

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Mr Zeeshan Jabbar
Heard on:	Wednesday, 14 October 2026
Location:	Remotely via Microsoft Teams
Committee:	Ms Colette Lang (Chair), Mr Abdul Samad (Accountant), Mr Mark Mills (Lay)
Legal Adviser:	Ms Giovanna Palmiero (Legal Adviser)
Persons present and capacity:	Mr Kamran Khan (Case Presenter) Ms Aimee Murphy (Hearings Office)
Observers:	Ms Joy Julien
Summary	Severe Reprimand
Costs:	£4,000.00

INTRODUCTIONS

1. The Disciplinary Committee ("the Committee") convened to hear allegations of misconduct against Mr Zeeshan Jabbar (Mr Jabbar).
2. Mr Kamran Khan (Mr Khan) presented the case on behalf of the ACCA.

3. Mr Jabbar attended and was not represented. An Urdu Interpreter, Mrs Hamida Begum was present, and assisted Mr Jabbar.
4. The Committee confirmed that it was not aware of any conflicts of interest in relation to the case.
5. In accordance with Regulation 11(1)(a) of the Chartered Certificate Accountants Complaints and Disciplinary Regulations 2014 (the Regulations), the hearing was conducted in public.
6. The hearing was conducted remotely via Microsoft Teams.
7. The Committee was provided with, and considered in advance, the following documents:
 - (i) A Report & Hearing Bundle with pages numbered 1-286;
 - (ii) An Additional Bundle with pages numbered 1-69;
 - (iii) A Tabled Additional Bundle with pages numbered 1-4;
 - (iv) A Service Bundle numbered with pages numbered 1-16.

Cost Schedules were provided to the Committee at the sanction stage.

PRELIMINARY MATTERS

APPLICATION TO HOLD HEARING IN PRIVATE

8. The Committee considered whether the hearing should be heard in private.
9. Mr Jabbar had stated in his Case Management Form (CMF) of the 31 August 2026 that he wanted to have the hearing held in private. He stated that:

"I understand that ACCA hearings are normally held in public and that the Committee has to consider the public interest when deciding whether a hearing should be private. Nevertheless, I would be grateful if the Committee could take into account the potential and lasting impact that public proceedings may have on my professional reputation and future employment opportunities."

I therefore respectfully ask the Committee to consider hearing my case in private. If the Committee does not consider that the whole hearing can be held in private, I would be grateful if it could consider whether any part of the hearing, or the publication of my identifying details, can be dealt with privately or anonymised where appropriate.”

10. Mr Jabbar asked the Committee if it was possible not to publish his name after the hearing. The Legal Advisor confirmed that the Committee had the decision whether to hold the hearing in private, but that Mr Jabbar was requesting anonymity to withhold his name from being published which was different and would require exceptional circumstances.
11. Mr Jabbar confirmed that he no longer wanted to apply for a private hearing or anonymity.

ALLEGATIONS.

12. Zeeshan Jabbar ('Mr Jabbar'), at all material times an ACCA trainee:
 - 1) *Applied for membership to ACCA on or about 8 December 2022 and in doing so claimed in his ACCA Practical Experience training record that he 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 18: Prepare for and plan the audit and assurance process*
 - *Performance Objective 19: Collect and evaluate evidence for an audit or assurance engagement*
 - *Performance Objective 20: Review and report on the findings of an audit or assurance engagement.*

- 2) *Mr Jabbar's conduct in respect of the matters described in Allegation 1 above demonstrates a failure to act with integrity given the corresponding statements to the performance objectives were not written in his own words as required by ACCA.*
- 3) *In the further alternative to Allegation 2, such conduct was reckless in that Mr Jabbar paid no or insufficient regard to ACCA's requirements to ensure the corresponding statements to the performance objectives referred to in Allegation 1 were in his own words as required by ACCA.*
- 4) *By reason of his conduct, Mr Jabbar is guilty of misconduct pursuant to ACCA byelaw 8(a)(i) in respect of any or all the matters set out at 1 to 3 above.*

BRIEF BACKGROUND:

13. 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.
14. A person undertaking practical experience is often referred to as an ACCA trainee, being the term used to describe Mr Jabbar's status in the allegations, the report and the supporting evidence bundle.
15. 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.
16. As part of their practical experience, each trainee is required to complete nine performance objectives (POs) 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 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.

17. In addition to approval of their POs, 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 POs.
18. If the trainee's line manager is not IFAC qualified, the trainee can nominate an IFAC qualified supervisor who is external to the firm to supervise their work and approve their POs. This external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor.
19. Once all nine POs 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.
20. The PER training records of eight 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 supervisor.
21. The PO statements for these eight trainees were sent for approval between 09 August 2022 and 27 August 2023.
22. Consequently, all eight trainees were referred to ACCA's Investigations Team. Mr Jabbar is one such trainee.

Facts of the Case - Allegation 1

23. Karen Watson, Senior Customer Operations Administrator in ACCA's Customer Operations Team, has provided a statement explaining ACCA's membership application process. She states that once an application is received, this is recorded in ACCA's database by an automated process. Ms Watson includes in her statement a sample record. The corresponding record for Mr Jabbar records his application was received on 08 December 2022. Mr Jabbar was admitted to membership on 08 December 2022.

24. Dawn McKenna provides an overview of the PER process in her statement as follows:

- POs and ACCA's exams are 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 POs 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 POs. The POs numbered 1 to 5 are compulsory. There are then a number of option 'Technical' POs from which the trainee needs to choose 4. ACCA recommends to trainees that they choose the technical POs 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 August 2020 guide explains 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.'

- 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 which Ms McKenna exhibits to her statement. 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 August 2020 published guide concludes:

'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.'

- ACCA's PER guides are available globally online. Although the Guides are printed in English, all trainees will have taken their exams in English and will therefore have a reasonable understanding of English.
- 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. However, where the trainee's manager is not IFAC qualified, the trainee

can appoint an external supervisor who is. In that regard, ACCA's August 2020 PER guide as exhibited to Dawn McKenna's statement states:

'If your organisation does not employ a professionally qualified accountant who can sign-off your performance objectives then you could ask an external accountant or auditor who knows your work, to be your practical experience supervisor and work with your line manager to sign off your objectives.'

- Trainees must enter their practical experience supervisor's details using their ACCA MyExperience online recording tool which generates an invitation to their nominated supervisor to act as their supervisor. If the supervisor accepts that invitation, the supervisor is required to record their details using the same recording tool.
- All practical experience supervisors have to be registered with ACCA through ACCA's online tool. For those supervisors registering as a trainee's IFAC qualified supervisor (whether internal or external), they are required to provide the name of their IFAC member body and their IFAC membership number issued by that body. They are also to provide evidence of their membership of that IFAC body by uploading their membership card.

The Practical Experience Requirement (PER) training record for Zeeshan Jabbar

25. The PER training record for Mr Jabbar records he obtained his experience while employed by one firm, Company A. In particular, it records the following:
- Mr Jabbar was employed by Company A from 15 May 2018 to 15 May 2021 in the roles of Audit Senior, Audit Semi Senior and Audit Associate.
 - Mr Jabbar's PER training record states a total of 35 months of relevant practical experience has been claimed, 4, 19 and 12 months. ACCA's PER tool has rounded down the time spent as an Audit Senior from approximately 4.5 months to 4 months and as an Audit Associate from

approximately 12.5 months to 12 months. However, ACCA accepts that Mr Jabbar has obtained 36 months of experience. This is reflected on the first page of Mr Jabbar's PER.

- The Supervisor Details for Mr Jabbar record that a Person A registered on 06 December 2022 as his 'IFAC qualified line manager'.
- This is reflected in Mr Jabbar's PER training record in that Person A is recorded as his supervisor in relation to his employment with Company A.
- As Mr Jabbar's IFAC qualified line manager, Person A was authorised to approve both Mr Jabbar's time/ experience and all his POs. In that regard, Mr Jabbar requested that Person A approve his time/experience totaling in effect 36 months on 07 December 2022 and, Person A did so the same day. On 07 December 2022, Mr Jabbar requested that Person A approve all nine POs and Person A did so on the same day.

Analysis of Mr Jabbar's PO statements as contained in his PER training record compared with those of other ACCA trainees being part of this cohort.

26. As referred to by Dawn McKenna, all PO statements should be unique and must not be copied from other trainees or from templates as this undermines the PER training record element of the ACCA qualification.
27. Where PO statements are the same or significantly similar to the PO statements of any other trainees, this would suggest at the very least, the trainee has not met the objective in the way claimed or possibly at all. Further this would suggest that the practical experience claimed, has not been supervised by a practical experience supervisor, who would or should have knowledge of the trainee's work.
28. In carrying out this analysis, ACCA has been careful to record the PO statement for any one PO which was first in time, on the basis this statement may be

original and therefore written by the trainee based on their actual experience, unless there is evidence suggesting otherwise.

29. The 'first in time date' is the date the trainee requested that their IFAC qualified line manager approve the PO in question within their PER. This is on the basis that as soon as the PO narrative had been uploaded to the PER, the trainee would have then requested approval. In most of the cases within this cohort, the supervisor approved the POs on the same day or if not very soon thereafter.
30. In relation to Mr Jabbar the analysis revealed:

- None of his PO statements were first in time; and
- All nine of his PO statements were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort which predated Mr Jabbar's.

ACCA SUBMISSIONS

Allegation 1

31. It was submitted that Allegation 1 is capable of proof by reference to the following:
- Dawn McKenna's statement which describes ACCA's Practical Experience Requirements;
 - Mr Jabbar's completed PER training record which was completed on or about 07 December 2022 which then permitted Mr Jabbar to apply for membership which he did on 08 December 2022. Mr Jabbar was subsequently admitted to membership on 08 December 2022.
 - Mr Jabbar's Supervisor details which record Person A was his 'IFAC qualified line manager', and therefore his practical experience supervisor;

- Mr Jabbar's PER training record which records Person A approved Mr Jabbar's time/ experience totaling in effect 36 months;
- Mr Jabbar's PER training record which records Person A approved all Mr Jabbar's POs;
- That all nine of Mr Jabbar's PO statements are the same as many of which predate his own, suggesting at the very least that he had not written those statements.
- Although Mr Jabbar has stated '*work experience described in my PO statements genuinely reflects my own duties*', nonetheless the PO statements of Mr Jabbar have not been written by him as they should be, which he appears to accept when he states '*... As English is not my first language, I was particularly conscious of ensuring that my statements were clear, professional, and appropriately presented. Unfortunately, this led me to place too much reliance on example wording and peer references, which resulted in excessive similarity in phrasing and structure. In hindsight, I recognise that this was an error of judgement, and I accept responsibility for this...*'.

Integrity - Allegation 2

32. 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.'*
33. There is extensive advice online on how an ACCA trainee must complete their PER training record which makes it clear that statements supporting performance objectives must be written by trainees in their own words and as such must be unique. Given the advice available, it is not credible that Mr Jabbar would have been unaware of this requirement. Rather Mr Jabbar knew full well the statements should have been written in his own words but for reasons of expediency decided to use template statements. It is therefore submitted that such conduct falls below the standard expected of an ACCA trainee and as such Mr Jabbar has failed to act with integrity.
34. ACCA submitted that Mr Jabbar must have known full well the corresponding statements to the POs should have been written in his own words to reflect his unique experiences. However, he used templates or duplicated the wording used by other trainees for all nine of his performance objective statements. ACCA submits that such conduct falls far below the standard to be expected of an ACCA trainee and as such Mr Jabbar has failed to act with integrity.

Recklessness - Allegation 3

35. It was ACCA's submission that in the further alternative Mr Jabbar's conduct was reckless in that he paid no or insufficient regard to the fact that his PO statements should truthfully and accurately set out, how the relevant objective had been met.
36. 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.'

37. Mr Jabbar, in not having any or any sufficient regard to the matters referred to above, must have appreciated the risk (which was unreasonable in the circumstances for him to take, given that this training is a precursor to membership of ACCA) that he had not completed all nine of the statements supporting the performance objectives correctly, and therefore the statements would not comply with ACCA's strict requirement that they must be written in his own words, reflecting his unique experiences.

Misconduct - Allegation 4

38. In *Roylance v. General Medical Council (No 2)* [2000] 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.'

35. Bye-law 8(c) states,

'For the purposes of bye-law B(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.'

39. It was submitted that Mr Jabbar's conduct described above subverts ACCA's PER training process, completion of which (in accordance with ACCA's requirements), is a precursor and condition precedent to membership of the ACCA; it follows that such conduct can be said to undermine public confidence in ACCA's membership qualification process. The above conduct also brings the Association and accountancy profession into disrepute.

40. Although misconduct is a matter of judgment for a professional panel, it was ACCA's submission that misconduct is clearly made out in the event that a lack of integrity or recklessness are found proved.
41. Mr Khan supplemented the ACCA's written submissions with oral submissions to the Committee.
42. Mr Khan stated that the ACCA exams are in English, so it is assumed that applicants have a sufficient understanding of the English language which would enable trainees to draft their own POs. The guidance is explicit that POs should be drafted in a trainee's own words. Mr Jabbar's POs were drafted using exactly the same or significantly similar to other trainees which were submitted before Mr Jabbar's.
43. Mr Khan directly addressed Mr Jabbar's submission that he had place reliance on example wording and peer reference because English was not his first language, which resulted in excessive similarity and structure. Mr Jabbar accepted that in hindsight this was an error of judgement. In Mr Jabbar's statement he clearly accepted that he had not drafted the POs in his own words and therefore had not complied with the rules.
44. Mr Khan submitted that the guidance emphasised to trainees, that they should use their own words and it was not credible that Mr Jabbar was not aware of this requirement.
45. Mr Khan further added, in response to the Committee's questions of Mr Jabbar, that if there was any doubt as to what the rules were, and what was required of Mr Jabbar, this should be resolved in ACCAs favour. Mr Jabbar would have been aware of the rules, as he accepted he had used wording extrapolated from elsewhere. Mr Jabbar signed up to the ACCA membership application process and those are the house rules.

MR JABBAR'S RESPONSE

46. ACCA's Investigations Team sent an email to Mr Jabbar on 19 December 2025 attached to which was a letter, and other documents. The letter set out the

complaint and requested that Mr Jabbar respond to a number of questions by 02 January 2026.

47. On 26 January 2026, Mr Jabbar sent a response to ACCA's investigation team.
48. ACCA's investigations officer emailed Mr Jabbar a letter on 28 January 2026, asking for comment on ACCA's observations about all of Mr Jabbar's PO statements being identical or significantly similar to others who submitted their PO statements before them.
49. Mr Jabbar responded on 04 February 2026, stating the following:

'I fully understand ACCA's concerns regarding the similarity between my performance objective (PO) statements and those of other trainees, and I appreciate the opportunity to respond.

I would like to state clearly that it was never my intention to copy, plagiarise, or misrepresent my experience. The work experience described in my PO statements genuinely reflects my own duties, responsibilities, and competencies developed during my employment.

At the time of completing my PER, I relied heavily on ACCA guidance materials, example formats, and discussions with colleagues to understand how performance objectives should be structured and written. As English is not my first language, I was particularly conscious of ensuring that my statements were clear, professional, and appropriately presented.

Unfortunately, this led me to place too much reliance on example wording and peer references, which resulted in excessive similarity in phrasing and structure. In hindsight, I recognise that this was an error of judgement, and I accept responsibility for this.

While we often worked in the same engagement teams, undertook similar assignments, and operated under the same reporting structures, I now fully appreciate that each trainee must describe their experience uniquely in their

own words, regardless of role similarity. I regret that my approach did not sufficiently reflect this requirement.

I wish to emphasise that the substance of my PO statements represents my genuine work experience. If helpful, I am entirely willing for this to be independently verified by my authorised supervisor. I can contact him directly and include you in correspondence should you wish him to confirm that these statements accurately reflect my practical experience.

I take this matter very seriously and remain fully committed to upholding ACCA's ethical and professional standards. I would welcome the opportunity to rewrite and resubmit my performance objective statements in my own words if ACCA considers this appropriate.'

50. ACCA's investigating officer wrote to Person A, Mr Jabbar's IFAC qualified line manager, on 19 December 2025. Person A responded on 14 February 2026, confirming he acted as Mr Jabbar's supervisor and enclosed documents supporting this. The evidence documents provided by Mr Jabbar and his supervisor indicate that Mr Jabbar was employed by Company A referred to in his PER training record and was also supervised by the supervisor as recorded in his PER training record.
51. Mr Jabbar completed the Case Management Form, which he dated 31 August 2026, and stated as follows:

I do not admit Allegation 1. I accept that I claimed the nine Performance Objectives in my PER when I applied for ACCA membership. However, the experience and work described in those Performance Objectives were based on work that I had actually carried out during my training, and the competencies described were ones that I had developed through my work.

I accept that the wording used in my Performance Objectives was very similar to wording used by other trainees. However, this does not mean that the underlying experience described in my PER was not my own. I did not knowingly claim experience or competencies that I had not obtained.

I do not admit Allegation 2.

I accept that the wording in my Performance Objectives was substantially similar to that used by other trainees and that I should have written my statements in my own words. However, I do not accept that this means that I acted without integrity.

The experience described in my Performance Objectives was based on my own work and the engagements I worked on during my training. I did not intend to mislead ACCA or claim experience that I had not gained.

At the time, I was working closely with other trainees on similar engagements and under the same or similar managers. English is also not my first language, and I wanted to make sure that my PER was written clearly and professionally. When preparing my PER, I relied too heavily on wording and descriptions that I had seen and become familiar with through my colleagues. I now understand that I should have described my experience independently in my own words.

I accept that this was poor judgement on my part, but I do not accept that I acted dishonestly or that my conduct amounted to a lack of integrity.

I do not admit Allegation 3.

I accept that I should have taken more care when preparing my Performance Objectives and made sure that the statements were written independently in my own words.

Looking back, I accept that I relied too heavily on wording that I had seen and used by colleagues.

However, I do not accept that I was reckless. My intention was to document the genuine experience I had gained during my training and the competencies I had developed through my work. I was not deliberately ignoring ACCA's requirements or trying to submit something that I knew was misleading.

As I have explained, I worked closely with other trainees on similar engagements, and the wording used to describe our work had become familiar to me. My concern at the time was also to express my experience clearly and professionally in English, which is not my first language.

I accept that I made a mistake in the way I prepared and documented my PER, but I do not believe that this amounted to recklessness as alleged....

Mr Person A has already provided ACCA with written confirmation regarding my supervision and the work and experience recorded in my PER. I understand that this correspondence is already available to ACCA, and I would ask that it be taken into account as part of the evidence in my case.”

52. On the 22 September 2026 Mr Jabbar submitted a written Statement of Defence, which re-iterated what had previously been submitted by Mr Jabbar to ACCA in written correspondence.
53. Mr Jabbar chose to make oral submissions to the Committee and preferred not to give evidence. It was made clear to him the difference in weight that the Committee would attach to this process.
54. Mr Jabbar relied upon his previous written submissions and added that he accepted that the wording was the same or similar to other POs submitted but his intention was never to misrepresent his experience to ACCA. He was busy working and taking exams and his decision was poor judgement. He did not lack of integrity, in carrying out his actions, as he simply wanted to present his work experience professionally and with clarity and had relied on other colleagues' examples but that the content was his own genuine experience.
55. The Committee asked a question of Mr Jabbar in clarification around the similarities of the PO examples. Mr Jabbar stated that he placed too much reliance on peer references and examples which resulted in the similarities of POs. The Committee referred to the example of a client finance manager asking him not to report a tax matter and how could this be the same example as someone else's PO, as this was not about phrasing or structure of the PO. Mr Jabbar explained that he was part of a big team dealing with audits, and 3

or 4 people were dealing with the same audit which is why this example is substantially the same.

56. Mr Jabbar was asked a further question by the Committee about his knowledge regarding the ACCA guidance for submitting POs. Mr Jabbar stated he could not recall and may not have paid too much attention on the wording of the PO. It was only when ACCA raised this with him did he realise that he should have used different wording.

DECISION ON ALLEGATIONS AND REASONS

57. The Committee considered all the evidence in this case including ACCA's written submissions, which were supplemented by Mr Khan orally. The Committee took into account the written and oral responses from Mr Jabbar.
58. The Committee considered legal advice from the Legal Adviser, which it accepted. The Committee bore in mind that the burden of proving the allegations rests on ACCA and the standard to be applied is proof on the balance of probabilities. It was not for Mr Jabbar to disprove them.
59. The Committee heard that there had been no previous findings against Mr Jabbar and, accepted that it was relevant to put his good character in relation to the likelihood of him acting as ACCA alleged, into the balance in his favour.

Allegation 1

60. The Committee noted that this allegation was a factual allegation, in that Mr Jabbar claimed in his ACCA Practical Experience training record that he had achieved the nine Performance Objectives.
61. The Committee was cognisant that there was no mental element attached to this allegation and Mr Jabbar further accepted submitting the POs in his application process during his submissions. The reasons as to why these were written in a particular manner were of no relevance at this stage.

62. The ACCA had presented evidence of Mr Jabbar's application and the relevant POs in support of his membership.

63. The Committee noted that whilst Mr Jabbar had formally denied this allegation, in his Statement of Defence submitted by him, included the following at Paragraph 12:

"12. I accept that I claimed the nine Performance Objectives when I applied for ACCA membership."

64. The Committee found that there was sufficient evidence on a balance of probabilities, to prove this allegation.

Allegation 2-Integrity

65. The Committee noted that it needed to consider two matters in considering this allegation. Firstly, the factual element that Mr Jabbar had not written the POs in his own words and secondly, that this act amounted to a lack of integrity.

66. Mr Khan had presented evidence from ACCA staff who had carried out a comparison to those of other trainees. It had set out each of Mr Jabbar's POs in a table alongside the POs of other trainees. They identified that that all nine of the POs submitted by Mr Jabbar were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort which predated Mr Jabbar's.

67. The Committee had viewed these POs and accepted the facts that:

- None of his PO statements were first in time; and
- All nine of his PO statements were identical or significantly similar to the PO statements contained in the PER's of other ACCA trainees from this cohort which predated Mr Jabbar's.

68. The Committee also noted that ACCA had referred to the August 2020 Guidance for trainees in completing and submitting POs which stated that:

...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.'

69. In Mr Jabbar's own defence statement he submitted:

"9. I also relied too heavily on wording and descriptions that I had seen through colleagues and on examples and guidance when preparing my PER. English is not my first language, and I wanted my statements to be clear and professional."

"10. Looking back, I understand that I should have taken my own experience and described it independently in my own words. I accept responsibility for that mistake."

70. The Committee had sufficient evidence to support the assertion that Mr Jabbar did not write the POs in his own words, due to the acceptance of Mr Jabbar that he relied on wording and descriptions he had seen from colleagues.

71. Having found the first matter of this allegation proved the Committee went on to consider whether Mr Jabbar's action amount to a lack of Integrity.

72. The Committee reminded itself that the issue of integrity was an objective test: *Williams v Solicitors Regulation Authority [2017] EWHC 1478 (Admin)*:

'[54] Want of integrity arises when, objectively judged, a solicitor fails to meet the high professional standards to be expected of a solicitor. It does not require the subjective element of conscious wrongdoing... [130] ... Honesty, i.e. a lack of dishonesty, is a base standard which society requires everyone to meet. Professional standards, however, rightly impose on those who aspire to them a higher obligation to demonstrate integrity in all of their work. There is a real difference between them'.

73. Mr Jabbar stated in his Statement of Defence:

“20. At the time, I did not appreciate the seriousness of relying on familiar wording in this way. I believed I was describing my genuine experience clearly and professionally. I now understand that I should have taken greater care to express it independently.

21. I accept that this was poor judgement. I respectfully do not accept, however, that it amounted to a lack of integrity.

”

74. The Committee accepted that there is extensive advice online on how an ACCA trainee must complete their PER training record which makes it clear that statements supporting performance objectives must be written by trainees in their own words and as such must be unique. Given the advice available, it is not credible that Mr Jabbar would have been unaware of this requirement.
75. The Committee concluded that it would have been reasonable for a trainee, when applying for membership of a professional body to be aware of all the necessary requirements. The training record is fundamental for them to obtain their professional status.
76. Mr Jabbar’s actions were not in accordance with the highest standards required of professions in obtaining their professional status.
77. The Committee concluded that Mr Jabbar knew or should have known, that the POs should have been written in his own words but for his own reasons decided to use other examples.
78. The Committee accepts that Mr Jabbar’s conduct falls far below the standard expected of an ACCA trainee and as such Mr Jabbar has failed to act with integrity.
79. The Committee therefore found that there was sufficient evidence on a balance of probabilities that Allegation 2 was found proved.

Allegation 3 - Recklessness

80. The Committee did not consider Allegation 3 as it was in the alternative to Allegation 2

Allegation 4 - Misconduct

81. Having found the facts of allegations 1 and 2 as set out above, proved, the Committee then moved on to consider whether Mr Jabbar was guilty of misconduct under allegation 4.
82. By applying for ACCA membership using POs which were not written in his own unique words and relying on other examples, Mr Jabbar had shown a complete disregard for the integrity of ACCA membership application process. Moreover, his behaviour had the potential to undermine public confidence and trust in the professional application process and this was serious.
83. Fellow professionals would find this behaviour deplorable as trainees were not acting diligently during the application process and brings the profession into disrepute as potentially trainees may not be appropriately qualified.
84. Whilst the Committee accepted that there was no proof that the POs were not underpinned by the appropriate work experience, the Committee was still satisfied that Mr Jabbar's conduct fell far short of the conduct that was expected from a trainee member of ACCA. For these reasons the Committee was satisfied that Mr Jabbar was guilty of misconduct.
85. The Committee therefore found that Mr Jabbar was found guilty of misconduct pursuant to ACCA byelaw 8(a)(i).

SANCTION

86. In reaching its decision on sanction, the Committee considered the oral submissions made by Mr Khan on behalf of ACCA. Mr Khan confirmed that there was no disciplinary record for Mr Jabbar prior to the hearing.
87. Mr Khan made no submission as to the actual sanction but referred to the Guidance for Disciplinary Sanctions (GDS) and particularly the summary of the

general principles. He commented on potential mitigating and aggravating features of the case, referring to the fact that Mr Jabbar had no other known previous disciplinary findings.

88. Mr Jabbar addressed the Committee and stated that he will never repeat these mistakes and regretted his actions. He submitted that he did not believe that his actions should result in a penalty at the higher end of the scale.
89. The Committee considered what sanction, if any, to impose taking into account ACCA's Guidance for Disciplinary Sanctions ('GDS') and the principle of proportionality. The Committee bore in mind that the purpose of sanctions was not punitive but to protect the public, maintain confidence in the profession and declare and uphold proper standards of conduct and behaviour. It took into account the submissions of the parties and the advice of the Legal Adviser.
90. The Committee considered that the conduct in this case was very serious due to the finding of lack of integrity. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour as this is a fundamental requirement of any accountant.
91. The Committee assessed the Aggravating and Mitigating features:

Aggravating features:

- Mr Jabbar has not demonstrated any real understanding of the seriousness of his conduct and the harm to the profession as a whole.
- No evidence of real insight, or reflection.

Mitigating features:

- There were no previous findings against Mr Jabbar;
- Mr Jabbar has given a qualified apology.
- Mr Jabbar has cooperated with his regulator during the investigation.

92. Having found that Mr Jabbar's actions amounted to a lack of integrity, taking no further action was clearly not appropriate. The Committee therefore considered the available sanctions in ascending order of seriousness.
93. The Committee considered that this conduct was at the more serious end of the scale. A sanction of admonishment would clearly not be appropriate or proportionate and nor would it adequately mark the seriousness of the offences.
94. The Committee was aware that a reprimand will ordinarily be appropriate where the conduct is of a minor nature, there appears to be no continuing risk to the public, and there is sufficient evidence of genuine insight. Relevant considerations include early acceptance, the short duration of the misconduct, little or no adverse consequence and conduct which was not a deliberate disregard of professional obligations. This is clearly not the appropriate, as the conduct is not of a minor nature and there is limited evidence of insight.
95. The Committee also concluded that there was no genuine acceptance of the lack of integrity or the impact or potential adverse consequences of his actions by Mr Jabbar. He had not fully understood his professional obligations.
96. In considering a severe reprimand the Committee was mindful that this sanction is ordinarily appropriate where the conduct is serious, but the circumstances and mitigation satisfy the Committee that there is no continuing risk to the public and there is evidence that the Respondent understands and appreciates the conduct found proved. Relevant factors include insight, regret, previous good record, absence of repetition, corrective measures and cooperation during the investigation.
97. The Committee, whilst accepting that the allegations were serious in nature, genuinely believed that there was no continuing risk. Mr Jabbar was of previous good character, and he had cooperated with his regulator during the investigation stage.
98. The ACCA had accepted that Mr Jabbar had undertaken the 36 months experience required for membership which was supported by Mr Jabbar's

supervisor. The ACCA had made no suggestion that Mr Jabbar did not achieve the practical experience.

99. The Committee considered the risk of repetition was low, and therefore there was no continuing risk to the public.
100. In considering if a Severe Reprimand was the proportionate and necessary sanction the Committee went on to consider the sanction of exclusion. The Committee was mindful that this was reserved for the most serious misconduct and is appropriate where the conduct is fundamentally incompatible with continued membership. The guidance identifies serious departures from professional standards, actual adverse impact, abuse of trust, dishonesty, lack of insight, prolonged misconduct, concealment and persistent denial. None of these features were present in Mr Jabbar's case.
101. Whilst this is a finely balanced decision, the Committee believed that Mr Jabbar's actions were not fundamentally incompatible with continuing membership.
102. Given the nature of the offending and the impact on the reputation of the profession, the Committee considered that no sanction less than a Severe Reprimand could be justified.
103. Therefore, pursuant to CDR 13(4), Mr Jabbar was given a Severe Reprimand.

COSTS AND REASONS

104. ACCA applied for costs in the sum of £7,937.50.
105. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the hearing.
106. The Committee had information regarding Mr Jabbar's financial circumstances as there was a completed statement of financial position. However, there was no supporting documentation in relation to the contents of that statement. There is information that there will be an increase in his future outgoings shortly.

107. The Committee considered that, in principle, a costs order should be made in favour of ACCA, and it was satisfied that the costs claimed had been reasonably incurred, are fair and appropriate.
108. The Committee determined that the appropriate order was that Mr Jabbar pay ACCA's costs in the sum of £4,000. This sum took into consideration and reflected Mr Jabbar's limited means.

EFFECTIVE DATE OF ORDER

111. The Committee considered whether it was necessary in the public interest to order that the sanction have immediate effect. The Committee determined that it would not be in the interests of the public for the order to take immediate effect.

Ms Colette Lang
Chair
14 October 2026