

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Miss Rimsha Khan

Heard on: Friday, 06 February 2026

Location: Remotely via MS Teams

Committee: Mr Tom Hayhoe (Chair)
Dr David Horne (Accountant)
Ms Victoria Smith (Lay)

Legal Adviser: Mr David Marshall

**Persons present
and capacity:** Ms Joanna La Roche (ACCA Case Presenter)
Ms Anna Packowska (Hearings Officer)

Summary Removed from the student register

Costs: £7,840

1. The Committee heard an allegation of misconduct against Miss Khan. Ms La Roche appeared for ACCA. Miss Khan was not present and not represented.

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2. The Committee had a main bundle of papers containing 213 pages, a supplementary bundle of 25 pages, correspondence relating to a proposed amendment (3 pages) and a service bundle containing 19 pages.

SERVICE AND PROCEEDING IN ABSENCE

3. The Committee was satisfied that Miss Khan had been served with the documents required by regulation 10(7) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 in accordance with regulation 22. The required documents were contained in the papers before the Committee. There was evidence that they were sent by email on 09 January 2026 to an email address notified by Miss Khan to ACCA as an address for all correspondence. That was 28 days ago.
4. In the Case Management Form she completed on 25 March 2025, Miss Khan was asked if she intended to attend her hearing. She answered no. She was asked again after the notice of hearing was served. On 05 February 2026 she emailed: 'I am outside the city, won't be able to attend the meeting, please proceed in my absence.' The Committee concluded that Miss Khan had decided not to exercise her right to be present and wished the hearing to go ahead today. The Committee decided to proceed in her absence as it was in the public interest to do so.

PRELIMINARY MATTERS

5. Ms La Roche applied to amend the allegations to include a final paragraph alleging misconduct or liability to disciplinary action. Such a paragraph is routinely included and it appeared to have been omitted in error. Submissions as to misconduct were already included in the bundle. There was no unfairness to Miss Khan because the correction of this error would not affect the nature of the evidence to be called. The Committee agreed and allowed a new paragraph 5 to be added.
6. Section 8 of the standard Case Management Form asks, 'Do you wish for all or part of your case to be heard in private pursuant to the above grounds?' Miss Khan answered 'yes – All of my case' but failed to give any reasons, as required by the form. The Legal Adviser reminded the Committee of the provisions of

Regulation 11(1). Disciplinary hearings should be conducted in public unless the Committee is satisfied that an exception should be made. He said that the courts had indicated that the principle of open justice is an important one and there is a strong presumption that hearings should be in public. If an exception has to be made it should be to the minimum extent possible. The Committee was not aware of any circumstances that could justify holding the entire hearing in private. If during the hearing it became necessary to consider receiving some evidence or submissions in private the Committee would consider it at that stage. In the event a small part of the submissions was treated as being in private.

ALLEGATION(S)/BRIEF BACKGROUND

7. Miss Khan registered as an ACCA Student on 08 October 2019. On 09 April 2021 she sat ACCA's Management Accounting (FMA) examination. This was a remotely-invigilated computer-based exam which Miss Khan took in a place of her choosing in her home country, Pakistan. The invigilator was not present but could view what was on Miss Khan's screen and could communicate directly with her if required through chat messages or by phoning her. The invigilator also had video and audio access to the camera on the computer which Miss Khan was using to take the exam. The video/audio from the camera would have been recorded but as the exam was so long ago no such recordings were now available. There was no record of any irregularities having been detected during the exam at the time.
8. On 04 May 2024 ACCA received a complaint by email (which has been anonymised) attaching numerous photographs said to be of questions set in various ACCA exams. Following investigation ACCA concluded that some of these were questions set in the exam taken by Miss Khan on 09 April 2021.
9. Miss Khan faced the following allegations:

Schedule of Allegations (as amended)

Miss Rimsha Khan, an ACCA student, during ACCA's remotely invigilated Management Accounting (FMA) exam on 09 April 2021:

1. *Used an unauthorised item with a camera, during the exam, to take*

photographs/images of exam questions.

2. *Caused or permitted one or more of the photographs referred to in Allegation 1 to be shared with a person or persons unknown.*
3. *By the reason of the matters referred to above in respect of Allegation 1, Miss Khan is in breach of one or more of:*
 - a) *Exam Regulation 5a*
 - b) *Exam Regulation 5b*
 - c) *Exam Regulation 14*
4. *Miss Khan's conduct at allegation 1–2 above,*
 - a) *Was dishonest in that she took the photographs referred to in order to potentially give herself an unfair advantage in a future re-sitting of that exam and/or caused or permitted the photos to be shared with other ACCA students to give them an unfair advantage and/or*
 - b) *Demonstrates a failure to act with integrity.*
5. *By reason of the above, Miss Khan is:*
 - a. *Guilty of misconduct pursuant to bye-law 8(a)(i), in respect of any or all of the above matters or, in the alternative,*
 - b. *Liable to disciplinary action pursuant to bye-law 8(a)(iii), in respect of allegations 1 and/or 2 above.*

DECISION ON FACTS/ALLEGATION(S) AND REASONS

10. There was no oral evidence at the hearing. Ms La Roche relied on the documentary evidence including a witness statement from Person A, an Exam Production Technician at ACCA. The Committee took into account all the statements made in the emails and other documents from Miss Khan.

Allegation 1

11. The evidence of Person A was clear. The pictures taken were pictures of what

would have been on Miss Khan's screen during the exam she took on 09 April 2021. Identifying details were clearly visible on the images and proved both that it was an exam taken by her and that it was the particular exam she sat on 9 April. It followed that someone in the room where the exam was conducted must have taken the pictures. It is a strict condition of these remotely invigilated exams that the candidate must be alone in the room for the entire duration of the exam. At the start of the exam the candidate is required to pan the video camera round to prove to the invigilator that there is no-one else present. The student is kept under video surveillance throughout.

12. When first challenged Miss Khan's position was that the charges were 'baseless'. She suggested that the photographs were not pictures of her exam questions but the result of some kind of manipulation to make it look as if they had been taken during her exam. On or about 12 July 2024 she provided answers to questions posed by ACCA. These included the following:

6. Do you admit or deny that you took photographs of exam questions during your FMA — Management Accounting exam ?

A; I am not even Aware of photographs, i simply did my exam and thats it.

14. Was there someone else in the room with you during the exam ?

A. No i was alone, i showed everything and every corner of my room prior to taking the exam and the invigilator asked me to sit at the door, so there was 0 possibility of someone being there with me, so its totally nonsense

13. On 03 October 2024 she was asked for more information about the place where she took the exam and these were her answers:

1- in my study room

2- no my personal study room

3- i told you million times that i was alone, and first the examiner made sure that no ones is in the room and she made me sit next to door, so pretty obvious in the camera that no one entered

4- same you can see throughout the exam that i was sitting next to door and it remained closed as you can see in the camera

14. On 25 March 2025 Miss Khan put forward an entirely different and inconsistent defence by email and in a Case Management Form:

I personally wasn't involved in cheating or taking advantage during the exam, but my tutor(which I will link his information) at the time of exam barged himself into my room and started taking pictures of my exam questions according to him it was to help other students what will be in exam, well I naive at the time, very young lesser than 18 yo.

[PRIVATE]

15. She named the person she accused and provided links to social media accounts which she said related to him. Later she said that she had reported the tutor to the police and that an investigation was being conducted by NCCIA – the National Cyber Crime Investigation Agency of Pakistan. This led to the hearing being postponed from the original date fixed, 16 October 2025, so that ACCA could make further enquiries. Ms La Roche informed the Committee that the further enquiries had not led ACCA to alter its case, which remained that it was more likely than not that Miss Khan was the person who took the pictures. She said that invigilators are under instructions to act on any suspicion that a candidate is using an unauthorised item or that another person has entered the room during the exam. Invigilators are required to stop the exam if any such suspicion was confirmed. Miss Khan said she had made a complaint to the police which was being investigated. Ms La Roche said that ACCA did not necessarily accept that, for example, there was a police investigation in progress against the person named by Miss Khan, but even if it was true, that would not support Miss Khan's defence.
16. The Committee considered that it was inherently unlikely that another person could have entered the room during the exam and taken pictures, for the reasons that Miss Khan herself gave. It would have been a flagrant breach of exam procedure and the invigilator would have taken action. There was no evidence to support Miss Khan's assertion that her tutor had 'barged himself into my room and started taking pictures of my exam questions'. Even if the

police were investigating, this was only as a result of a complaint made by Miss Khan herself. The Committee concluded on the balance of probabilities that the person who took the images in question was Miss Khan. **The Committee found Allegation 1 proved.**

Allegation 2

17. The photographs in question came to ACCA's attention because they were submitted by an informant, having apparently been published on social media. Clearly they had been shared with someone. Since the Committee had concluded that Miss Khan was the person who took the images it must have been Miss Khan who shared them. **The Committee found Allegation 2 proved.**

Allegation 3

18. The matters found proved were clearly breaches of the three exam regulations set out. No other conclusion was possible. **The Committee found Allegation 3 proved in its entirety.**

Allegation 4(a) dishonesty

19. The effect of Exam Regulation 6(b) in this case is that it must be assumed that Miss Khan intended to use the unauthorised item which was used to take the pictures in order to gain an unfair advantage in the exam, unless she proved the contrary. Even without that assumption the Committee concluded that Miss Khan's objective was to gain an unfair advantage either for herself (if she had to re-take the exam) or for others. It was hard to see any other reason why a candidate would take pictures of exam questions. Essentially, it was a preliminary step towards cheating. The Committee was satisfied that she acted dishonestly by the standards of ordinary, decent people. **The Committee found Allegation 4(a) proved.** Allegation 4(b) was in the alternative and did not have to be considered.

Allegation 5(a): misconduct

20. The Committee considered that Miss Khan's dishonesty was a very serious matter. It enabled her and others to cheat in ACCA examinations and could

have led to students gaining ACCA qualifications to which they were not entitled. Because the questions were published on the Internet the continuing damage caused was considerable. Her conduct fell far below the standards expected and would be regarded as deplorable by members and students of ACCA and by the general public. **The Committee was satisfied that Miss Khan's actions in this respect amounted to misconduct.** Allegation 5(b) was in the alternative and did not have to be considered.

SANCTION(S) AND REASONS

21. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify any mitigating and aggravating factors.
22. The Committee was unable to identify any mitigating factor apart from the facts that Miss Khan had no previous disciplinary findings against her and had to some extent engaged with the investigation.
23. In terms of aggravating factors, the complete reversal of Miss Khan's position on the facts indicated that she had little sense of what was expected of someone hoping to become part of the accountancy profession. It would be unreasonable for her to claim any insight or remorse or desire to remediate.
24. The Committee was satisfied that a sanction was required in this case. It considered the available sanctions in order of seriousness.
25. The Committee rejected the sanctions of admonishment and reprimand because the guidance made it clear that these were not sufficient. The Committee next considered the sanction of severe reprimand. The guidance states that this sanction would usually be applied in situations where the conduct is of a serious nature but there are particular circumstances of the case or mitigation advanced which satisfy 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. None of those factors is present in this case. The Committee went through the list of suggested features to support a severe reprimand but few, if any are present in this case. In any event, a severe reprimand would not be sufficient to mark the seriousness of the

misconduct.

26. The Committee considered that Miss Khan's dishonest conduct was fundamentally incompatible with remaining as an ACCA student and that the minimum sanction it could impose was removal from the student register.
27. A student who has been removed can normally apply to be re-admitted after one year. The Committee considered whether to extend this period but decided that it was not necessary. Miss Khan's status as an unqualified student gave her little opportunity to harm the public. If she were to apply for readmission her application would be scrutinised by the Admissions and Licensing Committee and she would have to demonstrate that she had overcome her serious misconduct and had become a fit and proper person to accept onto the student register.

COSTS AND REASONS

28. Ms La Roche applied for costs totalling £8,622.50. She pointed out that the hearing today would probably be shorter than estimated in the costs schedule and that some reduction might be appropriate,
29. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to its costs. It considered that the time spent and the sums claimed were reasonable, subject to a reduction for the fact that this hearing would not take as long as had been estimated. The Committee assessed the costs at £7,840.
30. Miss Khan had not submitted a statement of financial position. The Committee had no information about her means and it could not speculate. The Committee was therefore not able to consider whether there should be a reduction to the costs award based on inability to pay or hardship.

EFFECTIVE DATE OF ORDER

31. The Committee did not consider that there were any particular features of this case to justify an immediate order. This order will take effect at the normal time.

ORDER

32. The Committee ordered as follows:
- a) Miss Rimsha Khan shall be removed from the student register of ACCA.
 - b) Miss Rimsha Khan shall pay a contribution to ACCA's costs assessed at £7,840.

Mr Tom Hayhoe
Chair
06 February 2026