

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Miss Meng Zhang

Heard on: Tuesday, 26 May 2026

Location: Remotely via Microsoft Teams

Committee: Mr Martin Winter (Chair)
Mr Ryan Moore (Accountant)
Ms Alison Sansome (Lay)

Legal Adviser: Mr Lee Davies

**Persons present
and capacity:** Mr Mazharul Mustafa (Case Presenter)
Miss Sofia Tumburi (Hearings Officer)

Summary: Allegations 1, 2, 3(a) 3(b) and 5 found proved
Removal from the Register

Costs: No order for costs.

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PRELIMINARY

1. The Disciplinary Committee ('the Committee') convened to consider the case of Miss Zhang.
2. The Committee had before it a Report and Bundle (304 pages), a Service Bundle (17 pages), a Separate Bundle (30 pages), and a Tabled Additional Bundle (5 pages),
3. Mr Mazharul Mustafa ('Mr Mustafa') represented the Association of Chartered Certified Accountants (ACCA). Miss Zhang did not attend and was not represented.

SERVICE AND PROCEEDING IN ABSENCE

4. The Notice of Hearing was sent by email on 28 April 2026 to Miss Zhang's registered email address. The Committee was provided with a delivery receipt showing the email had been received by the addressee and a screenshot from the membership database showing Miss Zhang's registered contact details.
5. There was no response to that notice and so, on 12 May 2026, the Hearings Officer emailed Miss Zhang, asking her if she intended to attend the hearing. On 13 May 2026, Miss Zhang replied indicating she was unable to attend the hearing. The Hearings Officer replied and asked Miss Zhang if she consented to the hearing taking place in her absence. Miss Zhang replied via e-mail on 14 May 2026 that she consented to the hearing taking place in her absence. On 22 May 2026 the Hearings Officer sent Miss Zhang the link to the hearing.
6. The Committee accepted the advice of the Legal Adviser and was satisfied that the requirements of regulations 10(1) and 22(1) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ('CDR') as to service had been complied with.
7. Having satisfied itself that service had been carried out in accordance with the regulations, the Committee went on consider whether to proceed in the absence of Miss Zhang.
8. The Committee considered the submissions of Mr Mustafa. The Committee

accepted the advice of the Legal Adviser, who referred it to Regulation 10(7) of the Regulations, the ACCA document 'Guidance for Disciplinary Committee hearings' and the relevant principles from the cases of R v Jones [2002] UKHL 5 and GMC v Adeogba and GMC v Visvardis [2016] EWCA Civ 162.

9. The Committee was satisfied that Miss Zhang had voluntarily absented herself from the hearing. In those circumstances, the Committee considered it highly unlikely that Miss Zhang would attend on a further occasion if this hearing was adjourned, and therefore that no purpose would be served by doing so.
10. The Committee was satisfied that it was in the public interest that the hearing should proceed in Miss Zhang's absence.

ALLEGATIONS

11. The allegations against Miss Zhang are as follows:

Miss Meng Zhang ('Miss Zhang'), at all material times an ACCA trainee:

- 1) Applied for membership to ACCA on or about 29 November 2021 and in doing so purported to confirm in relation to her ACCA Practical Experience Training Record that her IFAC Qualified Practical Experience Supervisor in respect of her practical experience training in the period from 06 November 2017 to 28 November 2021 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.
- 2) Applied for membership to ACCA on or about 29 November 2021 and in doing so purported to confirm in relation to her ACCA Practical Experience Training Record she had achieved all or any of the following Performance Objectives:
 - Performance Objective 1: Ethics and professionalism
 - Performance Objective 2: Stakeholder relationship management
 - 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 10: Manage and control working capital
- Performance Objective 11: Identify and manage financial risk

- 3) Miss Zhang's conduct in respect of the matters described above was:
- a) In relation to Allegation 1 Dishonest in that Miss Zhang sought to confirm her Practical Experience Supervisor was Person A and Person A supervised her practical experience training in accordance with ACCA's requirements or otherwise which she knew to be untrue.
 - b) In relation to Allegation 2, dishonest in that Miss Zhang knew she had not achieved all or any of the performance objectives as described in the corresponding performance objective statements.
 - c) In the alternative, any or all of the conduct referred to in Allegations 1 and 2 above demonstrates a failure to act with Integrity.
- 4) In the further alternative any or all of the conduct referred to in Allegations 1 and 2 above was reckless in that Miss Zhang paid no or insufficient regard to ACCA's requirements to ensure:
- a) Her practical experience was supervised.
 - b) Her Practical Experience Supervisor, Person A, was able to personally verify the achievement of the performance objectives she claimed and/or verify they had been achieved in the manner claimed.
- 5) By reason of her conduct, Miss Zhang is 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.

ACCA'S Case

12. 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.

13. A person undertaking practical experience is often referred to as an ACCA trainee being the term used to describe Miss Zhang's status in the allegations, the report and the supporting evidence bundle.
14. An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement (PER) training record which is completed using an online tool called 'MyExperience' which is accessed via the student's MyACCA portal.
15. 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.
16. 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 practical experience supervisor. This means the same person can and often does approve both the trainee's time and achievement of PO's.
17. 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.
18. 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.

19. The PER training records of fifteen ACCA trainees have been reviewed by ACCA's Professional Development Team. This review has revealed these trainees shared most of the same PO statements as each other and/ or shared the same supervisors.
20. The PO statements for these fifteen trainees were approved between 11 August 2021 and 17 October 2022.
21. Consequently, all fifteen trainees were referred to ACCA's Investigations Team. Miss Zhang is one such trainee.
22. When Miss Zhang applied for ACCA membership, she named her supervisor as Person 'A'. As part of its investigation ACCA contacted Person 'A' who initially confirmed that they were the Supervisor of Miss Zhang. However, in an e-mail on 16 January 2024 Person 'A' confirmed that they had not supervised Miss Zhang or indeed any other trainees.
23. ACCA submits that Allegations 1 and 2 are capable of proof by reference to the following:
 - Dawn McKenna's statement which describes ACCA's Practical Experience Requirements;
 - Miss Zhang's completed PER training record which was completed on or about 29 November 2021 which then permitted Miss Zhang to apply for membership which she did on 29 November 2021. Miss Zhang was subsequently admitted to membership on 02 December 2021.
 - Miss Zhang's Supervisor details which record Person 'A' was her 'IFAC qualified line manager', and therefore her practical experience supervisor;
 - Miss Zhang's PER training record which records Person 'A' approved Miss Zhang's time/ experience of 48 months;
 - Miss Zhang's PER training record which records Person 'A' approved all Miss Zhang's PO's;

- That eight of Miss Zhang’s PO statements are the same as many other trainees, suggesting at the very least, she had not achieved the objectives in the way claimed or possibly at all.
 - Although Miss Zhang initially claimed that Person ‘A’ supervised her in accordance with ACCA’s requirements, this is not accepted by ACCA for the following reasons:
 - Person ‘A’ has admitted they did not supervise any of the twelve trainees within this cohort, including Miss Zhang, with such admission coming after ACCA pressed Person ‘A’ for consent for ACCA to approach their apparent employers directly.
 - Miss Zhang has not provided any evidence she was supervised by Person ‘A’.
 - In addition, Person ‘A’ has admitted Company A was created ‘orally’ and had ‘no relation to this PER experience supervision’, namely relating to any of the 12 twelve trainees, including Miss Zhang.
 - Following ACCA providing to Miss Zhang the admission by Person ‘A’ that they had not supervised her or any of the twelve trainees, Miss Zhang has admitted in effect that she sought out Person ‘A’ in 2021.
24. In relation to Allegation 2 ACCA submitted that it was clear from Miss Zhang’s membership application on 29 November 2021 that she had purported to have achieved Performance Objectives 1,2,4,5,8,9,10 and 11.
25. In relation to allegations 3(a) and 3(b) ACCA submits the following:

In *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67 at para 74 since approved in *R v Barton and another* [2020] EWCA Crim 575 it was said:

‘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. There is extensive advice online in English and in Mandarin on how an ACCA trainee must complete their PER training record. This makes it clear that (i) a trainee's experience has to be approved by a supervisor who has acted as their supervisor for the period of experience claimed (ii) statements supporting their PO's have to be written by trainees in their own words and as such must be unique, and (iii) PO's have to be approved by an IFAC qualified supervisor who has supervised that experience sufficient to be in a position to approve the POs.
27. Given the extensive advice available online, it is not credible that Miss Zhang was unaware her PO's had to be in her own words and describe the experience she had actually gained to meet the relevant Performance Objective.
28. In applying for ACCA membership, it is submitted Miss Zhang claimed (i) Person 'A' had supervised her work for 48 months which she knew was untrue, (ii) that Person 'A' had supervised her work to the extent they were able to approve her POs which she knew was untrue and (iii) that she had achieved eight PO's with the use of supporting statements which she knew had not been written by her and therefore knew she had not achieved the PO's as described in these statements or at all.
29. ACCA therefore submits this conduct would be regarded as dishonest by the standards of ordinary decent people, as per Allegations 3(a) and 3(b).
30. In relation to Allegation 3(c), ACCA submits:

In *Wingate and Evans v The Solicitors Regulation Authority* [2018] EWCA Civ366, the Court of Appeal addressed what was required in a professional disciplinary context by the standard of integrity. At paras 95-97, Jackson LJ expressed the matter in a way that applied to regulated professions generally and said this:

'95. Let me now turn to integrity. As a matter of common parlance and as a matter of law, integrity is a broader concept than honesty...

96. *Integrity is a more nebulous concept than honesty. Hence it is less easy to define, as a number of judges have noted.*
97. *In professional codes of conduct, the term “integrity” is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members. The underlying rationale is that the professions have a privileged and trusted role in society. In return they are required to live up to their own professional standards.’*
31. If the conduct of Miss Zhang is not found to be dishonest, it will be submitted that the conduct in the alternative fails to demonstrate Integrity.
32. In relation to Allegation 4, ACCA submits the following:
33. It is ACCA's submission that in the further alternative Miss Zhang's conduct was reckless in that she paid no or insufficient regard to the fact that her PER had to be approved by a supervisor who had supervised her experience for the period claimed and had also supervised her sufficiently to approve her POs.
34. In *R v G* [2003] Lord Bingham approved the following definition of recklessness (para 41).

‘A person acts recklessly within the meaning of section 1 of the Criminal Damage Act 1971 with respect to —

- (i) a circumstance when he is aware of a risk that it exists or will exist;*
- (ii) a result when he is aware of a risk that it will occur;*

And it is, in the circumstances known to him, unreasonable to take the risk.’

35. Miss Zhang in not having any or sufficient regard to the matters referred to above must have appreciated the risk (which it was unreasonable in the circumstances for her to take) that she had not completed the practical experience element of her training correctly and was therefore ineligible for membership.
36. ACCA submits the following in relation to Allegation 5:

In *Roylance v. Medical Council (No 2)* [2001] 1 AC 311, at p330, it was said in this Privy Council decision:

'Misconduct is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety may often be found by reference to the rules and standards ordinarily required to be followed by a medical practitioner in the particular circumstances.'

37. Bye-law 8(c) states,

'For the purposes of bye-law 8(a), misconduct includes (but is not confined to) any act or omission which brings or is likely to bring discredit to the individual or relevant firm or to the Association or to the accountancy profession.'

38. Miss Zhang's conduct described above is an attempt to subvert ACCA's Practical Experience Requirement process and undermines public confidence in ACCA's membership qualification process. The above conduct also brings the Association and accountancy profession into disrepute.

39. Although misconduct is a matter of judgment for a professional panel, it is ACCA's submission that misconduct is clearly made out in the event that dishonesty or a lack of integrity or recklessness are found proved

DECISION ON FACTS AND REASONS

40. As no formal admissions had been made by Miss Zhang, it was for ACCA to prove its case in relation to each of the allegations put forward.

41. The Committee considered with care all the evidence presented, and the submissions made by Mr Mustafa on behalf of ACCA. The Committee considered legal advice from the Legal Adviser, which it accepted.

ALLEGATION 1

42. In determining this allegation, the Committee carefully considered that there was no dispute that Miss Zhang applied for membership on 29 November 2021. Furthermore, Person A had conceded that they had not supervised Miss Zhang and Miss Zhang had admitted the allegation on the Case Management Form.

The Committee found this allegation proved.

ALLEGATION 2

43. The Committee determined that when applying for membership to ACCA on or about 29 November 2021, Miss Zhang had purported that she had achieved Performance Objectives 1,2,4,5,8,9,10 and 11. This was clear from the application submitted and responsibility for the application rested with Miss Zhang. At the time of submitting the application, Miss Zhang knew that the Performance Objective statements were a complete fiction. The Committee found this allegation proved.

ALLEGATION 3(A), (B) AND (C)

44. In considering these allegations of dishonesty, the Committee noted that following the Supreme Court decision in *Ivey v Genting Casinos* [2017] UKSC 67 in applying the test for dishonesty the Committee first had to determine Miss Zhang's actual knowledge or belief as to the facts and then determine whether her acts or omission were, on the balance of probabilities, dishonest by the standards of ordinary decent people.
45. In relation to Allegation 3(a), the Committee relied upon its findings under Allegation 1. The Committee found that Miss Zhang had applied for membership of ACCA on 29 November 2021 and knew at that time that Person 'A' was not her IFAC Qualified Practical Experience Supervisor. On the balance of probabilities, this was dishonest as judged by the standards of an ordinary decent person. The Committee found this allegation proved.
46. In relation to Allegation 3(b), the Committee relied upon its findings under Allegation 2. The Committee found that Miss Zhang knew when she applied for membership of ACCA that she had not achieved all or any of the Performance Objectives in the way set out in her membership application. The Committee determined that on the balance of probabilities, this was dishonest as judged by the standards of an ordinary decent person. The Committee found this allegation proved.
47. It was not necessary for the Committee to consider Allegation 3(c) as it was alleged in the alternative.

ALLEGATION 4

48. It was not necessary for the Committee to consider Allegation 4 as it was alleged in the alternative.

ALLEGATION 5

49. In relation to the allegations found proved, the Committee applied the test for misconduct, as per the case of *Roylance v General Medical Council* [2001] 1 AC 311, in which it was decided that the meaning of “[misconduct] is ... of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety in any given case may often be found by reference to the rules and standards ordinarily required to be followed by a ... practitioner in the particular circumstances.”
50. The Committee had found that Miss Zhang’s behaviour had been dishonest. Her actions were serious and fundamentally fell short of the standards required of a professional person. The Committee was satisfied that she was guilty of misconduct. Such conduct fell far below the standards expected of an accountant and member of ACCA and could properly be described as deplorable. In the Committee’s judgement, it brought discredit to Miss Zhang, the Association and the accountancy profession.
51. The Committee therefore found that the allegations found proved amounted to misconduct, and that Miss Zhang was liable to disciplinary action through her misconduct.

SANCTION AND REASONS

52. In reaching its decision on sanction, the Committee considered the oral submissions made by Mr Mustafa on behalf of ACCA.
53. Mr Mustafa referred the Committee to Guidance for Disciplinary Sanctions (‘GDS’). He commented on the aggravating features and identified that no previous findings had been made against Miss Zhang.
54. The Committee noted its powers on sanction were those set out in Regulation

13(1). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive, but may have a punitive effect, and that any sanction must be proportionate. It accepted the advice of the Legal Adviser.

55. 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.

56. The Committee assessed the aggravating and Mitigating features:

Aggravating features:

- This was a premeditated act;
- Lack of understanding and insight;
- Undermining the integrity of the membership process, which is the gateway to the profession and its benefits;

Mitigating features:

- No previous findings

57. Given the Committee's view of the seriousness of Miss Zhang'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. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the guidance were not present and, in particular, there was no evidence of meaningful insight or remorse.

58. The Committee had regard to Section E2 of the Guidance on Dishonesty and the seriousness of such a finding on a professional. It considered the factors listed at C5 of the Guidance for removal of Miss Zhang and was satisfied that her conduct was fundamentally incompatible with being a member. The Committee was satisfied that only removal from the register was sufficient to

mark the seriousness of the matters found proved.

59. The Committee noted that an application for readmission cannot be made until after 12 months has expired. The Committee decided not to extend this period, given the mechanisms in place at ACCA for readmission.

EFFECTIVE DATE OF ORDER

60. The Committee determined that an immediate order was necessary. It decided that this was proportionate as Miss Zhang was a member and posed an immediate risk to the public.

COSTS AND REASONS

61. ACCA applied for costs in the sum of £7,165.50. The Committee was provided with detailed and summary schedules of costs.
62. Miss Zhang provided details of her means and ACCA took no issue with the details provided. [PRIVATE]. The Committee therefore decided not to award costs given her financial position.

Mr Martin Winter
Chair
26 May 2026