

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr David Wong Tai Wai

Heard on: Thursday 08 January 2026

Location: Virtual hearing via Microsoft Teams

Committee: Mr Andrew Gell (Chair)
Ms Dinisa Kandasamy (Accountant)
Ms Samantha Lipkowska (Lay)

Legal Adviser: Mr Charles Apthorp

**Persons present
and capacity:** Mr Ryan Ross (ACCA Case Presenter)
Ms Anna Packowska (Hearings Officer)

Summary: Allegations 1 found proved. Exclusion from
membership.

Costs: Mr Wong ordered to pay £8,000 towards ACCA's costs.

1. The Disciplinary Committee ("the Committee") convened to consider the case of Mr David Wong Tai Wai ("Mr Wong").

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2. Mr Ryan Ross ("Mr Ross") represented the Association of Chartered Certified Accountants ("ACCA"). Mr Wong did not attend and was not represented.
3. The Committee confirmed that it was not aware of any conflicts of interest in relation to the case.
4. In accordance with Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ("the Regulations"), the hearing was conducted in public.
5. The hearing was conducted remotely through Microsoft Teams.
6. The Committee had considered the following documents: a Memorandum and Agenda (pages 1 to 2); a Hearing Bundle (pages 1 to 498); Mr Wong's bundle (pages 1 to 569); first table additional (pages 1 to 198) and second table additional (pages 1 to 4) and a Service Bundle (pages 1 to 18).

SERVICE OF PAPERS

7. The Committee considered whether the appropriate documents had been served on Mr Wong in accordance with the Regulations.
8. The Committee noted the written notice of the hearing that had been sent by electronic mail ("email") to Mr Wong's registered email address on 11 December 2025. As the notice of hearing was sent by email, the Committee noted that service may be proved by confirmation of delivery of the notice, which had been provided to the Committee, and that the notice would be deemed as having been served on the day that it was sent, that is, 11 December 2025. The Committee was therefore satisfied that the notice of hearing had been served on Mr Wong on 11 December 2025, 28 days before the date of today's hearing.
9. The Committee noted the contents of the notice of hearing and was satisfied that it contained all the information required by the Regulations.

10. The Committee accepted the advice of the Legal Adviser, who referred it to Regulations 10(1)(a) and 22 of the Regulations, and in particular the requirement that notice of the hearing must be served no later than 28 days before the date of the hearing unless there are exceptional circumstances.
11. The Committee found that service of the notice of hearing had been affected in accordance with Regulations 10 and 22 of the Regulations.

PROCEEDING IN ABSENCE

12. Mr Ross made an application to proceed in the absence of Mr Wong.
13. The Committee, having satisfied itself that the requirements of Regulations 10 and 22 of the Regulations had been complied with, went on to consider whether to proceed in the absence of Mr Wong.
14. The Committee took into account the submissions of Mr Ross. The Committee accepted and took into account the advice of the Legal Adviser, who referred it to Regulation 10(7) of the Regulations, the ACCA document 'Guidance for Disciplinary Committee hearings' and the relevant principles from the cases of *R v Jones* [2002] UKHL 5, and *GMC v Adeogba and GMC v Visvardis* [2016] EWCA Civ 162.
15. The Committee bore in mind that its discretion to proceed in the absence of Mr Wong must be exercised with the utmost care and caution.
16. The Committee noted that ACCA had sent a notice of hearing and further correspondence to Mr Wong at his registered email address. It also noted that as recently as 7 January 2026 Mr Wong has provided written representations and has indicated both in his case management form and in correspondence that he does not intend to attend the hearing in person.
17. On the basis of the evidence set out above, the Committee was satisfied that ACCA had made reasonable efforts to notify Mr Wong about today's hearing and that Mr Wong knew or ought to know about the hearing. The Committee

noted that Mr Wong had not applied for an adjournment of today's hearing and there was no indication that such an adjournment would secure his attendance on another date. The Committee was mindful that there is a public interest in dealing with regulatory matters expeditiously.

18. Having balanced the public interest with Mr Wong's own interests, the Committee decided that it was fair and in the interests of justice to proceed in his absence.

BRIEF BACKGROUND

19. Mr Wong became an ACCA member on 09 October 1986 and became an ACCA fellow on 09 October 1991.
20. Mr Wong has been a member of the Hong Kong Institute of Certified Public Accountants ("HKICPA").
21. Mr Wong has held a practising certificate issued by the Hong Kong Institute of Certified Public Accountants ("HKICPA").
22. On 10 April 2023, ACCA received email correspondence from Mr Wong which included information and supporting documentation concerning ongoing proceedings by the HKICPA. On 23 April 2023, ACCA received further email correspondence from Mr Wong confirming that the HKICPA's Disciplinary Committee had made initial findings on 30 March 2023 and invited his response. Mr Wong made submissions against these findings via email on 24 April 2023 and supplied a copy of the Disciplinary Committee's initial findings within this email.
23. On 9 June 2023, ACCA received a copy of the HKICPA's Disciplinary Committee's final decision dated 8 June 2023.
24. The background to the findings was following a practice review the Quality Assurance department of the HKICPA identified a number of significant findings and deficiencies in Mr Wong's practice's audit work.

25. A complaint was raised against Mr Wong under Section 32(D)(5) of the Professional Accountants Ordinance ("PAO") set out below:

Complaint 1

Section 34(1)(a)(vi) of the PAO applies to the Respondent in that he had failed or neglected to observe, maintain, or otherwise apply a professional standard in respect of his audit of Client A's consolidated financial statements for the year ended 31 December 2018, with auditor's report dated 8 August 2019.

Complaint 2

Section 34(1)(a)(vi) of the PAO applies to the Respondent in that he had failed or neglected to observe, maintain or otherwise apply a professional standard for his failure to maintain an adequate quality control system in the Practice.

Complaint 3

Section 34(1)(a)(viii) of the PAO applies to the Respondent in that his non-compliance as stated in Complaints 1 and 2 above amounts to professional misconduct.

26. The matter was heard before the Disciplinary Committee of the HKIPCA and having considered the evidence before it, unanimously found that all Complaints had been proved to its satisfaction. The Disciplinary Committee passed the following sanctions against Mr Wong:

(a) Mr Wong Tai Wai be reprimanded under section 35(1)(b) of the PAO;

(b) The name of Mr Wong Tai Wai be removed from the register of certified public accountants for 2 years under section 35(1)(a) of the PAO effective on the 42nd day from the date of this Order;

*(c) The practising certificate of Mr Wong Tai Wai be cancelled under section 35(1)(da) of the PAO effective on the 42nd day from the date of this Order;
and*

(d) Mr Wong Tai Wai pays the costs and expenses in relation to or incidental

to the proceedings of the Complainant, including costs of the Clerk to the Committee, in the sum of HK\$186,617.59 under section 35(1)(iii) of the PAO.

PARTICULARS OF ALLEGATION

Mr David Wong Tai Wai, a Fellow of the Association of Certified Chartered Accountants ('ACCA'):

1. Pursuant to Bye-law 8(a)(vi), is liable to disciplinary action by virtue of the disciplinary action taken against him by a Disciplinary Committee of the Hong Kong Institute of Certified Public Accountants on 08 June 2023.

EVIDENCE AND SUBMISSIONS OF ACCA

27. Mr Ross took the Committee through the documentary evidence relied upon by ACCA.
28. In relation to Allegation 1, Mr Ross drew the Committee's attention to byelaw 8(a)(vi) which provides that a member is liable to disciplinary action if they have been disciplined by another professional or regulatory body.
29. Mr Ross submitted that it is clear from the HKICPA order dated 8 June 2023 that the HKICPA has a disciplinary or regulatory jurisdiction in Hong Kong and therefore the Committee can be satisfied that the HKICPA is a professional or regulatory body.
30. Mr Ross submitted that the HKICPA Disciplinary Committee order dated 8 June 2023 confirms that Mr Wong was disciplined by that body and, as such, is liable to disciplinary action under byelaw 8(a)(vi).
31. Mr Ross highlighted the following paragraphs of the HKICPA Disciplinary Committee:
 - a. The order indicated that Mr Wong had denied the complaint made against

him; and

- b. The order indicated Mr Wong had been reprimanded and excluded from practice for two years;
 - c. The order indicated that a financial penalty was imposed on Mr Wong and he was ordered to pay a contribution to the costs of HKICPA.
32. Mr Ross submitted that Mr Wong had not appealed the order. However his response to ACCA had focused on disputing the finding made against him, which he submitted Mr Wong was not entitled to go behind. Mr Ross submitted that the HKICPA is a recognised accountancy body and therefore pursuant to bye-law 8(a)(vi), Mr Wong is liable to ACCA disciplinary action by virtue of the disciplinary finding made against him on 08 June 2023.

EVIDENCE AND SUBMISSIONS OF MR WONG

33. Mr Wong did not attend and was not represented. He had provided extensive written submissions to the Committee, which the Committee have had regard.
34. As Mr Wong had denied the allegation, the burden of proof therefore remained on ACCA.

DECISIONS AND REASONS OF THE COMMITTEE

35. The Committee considered all of the documentary evidence before it and the submissions of Mr Ross and the written submissions of Mr Wong.
36. The Committee accepted the advice of the Legal Adviser, which included reference to the applicable burden and standard of proof.

Allegation 1 - proved

37. In relation to Allegation 1, the Committee examined the content of the HKICPA Disciplinary Committee order dated 8 June 2023 and, on the basis of that document, was satisfied that Mr Wong had been disciplined by a professional or regulatory body other than ACCA. As such, the Committee found that Mr

Wong was liable to disciplinary action.

38. Accordingly, the Committee found Allegation 1 to be proved.

SANCTION AND REASONS

39. In reaching its decision on sanction, the Committee took into account the evidence that it had already heard and the further submissions made by Mr Ross.
40. Mr Ross highlighted Mr Wong's membership history with ACCA and confirmed that he had an unblemished regulatory record until the order of the HKICPA Disciplinary Committee in 2023.
41. The Committee accepted the advice of the Legal Adviser, who referred it to Regulation 13(1) of the Regulations, relevant caselaw and the ACCA document 'Guidance for Disciplinary Sanctions'. The Committee bore in mind that the purpose of any sanction was not to punish Mr Wong, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct, and that any sanction must be proportionate.
42. When deciding on the appropriate sanction, the Committee carefully considered whether there were any aggravating and mitigating features in this case.
43. The Committee considered the exclusion of Mr Wong by a disciplinary body to be a very serious matter and found that this together with a lack of insight were aggravating features.
44. The Committee considered the following to be mitigating features in this case:
- a. Mr Wong had a long (approximately 30 year) unblemished regulatory history prior to the HKICPA Disciplinary Committee order in 2023;
 - b. Mr Wong's conduct did not appear to have hampered ACCA's ability to investigate the matter and he had self-referred to ACCA;

45. The Committee noted that Section F of the 'Guidance for Disciplinary Sanctions' document indicated that: Disciplinary action taken by another professional body is a very serious matter.
46. The Committee considered the available sanctions in increasing order of severity.
47. The Committee first considered whether to take no further action but considered that such an approach was not appropriate given the seriousness of the misconduct.
48. The Committee considered that neither admonishment, reprimand nor severe reprimand would be appropriate, because there had been no demonstration of remorse, insight or remediation by Mr Wong. The Committee considered that these sanctions would be insufficient to mark the seriousness of the misconduct, to provide adequate protection of the public and to address the wider public interest.
49. The Committee considered that exclusion from membership was the appropriate sanction in this case because Mr Wong's conduct:
 1. Was fundamentally incompatible with being an ACCA member;
 2. Amounted to a very serious departure from professional standards;
 3. Was indicative of a continuing lack of insight into his conduct;
 4. There was, because of a lack of insight a risk of repetition of the conduct.
50. The Committee was mindful that the sanction of exclusion from membership was the most serious sanction that could be imposed and recognised that it could have negative consequences for Mr Wong in terms of his reputation and financial circumstances. However, the Committee considered the sanction to be proportionate in the circumstances, given the seriousness of the misconduct, the need to protect the public, and the wider public interest in upholding proper professional standards and maintaining public confidence in ACCA and the accountancy profession.

51. Accordingly, the Committee decided to exclude Mr Wong from membership.
52. The Committee did not deem it necessary to impose a specified period before which Mr Wong could make an application for readmission as a Member.

COSTS AND REASONS

53. Mr Ross made an application for Mr Wong to make a contribution to the costs of ACCA. Mr Ross applied for costs totalling £8,411. The Committee was provided with a Schedule of Costs providing a breakdown of the activity undertaken by ACCA and the associated costs. Mr Ross submitted that the costs claimed were appropriate and reasonable. However, he did acknowledge that the hearing today had taken slightly less time than that allocated to it on the Schedule of Costs.
54. The Committee accepted the advice of the Legal Adviser who referred the Committee to Regulation 15(1) of the Regulations and the ACCA document 'Guidance for Costs Orders' (September 2023).
55. The Committee was satisfied that ACCA was entitled to costs in principle and had been justified in investigating these matters. However, it considered that there should be a reduction to reflect the fact that the hearing had taken slightly less time than that which it was allocated.
56. The Committee noted that it could not take into account Mr Wong's financial and personal circumstances because Mr Wong had not provided any details of those circumstances.
57. In deciding the appropriate and proportionate order for costs, the Committee took into account the above matters and decided to make an order for costs in the sum of £8,000. The reduced amount reflected the removal of 3 hours of the time allocated for the Case Presenter and 2 hours of the time allocated for the Committee Officer.

EFFECTIVE DATE OF ORDER

58. The Order will take effect at the expiry of the appeal period.

ORDER

59. The Committee made the following order:

- a. Mr Wong shall be excluded from ACCA membership.
- b. Mr Wong shall make a contribution to ACCA's costs in the sum of £8,000.

Mr Andrew Gell
Chair
08 January 2026