 July 2019.
16. On 08 April 2025 ACCA received a complaint from Person 1 (Employee Relations and Wellbeing Coordinator) at Firm A. Mr Khan was employed by Firm A between 19 June 2023 and 06 February 2025. The complaint arose following Mr Khan's dismissal from Firm A due to falsified expense claims made during Mr Khan's employment.
17. Shortly before joining Firm A Mr Khan was sent an email on 15 May 2023 by a member of staff in Firm A's Talent Attraction and Acquisition team stating that Mr Khan was not eligible for '*relocation/accommodation*' and that he should make his own travel arrangements.

18. In January 2025 Firm A appointed an investigator to investigate allegations that Mr Khan had allegedly made multiple claims for expenses that Mr Khan was not entitled to claim. It was alleged that Mr Khan had claimed approximately £29,552.25 in respect of relocation expenses including 26 flights between July 2023 and November 2024. It was also alleged that Mr Khan had made two claims on 28 February 2024 and 24 April 2024 for £297 each in respect of Mr Khan's annual ACCA membership fees.
19. Firm A's investigator met with Mr Khan to discuss the allegations on 23 January 2025. Firm A's Investigation Report records that Mr Khan admitted during the meeting that he had made falsified expense claims to help pay for medical costs for a sick relative in [PRIVATE] Mr Khan offered to repay the money to Firm A but said that he would need to do so through an instalment plan.
20. Following the meeting on 23 January 2025 Firm A's investigator sent an email to Mr Khan summarising the meeting. Firm A's investigator noted that Mr Khan had acknowledged during the meeting that he was not entitled to claim the expenses but stated that he thought he was entitled to do so as they were approved on Firm A's expenses portal. Mr Khan then admitted to claiming all of the expenses '*fraudulently*' and admitted editing a number of the receipts using a PDF editor.
21. On 30 January 2025 Mr Khan attended a disciplinary meeting chaired by a Partner in Firm A. The disciplinary meeting outcome letter recorded that Mr Khan had admitted to making '*fraudulent expense claims*' in relation to relocation expenses and ACCA membership fees. Mr Khan was summarily dismissed by Firm A with effect from 6 February 2025.
22. Following Firm A's complaint to ACCA on 08 April 2025, ACCA wrote to Mr Khan using his registered email address on 29 July 2025 and 30 July 2025. ACCA invited Mr Khan to provide information in relation to the complaint and made Mr Khan aware of his duty to co-operate with ACCA in accordance with regulation 3(1) of the Regulations. Mr Khan then changed his ACCA registered email address on 31 July 2025. ACCA wrote to Mr Khan again on 06 August

2025 and 12 August 2025 using both Mr Khan's original and updated email address. Mr Khan never responded to ACCA's requests for information.

23. On 01 August 2025 Firm A notified ACCA that Mr Khan had been instructed to repay £29,552.25 in respect of the expense claims plus an ACCA membership fee claim of £297. As of 27 June 2025, Firm A had not received any repayments from Mr Khan.
24. On 17 December 2025 ACCA reviewed information held on ACCA's case management system which showed that ACCA's emails to Mr Khan on 29 July 2025, 30 July 2025 and 12 August 2025 had been opened by the recipient.

DECISION ON ALLEGATIONS AND REASONS

Allegation 1

25. The Committee first considered the email sent to Mr Khan on 15 May 2023 by a member of staff in Firm A's Talent Attraction and Acquisition team. The email stated:

'...as mentioned earlier in the process you aren't eligible for relocation/accommodation so please go ahead and make your own travel arrangements'. The Committee considered that this email was clear and unambiguous. The only reasonable interpretation of this email was that Mr Khan was not eligible to claim relocation expenses.

26. The Committee then had regard to the table of expense claims sent to Mr Khan by Firm A in an email dated 23 January 2025. The table showed that Mr Khan had made a large number of expense claims between approximately July 2023 and November 2024 described in the table as relocation expenses. The Committee also noted that the data showed that Mr Khan had made two separate claims on 28 February 2024 and 24 April 2024 for £297 each in respect of ACCA annual membership fees. Mr Khan was only entitled to make one claim for ACCA annual membership fees.

27. The Committee also took into account Mr Khan's responses as summarised in Firm A's Investigation Report dated 23 January 2025 and in the investigator's email to Mr Khan also dated 23 January 2025. Firm A's Investigation Report recorded that Mr Khan admitted during a meeting on 23 January 2025 that he had made falsified expense claims to help pay for the medical costs for a sick relative in [PRIVATE]. The investigator's email following this meeting recorded that Mr Khan had acknowledged that he was not entitled to claim the expenses but stated that he thought he was entitled to do so as they were approved on Firm A's expenses portal. Mr Khan then admitted to claiming all of the expenses 'fraudulently' and admitted editing a number of the receipts using a PDF editor.
28. The Committee also considered Mr Khan's email to Firm A's investigator dated 23 January 2025 in which Mr Khan stated that he was 'compelled' due to the severe medical condition of a relative which had a profound impact on Mr Khan.
29. The Committee was satisfied, on the balance of probabilities, that Mr Khan had made multiple false expense claims to Firm A as alleged in allegation 1.
30. Allegation 1 was found proved.

Allegation 2

31. The Committee considered whether Mr Khan had acted dishonestly by submitting false expense claims to Firm A. The Committee had regard to the test for dishonesty set out in *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67.
32. The Committee carefully considered Mr Khan's explanations for his actions including that he was not aware of the 'policy in question' in relation to relocation expenses. Mr Khan also stated to Firm A that he thought he was entitled to claim the expenses because they had been approved on Firm A's expenses portal. The Committee found this explanation to be unconvincing and implausible. The only reasonable interpretation of the email sent to Mr Khan on 15 May 2023 by a member of staff in Firm A's Talent Attraction and Acquisition team was that Mr Khan was not entitled to claim relocation expenses. Mr Khan

knew that he was not entitled to claim relocation expenses but did so repeatedly over a prolonged period of time.

33. The Committee also took into account Mr Khan's admission to his employer that he had claimed relocation expenses '*fraudulently*' and that he had edited a number of receipts using a PDF editor. Mr Khan told his employer that he did so in order to pay the medical bills of a sick relative.
34. The Committee found that Mr Khan's actions would be regarded as dishonest by the standards of ordinary decent people.
35. Allegation 2 was found proved.

Allegation 3

36. In light of the Committee's decision to find allegation 2 proved, the Committee did not go on to consider allegation 3.

Allegation 4

37. The Committee had regard to ACCA's correspondence to Mr Khan dated 29 July 2025. This correspondence invited Mr Khan to answer a number of questions and provide information to ACCA in relation to the complaint made by Firm A. Mr Khan was asked to provide the required information to ACCA by 12 August 2025. The Committee also noted that this correspondence specifically reminded Mr Khan of his duty to co-operate under regulation 3(1) of the Regulations. The Committee noted that ACCA wrote again to Mr Khan on 30 July 2025. Mr Khan did not respond to this correspondence.
38. On 31 July 2025 Mr Khan updated his registered email address in his ACCA online account.
39. On 06 August 2025 ACCA wrote to Mr Khan using both his original email address and the newly updated email address.

40. On 12 August 2025 ACCA wrote to Mr Khan pointing out that he had not responded to ACCA's earlier correspondence. Mr Khan was again reminded of the duty to co-operate under regulation 3(1) of the Regulations. Mr Khan was given an extended deadline of 19 August 2025 in which to respond but did not do so.
41. On 17 December 2025 ACCA reviewed information held on ACCA's case management system which showed that ACCA's emails of 29 July 2025, 30 July 2025 and 12 August 2025 had been opened by the recipient.
42. The Committee was satisfied that Mr Khan was under a professional obligation to co-operate and respond to ACCA but he did not do so. Mr Khan repeatedly failed to respond to any of ACCA's requests for information. As such, Mr Khan's conduct breached the duty to co-operate under regulation 3(1) of the Regulations.
43. Allegation 4 was found proved.

Allegation 5

44. In considering whether the facts found proved amounted to misconduct, the Committee took into account that Mr Khan had repeatedly made false expense claims to his employer. Mr Khan's dishonesty was sustained and repeated on multiple occasions which led to him receiving a significant financial benefit that he was not entitled to receive. The Committee noted that Mr Khan's dishonest conduct began around one month after joining Firm A and continued until December 2024.
45. As to Mr Khan's failure to engage with ACCA, the Committee noted that Mr Khan was given multiple opportunities to respond to ACCA but did not do so. Mr Khan updated his email address on 31 July 2025 and the emails sent to Mr Khan by ACCA on 29 July 2025, 30 July 2025 and 12 August 2025 had been opened. The Committee found that Mr Khan's failure to engage with ACCA was deliberate.

46. The Committee considered that Mr Khan's sustained dishonest conduct and his repeated failure to co-operate with ACCA amounted to a very serious falling short of the required standards of conduct of an ACCA member. In the Committee's view, Mr Khan's conduct could properly be described as deplorable. In these circumstances, the Committee found that all of the facts found proved amounted to misconduct.
47. Allegation 5(a) was found proved in respect of allegations 1, 2 and 4.
48. In light of this finding the Committee did not go on to consider whether Mr Khan was liable to disciplinary action pursuant to bye-law 8(a)(iii) as alleged in allegation 5(b).

SANCTION AND REASONS

49. In reaching its decision the Committee had regard to ACCA's Guidance for Disciplinary Sanctions. The Committee kept in mind that the purpose of a sanction was not to punish Mr Khan but to protect the public interest which included the protection of members of the public and the maintenance of public confidence in the profession.
50. The Committee considered possible mitigating factors and identified the following:
 - a. Mr Khan may have been experiencing difficult personal circumstances at the time, although the Committee had only limited information available;
 - b. Mr Khan has no previous disciplinary findings;
 - c. Mr Khan had made some limited acknowledgment of his actions during the course of Firm A's investigation.
51. The Committee identified the following aggravating features of the case:
 - a. Mr Khan's dishonesty was premeditated and involved the deliberate falsification of expense claims for financial gain;

- b. Mr Khan's dishonesty commenced around one month after joining Firm A and continued until his dishonesty was discovered by Firm A;
 - c. Mr Khan received a significant financial sum as a direct result of his dishonesty;
 - d. Firm A suffered actual financial loss which Mr Khan has failed to repay;
 - e. Mr Khan has not shown any insight or remorse for his actions.
52. The Committee then considered the available sanctions starting first with the least serious.
53. The Committee considered whether to take no further action or to admonish Mr Khan. The guidance indicates that admonishment may be appropriate in cases involving insight into the failings and genuine expressions of remorse. The Committee considered that none of those factors had been demonstrated in this case. The Committee also considered that taking no further action or admonishing Mr Khan would be insufficient to reflect the overall seriousness of the conduct found proved.
54. The Committee then considered whether to reprimand Mr Khan. The Committee considered the guidance in relation to reprimands which states that a reprimand may be appropriate where the conduct is of a minor nature and there is evidence of an individual's understanding and genuine insight into the conduct found proved. The Committee reminded itself that Mr Khan had repeatedly made false expense claims to his employer. Mr Khan's conduct was not minor in nature and in these circumstances, the Committee did not consider that a reprimand would reflect the seriousness of the facts found proved.
55. The Committee then considered a severe reprimand. The guidance states that a severe reprimand may be appropriate 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 facts found proved.

The Committee noted that Mr Khan has failed to engage with the process and has not shown any insight into his actions. Mr Khan has not demonstrated any remorse or apology for his actions. The Committee had regard to Mr Khan's explanation that he acted as he did in order to pay for medical bills for a sick relative. The Committee did not, however, accept that this justified Mr Khan's serious dishonesty. The Committee considered that a severe reprimand would be insufficient to mark the seriousness of the misconduct in this case.

56. The Committee concluded that the appropriate sanction was exclusion from membership. The Committee found that Mr Khan's sustained and repeated dishonesty was fundamentally incompatible with continued membership. Mr Khan deliberately falsified expense claims for his own financial gain. This led to Mr Khan receiving a significant amount of money that he was not entitled to receive. Mr Khan's dishonesty continued for a sustained period until his actions were discovered by Firm A. Mr Khan then deliberately failed to engage or co-operate with ACCA during the investigation into Firm A's complaint.
57. Members of the public must be able to trust accountants. Mr Khan's behaviour could seriously undermine public trust and confidence in the accountancy profession. Mr Khan abused the trust that Firm A placed in him by repeatedly making false expense claims for his own financial benefit. Mr Khan has not reflected or shown any insight into his actions and he has not demonstrated any remorse. The Committee concluded that Mr Khan was, therefore, liable to repeat his dishonesty in the future. In all of the circumstances the only sanction that will protect the public and reflect the gravity of Mr Khan's actions is exclusion from membership.

COSTS AND REASONS

58. ACCA applied for costs in the sum of £7,320. The Committee was provided with a simple and detailed schedule of costs. The Committee had regard to ACCA's Guidance for Cost Orders and kept in mind the principle that the majority of a membership body should not be required to subsidise the minority who through their own failings have found themselves subject to disciplinary proceedings.

59. The Committee did not receive any evidence as to Mr Khan's financial circumstances.
60. The Committee carefully considered the application and found that Mr Khan was liable to pay ACCA's costs. The case had been properly brought by ACCA and the Committee had found the allegations proved.
61. The Committee then considered the amount claimed by ACCA. The Committee found that the sum claimed was fair and reasonable, subject to a deduction of £700 to reflect the length of time taken to conclude the hearing.
62. The Committee made a costs order in the sum of £6,620.

EFFECTIVE DATE OF ORDER

63. The Committee determined that the exclusion order will take effect at the expiry of the appeal period.

ORDER

64. The Committee made the following order:
 - a. Mr Khan shall be excluded from ACCA membership.
 - b. Mr Khan shall make a contribution to ACCA's costs in the sum of £6,620.

Colette Lang
Chair
13 February 2026