

## HEARING

# DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

## REASONS FOR DECISION

<b>In the matter of:</b>	<b>Miss Tong Zhou</b>
<b>Heard on:</b>	<b>Thursday, 15 January 2026</b>
<b>Location:</b>	<b>Remotely via Microsoft Teams</b>
<b>Committee:</b>	<b>Ms Avril O'Meara (Chair) Mr Abdul Samad (Accountant) Ms Caroline Robertson (Lay)</b>
<b>Legal Adviser:</b>	<b>Ms Valerie Charbit (Legal Adviser)</b>
<b>Persons present and capacity:</b>	<b>Mr Leonard Wigg (Case Presenter on behalf of ACCA) Ms Aimee Murphy (Hearings Officer)</b>
<b>Observers:</b>	<b>Ms Jackie Alexander (ACCA Appointments Board)</b>
<b>Summary</b>	<b>Removed from the student register</b>
<b>Costs:</b>	<b>£6942.50 payable by Miss Zhou to ACCA.</b>

## PRELIMINARY APPLICATIONS/SERVICE OF PAPERS

1. The Committee convened to consider the following allegations against Miss Zhou:

Miss Tong Zhou, a registered student of the Association of Chartered Certified Accountants (“ACCA”):

- 1) On or about 05 September 2023, submitted or caused to be submitted to ACCA, false documents namely a Master of Professional Accounting Certificate dated 17 December 2022 and a corresponding examination transcript dated 17 December 2022 (the “Documents”) both purportedly issued by the Australian National University in support of her application for exemptions;
  - 2) Miss Zhou’s conduct at allegation 1 above was:
    - (a) Dishonest, in that she knew the Documents she submitted or caused to be submitted to ACCA were false and that she did not achieve a Master of Professional Accounting from the Australian National University as alleged or at all; in the alternative:
    - (b) Such conduct demonstrates a failure to act with integrity.
  - 3) By reason of any or all of the above, Miss Zhou is:
    - (a) guilty of misconduct pursuant to bye-law 8(a)(i).
2. The Committee had before it a Service Bundle numbering 22 pages and a Disciplinary Report and Bundle (“DC Bundle”) numbering 130 pages.

### **SERVICE AND PROCEEDING IN ABSENCE**

3. Miss Zhou was not present and she was not represented.
4. Mr Wigg submitted that Miss Zhou had been notified of the hearing date and time by a letter dated 17 December 2025 which was sent by email within the 28 day period in accordance with The Chartered Certified Accountants’ Complaints and Disciplinary Regulations 2014 (Amended 1 January 2025) (“CD Regulations”) Regulations 10 and 22.

5. Mr Wigg submitted that Miss Zhou had been properly served to the correct email address in accordance with the email address registered by Miss Zhou on ACCA's database as well as to the address from which Miss Zhou had recently corresponded with ACCA. Further Mr Wigg submitted that the email had been delivered to Miss Zhou.
6. Mr Wigg also invited the Committee to proceed in the absence of the Miss Zhou. He submitted that Miss Zhou had not provided any reason why she had not attended the hearing today due to little/if any involvement by her with ACCA. Mr Wigg submitted that Miss Zhou had voluntarily absented herself from the proceedings and he relied on the fact that she had not made any application for an adjournment. He submitted that it was in the public interest to proceed in Miss Zhou's absence.
7. There was evidence within the DC Bundle which referred to the fact Miss Zhou had previously said she was [REDACTED]. Mr Wigg stated that this was in relation to an application by Miss Zhou regarding a fee exemption for examinations in 2023. He submitted that there was no basis upon which to say Miss Zhou was [REDACTED] in 2026 as those [REDACTED] documents ACCA held pertained to 2023 only. Further he submitted that Miss Zhou's last communication with ACCA was on 7 July 2024, in which she said "*I want to apply conciliation and you can write off my account. I do not want to attend any ACCA exams in the future....*", she had not asserted she was [REDACTED] at that time.

#### **The Committee's decision on service and proceeding in absence**

8. The Committee carefully considered Miss Zhou's email addresses to check that she had been notified to the correct email address. It noted that the email sent to her on 17 December 2025 was within ACCA's 28 day period and that it contained the correct details of the date, time and remote venue for the hearing and Miss Zhou's right to attend the hearing by telephone or video link and to be represented if she wished. Additionally, the Notice provided details about applying for an adjournment.

9. The Committee considered all the documents in its bundles and decided that Miss Zhou had been properly served with notice by ACCA of the date and time of the hearing in line with the email address which ACCA had on its database and to the last email address she notified to ACCA that she wished to use in correspondence and from which she had last communicated with ACCA. It therefore decided Miss Zhou had been properly served with notice by ACCA in accordance with ACCA's CD Regulations.
  
10. The Committee went on to consider whether it should proceed in the absence of Miss Zhou. It noted that those [REDACTED] documents sent to ACCA in relation to [REDACTED] evidence previously provided by Miss Zhou to ACCA were all dated 2023. The Committee had no [REDACTED] evidence to suggest that Miss Zhou was absent due to [REDACTED]. It further noted that Miss Zhou had not responded to ACCA's notice and she had not engaged with ACCA's case officer since her email to ACCA dated 7 July 2024. It noted that ACCA had telephoned Miss Zhou on 14 January 2026 and the call had been answered and then disconnected. It therefore decided that Miss Zhou had not provided any reason for why she was absent today.
  
11. The Committee therefore concluded that Miss Zhou had chosen not to attend the hearing since there was no evidence from her that she was [REDACTED] today or that she was seeking an adjournment. The Committee concluded that there would be no purpose in adjourning the hearing as there was no likelihood that Miss Zhou would attend the adjourned hearing if it did so. The Committee further decided that it was in the public interest that the hearing today took place. It therefore decided to proceed in the absence of Miss Zhou.

## **ALLEGATIONS/BRIEF BACKGROUND**

12. On or around 31 October 2023, ACCA's Investigations Department received a referral from ACCA's Finance and Exemptions Team, and it was alleged that documents submitted by Miss Zhou to ACCA regarding her education qualifications were not genuine and had not been issued by the Australian National University ("the University").

13. On 19 November 2018, Miss Zhou became an ACCA registered student with ACCA number: [REDACTED].
14. On 29 July 2023, Miss Zhou sent an email to ACCA and applied for exemptions for F4, F5 and F6 exams, and provided:
  - a) A certificate awarding Miss Zhou a [REDACTED] Degree in [REDACTED]; and
  - b) The transcript with the student ID number: [REDACTED] issued from the [REDACTED].
15. On 11 August 2023, Miss Zhou was awarded exemptions for LW and TX exams which was communicated to Miss Zhou by email.
16. On 13 August 2023, Miss Zhou sent an email to ACCA regarding an error in the exemption fee.
17. On 14 August 2023, Miss Zhou sought clarification about the correct exemption fee to pay ACCA.
18. On 15 August 2023, ACCA sent an email and apologised for the error in exemption fee requested and advised that the figure would be amended.
19. On 16 August 2023, ACCA advised Miss Zhou that the incorrect fee for the exemptions was removed from her account.
20. On 05 September 2023, Miss Zhou sent an email to ACCA requesting exemptions and provided the following:
  - a) The certificate awarding Miss Zhou a Master of Professional Accounting Degree (the "Certificate"), purportedly from the Australian National University ("University") on 17 December 2022; and
  - b) The transcript dated 17 December 2022 (the "Transcript"), purportedly from the University.

21. On the same day, ACCA emailed Miss Zhou and advised that she had been awarded exemptions for Performance Management (PM), Financial Reporting (FR) and Audit and Assurance (AA) exams.
22. Again, on the same day, Miss Zhou asked whether she would be eligible for an exemption for FM exam as she had completed Applied Corporate Finance module.
23. On 08 September 2023, ACCA responded to Miss Zhou by explaining that her qualification was still under assessment by the Professional Qualifications Team as there was a module code mismatch for Applied Corporate Finance [REDACTED], which was different to accredited ones on the database.
24. On 11 September 2023, ACCA wrote to the University and asked whether the Transcript contained a typo or if it was invalid.
25. On 18 September 2023, the University responded to an ACCA email dated 11 September 2023 and advised that the Transcript was fraudulent and that Miss Zhou did not appear to be one of their students.
26. On 20 September 2023, Miss Zhou messaged ACCA requesting cancellation of her exemption for the FM exam and subsequently the exemption assessment request was withdrawn.
27. On 12 October 2023, Miss Zhou sent an email to ACCA and applied for exemptions based on her qualification and attached a certificate issued to Miss Zhou indicating full membership of CPA [REDACTED] dated 10 June 2023.
28. On the same day, the ACCA awarded Miss Zhou the following exemptions:
  - a. Business and Technology (BT)
  - b. Management Accounting (MA)
  - c. Financial Accounting (FA)
  - d. Corporate and Business Law (LW)
  - e. Performance Management (PM)

- f. Taxation (TX)
  - g. Financial Reporting (FR)
  - h. Audit and Assurance (AA)
  - i. Financial Management (FM)
29. Again, on the same day, Miss Zhou confirmed that she applied for the exemptions and had changed her email address.
30. On 13 October 2023, Miss Zhou wrote to ACCA and requested exemptions based on her qualification.
31. On the same day, ACCA clarified that on a preliminary assessment of her qualification, she may be eligible for exemptions as listed in paragraph 28 (a) to (i). It was also made clear that the exemptions will only be confirmed once she had registered as a student.
32. Again, on the same day, Miss Zhou confirmed that she applied for the exemptions and had changed her email address.
33. Later, on the same day, 13 October 2023, the ACCA sent an email to Miss Zhou and advised she has been awarded the following exemptions:
- a. Audit and Assurance (AA)
  - b. Business and Technology (BT)
  - c. Financial Accounting (FA)
  - d. Financial Reporting (FR)
  - e. Corporate and Business Law (LW)
  - f. Management Accounting (MA)
  - g. Performance Management (PM)
  - h. Taxation (TX)
34. Miss Zhou responded to ACCA on the same day, 13 October 2023, seeking clarification about whether she would be awarded exemptions for all “*F level exams*”, although her email was unclear.

35. On 14 October 2023, ACCA again reiterated that she may be eligible for exemptions as listed in paragraph 28(a) to (i).
36. On or around 31 October 2023, Miss Zhou was referred to the Professional Conduct Department for investigation.
37. On 20 November 2023, Miss Zhou sent an email seeking clarification with respect to being awarded exemptions for all "*F level exams*", although her email was unclear.
38. On 24 November 2023, it was confirmed to Miss Zhou that ACCA would not be awarding her any further exemptions.
39. On the same day, Miss Zhou asked for an explanation.
40. On 11 December 2023, ACCA advised that she was not eligible for an exemption for the FM paper as the University had confirmed the documents were not issued by them.
41. On 15 December 2023, Miss Zhou requested a refund of the examination fees, which was refused, and asked for her email address to be updated. She also raised a complaint and ACCA replied on 18 December 2023 stating that the examination entry fees will not be refunded.
42. A letter dated 01 March 2024 was received from the University in which it was confirmed that the Certificate and Transcript had not been issued by the University and were fraudulent. The University also highlighted additional discrepancies in the Transcript as follows:
  - a. The signature and name of the University Registrar is inconsistent with the date of the Transcript's date of issue. That is, Person A was not the Registrar, Student Administration in December 2022.
  - b. The Course Codes listed in the Transcript do not match the Course Names in at least seven instances.

- c. The number of listed Courses/Units do not match the requirements of the Master of Professional Accounting. That is, the Master of Professional Accounting requires the completion of twelve compulsory Courses (72 Units).
- d. The listed courses do not match the compulsory course requirements of the Master of Professional Accounting.

The University also confirmed that Miss Zhou was not registered as a student at the University in December 2022.

- 43. The witness statement dated 26 March 2024 from ACCA's Business Relationship manager, set out the steps she took to verify the Transcript.
- 44. ACCA tried to contact Miss Zhou via her registered email address regarding the Transcript and Certificate she submitted to ACCA. Correspondences were sent via ACCA's case management system, iCasework on 17 April 2024 and 17 May 2024.
- 45. On both occasions listed above, a separate email was sent to Miss Zhou from outlook informing her that ACCA had sent her an encrypted email and if she did not receive the encrypted email, she was asked to contact ACCA.
- 46. Miss Zhou did not provide any response to the allegations set out in the ACCA letter dated 17 April 2024.
- 47. On 07 July 2024, Miss Zhou sent an email to ACCA stating that she wished to pursue conciliation and asked ACCA to write off her account. ACCA replied on 08 August 2024 and confirmed that the matter was not appropriate for conciliation.
- 48. Since the email of 07 July 2024, there had been no further contact received by ACCA from Miss Zhou.

## **ACCA's SUBMISSIONS**

49. ACCA submitted that Miss Zhou submitted or caused to be submitted to ACCA, the Transcript and Certificate, purportedly from the University, which are not genuine. In relation to the Allegations, ACCA relied on the written confirmation from the University dated 18 September 2023 and a witness statement from an ACCA's Business relationship manager dated 26 March 2024 and the witness statement from ACCA's Finance and Exemptions Escalations Team Manager dated 03 July 2024 and their supporting exhibits which included documents from the University.

## **DECISION ON FACTS/ALLEGATIONS AND REASONS**

50. The Committee took advice from the legal adviser and accepted the advice and it decided not to draw any adverse inferences arising from Miss Zhou's absence. It also noted that Miss Zhou had no disciplinary findings against her and was of good character. It accepted the advice of the legal adviser regarding good character. The Committee considered with care all of the evidence before it, noting that it was for ACCA to prove all of the allegations.

### **Allegation 1**

51. The Committee decided that Miss Zhou had submitted a false document to ACCA which purported to suggest she had a specific qualification which would have allowed her to be exempt from certain ACCA examinations when seeking a qualification as an accountant with ACCA.
52. The Committee took into account that Miss Zhou had not provided any explanation as to how she came to be submitting those documents and that her only response to the allegations was in her email dated 07 July 2024 to ACCA in which she advised that she wished to pursue conciliation and that she did not want to attend any ACCA examinations in the future.
53. The Committee was satisfied on the balance of probabilities on all of the evidence contained in the DC bundle that Miss Zhou had sent an email on 05 September 2023 with the false documents. It was therefore satisfied that she

had caused to be submitted false documents namely a Master of Professional Accounting Certificate dated 17 December 2022 and a corresponding examination transcript dated 17 December 2022 from the University in support of her application for examination exemptions from ACCA.

54. The Committee accepted the evidence from the University from its Registrar set out in a letter dated 01 March 2024 that the documents from Miss Zhou were false. The Committee also noted that the University confirmed that Miss Zhou had never been a student at the University. The Committee was satisfied that the evidence was credible and persuasive in relation to the falsity of the documents she had provided purporting to be from the University.
55. In the Committee's view Miss Zhou had provided false documents to ACCA on 05 September 2023 from an email address which she had later used to correspond with ACCA. The Committee took into account the evidence from ACCA's Finance and Exemptions Escalations Manager regarding the email address used by Miss Zhou at the time she submitted the Certificate and Transcript.
56. The Committee noted that there was no reason advanced by Miss Zhou as to why she provided the documents, so the inference was that she provided them in order to try and obtain exemptions from examinations so she did not have to do more ACCA examinations to obtain a qualification and registration with ACCA as a member.
57. The Committee was therefore satisfied that Allegation 1 was proved.

### **Allegation 2(a)**

58. The Committee went on to consider whether Miss Zhou had acted dishonestly in that she knew that the documents she had submitted were false and that she did not achieve a Master of Professional Accounting from the University in December 2022.
59. The Committee decided that since Miss Zhou had not achieved such a qualification from the University, it was very likely that she knew that the

documents were false. Since she had also not been a student at the University she must have known that the documents she submitted to ACCA were false and untrue and there was unlikely to be any innocent explanation for submitting them.

60. Further, once Miss Zhou was informed that the documents were false by ACCA, she did not respond or give any credible explanation for providing them and instead she asked for examination fees to be returned to her and later for conciliation. The Committee concluded that there was no credible reason why she would have innocently submitted false documents and because she had not attended the University. The Committee concluded that on the balance of probabilities Miss Zhou knew that the Certificate and Transcript were false when she submitted them to ACCA on 05 September 2023.
61. The Committee then went on to consider whether such conduct was dishonest according to the standards of ordinary and decent people. It decided that the submission of false documents purporting to indicate that a student has a qualification when applying for exemptions from ACCA's examinations to try and obtain full registration with ACCA would be considered as dishonest by ordinary decent people.
62. The Committee therefore decided that Miss Zhou had acted dishonestly and it found Allegation 2(a) proved.

### **Allegation 2(b)**

63. Accordingly, the Committee did not consider Allegation 2(b) which was an alternative allegation to Allegation 2(a).

### **Allegation 3**

64. The Committee then went on to consider whether Miss Zhou was guilty of misconduct. It decided that acting dishonestly by submitting false documents to ACCA as a regulator in respect of a student's qualifications was extremely serious and had the potential to undermine the accountancy profession and ACCA as a regulator. Furthermore, it brought discredit upon Miss Zhou, the

accountancy profession and ACCA. It was completely contrary to the Rules and Standards applicable to accountants which required fair dealing and honesty particularly regarding documentation.

65. The Committee decided as a matter of judgment that Miss Zhou misconduct was found proved. It decided that this was a deliberately dishonest action which continued until ACCA discovered that Miss Zhou had submitted false documents. Students lying about their qualifications and providing false documents to get exemptions from ACCA was in the Committee's view completely contrary to the standards expected from student accountancy members.
66. Accordingly, the Committee found Allegation 3 proved.

### **SANCTIONS AND REASONS**

67. The Committee referred to ACCA's Guidance on Disciplinary Sanctions (with effect from February 2024) ("GDS"). It noted the paragraphs set out under section E2 and E3 of the GDS and it decided that this misconduct was extremely serious for an ACCA student and that it was dishonest conduct which had the potential to cause harm to members of the public had it not been discovered by ACCA.
68. The Committee accepted that Miss Zhou had no disciplinary findings against her as a mitigating factor. It noted that she had been a student for approximately five years after she had initially registered as a student with ACCA and that she had submitted the documents in 2023 approximately three years ago. Therefore, it considered limited weight should attach to this as a mitigating factor.
69. The Committee noted the following as aggravating factors: that Miss Zhou's actions had the potential to harm ACCA's reputation and Miss Zhou maintained the dishonesty by chasing up ACCA regarding the examination exemptions. This had resulted in her dishonest conduct existing over a period of time.

70. Miss Zhou had not engaged with ACCA as was her duty as a student with her regulator. She had not expressed any remorse or insight into the misconduct.

71. The Committee noted ACCA's GDS stated at paragraph E.2.2

*“The public is entitled to expect a high degree of probity from a professional who has undertaken to abide by a code of ethics. The reputation of ACCA and the accountancy profession is built upon the public being able to rely on a member to do the right thing in difficult circumstances. It is a cornerstone of the public value which an accountant brings.”*

72. The Committee was satisfied that there was potential for harm towards the public and the accountancy profession as well as towards ACCA as a regulator by Miss Zhou's actions. It also noted that for a student accountant to be dishonest with documents at an early stage in their career brought disrepute on Miss Zhou and the profession.

73. The Committee decided that the misconduct found proved was very serious so it decided that a sanction was necessary.

74. The Committee first considered the sanction of 'Admonishment'. It decided that such a sanction did not reflect the seriousness of the misconduct found proved. It found this was deliberate misconduct and that because there was no remorse or insight or remediation that admonishment was not a sufficient sanction to meet the public interest.

75. The Committee went on to consider the sanction of a 'Reprimand'. It noted that the GDS referred to this sanction as being appropriate if the conduct was of a minor nature and if there was no continuing risk to the public. The Committee decided that Miss Zhou posed a risk to the public in that she could work as a student accountancy member of ACCA. It therefore considered this sanction was insufficient and that a more serious sanction was warranted.

76. The Committee next considered the sanction of a 'Severe Reprimand'. It noted that Miss Zhou had not demonstrated any insight, remorse, regret or remediation into her wrongdoing. She had also not provided any character

references nor had she cooperated with ACCA during the investigation. Having determined that Miss Zhou continued to pose a risk to the public as a student it decided that this sanction was inappropriate. It noted from the GDS that most of the factors listed above would be required for a sanction of Severe Reprimand to be appropriate, which was not the case here.

77. The Committee decided that the misconduct found proved was a serious departure from the standards to be expected from student members of ACCA and that since Miss Zhou had maintained the dishonesty for a period of time and had never admitted having provided the false documents there was in fact very little mitigation. The Committee considered that such behaviour was fundamentally incompatible with remaining on the student register since Miss Zhou had been trying to get onto ACCA's register through dishonest means. In the Committee's view it was therefore both appropriate and proportionate to remove Miss Zhou from the student register. The Committee also took into account the potential for Miss Zhou to have misled the public and caused harm to them by her having an ACCA student registration and being able to work as a student if she wished to do so in the accountancy profession.

### **COSTS AND REASONS**

78. ACCA applied for costs in the sum of £6942.50.
79. Miss Zhou sent an email dated 07 July 2024 which included the following [REDACTED]. The Committee considered that this was likely to refer to her financial position but she did not provide any supporting evidence indicating that she did not have the financial means to pay any costs order. The Committee noted that Miss Zhou had not filled out any statement of means. ACCA's guidance for cost orders indicated that a member should at the very least fill out a statement of means as proof of their financial position.
80. The Committee noted that ACCA's allegations were well founded and so it decided that it was fair and proportionate that Miss Zhou paid the costs of bringing and conducting the disciplinary hearing.

81. Since the Committee had not received any documentary evidence as to the student's financial circumstances, and having considered ACCA's guidance as to costs, accordingly, the Committee has inferred that the student is able to meet the costs as assessed by the Committee.
82. It therefore ordered Miss Zhou to pay ACCA costs of £6942.50.

#### **EFFECTIVE DATE OF ORDER**

83. The Committee decided given the allegations found proved which included dishonesty, that there was a risk to the public if Miss Zhou remained on the student register until the conclusion of any appeal period as otherwise she could work whilst she as a student using her ACCA student membership.
84. The Committee therefore decided that an immediate order was necessary to protect the public.
85. It therefore ordered that Miss Zhou be immediately removed from the student register.

**Ms Avril O'Meara**  
**Chair**  
**15 January 2026**