

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr Prasuk Jain

Heard on: Wednesday, 25 March 2026

Location: Remotely via Microsoft Teams

Committee: Ms Carolyn Tetlow (Chair)
Ms Dorothee Berg (Accountant)
Ms Victoria Smith (Lay)

Legal Adviser: Ms Helen Gower

**Persons present
and capacity:** Mr Samuel Irving (Case Presenter on behalf of ACCA)
Miss Nicole Boateng (Hearings Officer)

Summary: Allegations 1, 2, 3, 4a), b) and c), 6a) proved
Student removed from the register with immediate effect.

Costs: £5,200 awarded in favour of ACCA.

PRELIMINARY APPLICATIONS

1. The Committee had considered the following documents: a Disciplinary Committee Report and Bundle pages 1-123, Exam Video, Phone Log and a Service Bundle pages 1-18. The Committee had also considered legal advice which it accepted.

SERVICE OF PAPERS

2. The Committee first considered whether the appropriate documents had been served in accordance with the Complaints and Disciplinary Regulations (“the Regulations”). The Committee took into account the submissions made by Mr Irving on behalf of ACCA.
3. The Service Bundle included a copy of the Notice of Hearing dated 23 February 2026 thereby satisfying the 28-day notice requirement, which had been sent to Mr Jain’s email address as it appears in the ACCA register. The Notice included details about the time, date and remote venue for the hearing and also Mr Jain’s right to attend the hearing, by telephone or video link, and to be represented, if he so wished. In addition, the Notice provided details about applying for an adjournment and the Committee’s power to proceed in Mr Jain’s absence, if considered appropriate.
4. The Committee was satisfied that the Notice had been served in accordance with the Regulations, which require ACCA to prove that the documents were sent, not that they were received.

PROCEEDING IN ABSENCE

5. The Committee considered the submissions made by Mr Irving and accepted the advice of the Legal Adviser. The Committee bore in mind that although it had a discretion to proceed in the absence of Mr Jain, it should exercise that discretion with the utmost care and caution.
6. The Service Bundle included evidence of attempts made by the ACCA Hearings team to contact Mr Jain regarding his attendance at today’s hearing. This included a telephone attendance note dated 18 March 2026 recording the Hearings Officer’s call to Mr Jain. Mr Jain answered the call and said that he was in a meeting and would get back to the Hearings Officer. A further attempt was made by the Hearings Officer to call Mr Jain on 23 March 2026, but this call was not answered. Mr Jain did not contact the Hearings Officer or reply to follow up e-mails sent by the Hearings Officer on 18 March 2026 and 23 March 2026.

7. The Committee was satisfied that Mr Jain was aware of today's hearing and ACCA's attempts to enquire about his attendance. The Committee inferred that Mr Jain had voluntarily absented himself and had waived his right to participate in the hearing. The Committee considered that an adjournment would be unlikely to secure his attendance at a subsequent hearing. Given that the allegations against Mr Jain were serious, the Committee had regard to the public interest in concluding the case expeditiously.
8. The Committee concluded that it would be fair and proportionate to accede to ACCA's application to proceed in Mr Jain's absence.

ALLEGATIONS

Mr Prasuk Jain, a student of ACCA, in respect of his on-demand remotely invigilated Financial Management exam taken on 05 September 2025 ('the Exam'):

1. Failed to adhere to ACCA's Exam Guidelines to 'move mobile phones...out of arms reach' and/or possessed an item on or about his desk or person which was not on the list of permitted items in the Exam Guidelines, contrary to Exam Regulation 1.
2. Was in possession of and/or used an unauthorised item, namely a mobile phone with camera, during the Exam, contrary to Exam Regulation 5(a) and/or 5(b) and thereby sought to gain an unfair advantage in the Exam and/or a future exam within the meaning of Exam Regulation 6(b).
3. Gave the exam proctor false or misleading information about the said unauthorised item, contrary to Exam Regulation 3.
4. Mr Jain's conduct in respect of any or all of the above was dishonest, in that:
 - a) He was in possession of and/or used an unauthorised item, namely a mobile phone, during the Exam; and/or

- b) He intended to use or used an unauthorised item, namely a mobile phone, to gain an unfair advantage for himself in the exam and/or a future exam; and/or
 - c) He attempted to give the exam proctor false or misleading information about the presence or use of an authorised item, namely a mobile phone.
5. In the alternative, on the same facts, with respect to any or all the conduct referred to in Allegations 1, 2 and 3 Mr Jain failed to demonstrate integrity.
6. By reason of the above, Mr Jain is:
- a) Guilty of misconduct pursuant to Bye-law 8(a)(i) in respect of any or all of the conduct above, or in the alternative:
 - b) Liable to disciplinary action pursuant to Bye-law 8(a)(iii), in respect of any or all of the conduct in Allegations 1 to 3.

BRIEF BACKGROUND

9. Mr Jain registered as an ACCA student on 25 September 2018. As an ACCA student he is subject to ACCA's Code of Ethics and Conduct, Bye-laws and Regulations, including the Exam Regulations.
10. On 5 September 2025 Mr Jain undertook ACCA's on demand remotely invigilated Financial Management exam, the "exam", During the exam booking process students are required to click to confirm that they agree to the exam regulations and guidelines. This is a mandatory step in the process and exams cannot be booked or accessed until the student confirms their acceptance of these conditions.
11. On or around 21 October 2025 ACCA's Exams Delivery Team notified Mr Jain that an Exam Regulation 20 Panel has determined that he should be suspended from sitting any further ACCA exams until the conclusion of the

investigation and any disciplinary process. The matter was then referred to ACCA's Investigations Department.

12. The exam video is 2 hours, 13 minutes and 53 seconds in length was reviewed by the Investigations Officer, together with relevant chat log and available audio logs, on 3 November 2025. In summary the Investigations Officer observed the following:

00.02.05 From chat log the proctor states "*Your check-in process is almost complete. I simply need to verify a few things, and then I will release your exam. If you have any unauthorised items with you or in your workspace, please remove them now and place them out of arm's reach.*" Mr Jain responds "*done*".

00.02.20 From chat log to the proctor requests a 360 scan of the room and says "*Please put your [sic] on silent mode and remove it out of arms reach*" Mr Jain again replies "*done*".

00.08.20 Exam is launched.

00.22.15 A reflection consistent with a mobile phone moves into Mr Jain's lenses and hands can be seen. He then looks down between 00.22.19 and 00.22.50.

00.55.55 The same reflection is seen again and Mr Jain again looks down between 00.56.05 and 00.56.13 when the reflection is seen again being held and moved.

01.10.31

to 01.10.43 The same reflection again appears moving from Mr Jain's right to left and the reflection of hands can also be seen before the item moves back to the left.

01.10.51

The reflection appears again from Mr Jain's right, together with the reflection of a hand.

- 01.29.52 The same reflection is seen again.
- 01.30.09 The same reflection is seen again.
- 01.31.19 The same reflection is seen again moving in from Mr Jain's right.
- 01.36.02 The same reflection is seen again.
- 01.41.20
to 01.41.23 The same reflection is seen again moving to Mr Jain's left and then back.
- 01.41.40 The same reflection is seen again.
- 01.42.46 The same reflection is seen again.
- 01.54.09 The same reflection is seen again together with the reflection of a hand.
- 02.04.34
to 02.03.14 The same reflection is seen again and Mr Jain is seen looking down before the reflection moves off to the left.
- 02.04.34 The proctor calls Mr Jain and asks to see his calculator. Mr Jain responds, "*I don't have any calculator*". The proctor then requests a 360 scan of the room and a visual of Mr Jain's desk.
- 02.05.16 Mr Jain shows his desk which has no calculator or scratch paper on it.
- 02.06.02 The conversation moves to the chat log as Mr Jain says he cannot hear the proctor.
- 02.08.54 In the chat log the proctor then says "*During proctoring, we identified unauthorised material usage during your exam. Your exam will have to be ended*".

02.08.54 Mr Jain says *“but sir I have shown you my whole room...as you can see my phone is also far from me...I have not touched it.”*

Mr Jain shows the position of his phone, which is not out of arms reach (02.09.40).

The proctor responds *“Sir, we identified unauthorised material usage, so your exam will be ended. You can contact ACCA for any questions.”*

Mr Jain says: *“sir but i have completed 50% of my exam...it would be a great loss for me...please sir....if you want to see my whole room then I can show you....you may be mistaken by my laptop stand*

I will show you...

this is just for my posture

this is just for my posture

02.13.04 Exam ends.

13. On 3 November 2025 the Investigation Department provided Mr Jain with the footage of the exam and wrote to him requesting his comments regarding his appearing to use a mobile phone during the exam.

14. On 17 November 2025, Mr Jain responded stating:

“Thank you for informing me of the concern regarding my FM exam attempt on 05 September 2025. I fully respect the seriousness of this process and ACCA’s responsibility to maintain the highest standards of exam integrity. I appreciate the opportunity to provide my explanation, and I wish to do so with complete sincerity and transparency.

First and foremost, I would like to clarify that I did not use, access, or operate any mobile device or unauthorised material at any time during the examination. I understand that certain behaviours or visual elements may have raised concern, and I genuinely regret that anything I did, even unintentionally, may have been interpreted in a misleading way.

During the exam I was extremely nervous which caused me to adjust my glasses, shift my posture, and move my hand several times. These were nervous, instinctive actions-not acts of misconduct. I acknowledge that such movements might have appeared irregular from the invigilator's angle, and I empathise with why this may have caused suspicion.

I would also like to provide a clear explanation for the reflection observed in my glasses, as this appears to be a key point of concern.

My spectacles have curved anti-glare lenses, and curved lenses can behave similarly to convex mirrors. Under exam conditions – where

- the laptop screen was the primary light source,*
- the webcam was positioned slightly above eye level, and*
- I made small head or hand movements due to stress-*

my lenses can naturally:

- distort reflections,*
- stretch bright shapes into rectangular forms,*
- magnify screen glare,*
- create momentary “ghost images”*

Scientifically, this is due to the interaction between lens curvature, incident light, and webcam perspective. The reflection seen was simply distorted light from my exam screen, not a mobile phone or any secondary device.

I fully appreciate that, from the invigilator's viewpoint, the combination of my anxious movements and optical distortion may have raised concern. I hold no

objection to the vigilance shown. However, I respectfully assure the panel that no unauthorised device was used, and the situation arose entirely from optical behaviour and nervous behaviour – not from misconduct.

This incident has deeply affected [PRIVATE]. I have always valued honesty, integrity, and professionalism, and being questioned on these grounds had been [PRIVATE] and reflective for me. I would never knowingly act against the ethical principles expected of an ACCA student. If any aspect of my behaviour contributed, even unintentionally, to confusion or doubt, I genuinely apologise.

I humbly request the panel to kindly consider the circumstances in full – that this was an unfortunate misunderstanding caused by [PRIVATE], involuntary movements, camera angles, and the scientific optical behaviour of my glasses, rather than any intent to breach regulations. I remain fully committed to ACCA's standards and respectfully request a positive outcome and the release of my exam result."

15. On 18 November 2025, Mr Jain was asked to provide further specific information about the comments regarding his glasses, the reflections seen and the position of his phone. Mr Jain responded stating:

"1 Response regarding my immediate reference to my phone – When the proctor informed me that the unauthorised material usage had been identified, I became concerned and confused. As mobile phones are commonly referenced in such situations, I instinctively reacted by stating that I had not touched my phone. This response was not based on any accusation made by the proctor at that time, but rather my own attempt to immediately clarify that I was not using any unauthorised device during the exam.

2. Explanation regarding reflections observed in my glasses – The reflections observed in my glasses were caused by screen glare from my laptop monitor combined with lighting conditions in the room. The brightness and contrast of the screen, particularly during question navigation, can produce reflections that appear rectangular or device-like when viewed from certain angles. I understand that the timing and positioning may appear misleading; however,

these reflections originated solely from the laptop screen and ambient light, not from any handheld device.

3. Clarification regarding lens behaviour – My lenses can distort reflections under bright light conditions. They tend to stretch bright shapes into rectangular forms, magnify screen glare, and create brief reflective artefacts when I move my head or adjust my viewing angle. These effects are optical in nature and can result in momentary “ghost-like” reflections.

4. Make and model of glasses/explanation of reflections – My glasses were obtained from a local optical vendor and are standard prescription lenses without a specific branded model name. I do not have the exact make or model details available. The reflections shown are consistent with glare from my laptop screen and surrounding light sources, rather than a mobile phone or any other unauthorised device.

5. Reason reflections appear to move – The reflections move because they are dependent on my head movement, eye movement, and slight changes in posture while reading and navigating the exam on my laptop. As the angle between my glasses and the screen changes, the reflections shift accordingly and are therefore not static.

6. Location of my mobile phone during check-in – During the check-in process, my mobile phone was placed away from my exam workspace and was not within my reach or line of sight. I did not access, touch, or use any unauthorised material during my exam. I fully understand the seriousness of this matter, and I truly ensure my full cooperation with the investigation process.”

DECISION ON FACTS

Allegation 1

Failed to adhere to ACCA’s Exam Guidelines to ‘move mobile phones...out of arms reach’ and/or possessed an item on or about his desk or person which was not on the list of permitted items in the Exam Guidelines, contrary to Exam Regulation 1.

16. The Committee was satisfied that Mr Jain had agreed to abide by the Exam Regulations and Guidance when he booked to attend the exam.
17. The documents before the Committee included the video recording. Towards the end of the video evidence Mr Jain sought to demonstrate to the exam proctor that his mobile phone was out of arms reach. A mobile phone was seen to be positioned on a window ledge slightly behind Mr Jain, but clearly within his arms' reach. The Committee was therefore satisfied that Mr Jain had failed to adhere to ACCA's Exam Guidelines to "move mobile phones....out of arms reach".
18. During the hearing the Committee reviewed the relevant parts of the video recording. The Committee was satisfied that the video showed reflections in Mr Jain's glasses of him holding a rectangular object, passing that object between his hands, and moving his fingers close to the rectangular object.
19. The image of the rectangular object, as seen in the video evidence, was consistent with a mobile phone. It was not consistent with a laptop stand. The Committee found that none of Mr Jain's explanations for the reflections visible in his glasses were credible. They did not explain the shape or appearance of the rectangular object, its movement, or its repeated positioning in portrait mode which would be consistent with the use of a mobile phone. The Committee found it was not credible that any nervous movement by Mr Jain of his hands or body could explain the images which clearly showed him holding a small rectangular object.
20. The Committee was satisfied that the rectangular object reflected in Mr Jain's glasses was a mobile phone, which was not a permitted item in the Exam Guidelines.
21. The Committee therefore found Allegation 1 proved. Mr Jain had been in possession of a mobile phone during the exam and he had failed to adhere to the Exam Guidelines.

Allegation 2

Was in possession of and/or used an unauthorised item, namely a mobile phone with camera, during the Exam, contrary to Exam Regulations 5(a) and/or 5(b) and thereby sought to gain an unfair advantage in the Exam and/or a future exam within the meaning of Exam Regulation 6(b).

22. The Committee was satisfied that the video recording and photographic stills from the video recording showed Mr Jain possessing and using a mobile phone with camera. The possession and use of a mobile with camera was a breach of the Exam Regulations 5a) and 5b).
23. Exam Regulations 6b) provides as follows:

“If you breach exam regulation 5a) and/or 5b), or permit another person to act contrary to those exam regulations, it will be assumed that you, and/or the other person, intended to use the ‘unauthorised items’ to gain an unfair advantage for you or others in the exam and/or a future exam. In any subsequent disciplinary proceedings, you will have to prove that you, and/or the other person, did not intend to use the ‘unauthorised items’ to gain an unfair advantage for you, or others, in the exam and/or a future exam.”

24. Mr Jain was therefore required to prove that he did not intend to use the mobile phone to gain an unfair advantage. Mr Jain denied the use of a mobile phone and he had not discharged the burden of proving any innocent or satisfactory reason for his use of the mobile phone. The Committee therefore concluded that Mr Jain sought to gain an unfair advantage in the exam.
25. The Committee therefore found Allegation 2 proved.

Allegation 3

Gave the exam proctor false or misleading information about the said unauthorised item, contrary to Exam Regulation 3.

26. The documents before the Committee included a copy of the log which recorded communication between the exam proctor and Mr Jain. When the exam was stopped by the exam proctor Mr Jain volunteered the information that he had not touched his phone. This information was false because Mr Jain had touched his mobile phone during the exam. This provision of false information to the proctor was contrary to Exam Regulation 3.
27. The Committee therefore found Allegation 3 proved.

Allegation 4(a)

Mr Jain's conduct in respect of any or all of the above was dishonest, in that:-

- a) He was in possession of and/or used an unauthorised item, namely a mobile phone, during the Exam;
28. The Committee considered whether Ms Jain's conduct was dishonest, in that he was in possession of and used a mobile phone during the Exam. During the exam Mr Jain had surreptitiously used a mobile phone within the exam, knowing that such use was prohibited. Mr Jain's actions were deliberate and planned. The Committee was satisfied that the only motive for such behaviour was to cheat in the exam and thereby gain an advantage over those students acting honestly.
29. The Committee was satisfied that Mr Jain knew that his conduct was unethical and wrong. Such conduct would undoubtedly be regarded as dishonest by the standards of an ordinary decent person.
30. The Committee therefore found Allegation 4(a) proved.

Allegation 4(b)

He intended to use or used an unauthorised item, namely a mobile phone, to gain an unfair advantage for himself in the Exam and/or for a future exam;

31. The Committee considered whether Mr Jain's conduct was dishonest, in that he intended to use the mobile phone to gain an unfair advantage for himself in the exam and/or for a future exam. The Committee was satisfied that there was no plausible explanation for Mr Jain's conduct other than his intention to gain an unfair advantage over other students. The Committee concluded that such behaviour is dishonest by the standards of an ordinary decent person.
32. The Committee therefore found Allegation 4(b) proved.

Allegation 4(c)

He attempted to give the exam proctor false or misleading information about the presence or use of an unauthorised item, namely a mobile phone.

33. The Committee was satisfied that Mr Jain knew that he had repeatedly touched his phone during the exam and that his statement to the exam proctor was false and an attempt to conceal his actions. Mr Jain lied to the proctor and the Committee concluded that this behaviour would be regarded as dishonest by the standards of an ordinary decent person.

Allegation 5

In the alternative, on the same facts, in respect to any or all of the conduct referred to in Allegations 1, 2 and 3, Mr Jain failed to demonstrate integrity.

34. Having found Mr Jain's conduct to have been dishonest, the Committee did not have to consider Allegation 5 which was alleged in the alternative.

DECISION ON MISCONDUCT

35. The Committee heard submissions from Mr Irving.
36. The Committee considered the context and surrounding circumstances relating to Mr Jain's dishonesty. The Committee was satisfied that Mr Jain was fully aware of the exam regulations, and that it was therefore wrong for him to have

a mobile phone with him during the exam, to use that phone during the exam, and to give false information to the exam proctor.

37. The Committee had regard to the partial definition of misconduct in Bye-law 8(c) and the assistance provided by the case law on misconduct. It was satisfied that Mr Jain's actions brought discredit on him, the Association and the accountancy profession. It was satisfied that dishonesty within a professional exam reached the threshold of seriousness for misconduct. The requirement of being honest and trustworthy is a fundamental tenet of the accountancy profession. Mr Jain's conduct potentially gave him an unfair advantage over other students. It had the potential to undermine the integrity of ACCA's examination system and public confidence in those taking the examinations and thus the profession.
38. In the light of its judgment on misconduct, no finding was needed upon liability to disciplinary action. Accordingly, the Committee was satisfied that Allegation 6(a) was proved and it did not need to consider the alternative of Allegation 6(b).

SANCTION AND REASONS

39. The Committee noted its powers on sanction were those set out in Regulation 13(4). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate. It accepted the advice of the Legal Adviser.
40. The Committee considered that the conduct in this case was very serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour. Being honest is a fundamental requirement of any accountant.
41. The Committee did not consider that Mr Jain had demonstrated insight into the seriousness of his misconduct. Although he had stated that he understood the seriousness of the matter and apologised for any confusion that his nervous actions may have caused, he had denied that he was in possession of a mobile

phone during the exam. The Committee was not reassured that there would be no repetition of similar misconduct.

42. The Committee identified the following mitigating factors:

- The absence of any previous disciplinary record;
- Mr Jain's co-operation with ACCA's investigation (the Committee gave this co-operation limited weight because it had rejected Mr Jain's explanations).

43. The Committee identified the following aggravating factors:

- Lack of insight
- Conduct was deliberate and planned.

44. Given the Committee's view of the seriousness of Mr Jain's conduct, it was satisfied that the sanctions of No Further Action, Admonishment, Reprimand, and Severe Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct.

45. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the guidance were not present as the conduct was intentional, involved repetition of dishonest conduct in using a mobile phone on multiple occasions, and potentially resulted in Mr Jain gaining an unfair advantage over other students. There was a lack of insight and a risk of repetition. The Committee was satisfied that in the circumstances a Severe Reprimand was not a sufficient and proportionate sanction, given the seriousness of the conduct.

46. The Committee had regard to Section E2 of the Guidance on Sanctions for Dishonesty and the seriousness of such a finding on a professional, including at paragraph E2.2:

"The public is entitled to expect a high degree of probity from a professional who has undertaken to abide by a code of ethics. The reputation of ACCA and the accountancy profession is built upon the public being able to rely on a

member to do the right thing in difficult circumstances. It is a cornerstone of the public value which an accountant brings.”

47. The Committee also considered the factors listed at C5 of the Guidance for removal of Mr Jain. Mr Jain had acted dishonestly by cheating in an exam and the Committee found that this conduct was fundamentally incompatible with remaining on the student register. The Committee was satisfied that only removal from the student register was sufficient to mark the seriousness of the misconduct to the profession and the public.

COSTS AND REASONS

48. ACCA claimed costs of £5,716.50 and provided a Simple and Detailed Schedule of costs. The Committee considered the costs to be reasonably incurred. However, the case had been listed for a whole day and in the event took less than the whole day and the Committee considered it appropriate to make a small reduction to reflect this.
49. The Committee noted that the normal position is that a member against whom an allegation has been found proved, should pay the reasonable and proportionate costs of ACCA bringing the case. This is based on the principle that the majority of members should not be required to subsidise the minority who, through their own failings, have found themselves subject to disciplinary proceedings.
50. Mr Jain did not provide any details of his means or provide any representations about the costs requested by ACCA. There was, therefore, no evidential basis upon which the Committee could make any reduction on this ground.
51. In light of its observations above, the Committee decided to make an order in the sum of £5,200. This reflected the reduction for the slightly shorter day.

EFFECTIVE DATE OF ORDER

52. The Committee decided that the order should have immediate effect to protect the public given the seriousness of the misconduct and the risk that Mr Jain might hold himself out as a student member of ACCA.

Ms Carolyn Tetlow
Chair
25 March 2026