

## HEARING

# DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

## REASONS FOR DECISION

**In the matter of:** Ms Vaishnavi Pillay

**Heard on:** Friday, 29 May 2026

**Location:** Remotely via Microsoft Teams

**Committee:** Mr Andrew Gell (Chair)  
Mr Kalwant Grewal (Accountant)  
Mr Andrew Skelton (Lay)

**Legal Adviser:** Mr Callum Cowx

**Persons present  
and capacity:** Ms Vaishnavi Pillay (ACCA Student)  
Ms Holly Girven (Case Presenter on behalf of ACCA)  
Miss Mary Okunowo (Hearings Officer)

**Outcome:** Removed from the student register

**Costs:** £50.00 awarded to ACCA

## SERVICE OF PAPERS

1. The Committee was satisfied that the ACCA had complied with its duty under Regulation 10(1)(a) Complaints and Disciplinary Regulations 2014 (“the CDR”)

### ACCA



+44 (0)20 7059 5000



info@accaglobal.com



[www.accaglobal.com](http://www.accaglobal.com)



The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom

to provide Ms Pillay with a compliant notice of the hearing at least 28 days before the hearing.

## **ALLEGATIONS & BRIEF BACKGROUND**

2. Ms Pillay registered as an ACCA student on 07 August 2023. On 04 December 2025 she sat for the on demand, remotely invigilated Financial Reporting examination.
3. During the exam booking process students are required to agree to abide by the exam regulations. In advance of the exam students are provided with the rules for the examination.
4. According to the exam rules students are not permitted to take certain items into the examination room. Such items include mobile phones equipped with cameras.
5. The proctor observed that while the exam was in progress Ms Pillay produced a mobile phone equipped with a camera and on more than one occasion, she held the phone up with the camera pointing towards the screen of her computer.
6. The proctor contacted Ms Pillay via a chat log and requested a pan of the table next to her. A mobile phone could be seen on the table. The proctor told Ms Pillay that they had seen her using the phone and that they would end her session. Miss Pillay denied using her phone.
7. The proctor referred the matter to ACCA for investigation on 21 January 2026.
8. On 28 January 2026 Ms Pillay submitted a formal complaint about the proctor's decision to terminate her examination and sought confirmation that their allegation was unfounded.
9. On 29 January 2026 ACCA sent the video footage of the examination to Ms Pillay. The next day she responded in writing, admitting misconduct in that she did use her phone, but not to secure any advantage and she did not use the phone to take pictures of what was on her screen.

10. On 20 February 2026, in response to a request from ACCA for further information, Ms Pillay elaborated further, explaining that she had encountered particular difficulty with one of the exam questions and therefore used her phone to refer to her own notes. She admitted lying to the proctor and expressed remorse.
  
11. The allegations made by ACCA are that Ms Pillay, a student member of the ACCA, during an on-demand remotely invigilated exam on 04 December 2025:
  1. Failed to adhere to ACCA's Exam Guidelines to 'move mobile phones... out of arm's reach' and/or possessed an item on or about her 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. Used the above referenced unauthorised item to take photographs and/or recordings of the Exam content, contrary to Exam Regulation 13.
  4. Gave the exam proctor false or misleading information about the said unauthorised item, contrary to Exam Regulation 3.
  5. Ms Pillay's conduct in respect of any or all of the above was dishonest, in that:
    - a) She was in possession of and/or used an unauthorised item, namely a mobile phone, during the Exam; and/or:
    - b) She intended to use or used an unauthorised item, namely a mobile phone, to gain an unfair advantage for herself in the Exam and/or for a future exam; and/or:
    - c) She intended to use or used an unauthorised item, namely a mobile phone with camera, to take photographs and/or recordings of the Exam content; and/or:

- d) She attempted to give/gave the exam proctor false or misleading information about the presence or use of an unauthorised item, namely a mobile phone.
6. In the alternative, on the same facts, in respect of any or all of the conduct referred to in Allegations 1, 2, 3 and 4, Ms Pillay failed to demonstrate integrity.
7. By reason of the above, Ms Pillay 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 4.

#### **DECISION ON FACTS/ALLEGATIONS AND REASONS**

12. Ms Pillay admitted allegations 1, 2, 4, 5a), 5b) and 5d). She denied allegations 3 and 5c) in that she denied using her mobile phone to take pictures of the examination paper on her screen. No plea was taken to allegations 6 and 7 because allegation 6 was an alternative to allegation 5 and in regard to allegation 7, misconduct was a matter for the Committee to decide.
13. ACCA did not call any oral evidence. It relied upon the video recording and other documents obtained during the investigation.
14. Ms Pillay gave oral evidence. She adopted her previous admissions and continued to deny taking pictures on her phone. She explained that her phone was raised up to the screen because she believed the examination instructions insisted that she maintain a raised eyeline throughout the exam and so she held up her phone so that she could read her notes on the phone. She did so several times because she was checking a formula against the exam question she was struggling with.
15. She repeated her apology to ACCA and expressed her remorse. She explained the background context to her conduct which was that she [PRIVATE] through her studies, which she hoped would provide her a route to a career [PRIVATE].

### **Allegations 1, 2, 4, 5a), 5b) and 5d)**

16. The Committee found these allegations proved by Ms Pillay's admissions.

### **Allegations 3 and 5c)**

17. The Committee carefully considered the video recording of the examination which included occasions when Ms Pillay visibly had her mobile phone in her hand with the camera pointing towards the screen.
18. The Committee considered ACCA's assertion that the phone was used to take photographs of what was on the screen and then balanced this against Ms Pillay's defence which was that she did nothing more than read notes on her phone. The Committee reminded itself of the burden and standard of proof. Ms Pillay was unshaken in cross-examination, providing a consistent account throughout the proceedings that she did not use the camera on her phone.
19. Ms Pillay provided a plausible explanation for why the phone was raised into view and in the absence of evidence demonstrating that she used her camera function, the Committee accepted her evidence on this point. The Committee therefore found these allegations not proved.

### **Allegations 6 and 7**

20. The Committee did not consider Allegation 6 because it was put in the alternative and is therefore marked as not proved.
21. Allegation 7 is in two parts. Part (a) is that if proved, individually or collectively, allegations 1 to 6 amount to misconduct. Part (b) is put in the alternative as liability to disciplinary action by virtue of bye law 8(a)(iii).
22. The Committee found that individually and collectively all of the proven allegations (1 to 5) amount to misconduct because Ms Pillay's actions would bring discredit on her, the ACCA and the accountancy profession. Seeking an unfair advantage in her exam by taking her notes into the exam on an unauthorised device or in any other way is a serious matter, as is lying to the proctor when challenged. Dishonesty in itself is especially serious and when

committed by a student member of the profession, in these circumstances, amounts to misconduct.

23. Having found misconduct the Committee made no separate finding on allegation 7(b).

### **SANCTION AND REASONS**

24. The Committee considered what sanction, if any, to impose in light of its findings, having regard to the ACCA's Guidance for Disciplinary Sanctions (2024). In determining the seriousness of Ms Pillay's misconduct, the Committee sought to identify mitigating and aggravating factors of that misconduct.
25. The Committee found the most serious feature of Ms Pillay's misconduct was her dishonesty which was bound to cause substantial reputational harm to ACCA and the profession if not adequately marked by sanction. The Committee found there was an element of planning to her misconduct in that she took the phone into the examination, with her notes on it, knowing this was in contravention of the examination rules and instructions which she was aware of.
26. The Committee did not identify any aggravating factors.
27. As factors mitigating her misconduct, the Committee accepted that Ms Pillay's conduct was unlikely to be repeated because she had demonstrated genuine remorse and insight and acknowledged the [PRIVATE] she was under to successfully complete the examination.
28. The Committee also gave Ms Pillay credit for her admissions at an early stage, recognising that her initial denial was made at a time when she was most likely in a state of panic about the consequences of her actions.
29. The Committee then carefully considered each of the available sanctions, starting with the least serious first. Having regard to the suggested factors for each as set out in the sanction guidance, the Committee decided that only the most serious available sanction, removal from the student register, would satisfy the overarching purpose of the ACCA disciplinary regime.

30. In particular the Committee reminded itself of Part E2 of ACCA's Guidance for Disciplinary Sanctions, which deals with cases of dishonesty. That guidance reflects well established law that acts of dishonesty are generally considered to be incompatible with membership of regulated professions. In this instance the Committee found that Ms Pillay's conduct would harm the reputation of ACCA and the accountancy profession, and if not marked by an appropriate sanction, would undermine the confidence of those who had entered the profession on merit.
31. The Committee decided that the mitigating factors in this case, including the personal mitigation advanced in regard to her personal circumstances and previous good character, was insufficient to enable it to step back from a sanction of removal from the student register.
32. Ms Pillay will be entitled to apply for readmission after one year. The Committee did not find it necessary to extend this period. If Ms Pillay does apply, she will have to persuade the Admissions and Licensing Committee that she has learnt the relevant lessons, has taken steps to ensure that there will be no repetition, and is a fit and proper person to be registered with ACCA.

### **COSTS AND REASONS**

33. ACCA applied for costs totalling £5,369.
34. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to a contribution to its costs. The Committee considered that the time spent, and the costs claimed were reasonable.
35. Ms Pillay provided a statement of means [PRIVATE]. This statement was not challenged by ACCA.
36. The Committee decided that Ms Pillay's ability to pay ACCA's costs was [PRIVATE] on Ms Pillay it was decided to limit the amount of costs awarded to £50, or the rough equivalent to [PRIVATE].

## **EFFECTIVE DATE OF ORDER**

37. The order will take effect at the end of the period of 21 days from the date on which this decision is served on Ms Pillay unless an application for permission to appeal is submitted before then.

## **ORDER**

38. The Committee ordered as follows:
- (a) Ms Vaishnavi Pillay shall be removed from the student register.
  - (b) Ms Vaishnavi Pillay shall make a contribution to ACCA's costs in the sum of £50.

**Mr Andrew Gell**  
**Chair**  
**29 May 2026**