

## HEARING

### ADMISSIONS AND LICENSING COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

#### REASONS FOR DECISION

**In the matter of:** Mrs Jalpa Trivedi

**Heard on:** Friday, 16 January 2026

**Location:** Remotely via MS Teams

**Committee:** Ms Helen Goulding (Chair)  
Dr David Horne (Accountant)  
Mr Mark Mills (Lay)

**Legal Adviser:** Mr Alastair McFarlane

#### **Persons present**

**and capacity:** Ms Joanna La Roche (ACCA Case Presenter)  
Mrs Jalpa Trivedi and Mr Hari Trivedi  
Ms Anna Packowska (Hearings Officer)

**Outcome:** Application to re-admit to Membership refused

1. The Committee had before it a main bundle numbered pages 1-54 and a service bundle, numbered pages 1-14, a Tabled Additional Bundle numbered pages 1-18 and Mr Trivedi's statement numbered pages 1-4.

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2. ACCA was represented by Ms La Roche. Mrs Trivedi attended and was accompanied by her husband but was otherwise not represented.

## **BACKGROUND AND APPLICATION HISTORY**

3. ACCA has received an application by Mrs Trivedi to be re-admitted as a Member of ACCA following a Disciplinary hearing on 21 January 2020 when she was excluded from membership. ACCA opposes the application.
4. Mrs Trivedi became an ACCA member on 31 March 2006 and a Fellow on 31 March 2011.
5. On 17 May 2018, Mrs Trivedi was convicted at Southwark Crown Court of conspiracy to defraud (count one) and cheating the public revenue (count two). The convictions arose out of a fraud involving the creation of bogus documentation, used by Bangladeshi nationals to support applications for UK visas. The judge imposed a sentence of two-and-a-half years' imprisonment on count one and six months' consecutively on count two, making a total of three years' imprisonment.
6. On 21 January 2020, an ACCA Disciplinary Committee considered the following allegation:

### *Allegation 1*

- (i) *On 17 May 2018 Mrs Jalpa Hariom Trivedi was convicted of 'Conspire to defraud x 1' and 'Cheat the public revenue x 1', at Southwark Crown Court which is discreditable to the Association or the accountancy profession;*

- (ii) (ii) *By reason of her conduct at 1(i) above, Mrs Jalpa Hariom Trivedi is liable to disciplinary action pursuant to bye-law 8(a)(ix).*
7. Allegations 1(i) and 1(ii) were found proved. Mrs Trivedi was excluded from membership, and the Committee ordered that no application for readmission may be considered for 5 years from the effective date of their order.
  8. Further, Mrs Trivedi was ordered to pay £5,000 costs to ACCA. Mrs Trivedi successfully appealed the costs order. On 29 April 2022 the Chair decided that the order of costs in the sum of £5,000 made in favour of ACCA, was replaced by an order of costs of £100.
  9. Mrs Trivedi's disciplinary costs have since been cleared and paid in full to ACCA.

### **ACCA's SUBMISSIONS**

10. ACCA opposes the application for Mrs Trivedi's readmission to ACCA's Membership register. It reminded the Committee that the burden is on Mrs Trivedi to establish that she 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'.
11. Mrs Trivedi's conviction was in 2018, although the offences for which she was convicted occurred in 2011. In his sentencing remarks, the Judge described the matter as a "*very large, long running fraud*". The purpose of the fraud in its original form was to provide false evidence, making it appear that the visa applicants had large salaries. This was to fool the Home Office into granting visas. As a result 18 people were granted

visas based on false figures, three subsequently became naturalised British citizens and two have been granted indefinite leave to remain.

12. The Sentencing Judge said that from the initial scam of creating an appearance of an income, the conspiracy turned to the production of entirely false information relating to investments in companies. For that purpose, the conspirators needed an accountant, and Mrs Trivedi allowed herself to be used to provide a gloss that the Home Office would be looking for. She was *"knowingly party to the conspiracy"*. She allowed the *"veneer of [her] qualification" to be put on to figures that she knew were being prepared* by Person A. While the Judge said that he considered Person A and Person B to be the leaders of what he described as a sophisticated fraud, he described Mrs Trivedi as being of *"medium culpability"* and said her role was *"significant"* because she was preparing dishonest returns for companies that she knew did not exist.
13. At her ACCA Disciplinary Committee Hearing, Mrs Trivedi admitted the allegations against her. The Committee was in no doubt that these convictions for conspiracy to defraud and cheating the public revenue were very serious offences. Mrs Trivedi had used her position as a certified accountant to assist in the commission of a fraud. The convictions resulted in a lengthy immediate sentence of imprisonment. This brought discredit to herself, to ACCA and to the accountancy profession as a whole. As a result, the Committee found Allegations 1(i) and 1(ii) proved.
14. ACCA submitted that although Mrs Trivedi has completed her sentence, and the offences took place more than ten years ago, these are still serious offences of fraud. ACCA contended that 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.”

15. ACCA contended that 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 a lack of integrity. Therefore, in cases of behavioural misconduct, public confidence will be a stronger factor in weighing any decision regarding admission.
16. ACCA submitted that, Mrs Trivedi has accepted only limited responsibility for her actions, stating in her application that she was misled rather than being responsible for any wrongdoing. She has stated that she failed to uphold the high standards of professionalism expected of an ACCA member, and for that, she is deeply sorry. Further ACCA contended that Mrs Trivedi had shown little appreciation for the impact of her conduct on other members of the profession who do not have criminal convictions, especially of such a serious nature. ACCA submitted that such conduct amounts to a lack of integrity.
17. For these reasons, therefore, ACCA submitted that Mrs Trivedi had not discharged the burden upon her to show that she was now a fit and proper person to be re-admitted as a member of ACCA.
18. ACCA noted that Mrs Trivedi has offered expressions of regret and lengthy reflections on her past misconduct.
19. Therefore, it was ACCA’s position that Mrs Trivedi has not demonstrated that she has been sufficiently rehabilitated to no longer be considered a risk to the public and to uphold the integrity of the accounting profession if she once again becomes an ACCA member.

20. For these reasons, therefore, ACCA submitted that Mrs Trivedi had not discharged the burden upon her to show that she was now a fit and proper person to be re-admitted as a member of ACCA.

### **MRS TRIVEDI'S SUBMISSIONS**

21. Mrs Trivedi maintains that she should be remitted to membership.
22. Mrs Trivedi relied on her detailed written Application for re-admission dated 7 June 2025 and her detailed response to ACCA's written submissions (undated) and two-character references. In addition, Mrs Trivedi also gave oral evidence to the Committee and subjected herself to cross-examination by ACCA. Her husband, Mr Trivedi also gave oral evidence to the Committee.
23. In relation to the background to the conviction Mrs Trivedi stated in her Application that:

*"I worked as an individual practitioner back in 2010 to around 2018. In 2011, I worked for a company in Canary Wharf and assisted their financial needs for Visa related applications. In 2013, I was arrested in support of this remote company and found that the work I had done was in support of a fraudulent company. I was not aware of their activities but as the only accountant to have maintained a record of all my work, I was pulled into this investigation. I had done due diligence and visited the offices, and everything that I saw at the time looked legitimate but since my home was in [PRIVATE] I continued my work from home. It transpires that accounts and details for Visa applicants were not correct and I had not caught this in the midst of my work. At the time, I was working very long hours as [PRIVATE], so all of my work for this particular company was at late night, approaching midnight. A trial should have started in around 2014 but the main company owners, who were criminals are*

*heart were still working in another criminal activity. They had corrupted their barrister, and this meant the trial was further delayed. I waited and finally the trial in early 2018. Again, something strange was afoot with the main mastermind criminal owners of this business as around mid-2018, just prior to my testimony the judge released the electronic tags from the criminals, and the next day they were gone. The reason for this sudden change at heart is unknown to this day but I was then put into the dock for testimony where I explained I had missed important checks but had been very truthful in my error. The arguments put upon me were then very harsh and distasteful as I was attacked for my financial standing, which following years of hard work was very true and honest. Every penny accountable. This was later confirmed when I was found guilty of this conspiracy and over 20 years of my financial records showed nothing out of place except for the money I had earned from this business which was around 15KGBP. in December 2018, a month after I was sentenced away from my family, I heard that the business owner and his colleagues were perhaps free. The main mastermind criminal was in [PRIVATE] I have no idea how this was possible but I was informed by my family after his photos were on google as a free man.*

*This is the basic detail into why I was suspended from the ACCA following a criminal trial and then a meeting at the ACCA to explain what had happened. For the most part, my understanding is that the judge in my criminal trial was most understanding on my side, even though I had been poor in grasping the truth of the criminal work behind this business. For that, part I was very sorry to the ACCA and everyone. In my ACCA trial, I believe that my story was well explained and that my hardship at a complex trial, indeed with a very smart business which was fraudulent had not been easy to spot. I have learnt a tremendous amount since and no longer trusting on anything in this world. In the end I was well received by the ACCA and I could sense that they understood to be a very unfortunate moment in my life for I have no past record or even hold a*

*parking ticket to my name. This is a scar that will live with me for a long time but at the same time, I know all that I have worked with and served in my previous years in a practice are longing for me to help them and have full faith in my skills and honesty. I have learned a lot.*

*Being removed from the ACCA members' list was a deeply emotional experience for me, as I had been an FCCA member and always took great pride in upholding the values of the institution. I felt a deep sense of shame, as I believed I had let down an association that represented one of the most significant and hard-earned achievements of my life. When I first pursued my ACCA qualification, [PRIVATE] while studying for exams. During my studies [PRIVATE] the day before one of my exams. Despite these challenges, I remained committed to my ACCA journey, which meant so much to me.*

*In 2011, an unfortunate situation occurred when I worked for individuals who were unprofessional and deceptive. I was misled into believing they were professionals, which ultimately led me down the wrong path. As a result, I failed to uphold the high standards of professionalism expected of an ACCA member, and for that, I am deeply sorry. This has been a painful journey of reflection, and I have learned a great deal from my mistakes.*

*Since then, I have taken responsibility for my actions and completed several courses in assertiveness, conflict management, and professional development to enhance my skills and understanding of my responsibilities. I have also learned how to set boundaries and say "no" when necessary.*

*Currently, as a Finance Manager in a charity organization, I am entrusted with overseeing the financial operations for a team of 54+ people who depend on my professionalism and expertise to guide the organization.*

*I regularly evaluate transactions and prepare audit papers for year-end audits. In these audits, I have successfully identified errors in previous accounts and drawn attention to discrepancies in the balance sheets. I also identified mistakes in opening balance adjustments conducted by auditors, which I communicated and resolved to the auditors' satisfaction.*

*In addition, I have designed and delivered a training course for small self-employed individuals, which has been well received in the community and is making a positive impact on their lives. Working in the charity sector has been incredibly rewarding, as I can make a difference in people's lives by sharing my knowledge and skills.*

24. Mrs Trivedi maintained that she is now a trusted member of staff with her current employer and has managed to turn her life around after this conviction.

## **DECISION ON APPLICATION AND REASONS**

25. The Committee referred to The Chartered Certified Accountants Membership Regulations 2014 (amended 01 January 2023) (MR) and in particular MR3, MR9 and MR14. 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).
26. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the burden of establishing that Mrs Trivedi meets the eligibility requirements for membership is on Mrs Trivedi.

27. The Committee was not satisfied that Mrs Trivedi had discharged the burden upon her to show that she had the “general character and suitability” to be re-admitted as a member of ACCA. Its reasons are as follows.
28. The Committee had specific regard to the underlying facts and surrounding circumstances of the disciplinary matter found proved which led to Mrs Trivedi’s exclusion. It noted that this was a very serious case of fraud. It was significant in the Committee’s view that the dishonesty directly related to her practice as an accountant. The Committee specifically considered the public interest and the maintenance of public confidence in the profession and the maintaining of proper standards of conduct. The Committee noted that the misconduct occurred some 15 years ago (although the conviction was eight years ago and the disciplinary hearing was five years ago).
29. The Committee noted the oral evidence given to it by Mrs Trivedi and by her husband. The Committee considered it commendable that Mrs Trivedi now has a stable job as a Finance Manager in which her role is valued. It noted that she has undertaken some training particularly in relation to leadership and assertiveness. However, the Committee considered that there had been little focus in training on ethical behaviour which was central to her conviction and subsequent exclusion for membership. The Committee considered that Mrs Trivedi had not made sufficient proactive efforts in relation to the ethical dimension in which accountants operate. It appeared that the online training she had completed on ethics was a requirement of her employment, as opposed to proactively seeking and undertaking ethical training such as the ACCA ethical training module.
30. Further, the Committee considered that such a conviction directly concerning her accountancy practice presented a very high threshold

(but not an insurmountable one) to re-admission. It was not satisfied that Mrs Trivedi had demonstrated any real appreciation of the impact of her behaviour on the reputation of the profession or how her actions harmed both ACCA and the profession overall. The Committee was further concerned that her comments about her involvement were at odds with the judge's sentencing remarks and indicated a lack of appreciation and reflection of her part in the fraud.

31. On the basis of the oral and documentary evidence, the Committee was not convinced that she had provided a sufficiently robust explanation as to how she would deal with a similar situation if she was put in that position again. The Committee had no sufficient assurance before it that she would not repeat the behaviour and was therefore of the view that there was a risk of repetition. There was both a lack of acknowledgement of her guilt and culpability as well as a lack of understanding of the impact of what she did on the ACCA and the wider profession.
  
32. The Committee reminded itself of the observations of Sir Thomas Bingham MR (as he then was) in Bolton v Law Society [1994] 1 WLR 512, 519 :

*“...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 reestablish 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 reestablish 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.”*

33. The Committee noted that honesty and integrity go to the heart of an accountant’s practice and are a fundamental tenet for membership of ACCA. The Committee was not persuaded that Mrs Trivedi had discharged the burden of proof regarding her ‘general character and suitability’ to be re-admitted to membership.

**Ms Helen Goulding**  
**Chair**  
**16 January 2026**