

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Ms Aisha Rega

Heard on: Wednesday, 25 February 2026

Location: Remote link via Microsoft teams

Committee: Ms Avril O'Meara (Chair),
Mr George Wood (Accountant)
Ms Victoria Smith (Lay)

Legal Adviser: Mr Alastair McFarlane

Persons present

and capacity: Ms Holly Girven (Case Presenter on behalf of ACCA)
Ms Lauren Clayton (Hearings Officer)

Outcome: Removal from the student register and costs awarded to ACCA in the sum of £5000.

1. ACCA was represented by Ms Girven. Ms Rega did not attend and was not represented. The Committee had before it a Bundle of papers, numbered pages 1 – 110, and a Service Bundle numbered pages 1 – 15.

SERVICE

2. Having considered the Service Bundle, the Committee was satisfied that notice of the hearing was served on Ms Rega in accordance with the Complaints and Disciplinary Regulations 2014 (“CDR”).

PROCEEDING IN ABSENCE

3. Ms Girven, for ACCA, made an application for the hearing to continue in the absence of Ms Rega.
4. The Committee accepted the advice of the Legal Adviser.
5. The Committee noted that following the service of the Notice of Hearing on 26 January 2026, Ms Rega did not respond to ACCA. On 11 February 2026 the Hearings Officer in an attempt to ascertain whether Ms Rega would be attending the hearing telephoned the number Ms Rega had registered with ACCA. A Telephone Attendance Note, prepared by the Hearings Officer, indicates that Miss Rega answered the call but indicated that she was "*not interested*" in attending the hearing and wanted "*nothing to do with it.*" The Hearings Officer sent an email dated 11 February 2026 attaching her telephone attendance note and confirming that Miss Rega had indicated she would not be attending the hearing. Nonetheless, the Hearings Officer sent the hearings link by email dated 24 February 2026. The Committee also noted that Ms Rega had indicated to ACCA in an email in February 2025 that she was not interested in the outcome of the proceedings.
6. The Committee was satisfied from Ms Rega's telephone communication on 11 February 2026 that she had voluntarily waived her right to attend this hearing. It was satisfied that an adjournment would be very unlikely to secure her participation. It was mindful of the duty on all professionals to co-operate with their regulator and the public interest in the expeditious discharge of the Committee's regulatory function. In all the circumstances the Committee decided that it was just to proceed with the hearing in her absence.

ALLEGATIONS

Allegation 1

- (a) During a Foundations in Financial Accounting (FFA) examination on 20 March 2024, Ms Aisha Rega was in possession of unauthorised materials comprising of handwritten notes, which she had at her desk, contrary to Examination Regulation 4.

- (b) Ms Aisha Rega intended to use any or all of the materials set out in 1(a) above to gain an unfair advantage.
- (c) Ms Aisha Rega's conduct in respect of 1(a) and (b) above was:
 - (i) Dishonest, in that Ms Aisha Rega intended to gain an unfair advantage in the exam; or in the alternative
 - (ii) Such conduct demonstrated a lack of integrity.
- (d) By reason of her conduct, Ms Aisha Rega is:
 - (i) Guilty of misconduct pursuant to Bye-law 8(a)(i), in respect of any or all of the matters set out at 1(a) to 1(c) above; or in the alternative
 - (ii) Liable to disciplinary action pursuant to Bye-law 8(a)(iii), in respect of 1(a)above.

BACKGROUND

- 7. Ms Rega became an ACCA student on 6 September 2023.
- 8. On 20 March 2024, Ms Rega sat a Foundations in Financial Accounting exam at the PwC Academy exam centre in Malta. The exam commenced at 10.00am and was due to last for 3 hours 20 minutes.
- 9. Prior to the start of any centre-based exam all candidates receive an exam attendance docket, which contains ACCA Exam Regulations and Guidelines. Ms Rega has admitted in her SCRS 2B form that she received the exam attendance docket that day and had read the reverse of the docket including ACCA's regulations and guidelines.

10. Unauthorised materials in the form of an A4 sheet of paper with FFA related equations and notes on both sides were found in the student's possession during the exam.

11. In the Exam Invigilators SCRS1B form, completed on the day of the exam by the Invigilator, the Invigilator states:

“The student possessed unauthorised material in the form of a lined A4 paper consisting of FFA-related equations and notes written both on the front and back sides of the same A4 paper” and were found at “10.30am.”

and that:

“The unauthorised materials were found underneath the stack of blank A4 papers provided by the same examination centre (PwC's Academy) to be used solely as rough paper and handed to the invigilator invigilating the exam at the end of the exam session.”

and that:

“The unauthorised material was not found in the student's clothing or any other personal item” and “These unauthorised material were found by [Person A] invigilating the exam.”

12. The Invigilator's report further records that the Invigilator approached the student and found the notes while checking her station and that the student was *“compliant and immediately handed over the unauthorised material”*. The invigilator states that:

“Following the exam, a discussion was held with the student whereby she acknowledged and admitted that she brought the unauthorised material into the exam room.”

13. On the same day of the exam, Ms Rega completed a SCRS2B form in relation to the incident and the unauthorised materials confirming that she *“possessed a lined A4 paper consisting of FFA related equations and notes written both on the front and back sides of the*

same A4 paper. The material was confiscated at 10:30 am by the invigilator of the session. I confirm that the unauthorised materials were relevant to the syllabus being examined.”

14. Ms Rega confirmed that: *“The unauthorised material consisted of equations and notes related to the below topics: 1. Ratios 2. Goodwill and retained earnings.”*

15. When asked on the form the purpose for which she had the unauthorised materials, Ms Rega has confirmed that she:

“Was afraid that I might blank out during the exam due to exam [REDACTED] and, therefore, resorted to bringing in the unauthorised material as a backup even though I was fully prepared to sit for the exam.”

16. When asked to indicate whether she used, intended to use or attempted to use the unauthorised items/materials, Ms Rega placed a mark indicating that she *“intended to use the materials/ item but did not end up using them during the exam.”*

17. Ms Rega also stated on the form:

“There where only two topics included on the unauthorised material (as indicated in the previous response) which one of the topics (ratios) was not examined on and the question pertaining to Goodwill and retained earnings was worked out after the unauthorised material was confiscated. (sic)”

18. Additionally, in response to whether she intended to gain an unfair advantage from these unauthorised materials, Ms Rega stated:

“I intended to resort to the material due to fear of blanking out and not to gain an unfair advantage.

However, I do understand and acknowledge that such material provided me with an unfair advantage over those who followed the exam regulations and guidelines.”

19. Ms Rega has concluded her statement on the form by stating:

“I am aware that this is a breach of the rules and regulations. I would like to emphasize that my action was unethical but this stems from my eagerness to follow the ACCA Qualification and hope to become an ACCA Affiliate. I am a student who is resilient to sit for my exams and, willing to keep on trying and doing my best to pass all ACCA exams. I wish to have the opportunity to continue with my studies and I guarantee that such an incident will not take place again.”

20. Ms Rega has signed the form confirming that the facts as specified are a true reflection of the incident. Ms Rega also signed a statement confirming that the confiscated materials of the FFA CBE on Demand exam on 20th March 2024 belonged to her.

21. ACCA’s Qualification Team has confirmed the relevance of the unauthorised materials, asserting, *“attachment that you sent contains relevant content for the FFA exam which could give an unfair advantage. It is also not permitted to have such materials in the examination.”* (page 46)

22. On 16 May 2024, ACCA’s Investigation Department, via the Investigations Officer, wrote to Ms Rega to advise her of the complaint which had been received and requested her comments in this regard and Ms Rega provided a response on 18 May 2024, asserting:

“1. Yes, I do accept that I was in possession of an unauthorised material. The paper was handwritten, it had relations about two topics that I was finding difficulty remembering.

2. I did intend to use the paper in the worst-case scenario that I couldn’t remember some of those things.

3. No, I did not use the paper for the following reasons. The paper was taken at an early stage of the exam where none of the questions included any relation to those two topics. One of the topics didn’t come out at all in the exam so the paper wouldn’t have been used even if I wanted to. The other topic came out at the very last question when the paper was already been taken away.

4. I would like to add that when I made the decision of bringing that paper in the exam room I wasn't [PRIVATE]. [PRIVATE]. I never wanted to have an advantage over the other students, I just wanted to make them and myself proud. As I didn't use the paper and I still passed I came to an even bigger realisation that I could have done it without it and that it was a big mistake from my side. Although this doesn't justify my actions, I really hope you consider that I learned my lesson and that I would never try to do something of the sort again. I still have the drive to keep studying for my ACCA exams and wish to be qualified with an ACCA qualification."

ACCA'S SUBMISSIONS

Allegation 1

- (a) During a Foundations in Financial Accounting (FFA) examination on 20 March 2024, Ms Aisha Rega was in possession of unauthorised materials comprising of handwritten notes, which she had at her desk, contrary to Examination Regulation 4.
23. ACCA submitted that Ms Rega breached exam regulation 4 in that she was in possession namely notes during her FFA exam on 20 March 2024. This was confirmed in the SCRS form completed by Ms Rega in which she states she intended to use the unauthorised materials. The SCRS forms completed by the Invigilator and Supervisor also confirm that such materials were found and underneath the scrap paper she was permitted to have during her exam.
- (b) Ms Aisha Rega intended to use any or all of the materials set out in 1(a) above to gain an unfair advantage.
24. ACCA submitted that the student's purpose for the possession of the notes was to use/ and or attempt to use the unauthorised materials to gain an unfair advantage. ACCA also relies on Exam Regulation 6. Once a student is found in possession of unauthorised materials it will be assumed that they intended to use the unauthorised materials to gain an unfair advantage in the exam. The student in this case was found in possession of notes and therefore Exam Regulation 6 is engaged. The burden of proof therefore shifts to the student

and ACCA submitted that in all the circumstances she has failed to discharge the requisite burden.

(c) Ms Aisha Rega's conduct in respect of 1(a) and (b) above was:

(i) Dishonest, in that Ms Aisha Rega intended to gain an unfair advantage in the exam; or in the alternative

(ii) Such conduct demonstrated a lack of integrity.

25. ACCA submitted that Ms Rega was aware that the exam regulations did not allow use/possession of unauthorised materials during the exam and that her admitted intention to use those notes if she needed to amounted to cheating. She was intending to use these notes to assist her in his exam and provide her with an unfair advantage. ACCA contends that cheating in an exam is dishonest by the standards of ordinary decent people.

26. ACCA submitted that if the Committee does not make a finding of dishonesty, then it should find that Ms Rega has breached the Fundamental Principle of Integrity in that she has admitted attempting to use unauthorised materials during the exam seemingly for the purpose of gaining an unfair advantage.

(d) By reason of her conduct, Ms Aisha Rega is:

(i) Guilty of misconduct pursuant to bye-law 8(a)(i), in respect of any or all of the matters set out at 1(a) to 1(c) above; or in the alternative

(ii) Liable to disciplinary action pursuant to bye-law 8(a)(iii), in respect of 1(a)above.

27. ACCA contended that the dishonest conduct of trying to cheat in a professional exam clearly reached the threshold for misconduct. There was an alternative liability to disciplinary action.

MS REGA'S SUBMISSIONS

28. Ms Rega admitted in her SCRS 2B form that her actions were unethical and did provide her “*with an unfair advantage over those who followed the exam regulations and guidelines.*” She accepted that she did intend to use the unauthorised material “*in the worst case scenario*” if she could not remember and referred to her conduct as a “*big mistake*”. Her responses are summarised above.

DECISION ON ALLEGATIONS AND REASONS

29. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the burden of proving the case was on ACCA and had regard to the observation of Collins J in *Lawrance v General Medical Council* on the need for cogent evidence to reach the civil standard of proof in cases of dishonesty. The standard of proof to be applied throughout was the ordinary civil standard of proof, namely the ‘balance of probabilities’. The Committee reminded itself to exercise caution in relation to its reliance on documents.
30. The Committee heard that there had been no previous findings against Ms Rega and accepted that it was relevant to put her good character into the balance in her favour.

Allegation 1

- (a) During a Foundations in Financial Accounting (FFA) examination on 20 March 2024, Ms Aisha Rega was in possession of unauthorised materials comprising of handwritten notes, which she had at her desk, contrary to Examination Regulation 4.
31. The Committee first asked itself whether ACCA had proved that Ms Rega was in possession of unauthorised material. The Committee accepted on the evidence of the Invigilator and Ms Rega’s own acceptance that she had the notes on her. They were handed over to the Invigilator. The Committee was satisfied that the handwritten “notes” fell within the definition of “Unauthorised Material” under Exam Regulation 4. Accordingly, the Committee was satisfied that Allegation 1 a) was proved.

- (b) Ms Aisha Rega intended to use any or all of the materials set out in 1(a) above to gain an unfair advantage.
32. The Committee further accepted that this was material relevant to the syllabus being examined. It noted that Ms Rega accepted this. The Committee also noted the evidence of ACCA's Qualification Team who confirmed that the notes would give her an advantage in the exam. The Committee was satisfied on this evidence that this material was relevant to the syllabus.
33. The Committee rejected any assertion from Ms Rega that she did not intend to gain an unfair advantage. Ms Rega confirmed that she knew that she should not have the notes with her. It was satisfied that the notes were secreted under scrap paper. They contained information relevant to the exam and as she accepted would allow her to cheat – *"in the worst-case scenario that I couldn't remember some of those things"*. Ms Rega accepted that she had them in her possession and would use them to assist her during the exam. The Committee was satisfied that the most likely explanation for her possession of the notes was to cheat in the exam – or intend to use the unauthorised material to gain an unfair advantage. The Committee was satisfied that she had not rebutted the presumption that she intended to use the notes to gain an unfair advantage under Exam Regulation 6. Accordingly, the Committee was satisfied that Allegation 1b) was proved.
- (c) Ms Aisha Rega's conduct in respect of 1(a) and (b) above was:
- (i) Dishonest, in that Ms Aisha Rega intended to gain an unfair advantage in the exam; or in the alternative
 - (ii) Such conduct demonstrated a lack of integrity.
34. The Committee first asked itself whether Ms Rega's conduct was dishonest in that she had sought to obtain an unfair advantage in the exam by having the unauthorised material with her. The Committee asked itself what Ms Rega's belief was as to the facts - what was her state of mind as to the facts at the time. Ms Rega had sat ACCA exams before and was clear that she knew what she was doing and that there was on her account the opportunity

to use these notes. The Committee was satisfied, given its findings of fact, that Ms Rega's state of mind was that she had taken the notes with her to assist with the exam questions. It was satisfied that she knew she was setting herself up in a position to cheat. It was a deliberate, planned act with the intention of gaining an unfair advantage in the exam. It was satisfied that Ms Rega's belief at the time was dishonest according to the standards of ordinary decent people. Further, Ms Rega's own responses to ACCA indicated an acceptance of being prepared to cheat by using the notes if she could not remember. The Committee was satisfied that she had not rebutted the presumption that she intended to use the notes to gain an unfair advantage under Exam Regulation 6. Accordingly, it was satisfied that Allegation 1c)(i) was proved and did not consider the alternative of Allegation 1c)(ii).

(d) By reason of her conduct, Ms Aisha Rega is:

- (i) Guilty of misconduct pursuant to Bye-law 8(a)(i), in respect of any or all of the matters set out at 1(a) to 1(c) above; or in the alternative
- (ii) Liable to disciplinary action pursuant to Bye-law 8(a)(iii), in respect of 1(a)above.

35. The Committee next asked itself whether, having been dishonest, Ms Rega was guilty of misconduct.

36. The Committee had regard to the definition of misconduct in Bye-law 8(c) and the assistance provided by the case law on misconduct. It was satisfied that Ms Rega's actions brought discredit on her, the Association and the accountancy profession. It was satisfied that cheating in a professional exam was deplorable conduct and reached the threshold of seriousness for misconduct. Being honest and trustworthy is a fundamental tenet of the accountancy profession. Her conduct therefore had the potential to undermine the integrity of ACCA's examination system and public confidence in those taking the examinations and thus the profession.

37. In the light of its judgment on misconduct, no finding was needed upon liability to disciplinary action. Accordingly, it was satisfied that Allegation 1d)(i) was proved and did not consider the alternative of Allegation 1d)(ii).

SANCTIONS AND REASONS

38. The Committee noted its powers on sanction were those set out in Regulation 13(4). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate. It accepted the advice of the Legal Adviser.
39. The Committee considered that the conduct in this case was very serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour. Being honest is a fundamental requirement of any accountant.
40. The Committee identified the following mitigating factors:
- Ms Rega was of good character with no previous disciplinary record.
 - Ms Rega made some admissions at an early stage.
41. The Committee identified the following aggravating factors:
- The conduct was for personal gain.
 - This was pre-planned, deliberate misconduct.
 - There is only limited evidence of insight.
42. Given the Committee's view of the seriousness of Ms Rega's conduct, it was satisfied that the sanctions of No Further Action, Admonishment, Reprimand and Severe Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the guidance were not present as the conduct was intentional and could have caused harm. While she had indicated it was a mistake, there was inadequate evidence of insight and no express apology. The Committee was satisfied that in the circumstances a Severe Reprimand was not a sufficient and proportionate sanction given the seriousness of the conduct. The

Committee had regard to Sections E2 and E3 of the Guidance on Dishonesty and the seriousness of such a finding on a professional. It considered the factors listed at C5 of the Guidance for removal of Ms Rega and was satisfied that her conduct was fundamentally incompatible with remaining on the register. The Committee was satisfied that only removal from the register was sufficient to mark the seriousness to the profession and the public.

COSTS AND REASONS

43. ACCA claimed costs of £5,841 and provided a Schedule of costs. The Committee noted Ms Rega has not provided a statement of means. The Committee decided that it was appropriate to award costs in this case, and considered the costs claimed to be reasonably incurred. The Committee however noted that the case had concluded in less time than scheduled and it was appropriate to make some reduction for this. It concluded that the proportionate and appropriate amount of costs was £5,000. Accordingly, it ordered that Ms Rega pay ACCA's costs in the amount of £5,000.

EFFECTIVE DATE OF ORDER

44. Given that Ms Rega was a student at the certificate level below the main qualification, the Committee was not satisfied that it was in the public interest to make an immediate order. This order shall take effect from the date of the expiry of the appeal period unless notice of appeal is given prior to the expiry of that period, in which case it shall become effective (if at all) as described in the Appeal Regulations.

Ms Avril O'Meara
Chair
25 February 2026.