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HEARING

ADMISSIONS AND LICENSING COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Ms Sara Javaid**
Heard on:	**Friday, 26 June 2026**
Location:	**Held remotely via Microsoft Teams**
Committee:	**Ms Valerie Paterson (Chair)** **Ms Dorothee Berg (Accountant)** **Ms Samantha Lipkowska (Lay)**
Legal Adviser:	**Ms Katrina Hyde (Legal Adviser)**
Persons present and capacity:	**Ms Holly Girven (ACCA Case Presenter)** **Ms Anna Packowska (ACCA Hearings Officer)**
Observer:	**Mr Alan Clamp (ACCA Appointments Board)**
Summary	**Application for re-admission to student register refused**

INTRODUCTION

1. The Admissions and Licensing Committee ("the Committee") met to consider an application by Ms Sara Javaid for re-admission to ACCA's student register pursuant to the Membership Regulations.

2. Ms Javaid attended the hearing, with a support person. ACCA was represented by Ms Girven. Ms Anna Packowska attended as Hearings Officer.

3. The papers before the Committee comprised of a Main Bundle (39 pages) and a Service Bundle (16 pages).

PROCEEDING IN PRIVATE

4. The Committee itself considered and raised whether matters relating to Ms Javaid's personal and private life should be heard in private. The Committee noted that both Ms Javaid and ACCA agreed that when hearing personal and private matters in relation to Ms Javaid, the hearing should proceed in private.

5. The Committee heard and accepted the advice of the Legal Adviser and determined that it was in the interests of justice to proceed in private when hearing those matters relating to Ms Javaid's personal and private life.

BRIEF BACKGROUND

6. Ms Javaid registered as an ACCA applicant on 08 December 2022 and was accepted as an ACCA student on 09 December 2022. On 19 March 2025, Ms Javaid uploaded a transcript purporting to be from the

Institute of Chartered Accountants Pakistan ("the ICAP") in support of an application for exemption from ACCA Examinations.

7. On 08 April 2025, the ICAP confirmed to ACCA that the transcript was forged and that it was not in their records. Accordingly, on 17 July 2025, ACCA advised Ms Javaid that she was being administratively removed from the ACCA student register.

8. On 06 September 2025, Ms Javaid applied for re-admission to ACCA's student register pursuant to the Membership Regulations. On her application form she signed a declaration that stated: *"I confirm that the information contained in this form is true, accurate and complete to the best of my knowledge and belief."* In support of her application, Ms Javaid provided explanations in her application form, a personal letter regarding the circumstances and her reasons as to why she should be readmitted. She submitted: her degree certificate from the University of the Punjab (Bachelor of Commerce degree), two-character references and the false document, which was the subject of the hearing, namely the transcript purporting to be from the ICAP in support of her application for exemption from ACCA Examinations.

SUBMISSIONS ON BEHALF OF ACCA

9. On behalf of ACCA, it was submitted that the application for re-admission should be refused. ACCA submitted that in providing information and evidence to the Committee, Ms Javaid had provided very little detail as to her reasons and thinking process in submitting the false document. She had simply stated that she was in a period of significant personal and academic pressure, without explaining further.

10. Although she had expressed regret, she had given no explanation of how she intended to prevent a similar incident from taking place in

future. One of her character referees stated that she sat the Audit and Assurance examination as a corrective step, having previously applied for an exemption in respect of this exam, in relation to this ACCA submitted that in fact this was arguably to further her career progression, as she had likely been advised that she would have to sit that examination anyway.

11. ACCA also submitted that Ms Javaid had shown little appreciation for the impact of her conduct on other members of the profession and that she could be considered a risk to the public and could fail to uphold the integrity of the accounting profession if she was readmitted to ACCA student membership. Such conduct at such an early stage in Ms Javaid's career was concerning to ACCA and to the accountancy profession. ACCA submitted that the behaviour of Ms Javaid was serious, involving behaviour that was both dishonest and demonstrated a disregard for ACCA's membership process.

12. ACCA submitted that the reputation of the accountancy profession depended upon members and prospective members acting with integrity. ACCA relied upon the authority of *Bolton v Law Society* [1994] 1 WLR 512, quoting Sir Thomas Bingham MR's observation that: *"the reputation of the profession is more important than the fortunes of the member. Membership of a profession brings many benefits, but that is a part of the price."*

13. ACCA also relied upon the Court of Appeal's decision regarding integrity in *Wingate and Evans v The Solicitors Regulation Authority* [2018] EWCA Civ366. Jackson LJ stated the following in relation to regulated professions generally:

"97. In professional codes of conduct, the term "integrity" is a useful shorthand to express the higher standards which society expects from

professional persons and which the professions expect from their own members. … The underlying rationale is that the professions have a privileged and trusted role in society. In return they are required to live up to their own professional standards."

14. In relation to the character references, ACCA submitted that they were not sufficient to outweigh the seriousness of what Ms Javaid had done.

15. In relation to Ms Javaid's oral evidence, Ms Girven on behalf of ACCA submitted as follows in relation to the factors below:

    a. Underlying facts and surrounding circumstances: it was submitted that the conduct was serious.
    b. Changes since the applicant was removed and her current attitude; it was submitted the applicant put forward limited evidence of change or insight.
    c. The applicant's reasons for wanting to be re-admitted, ACCA submitted that this was a matter for the Committee.
    d. Whether the applicant would be likely to contravene rules in future; ACCA submitted that there were still risks around dishonesty and lack of integrity.
    e. ACCA accepted that Ms Javaid had had no further disciplinary matters or complaints since she had been removed from the register.
    f. ACCA noted there were two positive character references.

16. Ms Girven also submitted on behalf of ACCA that Ms Javaid's evidence had been slightly confusing. She had originally stated in her written evidence that she thought she could benefit from an exemption for the examination. However during today's hearing she had accepted that at the time of submitting the false document, she knew that she could not get an exemption

17. Finally, ACCA submitted that pursuant to Regulation 9 of the Membership Regulations, the burden lay upon Ms Javaid to satisfy the Committee as to her general character and suitability for membership, and that, taking all matters into account, she had not discharged that burden. ACCA therefore opposed the application for re-admission.

THE APPLICANT'S SUBMISSIONS

18. The Committee considered the written material submitted in support of the application for re-admission and the oral evidence which Ms Javaid gave in person to the Committee during the hearing.

19. She had set out her reasons in a letter:

"In March 2025, I submitted a transcript that was not genuine …This action was the result of my own poor judgment, taken during a time of significant personal and academic pressure. I fully acknowledge that this was a serious lapse on my part, and I take complete responsibility for it. Since then, I have had time to reflect deeply on the consequences of my actions. I now understand the seriousness of what I did not only in breach of ACCA's rules, but also of the ethical standards I aspire to uphold…."

20. In addressing the question of future conduct, Ms Javaid expressed remorse and stated that she had learned a lesson. She wrote:

"This experience has been a turning point in my personal and professional development. It has made me acutely aware of the importance of honesty, transparency, and ethical conduct. I am fully committed to rebuilding that trust and ensuring that my future path is defined by integrity and accountability. I respectfully request the Committee to consider giving me an opportunity to continue my ACCA

journey. I am determined to meet every requirement honestly and to conduct myself in a manner worthy of the ACCA designation."

21. Ms Javaid also relied upon two-character references in support of her application. One was provided by Person A, who stated they had known her for six years in a personal capacity. She had explained the corrective actions she had taken to them. Person A stated that they had witnessed Ms Javaid's sincere remorse, renewed commitment to ethical standards, and determined efforts to rebuild trust. She had sat the Audit and Assurance paper in the June 2025 session as a corrective step, despite previously applying for an exemption. Person A said this reflected her regret and serious intent to align with ACCA's values. She had demonstrated genuine introspection and a clear commitment to moving forward with honesty and integrity.

22. The second reference was provided by Person B, who stated that they had known Ms Javaid for over seven years in both personal and professional settings. She had made a serious error, but in responding she had shown has shown immense strength of character. Her remorse was deep and sincere, and she had renewed purpose and maturity. She had embraced responsibility, sought self-improvement, and demonstrated an unshakable commitment to the core values of ethical and professional conduct. Person B was of the view that she was ready to contribute meaningfully and responsibly to the profession. Person B was also confident that Ms Javaid would uphold the standards ACCA stood for. They strongly and unreservedly recommended her readmission.

23. Ms Javaid also gave evidence in person to the Committee. She stated that she was extremely sorry for her actions. She understood that she had made a very serious mistake, it was in the past, and she now wished to show by her conduct going forward that she could be trusted.

She respectfully requested a second chance from the Committee so that she could prove herself. She was determined to take responsibility and uphold the standards of an ACCA student. She had been under social and family pressure at the time and regretted what she had done.

24. In answer to questions from the case presenter, Ms Javaid said that she knew at the time she submitted the false document that she was not entitled to an exemption. When asked what she would do differently, she said she needed another chance to regain trust. She would never do it again, the consequences had been so serious. She accepted that it had taken her some time to submit the false document. In answer to a question regarding the impact on the public, she answered that the impact on the profession and the public had been very bad.

25. In answer to questions from the Committee, Ms Javaid said she was currently working in taxation. Her previous workplace had known about the incident concerning the false document, and one of her written character references had been provided from that firm. At her previous workplace her job had consisted of auditing and taxation, she was learning. She had undertaken an articleship at that firm for three and a half years. When asked how she dealt with ethical situations, or difficult situations at work currently, she stated that she always worked harder, to find a way out and make something positive out of it.

26. [PRIVATE]

27. In answer to a question from the Committee about the impact on the public of her actions, Ms Javid replied that she was aware that the public interest was impacted negatively and what she had done was very unethical. Miss Javid was given the example by the Committee of a person holding themselves out as a doctor, without having passed

the requisite exams. She was asked in that case would she have concerns that advice given might be defective. She answered that bypassing the exam was not actually her purpose. Even after that she had five exams to pass. It was not her aim to not study.

DECISION AND REASONS

28. The Committee received and accepted the legal advice from the Legal Adviser. The Committee considered the application in accordance with the Membership Regulations, in particular Regulation 9, which required an applicant to satisfy the Admissions and Licensing Committee as to her general character and suitability for membership. It also considered Membership Regulation 14 titled "Readmission" and the ACCA Guidance for the Admissions and Licensing Committee.

29. The Committee also considered paragraph 2.3 of the ACCA Guidance for regulatory orders:

2.3.1 It is a settled principle of law that the purpose of orders issued by a professional regulatory body is to:

- *protect the public*
- *maintain public confidence in the profession*
- *maintain proper standards of conduct."*

30. The Committee reminded itself that the burden of proof was the balance of probabilities. The Committee further reminded itself that relevant considerations included:

a. The seriousness of her original action in submitted a fraudulent document;

b. The extent to which the applicant had accepted responsibility for that misconduct;
c. The degree of insight demonstrated;
d. Any evidence of remediation or changed behaviour;
e. The passage of time since exclusion;
f. The need to uphold public confidence in the profession.

31. The Committee also reminded itself that its decision had to be proportionate, balancing the impact upon the applicant against the need to protect the public, maintain the reputation of the profession and ACCA's regulatory objectives.

32. The Committee carefully considered all the evidence before it, including ACCA's submissions, Ms Javaid's written application for re-admission and supporting documentation, the evidence it heard during the hearing and the two character references.

33. The Committee considered that the original conduct of Ms Javaid in March 2025 of submitting a false transcript, was both recent and very serious. It was behaviour that went to the heart of integrity and honesty and therefore to eligibility for membership of the profession. The Committee considered that ACCA's submission regarding the amount of time it would have taken to execute and submit the false document was relevant. The act Ms Javaid had carried out was not quick or carried out on the spur of the moment. Nonetheless, she decided to go ahead, there was planning involved. That made the matter more serious.

34. In assessing Ms Javaid's application and evidence, the Committee had no doubt that Ms Javaid's regret and sorrow were sincere. It was clear from her evidence that she was sorry for what she had done. However

having gone on to consider other factors, the Committee was not satisfied that this was sufficient to grant the application.

35. The Committee considered the extent to which Ms Javaid had accepted responsibility for her behaviour and demonstrated insight. She had given an explanation of societal and family pressures. She had also explained in private session to the Committee other matters that had affected her. However the Committee was not satisfied that was enough to excuse her behaviour in submitting the false document.

36. In all the evidence she had presented, Ms Javaid had not demonstrated a sufficiently deep appreciation of the impact that her conduct had on other people, the public and the profession. The Committee had endeavoured to give Ms Javaid numerous opportunities, by re-wording its questions, to demonstrate that she had reflected on her actions. She failed to demonstrate that reflection and she failed to demonstrate sufficient insight into the seriousness of her conduct.

37. In relation to the current circumstances, the Committee found Ms Javaid's evidence unclear as to the ambit of her current work and it was of the view that she had not given sufficient proof of remediation. As of today's hearing, the information she had provided was under-developed and there was not enough to show that she had reflected thoughtfully on her actions.

38. The Committee carefully considered the two-character references relied upon by Ms Javaid. The Committee considered that these references, while they addressed some matters that were helpful, they provided insufficient independent evidence of Ms Javaid's current insight or rehabilitation.

39. The Committee acknowledged that Ms Javaid had no other prior disciplinary history and had expressed regret that the Committee evaluated as sincere and genuine. It considered whether attaching any conditions could address its concerns. However the Committee took the view that when balancing the fundamental seriousness of the conduct, the public interest and the lack of insight from Ms Javaid, no conditions would be sufficient. The Committee reminded itself of proportionality, and the importance of maintaining public confidence in the accountancy profession and in ACCA's role as regulator.

40. Having considered all the evidence before it and having taken into account proportionality and the impact of refusal upon Ms Javaid, the Committee concluded that she had not satisfied it, pursuant to Regulation 9 of the Membership Regulations, that she was of suitable character to be readmitted to ACCA student membership at this time.

ORDER

41. Pursuant to the Membership Regulations, the Admissions and Licensing Committee refuses Ms Sara Javaid's application for readmission to ACCA student membership.

Ms Valerie Paterson
Chair
26 June 2026