

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Miss Ziyi Zhao
Heard on:	Thursday, 19 March 2026
Location:	Held Remotely by Microsoft Teams
Committee:	Ms Ilana Tessler (Chair) Ms Jo Royden - Turner (Accountant) Ms Diane Meikle (Lay)
Legal Adviser:	Ms Tope Adeyemi
Persons present and capacity:	Mr Leonard Wigg (Case Presenter) Ms Anna Packowska (Hearings Officer)
Summary:	Removal from the student register
Costs:	£5198.50

INTRODUCTION

1. The Disciplinary Committee (“the Committee”) met to hear allegations against Miss Ziyi Zhao (Miss Zhao). Miss Zhao was not present at the hearing and was not represented. ACCA was represented by Mr Leonard Wigg. The papers

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before the Committee included a main bundle numbered 1 – 85, an uncompleted case management form numbered 1 – 13 and a service bundle numbered 1 - 18. The Committee also received one audio file and a video recording.

SERVICE OF PAPERS

2. The Committee first considered whether the appropriate documents had been served on Miss Zhao in accordance with the Complaints and Disciplinary Regulations (“the Regulations”). The Committee took into account the submissions made by Mr Wigg on behalf of ACCA and it also took into account the advice of the Legal Adviser.
3. Included within the Service Bundle was the Notice of Hearing dated 18 February 2026 (thereby satisfying the 28-day notice requirement) which had been sent to Miss Zhao’s email address as it appears on ACCA’s register. The Notice included the correct date, time and remote venue for the hearing and also Miss Zhao’s right to attend the hearing by telephone or video link, to be represented and to request an adjournment if she wished. The service bundle also included a delivery receipt dated 18 February 2026.
4. Having considered the relevant documents, the Committee was satisfied that notice had been served in accordance with the Regulations.

PROCEEDING IN ABSENCE

5. Having concluded that proper notice had been served in accordance with the regulations, the Committee went on to consider whether to exercise its discretion to proceed in the absence of Miss Zhao. The Committee bore in mind that Miss Zhao had been sent a number of emails by ACCA’s Hearings Officer asking if she would be attending the hearing with no response being received and that she had also been telephoned. It noted that no request for an adjournment had been made by Miss Zhao and that the allegations were serious. It also noted that Miss Zhao had corresponded with ACCA in June 2025 via the email address recorded on ACCA’s database. This indicated that

she was able to receive emails from that address and that she was aware of how to contact ACCA.

6. The Committee was of the view that Miss Zhao's attendance was unlikely to be secured if the hearing was held on a different date, she had not engaged in recent months, had not sought an adjournment and in the Committee's judgement had voluntarily absented herself. Balancing the interests of Miss Zhao against the public interest, the Committee concluded that it was in the interests of justice that the matter proceed expeditiously notwithstanding Miss Zhao's absence.

BACKGROUND

7. On 28 March 2025, ACCA received a communication from a whistleblower attaching images of ACCA exam content discovered in the public domain. The whistleblower explained that they had come across the screenshots and images on an app called [REDACTED] where there had been adverts posted for "cheating services". The whistleblower had discovered the images during the March exam sessions where they had been posted as adverts on the [REDACTED] app. Due to the information received, ACCA commenced an investigation on 4 April 2025. Following completion of the investigation, ACCA allege that Miss Zhao is liable to disciplinary action for conduct relating to the matters raised by the whistleblower.
8. Miss Zhao became a student of ACCA on 22 June 2021. On 2 December 2024 and 3 March 2025 she sat remotely invigilated Advanced Audit and Assurance International (AAA-INT) exams. ACCA state that it does not have access to the video footage of the 2 December 2024 exam, however footage relating to the 3 March exam is available and has been reviewed by ACCA's investigator. The investigator states the following can be observed:
 - 00:02:24-00:03:30 – Miss Zhao shows the Proctor the floor by her left hand side and shows her arms and then provides a room pan of the wall surrounding her desk, but not her desk;

- At 00:20:12-13 – Miss Zhao appears to move her right hand quickly in front of the screen. It is a blur so it cannot be seen if she is holding something in her right hand;
 - At 00:20:30 - 35, Miss Zhao appears to reach out to her left hand-side and partially disappears from frame;
 - In the chat log of the exam (page 79) the Proctor asked Miss Zhao to put her phone on silent mode and out of arm's reach.
9. ACCA also relies on the witness statement of Neil Smith, an Exam Production Technician at ACCA. Mr Smith exhibits redacted images of the questions that had been received from the whistleblower. The images are said to have been redacted in order to protect the integrity of ACCA's exams.
10. On 14 May 2025, Miss Zhao was notified of ACCA's investigation and sent a copy of the redacted ACCA questions and a set of questions about the exam to which she was asked to respond. Miss Zhao provided her response to ACCA's questions on 20 June 2025. Miss Zhao was asked if she admitted or denied that she had with her during the exam and/or in the exam room, an electronic device with a camera or mobile phone with a camera. In response she stated *"Yes, I admit that I did bring electronic devices with camera into the exam."* Miss Zhao was asked if she admitted or denied that she took photographs of exam questions during her AAA exams, replying *"Yes, I admit that I photographed exam-related questions. Looking back now, I feel deep regret. I should have strictly followed the exam regulations and upheld an attitude of honesty and integrity. My actions violated the exam rules, and for that, I sincerely apologise and feel deeply guilty."* Miss Zhao was asked if she permitted a third party to take photographs of her AAA exams. To that question she replied, *"No I did not."* In response to a question on whether she shared the images, Miss Zhao stated, *"I have never shared my questions or any of this content on social media or communication platforms"*.

11. Miss Zhao was asked why she shared the exam questions. To which, she replied, *“I did not share the exam questions. I took exam-related questions to better understand and master the knowledge points for myself, so that I can review the exercises again in the future. This way, I can have a rough idea of my exam results and my intention was to do my best to master every knowledge point. I am part of a study group at school with a few classmates, and we often study ACCA subjects together, discussing questions and key concepts. However, I have never sent my exam materials with them, nor have I posted or distributed this content on any social media or communication platforms.”*

12. Miss Zhao was asked if she was seeking assistance with her exam or seeking to assist others in taking ACCA’s AAA exam. Her response was, *“No, I don’t. For me, exams are a test of my understanding and mastery of knowledge points. They can directly test whether I have truly mastered the relevant knowledge points and can apply them, as well as whether I truly have the ability to become a professional accountant. When answering exam questions, I need to approach them from the perspective of a professional accountant”*. Miss Zhao was also asked to provide details of any social media platforms or other communication platforms she used to share the photographs of the exam questions. Her response was, *“I have not shared this content on social media or communication platforms.”*

13. Further questions put to Miss Zhao included whether there was someone else in the room with her during the exam and whether she paid a third party to assist her with the exam. Her response was no to both questions. In concluding her responses Miss Zhao stated *“I have no objections to this complaint. I did violate the relevant examination regulations, and I sincerely apologize once again.”* She went on to add that, *“Before taking the exam, I had read the Examination Regulations and Guidelines. Although I was eager to make full use of all available learning resources to study diligently, I now realize that I should not have taken photos of the exam questions during the examination. This action violated the exam regulations, breached exam room discipline, and reflected a lack of responsibility on my part. I deeply regret my behaviour and apologize once again.”*

ALLEGATIONS

14. Miss Zhao faces the following allegations:

Miss Ziyi Zhao, a student of the Association of Chartered Certified Accountants (ACCA), during a remotely invigilated Advanced Audit and Assurance International (AAA-INT) exam on 2 December 2024 and/or a remotely invigilated Advanced Audit and Assurance International (AAA-INT) exam on 3 March 2025:

1. Used or permitted a third party to use, an unauthorised item, namely an electronic communication device capable of taking photographs;
2. Further to the matter referred to in allegation 1, caused or permitted the taking of photographs of exam questions as presented on her computer screen;
3. Further to the matters referred to in allegations 1 and 2, caused or permitted the photographs referred to in allegation 2 to be shared with a third party or parties unknown;
4. By reason of the matters referred to above in respect of allegations 1 to 3, Miss Zhao is in breach of one or more of:
 - a) Exam Regulation 5(a) and/or 5(b) in respect of allegation 1;
 - b) Exam Regulation 10 in respect of allegation 2;
 - c) Exam Regulation 13 in respect of allegation 2;
 - d) Exam Regulation 13 in respect of allegation 3.
5. Miss Zhao's conduct as referred to in any or all allegations 1 to 3 above:
 - a) Was dishonest in that the taking and/or retaining of photographs of exam content could potentially assist her if she had to resit the same exam, and thereby provide her with an unfair advantage; and/or

b) Was dishonest in that causing and/or permitting one or more of the photographs to be taken and/or shared with a person or persons unknown whether during the exam or otherwise, could provide them with an unfair advantage in the said exam or a future exam; or in the alternative:

c) Demonstrates a failure to act with integrity.

6. By reason of any or all her conduct, Miss Zhao is:

a) Guilty of misconduct pursuant to bye-law 8(a)(i); or in the alternative:

b) Liable to disciplinary action by virtue of bye-law 8(a)(iii) in respect of breaches of the exam regulations as set out in allegations 1 to 4 above.

DECISION ON FACTS AND REASONS

15. The Committee considered with care all the evidence presented, and the submissions made by Mr Wigg. It also accepted the advice of the Legal Adviser and bore in mind that it was for ACCA to prove its case and to do so on the balance of probabilities.

Allegation 1 - Proved

16. In reaching its determination the Committee considered the responses provided by Miss Zhao in her email to ACCA dated 20 June 2025. Within those responses she accepts using an unauthorised item during the exams stating the following "Yes, I admit that I did bring electronic devices with cameras into the exam". The Committee also note that ACCA have provided redacted images of content published in the two online remotely invigilated AAA-Int exams attempted by Miss Zhao on 2 December 2024 and 3 March 2025. Those images include the access code generated specifically for Miss Zhao. The Committee was satisfied in light of the photographic evidence and Miss Zhao's admissions that allegation 1 was found proved.

Allegation 2 – Proved

17. The Committee considered whether in bringing a device into the exams, Miss Zhao had caused or permitted the taking of photographs of exam questions as presented on her computer screen.
18. The Committee noted that Miss Zhao accepted that she had taken photographs, stating in her responses in June 2025 “*Yes, I admit that I photographed exam-related questions*”. Further, ACCA had provided screenshots of the redacted images of content published in the two online remotely invigilated AAA-Int exams attempted by Miss Zhao on 2 December 2024 and 3 March 2025 which include the access code generated specifically for Miss Zhao. In light of the evidence, the Committee was satisfied allegation 2 was found proved.

Allegation 3 – Proved

19. The Committee went on to consider whether Miss Zhao caused or permitted the photographs taken by her to be shared with a third party or unknown party. In her response provided in June 2025, Miss Zhao denied sharing any material, stating that “*I did not share the exam questions. I took exam-related questions to better understand and master the knowledge points for myself, so that I can review the exercises again in the future*”.
20. The Committee noted Miss Zhao’s denial, however it also bore in mind that screenshots of the questions from the exams taken by Miss Zhao which bore her ACCA access code, had been available to a third party (the whistleblower). The whistleblower had explained that the images were in the public domain, specifically on a platform posting adverts for “cheating services”. The Committee considered it unlikely that the photographs would have got into the possession of a third party if Miss Zhao had not shared them. It follows therefore that allegation 3 is found proved.

Allegation 4 (a) – (d) – Proved

21. The Committee reviewed the exam regulations ACCA allege Miss Zhao to have breached, namely regulation 5(a) and /or 5(b) in respect of allegation 1, regulation 10 in respect of allegation 2 and regulation 13 in respect of allegations 2 and 3.
22. Exam regulations 5 (a) and (b) concern the prohibition of bringing unauthorised items which include mobile phones, into ACCA exams. The Committee found that Miss Zhao had clearly breached regulations 5(a) and (b) by taking her mobile phone into the exams on 2 December 2024 and 3 March 2025.
23. Regulation 10 stipulated that students *“may not engage in any irregular conduct designed to assist you in any exam attempt or provide any improper assistance to any other exam entrant in any exam attempt”*. Miss Zhao had stated in her responses in June 2025 that she had taken the pictures so that she could use them as a study aid, stating the following: *“I took exam-related questions to better understand and master the knowledge points for myself, so that I can review the exercises again in the future. This way, I can have a rough idea of my exam results and my intention was to do my best to master every knowledge point...”*. The Committee considered that in taking the photographs for such a purpose Miss Zhao was engaging in irregular conduct that was designed to assist her in a future exam. Furthermore, it had also found that she had shared the photographs and therefore had attempted to provide improper assistance to other exam entrants. For these reasons the Committee was satisfied that Miss Zhao had breached regulation 10 in respect of allegation 2.
24. Regulation 13 prohibits the *“copying, photographing, videoing or reproducing”* of exam content in any manner by student or the permitting of another person to do the same. It also strictly prohibits distributing or seeking to exploit for commercial/personal gain and/or any other reason, copies of exam questions or scenarios to any person including other ACCA registered candidates. As the Committee had already found that Miss Zhao had photographed the exam content and shared them, it was satisfied that regulation 13 had been breached in respect of allegations 2 and 3. Finally Miss Zhao appeared to fully accept

that she had breached exam regulations, stating in June 2025 that *"I did violate the exam regulations, and I sincerely apologize once again"*. The Committee therefore found allegation 4(a) – (d) proved.

Allegation 5 (a) – (b) Proved

25. The Committee moved on to consider whether Miss Zhao's actions in using the mobile phone to take pictures of the questions to potentially use them in the event of a resit was dishonest. It also considered whether her conduct in sharing the photographs was dishonest. Her conduct in both respects was considered having regard to the test for dishonesty as set out at paragraph 74 in the case of *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67 ("Ivey"):

"When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual's knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the factfinder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest."

26. The Committee found that taking photographs in contravention of the exam regulations with a view to using them as a study aid in the event of a re-sit, thereby gaining an unfair advantage, was dishonest. Furthermore, in sharing the photographs she had taken, also in contravention of the regulations, Miss Zhao provided others with the opportunity to cheat. Both actions were considered by the committee to be clearly dishonest by the standards of ordinary decent people. It was also noted that Miss Zhao acknowledged that what she had done was wrong in her responses in June 2025. In all the circumstances, the Committee found allegations 5(a) and (b) proved.

Allegation 5 (c) – N/A

27. As allegations 5(a) and 5 (b) were found proved, the Committee did not go on to consider Allegation 5(c) which was drafted in the alternative.

Allegation 6 (a) - Proved

28. The Committee turned to consider whether the matters found proved amounted to misconduct.
29. The matters found proved concerning Miss Zhao, related to her dishonest actions in using a mobile phone during an exam and sharing the images, with those images subsequently being discovered on platforms advertising cheating services. Such conduct was considered by the Committee to fall far short of what was expected of a student of ACCA and to be serious. Her behaviour also had the potential to undermine the integrity of ACCA's examination process and to undermine the public's confidence in the accountancy profession. In all the circumstances the Committee found Miss Zhao's actions to amount to misconduct. It follows that allegation 6 (a) was found proved.

Allegation 6 (b)

30. As allegation 6 (a) was found proved, the Committee did not go on to consider Allegation 6 (b) which was drafted in the alternative.

SANCTION AND REASONS

31. In reaching its decision on sanction, the Committee took into account the information that had been provided by Miss Zhao and the submissions of ACCA. The Committee referred to the Guidance for Disciplinary Sanctions issued by ACCA and had in mind that the purpose of sanctions was not to punish Miss Zhao but to protect the public. Furthermore, any sanction must be proportionate. The Committee accepted the advice of the Legal Adviser and considered the sanctions, starting with the least serious sanction first.

32. The Committee turned first to consideration of the aggravating and mitigating features in this case. The Committee took into account that Miss Zhao had made a number of early admissions, had initially engaged with the proceedings and had expressed remorse for what she had done. These factors were considered by the Committee to amount to mitigation.
33. Aggravating factors were also identified. Miss Zhao was considered to have not demonstrated any insight into her wrongdoing. It had also occurred on two separate occasions and therefore represented a pattern. Furthermore, her behaviour had the potential to undermine the integrity of ACCA's examination process and the reputation of ACCA as a body.
34. Taking into account all the circumstances of the case and bearing in mind the seriousness of the matters found proved, the Committee did not think it was appropriate, nor in the public interest, to take no further action. Neither did it consider it would be appropriate to order an admonishment in a case where (as here) an ACCA student had acted dishonestly on two separate occasions.
35. The Committee then considered whether to reprimand Miss Zhao. The guidance indicates that a reprimand would be appropriate in cases where the conduct is of a minor nature, and there is sufficient evidence of an individual's understanding and genuine insight into the conduct found proved. The guidance goes on to state that a reprimand may be appropriate where the conduct was not in deliberate disregard of professional obligations and that the period over which misconduct took place was short and it was stopped as soon as possible. The Committee did not find those factors to be present.
36. The Committee moved on to consider whether a severe reprimand would adequately reflect the seriousness of the case. The guidance indicates that such a sanction would usually be applied in situations where the conduct is of a serious nature, but where there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public, and that corrective steps had been taken to address the conduct and ensure such behaviour was not repeated. The Committee was not provided

with evidence to show these criteria to be met. There was no evidence that Miss Zhao had conducted any remediation or taken any corrective steps.

37. The Committee went on to consider the guidance relating to removal from the student register. Miss Zhao's misconduct involved dishonesty, had been repeated and also had the potential to undermine the integrity of ACCA's examination process. Such conduct was considered to be fundamentally incompatible with student membership. In all the circumstances the Committee considered removal from the student register to be the most appropriate and proportionate sanction

COSTS AND REASONS

38. ACCA applied for costs in the sum of £5,978.50. The application was supported by a schedule providing a detailed breakdown of the costs incurred by ACCA in connection with the hearing. A simple costs schedule was also provided. No information had been provided by Miss Zhao about her finances.
39. The Committee was satisfied that ACCA's costs were reasonable and properly incurred. It also determined that Miss Zhao could meet the costs given that no evidence had been provided to the contrary. As the hearing had not taken as long as scheduled, it was considered appropriate to reduce the costs to reflect the shorter hearing duration. Therefore, the Committee in its discretion awarded costs against Miss Zhao in the sum of £5198.50.

EFFECTIVE DATE OF ORDER

40. The Committee determined that in the interests of the public the sanction of removal from the student register should take effect immediately in accordance with Regulations 20(1)(b) of the Regulations.

Ms Ilana Tessler
Chair
19 March 2026