

HEARING

ADMISSIONS AND LICENSING COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr Ibrar Ashraf

Heard on: Thursday, 26 February 2026

Location: Remotely via Microsoft Teams

Committee: Mr Martin Winter (Chair)
Mr Kalwant Grewal (Accountant)
Mr Andrew Skelton (Lay)

Legal Adviser: Ms Giovanna Palmiero (Legal Adviser)

**Persons present
and capacity:** Ms Joanna La Roche (ACCA Case Presenter)
Miss Mary Okunowo (Hearings Officer)

Summary Application for re-admission refused.

INTRODUCTION

1. The Admissions and Licensing Committee (“the Committee”) met to consider an application by Mr Ibrar Ashraf for re-admission to ACCA’s register pursuant to Regulation 14 of The Chartered Certified Accountants Membership Regulations 2014 (amended 01 January 2023) (The Regulations)

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2. Ms Joanna La Roche (Ms La Roche) presented the case on behalf of the ACCA.
3. Mr Ibrar Ashraf did attend and was not represented.
4. The Committee had confirmed that it was not aware of any conflicts of interest in relation to the case.
5. In accordance with Regulation 3(7) The Chartered Certified Accountants' Authorisation Regulations 2014 the hearing was conducted in public.
6. The hearing was conducted remotely via Microsoft Teams.
7. The Committee was provided with, and considered in advance, the following documents:
 - (i) Hearing Bundle with pages numbered 1-79.
 - (ii) Supplementary Bundle with pages numbered 1-56.
 - (iii) Tabled Additional Bundles with pages numbered 1-2.
 - (iv) Service Bundle with pages numbered 1-22.

BACKGROUND

8. On 26 April 2019, Mr Ashraf became a member of ACCA.
9. On 12 July 2022, Mr Ashraf was removed from ACCA membership as a result of the findings of the Disciplinary Committee in respect of the allegations below:

Allegations

Mr Ibrar Ashraf, at all material times an ACCA trainee:

1. Submitted or caused to be submitted to ACCA on or about 23 March 2017 an ACCA Practical Experience training record which purported to confirm:
 - a) His Practical Experience Supervisor in respect of his practical experience training in the period 01 January 2014 to 31 December 2016 was Person B when Person B did not and/or could not

supervise his practical experience training in accordance with ACCA's requirements as set out and published in ACCA's PER Guidance (the Guidance).

b) He had achieved:

- Performance Objective 3: Strategy and innovation;
- Performance Objective 7: Prepare external financial reports; and
- Performance Objective 17: Tax planning and advice.

2. Mr Ibrar Ashraf's conduct in respect of the matters described in allegation 1 above was:

a) In respect of allegation 1a, dishonest, in that Mr Ibrar Ashraf sought to confirm his supervisor did and could supervise his practical experience training for the period referred to in allegation 1a above in accordance with ACCA's requirements which he knew to be untrue.

b) In respect of allegation 1b, dishonest, in that Mr Ibrar Ashraf knew he had not achieved the performance objectives referred to in paragraph 1b above as described in the corresponding performance objective statements or at all.

c) In the alternative, any or all of the conduct referred to in paragraph 1 above demonstrates a failure to act with integrity.

3. In the further alternative to allegations 2a and or 2b above, such conduct was reckless in that it was in wilful disregard of ACCA's Guidance to ensure:

a) His Practical Experience Supervisor met the specified requirements in terms of qualification and supervision of the trainee; and /or

b) That the statements relating to the performance objectives referred to in paragraph 1b above accurately set out how the corresponding objective had been met.

4. By reason of his conduct, Mr Ibrar Ashraf 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.

10. Regulation 3(a) of ACCA's Membership Regulations provides that an ACCA trainee cannot become a member of ACCA until they have completed three years of approved work experience, in accordance with ACCA's Practical Experience Requirement ('PER'). Trainees must achieve the requisite number of "Essential" and "Technical" Performance Objectives ('PO') by gaining experience and completing a personal statement for each PO, which are signed off by the trainee's Practical Experience Supervisor ('PES').

11. Mr Ashraf was identified as one of fifty-two ACCA trainees who submitted or caused to be submitted to ACCA that some or all of their practical experience training had been supervised by Person B (the PES), including at times when Person B was not qualified, and further in doing so submitted one or more performance objective ('PO') statements that were identical or near identical, to one or more of Person B's other trainee's PO statements or the same or similar to Person B's own PO statements which he included when completing his own training in 2016.

12. ACCA's investigation concluded that Person B had not worked closely with Mr Ashraf and was not familiar with Mr Ashraf's work, such that they would be permitted to act as Mr Ashraf's supervisor and that these facts should have been or were known by Mr Ashraf.

13. Further, Person B couldn't have been Mr Ashraf's supervisor when working as an Audit and Corporate Executive during most of the period claimed (a total of 36 months between 01 January 2014 and 21 December 2016), because Person B didn't become an ACCA member and therefore able to supervise trainees, until 23 September 2016.

14. At the Disciplinary Committee hearing on 12 July 2022, the Committee found the allegations particularly serious. Mr Ashraf had been found to be complicit in and entirely aware of participating in an arrangement that enabled him to qualify as a member of ACCA illegitimately and improperly. The Committee considered this dishonest behaviour, involving a level of premeditation, deception, and collusion with another, that amounted to misconduct. Mr Ashraf was excluded

from ACCA membership and ordered to pay £4,000 costs to ACCA in respect of the allegations previously referred to. Mr Ashraf was unable to make any application for readmission for a minimum period of 12 months in accordance with Regulation 14(2) of ACCA's Membership Regulations.

15. In August 2023, Mr Ashraf submitted an application for readmission to ACCA Membership.
16. Mr Ashraf's application for readmission was initially listed on 05 February 2025 before the Admissions and Licensing Committee. This hearing was adjourned on the basis that even if the Committee determined that Mr Ashraf had satisfied it that he was eligible for re-admission by virtue of his general character and suitability for such re-admission, he could not be readmitted as a member because he could not satisfy Membership Regulation 3(a)(ii) - namely that he had completed three years of approved experience in accordance with the association's Practical Experience Requirement ("PER").
17. Following Mr Ashraf's subsequent submission of a PER record, there is a statement from Person A dated the 09 December 2025 in the Supplemental bundle confirming:

"On 5 November 2025, I confirmed that I was happy to accept Mr Ashraf's PER record. When confirming the acceptability of Mr Ashraf's PER record, I also highlighted the above noted concerns regarding his and his supervisor's conduct. The statements contained in his revised PER record are acceptable and we have also received confirmation that he has the required 36 months of experience in relevant accounting and finance roles".

ACCA SUBMISSIONS

18. ACCA opposes the application to be readmitted as an ACCA member by Mr Ashraf.
19. ACCA have been provided with a copy of Mr Ashraf's readmission application form, professional references and employment documentation.
20. In his application, Mr Ashraf explains the factual circumstances which led to his removal from ACCA membership. He states:

'As it is a peak season in [REDACTED] (Jan to June), so my [e]mployer was not able to sign my PER/performance objectives. Due to unawareness of the requirements from ACCA for PER & supervision I asked one of my friend if [they] can sign off my PER. Later it was found that three performance objective are matching with someone else. Later my employer reconfirmed that I have worked on the same in my tenure...All this mistake was due to unawareness of the rules for PER. I can rewrite all or these three again & my employer will sign it again'.

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

'Back in year 2017, I was not aware of the requirement & technicalities for a supervisor to act in this capacity, that is why things went wrong but now spending time in practice [sic] life now I have the experience & knowledge for such thing & I would not be get [sic] involve by not knowing the indepth [sic] knowledge & believe blindly on friends sayings. At that time due to lack of knowledge the situation was a bit scary for me because my employer was not able to sign off my PER due to workload that is why i get it sign off from a person with whom I was doing personal assignments & [they] was use to supervise me'.

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

*- 'Because it was by mistake/unawareness that I sign off my PER from a third person
- my Employer is still ready to sign off again for me
- My Employer confirmation is attached for reference
- Since my removal it is hard to get good job, Even having experience & knowledge I having nominal job & beside doing personal assignments to [REDACTED]'*

23. Further in his application Mr Ashraf explains that his attitude towards his removal at the relevant time and now stating: *'I think my removal was a bit tough decision from ACCA side, although i cooperated in all the proceedings & provided the best possible evidence that i spent 3 years with [REDACTED] &*

my Employer who was ready to sign off all or the three performance objectives for me but it was not accepted at that time. For now i just want my membership to restore & Even now i am available to cooperate to the possible extent. It will be a good sign of kindness for ACCA to give me a chance in restoring'.

24. On 01 November 2024, ACCA wrote to Mr Ashraf requesting professional and personal references in support of his application for readmission. Mr Ashraf was also asked to expand on what he had learnt since his removal, including steps taken towards obtaining legitimate work experience, and to state his future intentions should he be readmitted to ACCA membership.

25. On 04 November 2024, Mr Ashraf responded to ACCA's request particularising the lessons he has learnt since he was removed from ACCA membership. He states:

- 'That I need to take full details before proceeding with any activity in order to not get involved in a offence or breach of a regulation.

After taking the details in the above point, afterwards I need to discuss with the line manager or someone having higher experience and knowhow for a better understanding and get instructions from [they] for the future course of action.

- To avoid committing a similar breach, I have read ACCA rule book the maximum number of times in order to gain good understanding. Also, if I feel any uncertainty in future regarding any point, I need to contact ACCA directly for guidance on any regulatory or professional conduct matter

I am actively working to uphold the highest standards of professional integrity. This multifaceted approach not only mitigates the risk of involvement in any offenses but also fosters a culture of accountability and excellence within my professional environment'.

26. Further in his response to ACCA, Mr Ashraf asserts that since his removal he has sought to obtain legitimate work experience stating:

'My experience from [REDACTED] and achievement of Performance objectives are genuine. However, I must clarify that I had my performance objectives signed off by a different supervisor than the one directly overseeing my work...I am attaching the same confirmation letter again. This document not only reaffirms my commitment to transparency and compliance with ACCA

regulations but also underscores my dedication to maintaining the integrity of my professional qualifications’.

27. Mr Ashraf details his intentions for the future should he be readmitted to ACCA membership, stating:

‘...Currently, my career growth has reached a standstill due to the suspension of my membership. However, I view this period as an opportunity for reflection and preparation. Once I am reinstated in the ACCA register, I am determined to elevate my career and professional growth new heights. My goal is to transition into mid-to higher-level management roles, where I can take on greater responsibilities and contribute meaningfully to my organization. I aspire to lead teams, drive strategic initiatives, and influence decision-making process that align with best practices in accounting and finance. I believe that achieving these career milestones will not only fulfil my professional ambitions but also enable me to make a positive impact within my organization and industry at large...As I advance my career, I will take it upon myself to advocate for ethical standards and compliance with ACCA guidelines. I am to share my knowledge and insights with colleagues, mentoring those who are new to the profession and encouraging a culture and accountability...’

28. In response to ACCA’s request for an up-to-date employment reference, Mr Ashraf informed ACCA of a change in employment. Mr Ashraf is currently employed by [PRIVATE] as an [PRIVATE]. He has been in their employment from since 13 September 2024. ACCA have been provided with a standard professional reference which is in the bundle.

29. Referee A, [PRIVATE] at Company C and friend to Mr Ashraf has provided a character reference in support of his application. Similarly, Referee B, [PRIVATE] at Company A, where Mr Ashraf was previously employed, has also provided a reference. Both referees confirm their knowledge of the disciplinary action taken against Mr Ashraf.

30. Mr Ashraf illegitimately obtained ACCA membership in April 2019. The allegations, as proven, against Mr Ashraf were particularly serious, involving behaviour that was both dishonest and demonstrated a disregard for ACCA’s membership process. This conduct led to his subsequent removal from ACCA membership.

31. The reputation of the accountancy profession is built upon the public being able to rely on a member and/or professional who has undertaken to abide by a code of ethics and do the right thing in difficult circumstances, "It is a cornerstone of the public value which an accountant brings." Therefore, a finding of dishonesty, that is directly related to obtaining membership, is behaviour that is fundamentally incompatible with being an ACCA member because it undermines the trust and confidence the public have in the profession.
32. In circumstances where dishonesty is concerned and as cited in *Bolton v Law Society [1994] 1 WLR 512, 519*, the then Master of the Rolls Sir Thomas Bingham said, "*the reputation of the profession is more important than the fortunes of the member. Membership of a profession brings many benefits, but that is a part of the price.*"
33. There is considerable importance in the public knowing that, save for in the most exceptional circumstances, they are dealing with members and potential members of a profession who have never been guilty of any dishonesty at all. Therefore, in cases of behavioural misconduct such as dishonesty, public confidence will be stronger factor in weighing any decision with regard to readmission. If allowing an individual to return to the register can undermine the public's trust in the profession, readmission is unlikely in those circumstances.
34. Mr Ashraf obtained ACCA membership by colluding with another to submit false Performance Objective statements that did not describe his own experience.
35. Although Mr Ashraf has been sanctioned for this misconduct, it should be borne in mind that the purpose of this sanction was not to punish Mr Ashraf, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct. It is ACCA's position that based on the finding of dishonesty in connection with his PER, Mr Ashraf presents an ongoing risk and readmission in these circumstances is not compatible with ACCA's overarching objectives.
36. Further, in cases where dishonesty is concerned less weight should be given to insight and references. It was held that a professional's personal mitigation will count for significantly less in these cases, in contrast to other contexts,

because of the imperative need to uphold and maintain public confidence in the profession:

“...On applying for restoration after striking off, all these points may be made, and the former solicitor may also be able to point to real efforts made to re-establish himself and redeem his reputation. All these matters are relevant and should be considered.

But none of them touches the essential issue, which is the need to maintain among members of the public a well-founded confidence that any solicitor whom they instruct will be a person of unquestionable integrity, probity and trustworthiness. Thus it can never be an objection to an order of suspension in an appropriate case that the solicitor may be unable to re-establish his practice when the period of suspension is past. If that proves, or appears likely to be, so the consequence for the individual and his family may be deeply unfortunate and unintended. But it does not make suspension the wrong order if it is otherwise right. The reputation of the profession is more important than the fortunes of any individual member. Membership of a profession brings many benefits, but that is a part of the price.”

37. Mr Ashraf has provided ACCA a with a letter from his former employer, Company A dated 29 March 2021. He submits this provides evidence of his completion of the POs 3, 7 and 17, although no description of the work allegedly carried out to satisfy these POs has been stated, nor have copies of the PO statements drafted by Mr Ashraf been produced for ACCA's consideration.
38. Despite Mr Ashraf's assertions in respect of steps taken to legitimise his practical work experience since the disciplinary proceedings, he has demonstrated little evidence of the same. The document he has provided, lacks adequate commentary on Mr Ashraf's workplace duties and responsibilities which would assist with an assessment of the legitimacy of his practical experience, particularly those responsibilities where he has shown honest character. It remains unknown whether Mr Ashraf, at the relevant time and/or presently has the relevant practical experience to become a member.
39. Mr Ashraf has offered expressions of regret in his application but has failed to demonstrate insight into the seriousness of his conduct and has not shown sufficient reflection on and/or addressed his deliberate dishonesty. In his

reflections on his past misconduct, Mr Ashraf maintains that the circumstances were brought about due to an unawareness of the PER requirements. At the time, the Disciplinary Committee did not consider that this could ever amount to a justification for acting dishonestly to circumvent the regulatory requirements that had to be followed in order to successfully become a member – and still this provides little assistance against the backdrop of serious and dishonest behaviour.

40. Mr Ashraf has not shown an appreciation for the impact of his conduct on other members and potential members of the profession who have approached their practical training honestly and legitimately.
41. Therefore, it is ACCA's position that Mr Ashraf has not demonstrated that he has been sufficiently rehabilitated to no longer be considered a risk to the public and uphold the integrity of the accounting profession if he once again becomes an ACCA member.
42. The burden is on Mr Ashraf to establish he meets the eligibility requirements for membership in accordance with Regulation 9 of the Membership Regulations, which requires an individual to:

"[satisfy]...the Admissions and Licensing Committee as to his general character and suitability'.

Taking all the above into account, Mr Ashraf has not, it is submitted, discharged that burden. Therefore, ACCA opposes the application for Mr Ashraf's readmission to ACCA membership.

THE APPLICANT'S SUBMISSIONS

43. Mr Ashraf was present and not represented.
44. The Committee considered the written material submitted in support of the application for re-admission, including Mr Ashraf's completed application form, his written responses to ACCA's questions, and the character references. Mr Ashraf did not wish to add anything further to his written submissions but was happy to answer the Committee's questions.

45. Mr Ashraf was asked by the Committee about the original misconduct, and he stated that this occurred during the early days of his profession life and was due to an unawareness of the rules.
46. When asked about his reflection on the impact of the finding of dishonesty upon the profession and himself, Mr Ashraf stated that he had been punished and had engaged with the ACCA and provided them with all the information regarding his application for re-admission.
47. Mr Ashraf was asked to clarify the references submitted. He confirmed that Mr Hamza had been his supervisor and direct line manager and had spent two years reporting to him. Mr Hamza was aware of the ACCA disciplinary proceedings and the findings of the Committee and his application for re-admission.
48. Mr Ashraf confirmed that he no longer worked with Referee C and left that employment on 25 December 2025. In regard to his current employer, he confirmed that there was no reference from them. As he has only been there for two months. When asked why there was no reference from his current employer, Mr Ashraf stated that he was not asked to provide a current reference by ACCA.
49. It was also clarified that Referee A is a friend of Mr Ashraf's from [PRIVATE] and that Referee A is an ACCA member and also worked at Company B before Mr Ashraf commenced working there.
50. There was a discussion regarding the references provided by Mr Ashraf looking very similar to one another, and all dated the 26 November 2024. Mr Ashraf confirmed to the Committee that he himself had drafted the references and sent them to the referees for them to sign.
51. Ms La Roche confirmed that Referee B had provided a signed copy of the reference, however the Committee did not have sight of this.
52. Mr Ashraf confirmed that it has been a long time since the original application for re-admission was made.

53. The Committee asked about Mr Ashraf's LinkedIn account, and he stated that he did not use this account often and when it was pointed out that it still referred to him being an ACCA member, he amended it, as he had forgotten.
54. When asked about insight and reflection of the original misconduct, Mr Ashraf confirmed that his reading of the rules and regulations meant he had an understanding of ethical behaviour and would report fraud, and he would change his behaviour. He offered an example of a recent situation where client offered him a gift in appreciation of work completed, and he spoke to his manager before accepting the gift.
55. Mr Ashraf was asked what safeguards had been put in place and what he would do differently since the finding of misconduct. He stated that in future he would wait for the employer to sign off the PO's and he needed to be more patient and keep his professional standard to a high level.
56. The Committee further asked, how would his re-admission maintain the profession standard and protect the public. Mr Ashraf responded that he was advising junior members of staff of the consequences of not following guidance and to read the rulebook. He stated that he was no longer a risk. Being an ACCA member is his dream, and he is currently struggling in his employment due to not being a member.

COMMITTEE'S DECISION AND REASONS

57. The Committee received legal advice from the Legal Advisor which it accepted.
58. The Committee considered the application in accordance with the Membership Regulations, in particular Regulation 9, which requires an applicant to satisfy the Admissions and Licensing Committee as to his general character and suitability for membership. It took into consideration the Guidance produced by ACCA entitled: Admissions and Licensing Committee Guidance (01 January 2019), Guidance for Regulatory Orders (01 January 2022).
59. The Committee noted that where an applicant has previously been excluded following disciplinary findings, re-admission is not automatic upon the expiry of any minimum exclusion period. The burden rests upon the applicant to

demonstrate that he now meets the requirements for admission. This burden is on a balance of probabilities.

60. In assessing whether that burden had been discharged, the Committee reminded itself that it was required to consider not only the interests of the applicant but also the need to maintain public confidence in the accountancy profession and in ACCA's regulatory processes and balance the impact upon the applicant against the overarching public-interest considerations and ACCA's regulatory objectives.
61. The Committee reminded itself that its task was not to re-visit the findings made by the Disciplinary Committee however it had to assess Mr Ashraf's proper understanding and reflection of the misconduct in order to assess whether it was likely to recur.
62. The Committee noted that the original misconduct proved against Mr Ashraf involved dishonesty in the context of admission to the profession and was particularly serious, as it strikes at the heart of trust in the profession. The original findings noted that Mr Ashraf had been found to be complicit in and entirely aware of participating in an arrangement that enabled him to qualify as a member of ACCA illegitimately and improperly. The Committee noted a level of premeditation, deception, and collusion with another.
63. It was also noted that Mr Ashraf stated in his written submission that he believed that the original sanction was "a bit tough" and his explanation of the original events was due to not being aware of the rules. He confirmed that his remediation included reading the rules and explaining to junior members of staff the pit falls of failing to do so. In his correspondence with ACCA when being asked about insight into the misconduct, he stated that; "there are no reasons since my removal".
64. Mr Ashraf gave an example of insight in relation to receiving gifts from clients as an example of how he would do things differently. He also stated that in the future he would report fraud and wait for employers to be in a position to sign off his work.
65. In assessing Mr Ashraf's insight into the misconduct and the impact upon the profession, the Committee found that this was lacking but developing. Mr

Ashraf's main concern was the impact of the disciplinary finding upon on his own professional career and ability to obtain employment. He showed no personal reflection of how the public would assess his original behaviour and finding of dishonesty. Mr Ashraf has not demonstrated any real appreciation of the impact of his behaviour on the reputation of the profession or how his actions harm both ACCA and the profession overall.

66. The Committee considered the references submitted by Mr Ashraf. Out of an abundance of fairness the Committee did not focus on the fact that not all references were not on letter heads or signed, and that they were of some age.
67. However, Mr Ashraf admitted that he had written these references himself. It was also noted that none of the references referred to Mr Ashraf's character or integrity which were important considerations with a finding of dishonesty. It was noted that there was no reference from Mr Ashraf's current employer, which is highly relevant to the application. The Committee therefore could attach little weight to these references.
68. The Committee found that the above meant that they were unable to fully assess Mr Ashraf's integrity and suitability, as there was no independent third-party view of Mr Ashraf's character, and therefore there was nothing to support the fact that the misconduct would not be repeated.
69. The Committee had particular regard to the case of *Bolton v The Law Society [1994] 2 ALL ER 486* that the reputation of a profession as a whole is more important than the fortunes of an individual member of that profession and the balance this with Mr Ashraf's interests.
70. The Committee considered whether Mr Ashraf has shown that he will be better able to represent ACCA and considered the public interest and the maintenance of public confidence in the profession and the maintaining of proper standards of conduct.
71. The Committee noted that honesty goes to the heart of an accountant's practice and is a fundamental tenet for membership of ACCA. The Committee felt there was insufficient evidence before it to be satisfied that Mr Ashraf had understood the seriousness of the original finding of misconduct or had demonstrated his understanding of the implications of this finding and his behaviour. The

Committee, without the support of suitable references as to his character, could not be convinced that re-admitting Mr Ashraf was compatible with the overarching principles of public protection and public confidence.

72. The Committee was not persuaded that Mr Ashraf had discharged the burden of proof regarding his 'general character and suitability' or was a fit and proper person to be re-admitted to membership.

73. Pursuant to the Membership Regulations, the Admissions and Licensing Committee refused Mr Ashraf's application for re-admission to ACCA membership.

Mr Martin Winter
Chair
26 February 2026