

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Miss Yawen Liu
Heard on:	Friday, 22 May 2026
Location:	Remotely via Microsoft Teams
Committee:	Mr David Tyme (Chair) Ms Wanda Rossiter (Accountant) Mr Nigel Pilkington (Lay)
Legal Adviser:	Ms Valerie Charbit (Legal Adviser)
Persons present and capacity:	Mr Matthew Kerruish-Jones (ACCA Case Presenter) Ms Aimee Murphy (Hearings Officer)
Summary	Exclusion from membership with immediate effect
Costs:	Miss Liu to pay ACCA costs of £6500

PAPERS AND ALLEGATIONS

1. The Committee convened to consider the following five allegations against Miss Liu:

Miss Yawen LIU ('Miss Liu'), at all material times an ACCA trainee:

1. *Applied for membership to ACCA on or about 17 October 2022 and in doing so purported to confirm in relation to her ACCA Practical Experience training record*
 - a) *Her Practical Experience Supervisor in respect of her practical experience training in the period from 15 April 2019 to 04 August 2019 was Person 'A' when Person 'A' did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all.*
 - b) *She had achieved the following performance objectives:*
 - *Performance Objective 1: Ethics and professionalism*
 - *Performance Objective 2: Stakeholder relationship management*
 - *Performance Objective 3: Strategy and innovation*
 - *Performance Objective 4: Governance, risk and control*
 - *Performance Objective 5: Leadership and management*
 - *Performance Objective 8: Analyse and interpret financial reports*
 - *Performance Objective 9: Evaluate investment and financing decisions*
 - *Performance Objective 11: Identify and manage financial risk*
 - *Performance Objective 13: Plan and control performance*
2. *Miss Liu's conduct in respect of the matters described in Allegation 1 above was:*
 - a) *In respect of Allegation 1a), dishonest in that Miss Liu sought to confirm her Practical Experience Supervisor did supervise her practical experience training in accordance with ACCA's requirements or otherwise which she knew to be untrue.*
 - b) *In respect of Allegation 1b) dishonest in that Miss Liu knew she had not achieved all or any of the performance objectives referred to in*

Allegation 1b) as described in the corresponding performance objective statements.

c) In the alternative, any or all of the conduct referred to in Allegation 1 above demonstrates a failure to act with Integrity.

3. In the further alternative to Allegations 2a), 2b) and 2c) above, such conduct was reckless in that Miss Liu paid no or insufficient regard to ACCA's requirements to ensure:

a) Her practical experience was supervised;

b) Her Practical Experience Supervisor was able to personally verify the achievement of the performance objectives she claimed and / or verify they had been achieved in the manner claimed.

c) That the performance objective statements referred to in Allegation 1b) accurately set out how the corresponding objective had been met.

4. Failed to co-operate with ACCA's Investigating Officer in breach of Complaints and Disciplinary Regulation 3(1) in that she failed to respond fully or at all to ACCA's correspondence dated:

a) 10 October 2023

b) 25 October 2023

c) 10 November 2023

5. By reason of her conduct, Miss Liu is:

a) Guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at 1 to 4 above; in the alternative in respect of Allegation 4 only;

b) Liable to disciplinary action pursuant to bye-law 8(a)(iii).

2. The Committee had before it the following papers: a service bundle numbering 23 pages, a Disciplinary Committee bundle numbering 262 pages. At the appropriate time it was also supplied with a simple costs schedule (1 page) and a detailed costs schedule (1 page).
3. Miss Liu was not present and she was not represented.

SERVICE OF PAPERS AND PROCEEDING IN ABSENCE

4. Mr Kerruish-Jones submitted that Miss Liu had been properly served with notice of the Disciplinary Committee hearing. He applied to proceed in the absence of Miss Liu since she had failed to attend the hearing. In summary, he invited the Committee to exercise their discretion to proceed in her absence on the basis that she had voluntarily absented herself from the hearing because she had not engaged in the disciplinary process at all.
5. The Committee firstly considered whether Ms Lui was properly served with notice of the hearing in accordance with the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 (amended 01 January 2025) (CDR). Regulation 10(1) of the CDR says that notice should be given to the member 28 days before the hearing and that they should be supplied with specific documents and that the notice should be served in accordance with CDR 22.
6. The Committee took into account ACCA's Guidance for Disciplinary Committee hearings. It also referred to the CDRs.
7. The Committee was satisfied that Miss Liu had been properly served with the Notice of the hearing on 24 April 2026 along with the required documentation as set out in CDR 10. It was further satisfied that this notice was served to the email address Miss Liu had registered with ACCA. It therefore found service to be properly effected in accordance with CDR 10 and 22.

8. The Committee went on to consider whether or not to exercise its discretion to proceed in the absence of Miss Liu. It noted that she had not engaged with the disciplinary investigation at all despite a number of attempts to contact her and seek to engage her. The Committee noted that ACCA had tried to contact Miss Liu since sending her the Notice of Hearing, by emailing her on 29 April 2026, 07 May 2026, 11 May 2026, 19 May 2026 and 21 May 2026. It also noted that ACCA had attempted to contact Miss Liu by telephone without success.
9. The Committee therefore decided that it was fair and in the public interest to proceed with the hearing in the absence of Miss Liu since there was on the face of the papers within the bundle no reason as to why she had not attended the disciplinary hearing and because it was highly unlikely that an adjournment would secure her attendance in the future. The Committee concluded that Miss Liu was unlikely to engage in a future hearing and so it was fair to proceed in her absence because it was important and in the public interest to determine regulatory matters expeditiously.

BACKGROUND

10. Upon an ACCA student completing all their ACCA exams, they become an ACCA affiliate. However, in order to apply for membership, they are required to obtain at least 36 months' practical experience in a relevant role ('practical experience'). It is permissible for some or all of that practical experience to be obtained before completion of ACCA's written exams.
11. A person undertaking practical experience is often referred to as an ACCA trainee being the term used to describe Miss Liu's status in the allegations, the report and the supporting evidence bundle.
12. An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement training record (PER), which is completed using an online tool called 'MyExperience' which is accessed via the trainee's MyACCA portal. As part of their practical experience, each trainee is required to complete nine performance objectives (PO's) under the supervision of a qualified accountant. An accountant is recognised by ACCA as a qualified accountant if they are a qualified accountant recognised by law in the trainee's country and

or a member of an IFAC body (International Federation of Accountants). Once a trainee believes they have completed a PO, they are required to provide a statement in their PER training record describing the experience they have gained in order to meet the objective. Given this is a description of their own experience, the statement should be unique to them. Through the online tool, the trainee then requests that their practical experience supervisor approves that PO.

13. In addition to approval of their PO's, the trainee must ensure their employment where they have gained relevant practical experience (being a minimum of 36 months) has been confirmed by the trainee's line manager who is usually also the trainee's qualified supervisor. This means the same person can and often does approve both the trainee's time and achievement of PO's.
14. If the trainee's line manager is not qualified, the trainee can nominate a supervisor who is external to the firm to supervise their work and approve their PO's. This external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor. Once all nine PO's have been approved by the trainee's practical experience supervisor (whether internal or external) and their minimum 36 months of practical experience has been approved, the trainee is eligible to apply for membership - assuming they have also passed all their ACCA exams and successfully completed ACCA's Ethics module.
15. The PER training records of fifteen ACCA trainees were reviewed by ACCA's Professional Development Team. This review revealed those trainees shared most of the same PO statements as each other and / or shared the same supervisors.
16. The PO statements for those fifteen trainees were approved between 11 August 2021 and 17 October 2022. Miss Liu was one such trainee.
17. A Senior Administrator in ACCA's Member Support Team, provided a statement explaining ACCA's membership application process stating that once an application is received, this is recorded in ACCA's PROD database by an automated process. The corresponding record for Miss Liu was produced in

the Committee's bundle of papers and records her application was received on 17 October 2022. Miss Liu was admitted to ACCA's membership on 20 October 2022.

18. The Committee had evidence about the Performance Objectives and ACCA's exams being closely linked so that the knowledge and techniques the trainee develops through their studies, are relevant in their workplace. The tasks and activities a trainee will be asked to demonstrate in the PO's are also closely related to the type of work they will undertake on a regular basis in an accounting or finance role. Each PO comprises 3 parts; (i) a summary of what the PO relates to; (ii) 5 elements outlining the tasks and behaviours a trainee must demonstrate to be able to achieve the PO; and (iii) a 200- to 500-word concise personal statement in which a trainee must summarise how they achieved the PO. In total a trainee is required to complete nine PO's. ACCA recommends to trainees that they choose the technical PO's that best align to their role so that it is easier to achieve the PO. In that regard the ACCA's requirements as published in the 2019 guide, and subsequently, explain the following:

'The performance objectives you choose should be agreed with your practical experience supervisor. You should consider the following points when selecting which performance objectives to target...

... ..

Match any business objectives you have been set at work with the performance objectives. This will allow you to work towards your business objectives and your PER at the same time.'

19. In their personal statement for each PO, a trainee needs to provide a summary of the practical experience they gained. They must explain what they did, giving an example of a task. They must describe the skills they gained which helped them achieve the PO and they must reflect on what they have learned including what went well or what they would have done differently. A trainee's personal statement for each PO must be their own personal statement that is unique to them and their own experience. This has been consistently referred to in ACCA's published guides. Trainees must not therefore use a precedent or template or another trainee's personal statement, which would undermine the

PER training record element of the ACCA qualification. The 2019 published guide (and all subsequent guides) concludes (page 195):

'Your situation and experience are unique to you, so we do not expect to see duplicated wording, whether from statement to statement, or from other trainees. If such duplication occurs, then it may be referred to ACCA's Disciplinary Committee.'

20. ACCA's [REDACTED]
21. A practical experience supervisor means a qualified accountant who has worked closely with the trainee and who knows the trainee's work. 'Qualified accountant' means a member of an IFAC (International Federation of Accountants) member body and or a body recognised by law in the trainee's country. A practical experience supervisor is usually the trainee's line manager. All practical experience supervisors have to be registered with ACCA through ACCA's online tool.
22. The Practical Experience Requirement (PER) training record for Miss Yawen LIU recorded that she was employed by three firms, detailed below. In particular, it records the following:
 - i) Dezhou Thermal Company.
 - The first firm was Dezhou Thermal Company where Miss Liu was employed from 1 November 2016 to 1 February 2017 in the role of Assistant Accountant.
 - At page 40 of the PER training record, in red text, three months of relevant practical experience has been claimed, which relates to the period of employment referred to in the paragraph immediately above.
 - The Supervisor details for Miss Liu (page 62) record that Xinchun Kong registered on 20 February 2019 as Miss Liu's 'non IFAC qualified line manager'.

- The PER training record refers to Xinchun Kong as the sole supervisor for Miss Liu in this role and is recorded as authorised to approve Miss Liu's experience / time claim only (page 40). In that regard, Miss Liu requested that Xinchun Kong approve her experience / time claim of three months on 17 March 2022 and that Xinchun Kong approved Miss Liu's experience / time claim the same day (page 40).

ii) Deda Group.

- The PER training record states the second firm where Miss Liu was employed was Deda Group where she was employed from 15 April 2019 to 04 August 2019 in the role of Accountant (page 37). There was therefore a period of just over two years between her leaving Dezhou in February 2017 and commencing her employment at Deda in April 2019.
- At page 38 of the PER training record, in red text, three months of relevant practical experience has been claimed, which relates to the period of employment referred to in the paragraph immediately above.
- The Supervisor details for Miss Liu (page 60) record that Zhujun Zhang registered on 14 March 2022 as her 'IFAC qualified line manager'.
- The PER training record refers to Zhujun Zhang, as one of two supervisors for Miss Liu in this role who is recorded as authorised to approve Miss Liu's experience / time claim and performance objectives (page 38).
- In that regard, Miss Liu requested that Zhujun Zhang approve her experience / time claim of three months on 14 March 2022 and that Zhujun Zhang approved Miss Liu's experience / time claim the same day (page 38).

- Although Zhujun Zhang was also authorised to approve Miss Liu's POs, Zhujun Zhang is not recorded as doing so.
- The other supervisor for this firm referred to in the PER training record for Miss Liu was Mingfeng He who is registered to approve her performance objectives only (page 38). The Supervisor Details for Miss Liu record that Mingfeng He registered as her IFAC qualified external supervisor (page 59).
- Miss Liu requested that Mingfeng He approve all her nine PO's on 03 September 2022, and Mingfeng He did so on the same day (pages 40 – 57).

iii) Decheng District Bureau of Finance

- The PER training record states the third firm where Miss Liu was employed was Decheng District Bureau of Finance, where she was employed from 05 August 2019 to 14 March 2022 in the role of 'staff'(pages 38 - 39).
- At page 39 of the PER training record, in red text, 31 months of relevant practical experience has been claimed, which relates to the period of employment referred to in the paragraph immediately above.
- The Supervisor details for Miss Liu (page 61) record that Yan Meng registered on 13 May 2020 as her 'non-IFAC qualified line manager'.
- The PER training record refers to Yan Meng, as the sole supervisor for Miss Liu in this role. Yan Meng is recorded as authorised to approve Miss Liu's experience / time claim only (page 39). In that regard, Miss Liu requested that Yan Meng approve her experience / time claim of 31 months on 14 March 2022 and that Yan Meng

approved Miss Liu's experience / time claim the same day (page 39).

- This 31 month period, plus the time claimed while employed at Dezhou Thermal Company of three months and the time claimed while employed at Deda Group also of 3 months totals 37 months, being therefore just in excess of the minimum experience requirement of 36 months.

23. Mingfeng He was contacted by ACCA. At all material times he was an ACCA member. The Committee noted the email address used in correspondence with ACCA in emails is the same address as recorded for Mr He in Mr Zhao's Supervisor Details

24. ACCA asked Mr He to confirm he supervised these trainees as claimed in each of their PER training records. In his response dated 30 November 2023, he confirmed he had supervised each trainee as claimed. One of the investigating officer's questions referred to evidence from the PER training records of all 12 trainees which indicated Mr He had supervised these trainees whilst employed at two different firms but during overlapping periods. The firms being Tetherless Capital and ZHD Capital Co Ltd (the latter being the firm referred to in the Supervisor Details at page 59). That being so, as IFAC external supervisor, Mr He was holding out as being employed by ZHD Capital whilst supervising Miss Liu for her objectives. In his response to this question, Mr He confirmed he had been employed by both firms, being 'within the allowable range of [REDACTED]' and provided a document from each firm which purported to support his claim.

25. ACCA's investigating officer emailed Mr He again on 21 December 2023 acknowledging that although Mr He had provided documents relating to his employment at both firms, ACCA wished to approach both firms directly for verification and in that regard attached to the email consent forms for Mr He to sign and return to ACCA. The email went on to advise that an email address had been found online for Tetherless Capital but no email could be found for ZHD. He was therefore asked to provide an email address for the latter.

26. Mr He responded on 22 December 2023 advising he wished to resign from ACCA. He then went on to advise:

'...I did not read your email carefully, so I would like to correct some of the information. Tetherless Capital is not the one you found, it's just a private organization I started with a few friends, but it's not officially registered, it just happens to overlap in the English name. ZHD Capital is also not officially registered, but a private organization set up by my friends and me. And both are no longer existing. I'm sorry that the above problems have caused trouble to your previous work, and considering that some of my behaviors are inappropriate, I decide to give up my ACCA membership, as I wrote at the beginning.'

27. On 12 January 2024 Mr He emailed asking when the matter would be concluded. Mr He again emailed the investigating officer on 16 January 2024 (page 87) advising as follows:

'...After careful consideration, I would like to be honest with you:

- (1) I did not have any supervision over those trainees, as they were all recommended by acquaintances or contacted through other channels.*
- (2) I have not worked in any company either, as I am still unemployed to this day. The two companies mentioned in earlier emails are indeed unofficially registered private organizations that I orally created with a few friends a long time ago, but are no longer exist for a long time and have no relation to this PER experience supervision. (I don't know if they happen to have the same name as real organizations in English or Chinese language, but considering that they were only established orally long long ago and have no connection to the outside and have no longer existed for a very long time, I can make sure that they have no influence on others.).*
- (3) Therefore, the whole thing is actually that those trainees or their representors contacted me through acquaintances or other channels, but I did not supervise their work. In the previous investigation phase, all the*

materials I provided to you were untrue, and I deeply apologize for this behavior. As I mentioned in my previous email, I voluntarily give up my ACCA membership in order to protect the public interest and comfort myself. Recently, my depression has recurred, so this has caused a strong mental distress for me. I hope you can draw a conclusion and inform me as soon as possible based on my truthful statement above. Appreciate much and look forward to your reply...'

28. Despite further emails being sent to Mr He, no further communications have been received from Mr He to date.
29. Analysis of Miss Liu's PO statements as contained in her PER training record were compared with those of other ACCA trainees being part of this cohort. In most of the cases within this cohort, the supervisor approved the PO's on the same day or if not very soon thereafter.
30. In relation to Miss Liu the analysis revealed:
 - None of her PO statements were first in time.
 - All nine of her PO statements were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort and which predate Miss Liu's.
31. The analysis relating to Miss Liu is summarised in the table contained in the DC bundle. In addition the Committee was supplied with the PO statements from these other trainees. Miss Liu's PO1, PO2, PO3, PO4, PO5, PO8, PO11 statement is identical or significantly similar to the statements in the PER for four other named trainees. The schedules in ACCA's bundle detail the names of each trainee for each PO.
32. Miss Liu's PO9 statement is identical or significantly similar to the PO9 statements in the PER for five other named trainees.
33. Miss Liu's PO13 statement (page 58) is identical or significantly similar to the PO13 statements in the PER for three other named trainees.

34. Following referral of this matter to ACCA's Investigations Team, a member of that team sent an email to Miss Liu on 10 October 2023 attached to which was a letter, and other documents, which clearly set out the complaint and requested that Miss Liu respond to a number of questions by 24 October 2023. A copy of the letter was produced in ACCA's bundle. The letter also referred to Complaints and Disciplinary Regulation 3(1) requiring Miss Liu to cooperate with the investigation by responding to the questions by the deadline. This email was sent encrypted with a password which is recorded in the email. Shortly after this encrypted email was sent, an unencrypted email was sent to Miss Liu on the same day (page 72) asking her to check if she had received the encrypted email and if not to let ACCA know.
35. Given Miss Liu did not respond by the above deadline, a further encrypted email was sent on 25 October 2023 (with a copy of the letter attached to the previous email). In the covering email Miss Liu was reminded of her obligation to cooperate by responding to the questions in the letter and to do so by 08 November 2023.
36. Shortly after this encrypted email was sent, an unencrypted email was sent to Miss Liu on the same day asking her to check if she had received the encrypted email and if not to let ACCA know. No response was received to this first reminder and therefore a second and final email was sent to Miss Liu on 10 November 2023 with a copy of the letter attached to the initial email. In the covering email Miss Liu was again reminded of her obligation to cooperate by responding to the questions by 24 November 2023, and that if she failed to do so, ACCA would raise an allegation of failure to cooperate against her. In relation to this second and final reminder, an extract taken from ACCA's records for Miss Liu on the day the above email was sent.
37. ACCA's investigations officer attempted to telephone Miss Liu on 13 November 2023 using her registered telephone number as recorded in the above extract. However, an automated message stated the line was busy.
38. On 24 November 2023, an Outlook email was sent to Miss Liu asking her to check if she had received the encrypted email of 10 November 2023 and if not

to let ACCA know. A delivery receipt confirming the email was delivered successfully is on page 85.

39. In respect of all the emails sent an extract taken from ACCA's records for Miss Liu on the day the emails were sent records that the email address for Miss Liu used for these emails was the email address on ACCA's system that day was provided in the bundle to the Committee.
40. No response was received from Miss Liu to the encrypted final reminder email of 10 November or the Outlook email of 24 November.
41. On 17 January 2024, ACCA's [REDACTED] office sent a mobile message to Miss Liu. The extracts from ACCA's database for Miss Liu referred to above include a telephone number, namely [REDACTED]. The message sent by ACCA's [REDACTED] office using this mobile number read as follows:

IMPORTANT: ACCA sent you a password protected email to your registered email on 10 October 2023 requiring a response. Reminders were sent on 25 October and 10 November 2023. However, no response has been received. If you have not received any of these emails or you have but cannot open any of them, please immediately email ACCA at complaintassessment@accaglobal.com with your full name, ACCA ID and date of birth.

42. ACCA's [REDACTED] office has provided a spreadsheet recording when this message was sent and whether or not it was successfully delivered. An extract from that spreadsheet recorded the message was sent on 17 January 2024 and was successfully delivered to Miss Liu's mobile number that day and no response has been received from the trainee following this message.
43. The investigating officer emailed Miss Liu on 20 March 2024 with a copy of Mingfeng He's email in which he admitted not supervising any ACCA trainees, including Miss Liu. The investigating officer's email asked Miss Liu to confirm whether or not she accepted she was not supervised by Mingfeng He. No response was received from Miss Liu to this email.

44. Miss Liu has not corresponded with ACCA in respect of the allegations at all nor has she advanced any defence to them.
45. The Committee was also provided with an ACCA Disciplinary Committee decision head on 27 November 2025, in which Mr He was found to have falsely represented to ACCA that he supervised 12 ACCA trainees including Ms Yiu. He was found to be dishonest and guilty of misconduct and was excluded from membership of ACCA.

The Committee's Decision and Reasons

Allegations 1 (a) and 1(b)

46. The Committee found Miss Liu's completed PER training record on or about 3 September 2022 which purported to permit Miss Liu to apply for ACCA membership, which she did on 17 October 2022. Miss Liu was subsequently admitted to ACCA's membership on 20 October 2022.
47. The Committee noted that Miss Liu's Supervisor details record Mingfeng He as her 'IFAC qualified external supervisor', and therefore her practical experience supervisor and Miss Liu's PER training recorded Mingfeng He as having approved all Miss Liu's PO's.
48. Although the Committee was provided with a Disciplinary Decision in respect of Mr He, it did not rely on this in proving the allegations against Ms Liu because it had an admission from Mr He by email and it considered this to be very persuasive evidence.
49. The Committee took into consideration Mr He's email to ACCA's investigating officer in which he admitted that he did not supervise any of the trainees he is recorded as supervising in the PER training records supplied to him, which included Miss Liu. The Committee also noted that Miss Liu did not provide any explanation to the contrary following ACCA's evidence having been provided to her. Since Mr He admitted that he had not acted as her supervisor, the Committee therefore found Allegation 1(a) proved on the basis that it

considered it was more likely than not that Miss Liu had not been supervised by Mr He for her practical experience.

50. The Committee noted that all nine of Miss Liu's PO statements are the same or similar to those of other trainees. It accepted ACCA's submission that it was more likely than not that Miss Liu had therefore not achieved the objectives as she had claimed. It therefore found Allegation 1(b) proved.

Allegation 2(a) and 2(b)

51. The Committee referred to the authority of Ivey v Genting Casinos (UK) Ltd t/a Crockfords [2017] UKSC 67 when considering whether Miss Liu had behaved dishonestly. The Committee accepted ACCA's submission that there is extensive advice online on how an ACCA trainee must complete their PER training record. It accepted that such advice makes it clear that trainees must be supervised during their period of practical experience. It also makes it clear the statements supporting their PO's have to be written by trainees in their own words and as such will be unique.
52. The Committee decided that it was more likely than not that Miss Liu had completed the PER dishonestly as her experience would have had to have been unique to her and therefore could not be the same or similar to the experience of other trainees which it was. It similarly found it was more likely than not that Miss Liu had been dishonest in relation to achieving the POs regarding the matters set out Allegation 2(b).
53. The Committee took into consideration the fact that there is extensive advice available online, and it is not credible that Miss Liu was unaware that her practical experience had to be supervised or the statements supporting her PO's had to be in her own words, The Committee was satisfied that the guidance made clear that she should have described the experience she had actually gained to meet the relevant Performance Objectives.
54. The Committee took into account in her favour before deciding dishonesty that Miss Liu had no disciplinary findings against her.

55. The Committee concluded that Miss Liu had been dishonest in applying for ACCA membership and in her claim to have been supervised by Mingfeng He in her PER training record. It decided that it was more likely than not, that at the time she made her submission, she knew what she had submitted was untrue because it had found he had not supervised her.
56. Similarly, the Committee found that Miss Liu had acted dishonestly when claiming she had achieved the PO's with the use of supporting statements which she must have known had not been written by her because they were similar to other trainee PERs.
57. The Committee therefore found it likely that Miss Liu must have known her actions in relation to Allegation 1 (a) and 1 (b) were dishonest. In the Committee's view this conduct would also be regarded as dishonest by the standards of ordinary decent people in relation to both 1(a) and 1(b).
58. Accordingly the Committee found Allegations 2(a) and 2(b) proved.
59. Since Allegations 2(c) and Allegations 3(a)(b) and (c) are alternative allegations to Allegations 2(a) and 2(b), the Committee did not go on and consider them.

Allegation 4

60. The Committee reviewed carefully the sequence of correspondence between ACCA and Miss Liu. It decided that it was more likely than not, that Miss Liu's had received the emails sent to her on the dates specified in Allegation 4 and that she had decided not to respond to them.
61. The Committee noted that ACCA acts in the public interest by ensuring its members uphold proper standards, thereby maintaining public confidence in the accountancy profession. It found the failure by Miss Liu to cooperate with this disciplinary investigation and respond to correspondence sent to her as set out in Allegation 4, undermined ACCA's ability to act in the public interest as a regulator for the accountancy profession and it prevented ACCA from fully investigating the complaints against her.

Allegation 5

62. Having found Allegations 1(a), 1(b), 2(a), 2(b) proved, and noting that the allegations proved included dishonesty, the Committee decided that this conduct amounted to misconduct. It was satisfied that to lie about a PER and PO's was serious behaviour which had in fact allowed Miss Liu to claim for an extended period of time that she was an ACCA member when had the true picture been realised she would not have been able to do so. This in turn misled the public and undermined ACCA as a regulator. The Committee was satisfied that such conduct brought discredit to Miss Liu and to the Association and was disreputable conduct for the accountancy profession.
63. Furthermore the Committee decided in relation to Allegation 4, that Miss Liu's failure to cooperate with ACCA's investigation as her regulator meant she had breached CDR 3(1). It found that this too amounted to misconduct on the basis that it was conduct which seriously undermined ACCA as a regulator and brought discredit on Miss Liu and ACCA.
64. The Committee therefore found Allegation 5 proved in relation to Allegation 1(a)1(b), 2(a), 2(b) and 4.

SANCTION AND REASONS

65. The Committee referred to ACCA's Guidance on Disciplinary Sanctions (updated 10 February 2026)(GDS). It was satisfied that a sanction was necessary in order to uphold the public interest and to send a signal as to how serious the conduct was considered by the Committee to be.
66. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate to conclude the case with no order.
67. The Committee was mindful of the fact that its role was not to be punitive and that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.

68. The Committee found that the following aggravating factors:
- Lack of insight
 - The conduct found proved undermined ACCA and the accountancy profession
69. The Committee was informed by Mr Kerruish-Jones that Miss Liu had no previous disciplinary findings against her. It therefore took this into account as a mitigating factor.
70. The Committee referred the GDS and decided that the sanctions of 'Admonishment' and 'Reprimand' were not appropriate for the conduct it had found proved in relation to Miss Liu. It noted that Miss Liu had not made any admissions, she displayed no insight, there was no remorse and the conduct found proved was overall very serious and was conduct which seriously undermined ACCA and the accountancy profession. It decided these sanctions did not reflect the seriousness of the Committee's findings.
71. The Committee went on to consider whether the sanction of 'Serious Reprimand' was appropriate but it decided it was not. The misconduct was continuing in that Miss Liu remained an ACCA member, she had shown no insight or remorse and the Committee had no evidence to indicate that she would not act similarly in the future.
72. The Committee decided that taking all of the conduct it had found proved together, such conduct was wholly incompatible with membership of ACCA and undermined ACCA and the accountancy profession. It therefore decided that exclusion from membership was the only proportionate sanction. It made this decision noting sections C5 and E2 of the GDS and because the matters it had found proved included serious dishonesty which related to membership and qualification.
73. It therefore decided that the only proportionate sanction was exclusion from membership of ACCA.

EFFECTIVE DATE OF ORDER

74. The Committee was concerned that Miss Liu remained an ACCA member despite not having completed her PER or POs. It therefore considered that this posed a risk to the public and that it was in the public interest that its sanction take effect immediately.

COSTS AND REASONS

75. The Committee was provided with a simple costs schedule and a detailed costs schedule. There were no documents submitted in relation to Miss Liu's financial circumstances. The Committee therefore were entitled to infer that Miss Liu could meet a costs order.
76. Having considered ACCA's Guidance for Costs Orders (updated in September 2023), the Committee was satisfied that Miss Liu should pay costs to ACCA since it had found all of the allegations proved against her.
77. The Committee considered the application for costs to be paid to ACCA was well founded and the sum set out in the costs schedule reasonable. Since the hearing itself lasted less than half a day it made a small reduction in the total costs claimed by ACCA from £6839.50 to £6500. It therefore ordered Miss Liu to pay costs to ACCA of £6500.

Mr David Tyme
Chair
22 May 2026