

HEARING

**DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

In the matter of:	Ms Kareen Fosang
Heard on:	Thursday, 05 March 2026
Location:	Remotely via Microsoft Teams
Committee:	Ms Ilana Tessler (Chair) Mr Abdul Samad (Accountant) Mrs Victoria Smith (Lay)
Legal Adviser:	Mr Elliott Kenton (Legal Adviser)
Persons present and capacity:	Ms Kareen Fosang (ACCA Member) Mr Mazharul Mustafa (ACCA Case Presenter) Ms Aimee Murphy (Hearings Officer)
Summary	Severe Reprimand
Costs:	£7,837.50

INTRODUCTION AND PRELIMINARY MATTERS

1. The Disciplinary Committee of ACCA (the “Committee”) convened to consider a report concerning Ms Kareen Fosang.
2. The Committee had before it a bundle of documents (267 pages), a service bundle (22 pages) and a tabled additional bundle from Ms Fosang (12 pages)

3. By way of preliminary application, ACCA made an application to amend the allegations, pursuant to Complaints and Disciplinary Regulations 2014 (CDR) 10(5). These related to incorrect pronouns in Allegation 4 (a) and 4 (c) and at Allegation 5(b), the inclusion of reference to Allegation 2. Ms Fosang remained neutral to this application.
4. Having considered ACCA submissions and the legal advice, the Committee granted the application pursuant to CDR 10(5).

ALLEGATIONS/ BACKGROUND

5. The allegations (as amended in red) faced by Ms Fosang were as follows:

Allegation 1

Ms Kareen Fosang, an ACCA member breached the Global Practising Regulations (applicable from 2015 – 2024) by virtue of the following:

- a) On dates between, 23 May 2015 to present, Ms Fosang was holding out and/or carrying on public practice). without holding a valid ACCA practising certificate, contrary to regulation 3(1)(a).
- b) On dates between, 23 May 2015 to 24 May 2023, Ms Fosang was an LLP Designated Member of Company A a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(a).
- c) On dates between, 06 December 2019 to 30 March 2021, Ms Fosang was director of Company B a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(a).
- d) On dates between, 06 December 2019 to 30 March 2021, Ms Fosang held rights in Company B which in effect put her in position of principal of a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(b).

- e) On dates between, 30 June 2021 to 24 May 2023, Ms Fosang was director of Company D a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(a).
- f) On dates between, 30 June 2021 to 24 May 2023, Ms Fosang held rights in Company D, which in effect put her in position of principal of a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(b).
- g) On dates between, 21 July 2021 to 18 May 2024, Ms Fosang was director of Company C a firm holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(a).
- h) On dates between, 21 July 2021 to 18 May 2024, Ms Fosang held rights in Company C which in effect put her in position of principal of a firm carrying on and/or holding out to be in public practice without holding a valid ACCA practising certificate, contrary to regulation 3(2)(b).

Allegation 2

On dates between 26 June 2017 to 15 June 2021, Ms Fosang an ACCA member, provided accountancy services within the terms of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 without having registered with a supervisory authority for monitoring purposes, contrary to regulation 3(2) of Annex 1 of the Global Practising Regulations 2003.

Allegation 3

On dates between, 05 May 2018 to 26 January 2022, Ms Fosang submitted online annual CPD returns to ACCA as detailed in Schedule 1, in which she declared that she had not engaged in public practice without holding an ACCA Practising certificate when she had.

Allegation 4

Ms Fosang's conduct in respect of allegation 3 above

- a) Was dishonest in that she knew she had been carrying on public practice without a practising certificate but declared that she had not; or
- b) Demonstrates a lack of integrity; or in the further alternative;
- c) Was reckless in that she failed to have any or sufficient regard to the declaration she signed when she wrongly stated that she had not engaged in public practice activities without holding a practising certificate.

Allegation 5

- a) In respect of any or all of the facts set out at allegations 1 to 4 above, Ms Fosang is guilty of misconduct pursuant to bye-law 8(a)(i) or in the alternative;
- b) In respect of allegation 1 and 2, liable to disciplinary action contrary to bye-law 8(a) (iii).

Schedule 1	
CPD return – public practice declaration	Date of submission
2016	05 May 2018
2017	05 May 2018
2018	16 Jan 2019
2019	07 Jan 2020
2020	27 Jan 2021
2021	26 Jan 2022
2022	27 Jan 2023

6. Ms Fosang became a Member of ACCA on 11 December 2015.

7. On June 2021, a referral was made to ACCA's Investigations Department following an application for a practising certificate from Ms Fosang. She had submitted her application via email on 16 April 2021 and her email signature included the following references, Partner at Company A Chartered Accountants - ACCA Qualified. Also, the email signature included a link to the webpage [REDACTED].
8. The referral confirmed that Ms Fosang had been an LLP Designated Member since 23 May 2015, for the firm, Company A The firm's website outlined services which "appear consistent with public practice".
9. There was an X (formerly Twitter) profile (set up in 2015) and a Facebook profile for Company A with posts regarding self-assessment tax returns.
10. On 12 February 2022, Ms Fosang was notified of ACCA's investigation and was sent a copy of ACCA's Am I In Public Practice Factsheet.
11. Ms Fosang submitted a response on 13 February 2022. In that response, she states:

In response to the above, currently work is being carried out for friends and family which I was not aware would be deemed as public service and therefore would like the grace to be able to take the right precautions to make sure that I am compliant with ACCA regulations.

- *Is a director of Company A and Company D.*

I am a Partner of Company A and a director of Company D. Company D has been operating for some time and providing bookkeeping services as well some submissions for family and friends and Company A has been incorporated but there has been no trading activity to date.

- *Holds shares in Company A and Company D.*

I hold shares in both companies but was unaware that this would be any issue or going against any ACCA regulations.

Enquiries 2 a)

- You became a member of ACCA on 11 December 2015 and a fellow on 11 December 2020*

This is accurate.

- You became a director of Caompy A on 23 MAY 2015 and a director of Company D on 30 June 2021*

This is accurate. I am a Partner of Company A and director of Company D.

- You held over 4.99% shares in Company A from 2015 and Compantrom 2021, which put you in the position of principal in the firms*

This is accurate

- Company A and Company D's nature of business category is shown on Companies house as 69201 - Accounting and auditing activities*

This is accurate, this is the best description we felt was appropriate and we carry out absolutely no audit work with either business and Company D is not trading yet.

- You appear to be out in the public practice by virtue of your occupation which is shown as 'Director' in Companies house for both firms*

Company A is an LLP so I am a partner and Company D. I am a Director of which no activity is being carried out yet. Both of which I was unaware that I was classed as carrying out public practice services given this has only been catered to family and friends.

- *Your website for the company indicates that you are holding out to be in public practice due to the services being advertised, including tax and accountancy services*

Our website was created in preparation of my practising certificate being obtained in order to start gaining awareness to wider than just family and friends, however we have had no activity via our website with providing services for the wider public and I was unaware that this would be an issue until then. The website has been deactivated straight away and will be till this matter is dealt with accordingly.

- *Your email signature stated Kareen Fosang, Partner, Company A Chartered Accountants - ACCA Qualified therefore describing the firm as Chartered Accountants – ACCA Qualified*

Given I am an active member of ACCA I was unaware that adding this to my signature that I am ACCA qualified was not something that should be displayed without a practising certificate, as I am a partner of the LLP this has been added to my signature also. I have removed this straight away until this matter is dealt with accordingly.

- b) *Were you aware that you could be in breach of ACCA's regulations?*

I was only made aware of this once noted by ACCA on 28th April 2021 via email to provide information for a practising certificate of which my last correspondence to them was to ask for an extension to obtain the certificate as I was [REDACTED] (please find attached email correspondence emailed 24th May 2021). I received no response to this email to date and therefore have been waiting for clarification on whether this extension has been granted. That being said, after [REDACTED] I have then since begun to continue working on the practising certificate which is now in the position to forward onto my managers for sign off. As it is a very lengthy document it has taken me some time trying to juggle that and adjusting to looking [REDACTED], but as mentioned it's now in a position to be sent to managers for sign off.

In relation to the CPD declaration, as I was unaware that carrying out some work for family and friends fell under public service and therefore did not know that I was in breach of any ACCA regulations which I am dedicated to making sure this is rectified straight away and will follow any further correspondence needed to make sure that I am within regulations.

c) Please confirm what practising certificate you hold

I do not currently hold a practising certificate; however I am in the process of obtaining the ACCA certificate

d) Please set out in full details of your role in the firm(s) and describe in detail the services that you and the firm(s) offer

The firm offers bookkeeping services, VAT returns, self-assessment, preparation of company accounts & corporation tax. This is currently provided for family and friends and is for basic accounts and tax returns.

e) In particular, please let me know about your role in signing off accounts or reports on accounts, conducting audit work or taxation work.

The firm currently signs off accounts for basic accounts and tax computations for family and friends.

The firm does not carry out any audit work whatsoever, as we do this for family and friends; these are merely for sole traders and small start-up businesses.

f) Please describe the firm(s), including their sizes, the number of employees and the number of professionally qualified persons in the firm(s) No employees within both companies

2 persons (including myself) who are ACCA qualified and are both partners/directors of both Company A and Company D.

Regularising your position

2. *I am dealing with this as a matter of urgency in order to be in line with ACCA's regulations. I will seek to go down the ACCA practising certificate route in order to be regularised".*
12. The letterhead paper for Company A described Ms Fosang as a "Partner" at the firm. Her business card stated she was an "accountant" and referred to "VAT" and "tax".
13. Ms Fosang submitted a copy of an email dated 24 March 2021 to ACCA in which she asked for an extension of time to return the forms to ACCA's Authorisations department as she was [REDACTED].
14. On 14 March 2022, Ms Fosang submitted a screenshot of her email to ACCA's Authorisations department as proof of her application for an ACCA practising certificate.
15. On 22 February 2023, ACCA's Authorisations Department again sent a copy of ACCA's Am I in Public Practice Factsheet.
16. On 24 February 2023, ACCA's Authorisations Department notified Ms Fosang that they were unable to progress the practising certificate waiver application. They stated,

"As your practising certificate experience forms remain incomplete, we cannot further your application. If you would like an application to waive the requirements to be placed before the Admissions & Licensing Committee, then you must provide us with the names and professional body details of the training principals who supervised the experience documented in your practising certificate experience forms. We appreciate that members will not be able to contact training principals from previous employers from time to time, but it is not acceptable to not tell us who the training principals were so that we can see if they were adequately qualified to provide training and supervision to a member seeking to obtain our practising certificate.

If you decide to fully complete the practising certificate experience form, please let me know and I can try and help further.

Alternatively, you can gain experience at an ACCA approved employer (practising certificate development) and apply for a practising certificate when you meet the requirements as stated in the global practising regulations”.

17. There were further email exchanges between ACCA’s Authorisations Department and Ms Fosang. Ms Fosang sent an email to ACCA’s Authorisations Department on 01 March 2023, in which she stated:

“Not once in the application stage was I told or asked for the principal's names other than that of the 12 months of experience I was claiming.

I'm more than to provide the names....” (sic)

18. ACCA’s Authorisations Department responded on 02 March 2023, enclosing a screenshot of the application form which asked for “The Principal's name, job, title, professional body, membership number, date of birth and email”. There was a further query as to why Ms Fosang had not asked either principal to fill out their section of the experience forms.

19. Ms Fosang responded the same day stating,

“In the application I made it clear that I am unable to contact my principals as I don't have their contact details or know where they currently work.

I didn't know that irrespective of not being able to contact the principals I still have to provide their names (this is the point I was trying to make in my last email).

So with that being said, please do let me know what I need to do to move the application forward”.

20. By 27 April 2023, ACCA’s Authorisations Department informed Ms Fosang that she should restrict her services to basic bookkeeping until she had built up sufficient experience to apply for an ACCA practising certificate. She was

reminded to be careful to avoid holding out as being in public practice by references to “accountants” and that bookkeeping required AML supervision.

21. On 27 April 2023, ACCA sent an email to Ms Fosang informing her that the investigation regarding her carrying on public practice without an ACCA practising certificate and lack of AML supervision had been allocated to another Investigations Officer. She was asked for an update on steps she had taken to regularise her position and shown other options for regularisation as an alternative to obtaining an ACCA practising certificate.

22. Ms Fosang responded the same day explaining that she had applied for a practising certificate waiver (as she had said she would do) and that she

“would provide services outside of the practising certificate requirements, and as of [REDACTED] email today [they] said to remove accounting from the name which I will look to do as soon as possible”

23. On 11 May 2023, Ms Fosang sent an email informing ACCA that,

“To regularise my position I have taken the word 'accounting' off the name of any companies on the companies house register for which I am a director for. For the one which I'm a partner for I'm in the process of dissolving that company.

Until I am able to hold a practicing certificate I will carry out services I am able to such as bookkeeping, VAT and payroll.

The money laundering registration number for the LLP which I'm currently dissolving is [REDACTED]. No certificates were issued”.

24. On 23 May 2023, ACCA responded to Ms Fosang informing her that she would need to amend the SIC code for Company D's it stated that the nature of business was “accounting and auditing activities”. She was asked about AML supervision for any of the other firms and about the firm Compan. Ms Fosang was asked to provide an undertaking that she would not offer/carry out services deemed as public practice unless she was an employee.

25. Ms Fosang responded on the same day providing evidence of the AML registration for Company A only. She stated that:

“Thanks for pointing out the SIC code - that slipped my mind.

With Company B, I was employed by a company [REDACTED] but was being paid through a ltd company as the role was scoped outside IR35. Covid hit and [REDACTED] so didn't need the company anymore.

I have [REDACTED], which leads me to my next point; it's been [REDACTED] juggling everything so I've decided as of yesterday to take a break which means I'll be closing down the two companies Company A and Company E. I'll be [REDACTED] with the hope to get experience to have a current principal sign off my experience and be back to apply for a practicing cert down the line should I wish to.

With regards to the AML this was done through HMRC, we paid around £500 for this and I believe a payment receipt was issued. The registration number for AML was [REDACTED]”.

26. ACCA contacted Ms Fosang on 25 May 2023, noting that she still held shares which in effect put her in position of principal at Company A and Company E. Further, “... you are still a joint majority shareholder of Company E which currently still has accounting and auditing activities as it's SIC Code on it's Companies House profile you are still in breach of ACCA's Global Practising Regulation 3(2)(b)”.

27. On 26 May 2023, Ms Fosang provided a written undertaking stating:

“I can confirm that until I hold a practicing certificate, I will not do the following:

- i. Not offer/carry out those services deemed as public practice unless as an employee;*

- ii. *Not accept an appointment, or hold myself out as available to accept an appointment as an auditor unless as an employee; and*
 - iii. *Not advertise myself as an ACCA member, a Chartered Certified Accountant or use her designatory letters during the course of business or on business stationery/signage unless as an employee”.*
28. On 09 May 2024, ACCA contacted Ms Fosang notifying her that her case had been re-allocated and that there were outstanding issues which needed to be resolved before a case outcome could be prepared. She was asked about the start date of the AML supervision for Company A whether she held AML supervision for any of the other companies, what prompted her to apply for a practising certificate in 2021 and the public practice declarations she had made to ACCA. Ms Fosang was also asked about an active firm, Company C firm where the nature of business was “accounting and auditing activities”
29. Ms Fosang submitted a response on 13 May 2024 confirming that the AML supervision commenced on 01 July 2021. AML supervision was only in place for the LLP. With regards to what prompted her to apply for a practising certificate in 2021 she stated,
- “I wasn't aware I was in breach until I was contacted by ACCA as we were doing accounts for families and friends, I was then advised to regularise my position by applying for a practicing certificate which took some time as [REDACTED] during this period. I then was told as I'm unable to contact some principles, to either wait till I can reach them or apply again when I have relevant experience with a current principal”.*
30. Regarding the public practice declaration in the annual CPD returns she stated, *“I was unaware public practice included family and friends until it was explained to me by the initial adviser that contacted me”.* Ms Fosang explained that she used Company C when she was “a [REDACTED] working for a company”.
31. With regards to regularising her position and achieving compliance with ACCA's Global Practising Regulations, Ms Fosang stated,

"I attempted to apply for a practicing certificate as mentioned above, I did everything else that was asked of me (resigned as director/shareholder), take out the word 'accounting' from any existing company names. I would also add, all the regulations that have been mentioned since I was contacted that I wasn't aware of, have been acted on as advised almost immediately".

32. On 14 May 2024, ACCA contacted Ms Fosang noting that she had been made aware of ACCA's regulations at the time that she applied for a practising certificate in April 2021, and then again in 2022 and 2023 when she was contacted regarding the investigation into her allegedly carrying on public practice. It noted that,

"There is an expectation that professional accountants / ACCA members will familiarise themselves with the regulatory requirements and rules of the professional body of which they are a member. The requirements around public practice are also set out in the annual CPD declarations (attached). There is also a link to our Am I in Public Practice Factsheet (attached).

ACCA may outline the options for regularising your position but ultimately it remains the member's responsibility to ensure that they comply with any regulations, rules etc. of the professional body of which they are a member".

33. Ms Fosang provided further information regarding Company C confirming that she was not carrying on public practice through it and it was used for the purposes of her [REDACTED] work. With regards to the SIC code referencing "accounting and auditing activities", she stated, *"I didn't realise that SIC code can't be used, I can change it"*.
34. On 01 July 2024, Ms Fosang was notified of the draft allegations and that a report of disciplinary allegations was being prepared. She replied on the same day stating she was *"unaware"* of that she may be in breach of the Global Practising Regulations. Also, she was *"unaware of an anti-money laundering certificate being required and when I found out, one was purchased"*. With regards to the public practice declaration in the annual CPD returns she was similarly, *"unaware of this declaration which is an oversight on my part"*.

DECISION ON FACTS/ALLEGATION(S) AND REASONS

35. The Committee considered the documents before it, the submissions of Mr Mustafa on behalf of ACCA, the submissions made by Ms Fosang and the advice of the Legal Adviser. The Committee bore in mind that the burden of proving an allegation rests on ACCA and the standard to be applied is proof on the balance of probabilities.

Allegation 1

36. The Committee considered each of the sub-allegations in Allegation 1. They accepted Mr Mustafa's submissions that the sub-allegations in Allegation 1 are a matter of strict liability. They took into account the documentary evidence available to them and reviewed the various iterations of the Global Practising Regulations at the relevant time.
37. Turning to Allegation 1(a), the Committee considered that Ms Fosang had held out and / or carried out public practice without holding a valid ACCA practising certificate during the relevant time period.
38. They were satisfied of this based on the evidence within the bundle, which included that Ms Fosang had attempted, but was not successful in her application for an ACCA practising certificate and her submissions that she had been providing ad-hoc assistance to family and friends which includes basic accounts and tax returns.
39. The panel accepted the submissions from Mr Mustafa that notwithstanding the position of Ms Fosang that she did this for family and friends, this still constituted public practice within the meaning of the Global Practising Regulations. The panel also considered that due to Ms Fosang's role in numerous companies advertising accountancy services, descriptions of accountancy in company names, or SIC codes, and Ms Fosang holding herself out as a partner/director/LLP member of these entities that this allegation was proved as she was holding herself out as undertaking public practice.
40. Therefore, the Committee found Allegation 1(a) proven.

41. Having found that Ms Fosang was holding out and carrying on public practice, for the remaining sub-allegations to Allegation 1, the Committee considered the evidence made available in the bundle, which comprised of Companies House records of Ms Fosang's role in four different body corporates:
- a. Company A
 - b. Company B
 - c. Company D and
 - d. Company C.
42. The Committee considered that there was sufficient evidence that Ms Fosang was a designated member of Company A; and a director and held rights in Company B , Company D and Company C
43. The Committee applied this to the Global Practising Regulations in force at the relevant time, and considered that being a director and / or holding the shareholding that Ms Fosang held in these companies contravened the Global Practising Regulations, due to the director and principal restrictions in those Regulations.
44. Therefore, the Committee found Allegations 1(b) – (h) proven.

Allegation 2

45. The Committee considered that there was documentary evidence within the bundle of an extract of the HMRC Supervised Business Register that demonstrated that Company A was registered from 16 June 2021. However, there is no evidence of any supervisory registration prior to this date.
46. Ms Fosang's submissions accepted that at the relevant time before 2021, she did not appreciate her business activities fell within the scope of the Money Laundering Regulations. The Committee determined that based on her submissions and the evidence they had available, that Ms Fosang was providing accountancy services without having a supervisory authority during the relevant time.

47. Therefore, the Committee found Allegation 2 proven.

Allegation 3

48. The Committee took into account the evidence from Linda Calder of ACCA, and the associated exhibits which include the various CPD declarations that Ms Fosang would have needed to sign each year. The Committee noted that each declaration included a statement that would need to be ticked in order to submit that *"if I engage in public practice activities, I will need to hold an ACCA practising certificate."*

49. The Committee were satisfied that Ms Fosang had been engaged in public practice during the relevant time, by virtue of her submissions that she had been assisting friends and family which includes basic accounts and tax returns, which the Committee find falls into the meaning of public practice, within the definitions of the Global Practising Regulations.

50. Therefore, the Committee found Allegation 3 proven.

Allegation 4

51. The Committee considered Allegation 4(a) which states that the conduct in Allegation 3 was dishonest in that she knew she had been carrying out public practice without a practising certificate but declared she had not. The Committee accepted that Ms Fosang held a genuine belief that she was not undertaking public practice and / or holding out to undertake public practice. They considered that when applying the objective standard, Ms Fosang was not dishonest in her genuinely held belief, when submitting CPD returns. Therefore, the Committee found that Allegation 4(a) is not proven.

52. The Committee then considered Allegation 4(b) in that Ms Fosang's conduct in Allegation 3 demonstrated a lack of integrity. The Committee considered that Ms Fosang as an ACCA member for a number of years should have accustomed herself to the Global Practising Regulations, and had a number of opportunities to do so. The Committee discussed and agreed that integrity

means abiding by your own professional standards, and she should have known through further investigation that she was carrying out public practice and holding herself out to be notwithstanding her genuinely held belief that she was not. Therefore, she had breached her own professional standards and failed to act with integrity.

53. Therefore, the Committee found Allegation 4(b) proven.

54. As Allegation 4(c) was an alternative allegation, the Committee did not determine this sub-allegation.

Allegation 5

55. The Committee next considered whether the facts proven at allegation 1 – 4 would constitute misconduct. The Committee determined that the allegations found proven do constitute misconduct, as Ms Fosang had breached professional standards, had been undertaking activities which were not properly regulated, and there was risk to the public. The Committee considered that Ms Fosang's actions were a significant departure from good practice and brought discredit to the profession, and therefore did constitute misconduct.

56. Therefore, the Committee found Allegation 5(a) proven.

57. As Allegation 5(b) is an alternative allegation, the Committee did not determine this sub-allegation.

SANCTION(S) AND REASON(S)

58. The Committee considered what sanction, if any, to impose taking into account ACCA's Guidance for Disciplinary Sanctions ('GDS') and the principle of proportionality. The Committee bore in mind that the purpose of sanctions was not punitive but to protect the public, maintain confidence in the profession and declare and uphold proper standards of conduct and behaviour. It took into account the submissions of the parties and the advice of the Legal Adviser.

59. The Committee took into account the following mitigating factors:

- a. Ms Fosang had shown insight and remorse into her actions based on her written and oral submissions;
 - b. She had cooperated extensively with the ACCA investigation and the Disciplinary proceedings.
 - c. She had undertaken remedial action on understanding she was in breach.
 - d. Ms Fosang had provided a number of character references which the Committee considered were demonstrative of her otherwise good character.
 - e. Ms Fosang had no previous disciplinary record.
60. The Committee took into account the aggravating feature that there were multiple allegations found proven over a sustained period of time.
61. Having found that Ms Fosang's actions amounted to misconduct, taking no further action was clearly not appropriate. The Committee therefore considered the available sanctions in ascending order of seriousness.
62. The Committee had regard to the GDS. Given the seriousness of the allegations, the serious departure from the relevant professional standards, and the conduct taking place over a prolonged period, the Committee considered that an admonishment or reprimand was not appropriate in this case.
63. The Committee considered that although the conduct in this case was of a serious nature, they were satisfied that when balancing the mitigating factors in this case, there is no continuing risk to the public and there is evidence of Ms Fosang's understanding of her actions. She held insight, a genuine expression of regret, and otherwise had a good record.
64. Therefore, the Committee determined that the sufficient sanction in this case was a Severe Reprimand.

COSTS AND REASON(S)

65. ACCA applied for costs in the sum of £7,837.50. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the investigation and hearing. No discount was available as the hearing was held for the length of time as set out in the ACCA's detailed schedule of costs.
66. Ms Fosang submitted documents relating to her financial position, which the Committee considered.
67. The Committee considered that in principle a costs order should be made in favour of ACCA. It was satisfied that the costs sought were appropriate and had been reasonably incurred.
68. The Committee determined that the appropriate order was that Miss Fosang pay ACCA's costs in the sum of £7,837.50, which could be paid by way of a payment plan.

Ms Ilana Tessler
(Chair)
05 March 2026