

## HEARING

### DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

#### REASONS FOR DECISION

<b>In the matter of:</b>	<b>Ms Afrah Alghafri</b>
<b>Heard on:</b>	<b>Thursday, 29 &amp; Friday, 30 January 2026</b>
<b>Location:</b>	<b>Remote via Microsoft Teams</b>
<b>Committee:</b>	<b>Mr Andrew Gell (Chair) Ms Nimra Syeda (Accountant) Ms Samantha Lipkowska (Lay)</b>
<b>Legal Adviser:</b>	<b>Mr Robin Havard</b>
<b>Persons present and capacity:</b>	<b>Mr Mazharul Mustafa (ACCA Case Presenter) Miss Nicole Boateng (Hearings Officer) Ms Afrah Alghafri (Student Member) Mr Yasser Al Lawati (Ms Alghafri's Representative)</b>
<b>Observers:</b>	<b>Ms Geraldine Murray (ACCA) Ms Thanida Nuangchamnong (ACCA)</b>
<b>Summary</b>	<b>Allegations 1(a), (b), (c)(i) &amp; (d)(i) proved. Sanction – Removal from student register with immediate effect.</b>
<b>Costs:</b>	<b>£2,000</b>

## **PRELIMINARY APPLICATIONS**

### **Application by ACCA to amend Allegation 1(a)**

1. Mr Mustafa applied to amend Allegation 1(a). He stated that the proposed amendment related to a typographical error in that the date shown in the allegation should be 5 November 2019 as opposed to 15 November 2019. Mr Mustafa submitted that the amendment should be allowed as it would not cause any prejudice to Ms Alghafri in the conduct of her defence.
2. Mr Yasser confirmed on behalf of Ms Alghafri that there was no objection to the application.
3. The Committee accepted that this was a typographical error and concluded that allowing the amendment would not cause any prejudice to Ms Alghafri in the conduct of her defence. It therefore granted Mr Mustafa's application.

## **ALLEGATIONS (as amended)**

### Allegation 1

Ms Afrah Alghafri (Ms Alghafri'), a student member of the Association of Chartered Certified Accountants ('ACCA'):

- (a) On or around 5 November 2019 Ms Alghafri, submitted or caused to be submitted to ACCA one or both documents listed in Schedule A which purported to have been issued by the [REDACTED] when in fact they had not.
- (b) On or about 23 January 2020 Ms Alghafri submitted or caused to be submitted to ACCA an email in which she requested the credit balance on her myACCA account should be credited to her bank account
- (c) Ms Alghafri's conduct as set out in paragraph 1(a) and or 1 (b) above was:

- i. Dishonest in that Ms Alghafri knew that one or both documents referred to at 1(a) above were false and were submitted in order to gain exam exemptions to which she was not entitled and in respect of 1 (b) above was dishonest because she knew the credit balance referred to was not due to her or in the alternative her conduct in either or both respects.
- ii. Demonstrates a lack of integrity.

(d) By reason of her conduct in relation to any or all of the matters set out at 1(a) — 1(c) above Ms Alghafri is:

- i. Guilty of misconduct pursuant to Byelaw 8(a)(i)

#### **Schedule A**

- |  |
|--|
| 1. The degree of Master of Science in Accounting and Finance — session fall 2016 |
| 2. [REDACTED] official transcript issued 30 November 2018                        |

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

- 4. In reaching its findings, the Committee relied upon the documents contained in ACCA's Report and Bundle (pages 1 to 183); a Supplementary Bundle (pages 1 to 11), and a Service Bundle (pages 1 to 18). It had also heard from Mr Cameron and Mr McNeil who gave oral evidence on behalf of ACCA, and it had listened to Ms Alghafri who gave oral evidence on her own behalf. The Committee had taken account of the submissions made by Mr Mustafa on behalf of ACCA, and Mr Yasser on behalf of Ms Alghafri. Finally, the Committee had received legal advice, which it accepted.
- 5. At all times in reaching its findings in respect of the allegations, the Committee bore in mind that the burden of proving the allegations rested with ACCA and

the standard of proof to be applied was the civil standard, namely on the balance of probabilities.

### **ALLEGATION 1(a)**

#### **ACCA's Case**

6. Before calling Mr Cameron and Mr McNeil to give evidence, Mr Mustafa provided an outline of ACCA's case.
7. On 15 November 2018, Ms Alghafri registered as an ACCA student.
8. On 5 November 2019, ACCA received an email from Ms Alghafri who used the following email address Email 1. In that email, Ms Alghafri claimed that she had studied for an MSc in Accounting and Finance at [REDACTED]. She attached to that email what she claimed to be a certificate of her Master's degree, and a transcript of the subjects that she had studied which showed the grades she had achieved in those subjects. In her email, Ms Alghafri claimed exemptions from ACCA exams in respect of F4, F5, F6 and F9.
9. Mr Mustafa referred the Committee to an internal email dated 26 September 2025 and screenshots of ACCA's register. These documents showed that, on 5 November 2019, Ms Alghafri changed her email address from Email 2 to Email 1. Ms Alghafri then changed the email address on her myACCA account back to Email 2 on 19 November 2019.
10. Mr Mustafa suggested that two points flowed from the change of email address, and the dates on which this occurred: firstly, the email address that was used on 5 November 2019 to send ACCA the certificate and transcript from the [REDACTED] was the email address for Ms Alghafri on her account with ACCA. Secondly, it was Ms Alghafri who, on 5 November 2019, had changed the email address on her myACCA account to the email address used to send to ACCA the documents from the [REDACTED]. This was on the basis that, when a change has been implemented to a person's myACCA account, and it refers to

the change being made by “HUBUSER”, that meant it was effected by the member as opposed to ACCA.

11. On 8 November 2019, ACCA sent an email to Ms Alghafri confirming that she had been awarded the following exemptions: (TX) Taxation; (FR) Financial Reporting; (AA) Audit and Assurance, and (FM) Financial Management.
12. On 15 November 2019, Ms Alghafri sent another email to ACCA from the Email 1 account, saying that she had applied for exemptions but had not received exemptions in F5, requesting ACCA to look into the matter.
13. On the same day, ACCA responded to the same email address, confirming that she had been awarded the additional exemption in respect of (PM) Performance Management.
14. On 17 November 2019, ACCA received an email from Ms Alghafri’s employer, Company A. Mr Mustafa referred in particular to what was said by Company A in the second bullet point of that email, namely:

*“We are being charged for the exemptions of several papers for Afrah Al Ghafri however all exemptions were done when we registered her earlier this year. Additionally she is due to test for the FR paper in December and has already tested for the Tax & AA papers however failed. We have made payments towards the books, towards registrations of the exams, re-sits....etc and now the invoice is charging us for exemptions of these papers and other papers. How is this possible?”(sic)*

15. The email concluded by saying:

*“It is unacceptable that we are being charged in this way for Afrah.”*

16. By reference to the email from Ms Alghafri to ACCA of 5 November 2019, the exemptions to which the email from Company A made reference are the exemptions for which Ms Alghafri applied in her email.

17. On 18 November 2019, i.e. the day after ACCA had received the email from Company A, Ms Alghafri sent an email, using the email address Email 1, stating that she wanted to forfeit her FR and AA exemptions, i.e. the exams that Company A had pointed out in its email that Ms Alghafri had failed, and for which ACCA required payment of the fees.
18. As stated, on the next day, namely 19 November 2019, Ms Alghafri accessed her myACCA account and changed her email address back to the address she was using prior to 5 November 2019, namely Email 2.
19. On 13 January 2020, Ms Alghafri sent an email to ACCA using the email address Email 2 stating that she wished to remove her Master's degree she had recently submitted in her portal as soon as possible, asking for the steps she needed to take to remove it.
20. On the same day, Ms Alghafri sent another email to ACCA using the same email address saying:

*"This is Afrah alghafri, I want to cancel the recent Master degree certificate. Also, I want to cancel the exemption that I have got recently.*

*Do I have to pay more for these kind of transaction?*

*Thank you,*

*Afrah Alghafri"*

21. On 17 February 2020, Ms Alghafri sent an email to ACCA and, for the first time, she made the suggestion that the certificate had not been entered by her and that her employer had just informed her that the submission had been made in her name. Furthermore, she attached to that email the certificate and transcript from [REDACTED] even though she stated that they had not been submitted by her.

22. On 18 February 2020, ACCA sent an email to Ms Alghafri summarising the emails that had been exchanged between her and ACCA using the address Email 2. At the conclusion of the email, ACCA referred to the waiver form sent in January 2020 by Ms Alghafri regarding the exemptions Ms Alghafri had originally requested.
23. On the same day, 18 February 2020, Ms Alghafri sent an email to ACCA from Email 2 questioning the use of the email address Email 1 in November 2019, suggesting that her registered email address always had a double [REDACTED] and a [REDACTED].
24. However, Mr Mustafa maintained that at no stage had ACCA disclosed to Ms Alghafri the address used in November 2019. He suggested that the fact Ms Alghafri could provide ACCA with the email address Email 1 was highly indicative of her having used this email address in order to send to ACCA the certificate and transcript from [REDACTED].
25. Mr Mustafa confirmed that the chronology showed that it was Ms Alghafri who had submitted the certificate and transcript from the [REDACTED] on 5 November 2019 and that it was sent from the email address registered with ACCA at that time.
26. Turning to whether the certificate and transcript submitted on 5 November 2019 were genuine, Mr Mustafa indicated that there was no dispute that they were false documents.
27. On 14 January 2020, the certificate and transcript were sent by ACCA to [REDACTED] for verification.
28. On 14 January 2020, the University responded to confirm that the certificate and transcript were, *"fake and tempered documents belonging to other student of [REDACTED]."*

29. At this stage, Mr Mustafa called Mr Cameron to give evidence. He confirmed that the content of his statements of 12 November 2020 and 28 November 2025 were true. His written evidence set out the process and factors taken into consideration when awarding exemptions. They also outlined the chronology of events in terms of the submission of the certificate and transcript from the [REDACTED] as outlined above.
30. In answering questions put to him by Mr Yasser, Mr Cameron confirmed that he personally had not dealt with the award of exemptions to Ms Alghafri. This had been administered by someone who was no longer employed by ACCA.
31. Mr Cameron confirmed that when a request for exemptions was received along with a document on which a person may rely in seeking those exemptions, it would not be standard practice to check the name on that document but that it would depend on the institution rather than the country of its origin. If there was an entirely different name on the certificate compared with ACCA records, ACCA would seek verification.
32. If a student was awarded exemptions and then that student submitted an exemption forfeit, ACCA would then cancel the exemption fee.
33. Mr McNeil then gave evidence. He did so on the basis that [REDACTED], who had provided a statement dated 1 December 2020, had since left ACCA. Mr McNeil confirmed that the content of [REDACTED] statement was accurate. The purpose of [REDCATED] statement was primarily to describe the system of payments that would be made by a student in the event of applications being made for exemptions, or by employers on behalf of students, and was therefore more relevant to Allegation 1(b) below.
34. However, Mr McNeil did confirm that, if an application for exemptions was made and a certificate was attached, ACCA would look at the student's name and that of the organisation and, if a spelling mistake was identified, it would depend on the nature of the mistake whether a check would then be undertaken. If there was a suspicion it was not genuine, a check would then be carried out.

### **Ms Alghafri's Case**

35. On 30 October 2025, a Disciplinary Committee made the following direction:

*vii. Ms Alghafri is to serve her own witness statement setting out her case and any additional documents on which she wishes to rely, including any references and testimonials by 4 pm 28 November 2025.*

36. However, despite being represented at the hearing on 30 October 2025 and at this hearing, Ms Alghafri had failed to provide a witness statement, nor had she provided the Committee with any further documents.

37. In the event, Ms Alghafri agreed to give oral evidence. Before outlining a summary of the responses, she gave to questions put to her by Mr Yasser, Mr Mustafa and the Committee, the following is the written account provided by Ms Alghafri in the Case Management Form ("CMF") she submitted, dated 14 May 2022, in answer to the allegations:

*"1- I do deny this allegation.*

*2- I did not submit anything from:*

*a- my registered email with ACCA which is used as a method of communication between us.*

*b- neither from any of my other email addresses.*

*3- I have registered with ACCA with my bachelor's degree from [REDACTED]. On my official certificate, the day of completion is [REDACTED]. The Certificate Mentioned in Schedule A says that I have a Master's degree from [REDACTED]- degree. So may this respective committee answer the following questions:*

*a- How could this well reputed institution accept a master degree that is awarded 3 months after the bachelor's degree that is submitted in my ACCA application?*

*b- How could this well reputed institution accept a request for a waiver from a random email address?*

*c- Do you think that I am not smart enough to not know that a master's degree will need a minimum of 12 months to be completed? If I wanted to commit a fraud, I will at least put a date of awarding this master degree as 2 years after the date stated on my Bachelor's degree.*

*d- How does this happen that an official transcript dated 2 years after the date of completing the Master's? It normally takes max 2 months to generate/issue a transcript. Hence, if I was to commit a fraud, I will put the date of my transcript to be 2 months after the date of awarding the fraudulent master's degree.*

*This email that was sent on Jan 23, 2020 is clear evidence that I had no intention to commit a fraud. I had requested the institution to refund the amount that was paid for the exemptions.*

*This email was sent straight after I knew that I had received an exemption based on a Fictitious master's degree.*

*I had registered at ACCA by myself because I was looking to gain knowledge. The certificate was not considered as a priority. Hence, I had no intention to get exemptions.”*

38. In addition, the Committee had taken note of what Ms Alghafri had stated in her email of 29 April 2020.
39. In that email, Ms Alghafri said that she had not submitted any certificates since her registration as a student in November 2018 and that her account was managed by Company A. She wrote as follows:

*“On 19th of January, the submission of the certificates was noticed by my employer. I wonder how the ACCA global can conform these kind of certificates. Firstly, the certificate was not from my email ID which was written in my portal. Secondly, these certificates hold wrong spelling of my real name. I waived the exemptions once we noticed these kind of documents.*

*No, I didn't submit to ACCA the degree certificate and the exams transcript that issued by [REDACTED] And Yes, I agree that these certificates don't belong to me and I don't have any idea about this University at all. As I mentioned above my employer notified me about these certificates because the bank was a sponsor for this scholarship.”*

40. In answer to questions from Mr Yasser, Ms Alghafri maintained her denial that she had submitted the certificate from [REDACTED]. She posed the question why she would have notified ACCA if she herself had submitted the certificate.
41. Ms Alghafri stated that she was a [REDACTED] and so she was working in that field. Ms Alghafri denied that she had been there at the time of the submission of the certificate. Indeed, later in her evidence, she stated that the certificate was in the wrong name and that she had never been to that country [REDACTED] before.
42. Her previous employer, Company A, had informed her that an anonymous email came into them with the fake certificate on this student's account. Ms Alghafri also suggested that the log-in details would assist, and the Committee should ask ACCA to send details to check from which country that this happened i.e. where the log-in had taken place.
43. In answer to questions from Mr Mustafa, Ms Alghafri denied that the email of 5 November 2019 was sent by her and that the email address did not belong to her.

44. As for the four exemptions listed in the email from ACCA on 8 November 2019, Ms Alghafri questioned why she would request exemptions as she had sat the exams and had studied for three months before each exam. However, she accepted that she had not passed the exams and had re-sat them.
45. Ms Alghafri said that she knew the person who had sent the email on 17 November 2019 on behalf of Company A in which Company A questioned why it was being required to pay the fees for exemptions of exams which she had sat and failed. She denied sending the email of 18 November 2019 containing the request to forfeit the exemptions for FR and AA, the two exams Company A stated that she had sat and failed. Ms Alghafri could not agree that there was any connection between the two emails, or that it was a coincidence that the email of 18 November 2019 from Email 1 was sent the day after the email from Company A.
46. As for the two emails of 13 January 2020 from Email 2, Ms Alghafri accepted that they were emails that she sent, requesting ACCA to remove and cancel the Master's certificate she had recently submitted but she stated that she had sent those emails in a panic. As for her failure to point out to ACCA that it was not her who had submitted the certificate, Ms Alghafri indicated that her English was not very good at that time, and she repeated that she was in a state of panic.
47. As for her email on 17 February 2020, Ms Alghafri confirmed this was the first occasion on which she indicated that it was not her who had submitted the certificate from [REDACTED] and she had received from her employer the certificate and transcript she attached to her email to ACCA although Ms Alghafri had not produced the email from Company A.
48. In the email Ms Alghafri sent to ACCA on 18 February 2020, Ms Alghafri referred to the email address used to send the Master's certificate and transcript on 5 November 2019 and the subsequent email of 18 November 2019. When asked how she had become aware of that email address i.e. Email

1, Ms Alghafri could not recall whether she had been informed by Company A or ACCA.

49. Finally, Ms Alghafri maintained that the Master's certificate and transcript could not have been sent by her as they contained inaccurate information such as her first name and her surname. The certificate also did not contain the appropriate seal from the University.

50. Mr Yasser then called Person A to give evidence on behalf of Ms Alghafri as to her character. In answer to questions from Mr Mustafa, they confirmed that they were aware of the nature of the allegations being made against Ms Alghafri and that Ms Alghafri had asked them for advice. In the course of their written testimonial, Person A stated as follows:

*"Based on my direct knowledge and experience, Ms Alghafri is a person of good character, integrity, and sound moral values. She has consistently demonstrated honesty, diligence, and a strong commitment to professional and ethical standards in her work and interactions.*

*At no time during our acquaintance have I observed, nor have I become aware of, any conduct on her part that would indicate dishonesty, fraud, or deliberate misconduct. On the contrary, her approach has always reflected respect for professional obligations, compliance, and ethical responsibility."*

51. In his closing submissions, Mr Yasser emphasised that there were multiple errors in the certificate from the [REDACTED], to include the misspelling of Ms Alghafri's name, the absence of a seal, and the incorrect format. He suggested that if ACCA had looked at the certificate and transcript properly, *"we would not be here"*.

52. Mr Yasser also stated that the allegations should be rejected and placed reliance on the Statute of Limitations, submitting that this allegation related to events that occurred some six years ago. However, Mr Yasser was not in a

position to provide the Committee with any authority or statute on which he relied in support of such a submission.

### **Findings of the Committee in respect of Allegation 1(a)**

53. In reaching its decision, the Committee reminded itself that it was for ACCA to prove the facts of the allegation and that the standard of proof was the civil standard, namely on the balance of probabilities.
54. The Committee had also listened to the advice of the legal advisor in relation to Ms Alghafri's good character and it had taken this fully into account when assessing the evidence.
55. The Committee had heard the evidence of Mr Cameron and Mr McNeil. Mr McNeil had effectively adopted the evidence contained in the witness statement of [REDACTED]. None of this evidence had been challenged to any material extent.
56. In any event, the Committee was able to base its findings of fact to a significant extent on the documentary evidence contained in the bundle and primarily produced by ACCA.
57. Ms Alghafri had been provided with ample opportunity to produce any documentary evidence on which she may wish to rely but she had failed to do so. She had also been represented both at this hearing and also at previous hearings. In particular, she had been represented at the hearing on 30 October 2025 when she was directed to provide a witness statement "*and any additional documents on which she wishes to rely.... by 4 p.m. 28 November 2025*".
58. Having considered the documentation, and having heard Ms Alghafri's account, the Committee did not find her explanation to be credible. In reaching this conclusion, and as stated above, the Committee had taken fully into consideration that Ms Alghafri was a person of good character.

59. The Committee was satisfied that, prior to 5 November 2019, Ms Alghafri had registered her information on her myACCA account, with the email address of Email 2. Ms Alghafri did not dispute that this was an email address she used.
60. Ms Alghafri disputed that she went on to her myACCA account on 5 November 2019 and changed her email address to Email 1. However, the Committee was satisfied, on the balance of probabilities, that either Ms Alghafri or someone with her knowledge and consent did so. Ms Alghafri suggested that ACCA should check who else may have logged on to her account at that time but she had every opportunity to do so herself. She had neither done so nor requested ACCA to do so in the months before the hearing. It was not challenged that the reference to "HUBUSER" meant that it was Ms Alghafri who had changed the email address via her myACCA account.
61. Furthermore, the sequence of events as set out below and as evidenced by the documentation, supported the conclusion that Ms Alghafri knew that the email had been changed.
62. The Committee was satisfied that, on 5 November 2019, ACCA received an email from Ms Alghafri who used the following email address Email 1. In that email, Ms Alghafri claimed that she had studied an MSc in Accounting and Finance at the [REDACTED]. She attached to that email what she claimed to be a certificate of her Master's degree and a transcript of the subjects that she had studied and the grades she had achieved in those subjects. In her email, Ms Alghafri claimed exemptions from ACCA exams in respect of F4, F5, F6 and F9.
63. In the course of her evidence, Ms Alghafri had suggested that Company A had informed her that it had received an anonymous email from someone who had submitted the false certificate from the [REDACTED] but she had not produced that email nor any evidence that she had contacted Company A requesting them to forward the email to her. The Committee rejected Ms Alghafri's evidence and found, on the balance of probabilities, that there was no such anonymous email.

64. On 8 November 2019, ACCA sent an email to Ms Alghafri confirming that she had been awarded the following exemptions: (TX) Taxation; (FR) Financial Reporting; (AA) Audit and Assurance, and (FM) Financial Management.
65. On 15 November 2019, Ms Alghafri sent another email to ACCA from the Email 1 account, saying that she had applied for exemptions but had not received exemptions in F5, requesting ACCA to look into the matter.
66. On the same day, ACCA responded to the same email address, confirming that she had been awarded the additional exemption of (PM) Performance Management.
67. On 17 November 2019, an important development took place. ACCA received an email from Ms Alghafri's employer, Company A. In the second bullet point of that email, it said as follows:

*"We are being charged for the exemptions of several papers for Afrah Al Ghafri however all exemptions were done when we registered her earlier this year. Additionally she is due to test for the FR paper in December and has already tested for the Tax & AA papers however failed. We have made payments towards the books, towards registrations of the exams, re-sits....etc and now the invoice is charging us for exemptions of these papers and other papers. How is this possible?"*

68. The email concluded by saying:

*"It is unacceptable that we are being charged in this way for Afrah."*

69. By reference to the email from Ms Alghafri to ACCA of 5 November 2019, the exemptions to which the email from Company A made reference were the exemptions for which Ms Alghafri applied in her email.

70. On 18 November 2019, i.e. the day after ACCA had received the email from Company A, Ms Alghafri sent an email, using the email address Email 1. The Committee noted that, in this email, Ms Alghafri said that she wanted to forfeit her FR and AA exemptions, i.e. the exams that Company A had pointed out in its email that Ms Alghafri had failed, and for which ACCA required payment of the fees. The Committee found that this was significant, in that Ms Alghafri had reacted to the fact that Company A had questioned the payments it had been requested to make on her behalf.
71. On the next day, namely 19 November 2019, Ms Alghafri, or someone on her behalf and with her knowledge, accessed her myACCA account and changed her email address back to the address she was using prior to 5 November 2019, namely Email 2. In the course of her oral evidence, Ms Alghafri confirmed that this was the correct email address that she was using.
72. On 13 January 2020, Ms Alghafri sent an email to ACCA using the email address Email 2 stating that she wished to remove her Master's degree she had recently submitted in her portal as soon as possible, asking for the steps she needed to take to remove it.
73. Indeed, it is worth producing the email in full:

*"Hi*

*This is Afrah [REDACTED]*

*I want to remove my Master degree that I've recently submitted in my portal as soon as possible. Please provide me the steps to remove it.*

*Thank you,*

*Afrah Alghafri*

*Sent from my iPhone"*

74. On the same day, Ms Alghafri sent another email to ACCA using the same email address saying:

*“This is Afrah alghafri, I want to cancel the recent Master degree certificate. Also, I want to cancel the exemption that I have got recently.*

*Do I have to pay more for these kind of transaction?*

*Thank you,*

*Afrah Alghafri”*

75. The Committee noted that, on neither occasion did Ms Alghafri make the suggestion that her account had been misused by some unknown third party. She had not suggested that some unknown person had changed her email address on her myACCA account and then sent forged documents to ACCA in an attempt to deceive ACCA into believing that she had obtained a Master’s degree from the [REDACTED] to enable her to falsely claim a number of exemptions.
76. The Committee did not accept that Ms Alghafri had sent the emails of 13 January 2020 in a state of panic, nor did the Committee find Ms Alghafri’s explanation that her *“English was not very good”* to be persuasive. Ms Alghafri had obtained an English Language certificate which showed that her ability to speak English was proficient. The Committee found that Ms Alghafri had realised that her attempt to obtain exemptions by submitting a false Master’s certificate and transcript had been discovered, and she was endeavouring to cover her tracks.
77. On 17 February 2020, Ms Alghafri sent an email to ACCA and, for the first time, she made the suggestion that the certificate had not been submitted by her and that her employer had just informed her that the submission had been made in her name. However, this was approximately three months after Company A had queried the position with ACCA in its email of 17 November 2019.

Furthermore, she attached to that email the certificate and transcript from the [REDACTED] even though she stated that they had not been submitted by her. Whilst Ms Alghafri had suggested that Company A had sent the documents to her, she had not produced the email to support what she had said.

78. On 18 February 2020, ACCA sent an email to Ms Alghafri summarising the emails that had been exchanged between her and ACCA using the address Email 2. At the conclusion of the email, ACCA referred to the waiver form sent in January 2020 by Ms Alghafri regarding the exemptions Ms Alghafri had originally requested.
79. On the same day, 18 February 2020, Ms Alghafri sent an email to ACCA from Email 2 questioning the use of the email address Email 1 in November 2019, suggesting that her registered email address always had a double [REDACTED] and a [REDACTED].
80. However, the Committee was satisfied that at no stage had ACCA disclosed to Ms Alghafri the address used in November 2019. The Committee found that the fact Ms Alghafri could provide ACCA with the email address Email 1 was highly indicative of her being aware of the fact that this email address was used in order to send to ACCA the certificate and transcript from the [REDACTED].
81. It was not disputed by Ms Alghafri that the Master's certificate and transcript were not genuine. By reference to the email from the representative of the [REDCACTED] dated 14 January 2020, which had not been challenged, the Committee was satisfied that this was so.
82. However, part of the defence put forward by Ms Alghafri was that, had ACCA examined the certificate and transcript properly, it would have been obvious that they were forgeries. However, the Committee did not consider such an argument to hold any merit.

83. By reference to the certificate and transcript, it was suggested by Ms Alghafri that they showed her incorrect forename and surname, the format was incorrect and the certificate did not have a proper seal.
84. However, [REDACTED] indicated that the forged documents belonged to another student of the [REDACTED]. In the absence of any evidence to the contrary, there was nothing to suggest that the format was incorrect nor was the absence of a seal of significance, particularly in respect of the transcript.
85. As for the name, the only error in the documents referring to Ms Alghafri was the misspelling of her first name as Arfah instead of Afrah. It was suggested that the surname was misspelt as it should have been written as Alghafri. However, in emails sent by Ms Alghafri herself to ACCA, for example on 13, 23 and 26 January 2020, she typed her name as "*Afrah Alghafri*". Indeed, in the second of the emails of 13 January 2020 when she requested the cancellation of the recent Master's degree certificate, she started the email by saying, "*Hi This is Afrah alghafri*" (sic). Even Person A referred in her written reference to Ms Alghafri as Ms Alghafri. Furthermore, Ms Alghafri confirmed that her date of birth quoted in both documents was correct.
86. Consequently, the Committee rejected the suggestion that it could not have been Ms Alghafri, or someone on her behalf, who submitted the documents to ACCA because of the errors they contained.
87. The Committee was satisfied that the only person who would derive any advantage from this deception, namely, to gain exemptions from ACCA which were not justified, was Ms Alghafri.
88. As for the submission made by Mr Yasser that these proceedings should not continue as it was in breach of the Statute of Limitations, the Committee had not been provided with more information regarding the statutory framework on which Mr Yasser relied. The Committee accepted the legal advice that no such Statute applied to regulatory proceedings such as this.

89. Further, whilst it was of concern that the events giving rise to these proceedings took place in 2019 and 2020, the Committee was satisfied that it was possible for Ms Alghafri to receive a fair hearing. This was primarily because of the substantial documentary evidence available and also because Ms Alghafri had not suggested at any stage prior to, or during, the hearing that her recollection of events was impaired as a result of the passage of time.
90. For all these reasons, the Committee was satisfied to the necessary standard that, on or around 5 November 2019, Ms Alghafri submitted or caused to be submitted to ACCA both the degree of Master of Science in Accounting and Finance – session fall 2016 and [REDACTED] official transcript issued 30 November 2018 which purported to have been issued by [REDACTED] when in fact they had not.
91. On this basis, the Committee found the facts of Allegation 1(a) proved.

#### **Allegation 1(b)**

92. This allegation was admitted by Ms Alghafri and the Committee therefore found it proved.
93. However, the basis on which the allegation was admitted was not accepted by Mr Mustafa.

#### **ACCA's Case**

94. On 23 January 2020, Ms Alghafri sent an email to ACCA in which she said as follows:

*"Hi.*

*This is Afrah, recently I waived exemption for some papers in level 2.*

*I want that amount to be credited to my bank account*

.....

*Thank you,  
Afrah Alghafri*

95. On 25 January 2020, ACCA responded, stating:

*“The relevant amount will be adjusted for the exemptions you forfeited.*

*Please make payment for the remaining exemptions.*

*If you need any further help, please contact us again.”*

96. On 26 January 2020, Ms Alghafri sent an email to ACCA stating that she had checked myACCA and maintained that there were no outstanding fees to pay and requested ACCA to credit her bank account with £525.

97. On 3 February 2020, ACCA responded and stated:

*“Thanks for contacting us*

*As per communications from your exchange employer, they shall not be submitting payment for your 2020 annual subscription fees or for the 5 exemptions they were invoiced that you have subsequently forfeited.*

*Due to this it is not possible to process your refund request.*

*A debit of 530 GBP for the 5 exemption fees the employer was invoiced and 112 GBP for the 2020 annual subscription fee has been raised on your account accordingly.*

*You currently have an outstanding balance of 228 GBP, the easiest way to make payment using a credit/debit card is through your myACCA:”*

98. Mr Mustafa submitted that if this email was considered in conjunction with the email from Company A of 17 November 2019, as described at paragraph 14 above, ACCA alleged that Ms Alghafri was claiming payment of funds which did not belong to her.
99. Consequently, this was a case where Company A, as Ms Alghafri's employer, was paying for everything and so ACCA submitted that it was on this basis that the facts of Allegation 1(b) were established.

### **Ms Alghafri's Case**

100. Ms Alghafri accepted that she had made a request for payment of the credit balance. She maintained that Company A had taken over her account with ACCA in November 2019, but they did not pay the invoice for the exemptions.
101. Ms Alghafri stated that she had paid before asking Company A if they intended to pay her back. When she received the invoice, she made payment to ACCA. However, Ms Alghafri subsequently stated that the email from ACCA dated 3 February 2020 shows that the invoice was sent to her employer for the exemption and it was at that stage that the employer informed her of the invoice.
102. When it was suggested to Ms Alghafri that she was changing her account by initially saying the invoice was sent to her and then saying the invoice was sent to Company A, Ms Alghafri said that she thought it was sent to her employer but she was not sure and that it may have been sent to her as well. However, she maintained that she was the person who made the payment to ACCA although she was not able to produce any evidence in support.

### **Findings of the Committee in respect of Allegation 1(b)**

103. As stated, the facts of the allegation had been admitted and therefore found proved. Nevertheless, ACCA had put its case on the basis that Ms Alghafri had

requested a credit balance on her myACCA account to be credited to her personal account when she knew that she was not entitled to those funds.

104. Whilst the account provided by Ms Alghafri was vague and inconclusive, the Committee reminded itself that the burden of proof remained with ACCA.
105. The Committee was not satisfied that ACCA had produced sufficient evidence to enable it to be satisfied that Ms Alghafri had claimed funds to which she was not entitled. In reaching this conclusion, the Committee had considered carefully the statement of [REDACTED] and its exhibits. For example, it had been submitted by Mr Mustafa that it was Company A which had assumed responsibility to pay for Ms Alghafri's annual subscription and for her exemptions which were subsequently forfeited. This was consistent with the statement of [REDACTED]. Whilst this was so, the Committee was not satisfied that ACCA had established to the required standard an audit trail in respect of the funds, to include what had, or had not, been paid by Company A.

#### **Committee's decision in respect of Allegation 1(c)(i)**

106. In reaching its decision on whether Ms Alghafri had acted dishonestly, the Committee had relied on the test for dishonesty as prescribed by the Supreme Court in the case of *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.
107. The Committee relied on the facts it had found in respect of allegation 1(a).
108. The Committee was satisfied that Ms Alghafri, or someone on her behalf with her knowledge and consent, had accessed her myACCA account on 5 November 2019 and changed her email address on ACCA's register from Email 2 to Email 1.
109. Having done so, the Committee had found that Ms Alghafri, or someone on her behalf with her knowledge and consent, had sent to ACCA a certificate purporting to show that Ms Alghafri had obtained an MSc in Accounting and Finance – session fall 2016 and an official transcript issued on 30 November

2018, both from [REDACTED], and that, at the time they were sent, she knew that both documents were false. The Committee also found that Ms Alghafri submitted the false documents in order to gain exemptions to which she knew, when she submitted the falsified documents, she was not entitled.

110. The Committee found that, by the standards of ordinary decent people, such conduct was dishonest.

111. Consequently, in respect of Allegation 1(a), the Committee found Allegation 1(c)(i) proved.

112. With regard to Allegation 1(b), the Committee relied on its findings of fact as outlined above. For the reasons given, the Committee was not satisfied that ACCA had proved to the required standard that Ms Alghafri had deliberately requested ACCA to credit her personal account with the credit shown on her myACCA account knowing that she was not entitled to those funds.

113. Consequently, the Committee did not find Allegation 1(c)(i) proved in respect of Allegation 1(b).

#### **Allegation 1(c)(ii)**

114. With regard to Allegation 1(a), this allegation was pleaded in the alternative to Allegation 1(c)(i). Therefore, the Committee made no finding in respect of it.

115. As for Allegation 1(b), the Committee did not find it proved for the same reasons as set out above under Allegation 1(c)(i).

#### **Allegation 1(d)(i)**

116. Taking account of its findings that Ms Alghafri had acted dishonestly, the Committee was satisfied that she was guilty of misconduct. Such conduct fell far below the standards expected of a student member of ACCA and could properly be described as deplorable. It put at risk the integrity of the procedure

relating to examinations and the entire process of becoming a member of ACCA. This had profound consequences for the reputation of ACCA. In the Committee's judgement, it brought discredit to Ms Alghafri, the Association and the accountancy profession.

117. The Committee found Allegation 1(d)(i) proved.

### **SANCTION AND REASONS**

118. The Committee considered what sanction, if any, to impose, taking into account all it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions, and the principle of proportionality. It had also listened to the submissions of Mr Mustafa and Mr Yasser and received legal advice from the Legal Adviser which it accepted.

119. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate to conclude the case with no order.

120. The Committee was mindful of the fact that its role was not to be punitive and that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.

121. The Committee had found Ms Alghafri to have acted dishonestly which the Committee considered to be very serious. The Committee concluded that the falsification of the documents and their submission to ACCA was pre-meditated and involved a degree of planning.

122. The Committee considered whether any mitigating or aggravating factors featured in this case.

123. In terms of mitigation, the Committee had not been informed that there were any previous findings against Ms Alghafri. She had cooperated to the extent

that she corresponded with ACCA during the course of the investigation and had attended the hearing and given evidence. Ms Alghafri had made some partial admissions in respect of Allegation 1(b). The Committee also had taken into consideration the written and oral evidence of Person A regarding Ms Alghafri's character as outlined above.

124. The Committee had listened to the submissions of Mr Yasser who endeavoured to mitigate on behalf of Ms Alghafri.
125. However, the Committee noted with surprise that, in the course of his submissions in mitigation, Mr Yasser suggested that the only mistake Ms Alghafri had made was to share her password with a colleague who was in [REDACTED] who said he would be able to get her exemptions. He repeated that the only thing Ms Alghafri did was to share her password.
126. The Committee found such serious misconduct to be aggravated in the following ways.
127. In denying the allegation of submitting false documents to ACCA, Ms Alghafri had shown neither insight nor remorse. Furthermore, as stated, the motivation for submitting false documents in order to gain exemptions to which she was not entitled was pre-meditated, took a degree of planning and the motive was to derive a personal benefit.
128. The Committee also noted that certain of the exemptions related to exams that Ms Alghafri had failed. There was a risk, therefore, that Ms Alghafri may have advanced her career when not competent to do so. In this way, she may have represented a risk to the public.
129. The Committee was satisfied that Ms Alghafri's conduct represented a serious breach of trust placed in her by ACCA to conduct herself properly and honestly. It was also unfair to those who approached their exams and their entitlement to exemptions in an honest and compliant way.

130. On the basis of its findings, the Committee concluded that neither an admonishment nor a reprimand would represent a sufficient and proportionate outcome. Neither sanction would adequately reflect the seriousness of the Committee's findings.
131. The Committee then considered whether a severe reprimand would be an appropriate sanction. Again, taking account of the seriousness of its findings, and reflecting on the criteria suggested in the Guidance, the Committee did not consider that a severe reprimand would be sufficient or proportionate. Indeed, the Guidance suggests that such a sanction may be appropriate when there is evidence of an individual's understanding and appreciation of the conduct found proved. No such evidence had been provided by Ms Alghafri.
132. The whole purpose of the process by which a student member progresses to qualification was in order to maintain the integrity of that process.
133. Ms Alghafri's dishonest conduct represented conduct which was fundamentally incompatible with being a student member of ACCA. Her failure to show any insight led the Committee to conclude that, currently, there was no guarantee that Ms Alghafri would behave in a manner expected of a member of ACCA.
134. Having found Ms Alghafri to have acted dishonestly, the Committee had not been provided with mitigation which was so remarkable or exceptional that it warranted anything other than removal from the student register.
135. The Committee concluded that the only appropriate, proportionate and sufficient sanction was to order that Ms Alghafri shall be removed from the student register.

### **COSTS AND REASONS**

136. The Committee had been provided with a Simple Costs Schedule (page 1) and a Detailed Costs Schedule (pages 1 to 3) relating to ACCA's claim for costs.

137. The Committee concluded that ACCA was entitled to be awarded costs against Ms Alghafri, all allegations having been found proved. The amount of costs for which ACCA applied was £10,943.50. The Committee considered that, taking account of the history of the case, the amount claimed was reasonable.
138. Ms Alghafri had provided ACCA with a Statement of her financial circumstances. Whilst no documents had been produced to support the figures contained in the Statement, the Committee was prepared to accept that Ms Alghafri's financial means were [PRIVATE]. After outgoings, it would appear that Ms Alghafri [PRIVATE].
139. In all the circumstances, and in exercising its discretion, the Committee considered that it was reasonable and proportionate to award costs to ACCA in the reduced sum of £2,000.00.

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

140. The Committee had considered whether the order should have immediate effect.
141. Whilst the Committee noted that Ms Alghafri is a student, it was concerned that she had been found to be dishonest and the Committee had no information regarding her current employment status, other than her involvement in certain organisations. In the absence of such information, and in light of the Committee's findings regarding Ms Alghafri's conduct, it concluded that Ms Alghafri presented a risk to the public and therefore it was in the interests of the public to make an order which takes effect immediately.

**Mr Andrew Gell**  
**Chair**  
**5 February 2026**