Think Ahead ACCA

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Mr Kashif Mustafa**
Heard on:	**Wednesday, 28 October 2026**
Location:	**Remotely via Microsoft Teams**
Committee:	**Ms Carolyn Tetlow (Chair)** **Mr Kalwant Grewal (Accountant)** **Ms Caroline Robertson (Lay)**
Legal Adviser:	**Mr Elliott Kenton (Legal Adviser)**
Persons present and capacity:	**Ms Joanna La Roche (Case Presenter)** **Miss Mary Okunowo (Hearings Officer)**
Summary:	**Exclusion from membership with immediate effect**
Costs:	**£8,800 awarded to ACCA**

INTRODUCTION AND PRELIMINARY MATTERS

1. The Disciplinary Committee of ACCA (the "Committee") convened to consider two reports concerning Mr Kashif Mustafa ("Mr Mustafa").

2. The Committee had before it a bundle of documents in connection with Case [REDACTED] (210 pages), a bundle of documents in connection with Case [REDACTED] (154 pages), and a service bundle (18 pages).

3. As a preliminary matter, the Committee noted that the case against Mr Mustafa concerned two separate sets of allegations with different factual backgrounds. It was confirmed that a joinder application had been made by ACCA and a Case Management Meeting held on 12 June 2026. The Committee was provided with a copy of the decision of the Case Management Meeting (6 pages).

4. The Committee throughout the proceedings referred to Case [REDACTED] as "Case 1" and Case [REDACTED] as "Case 2".

PROCEEDING IN ABSENCE

5. Mr Mustafa did not attend the hearing and was not represented.

6. Notice of today's hearing was sent by email to Mr Mustafa on 28 September 2026. Service was sent to his registered email address, and the Committee was provided with a delivery receipt.

7. ACCA made a number of further attempts to contact Mr Mustafa by email. These attempts were made on 13 October 2026 and 19 October 2026. These attempts were unsuccessful and it appeared from the service bundle that the email address held by Mr Mustafa was no longer in use. ACCA attempted contact him by telephone on 27 October 2026 but were not successful.

8. The Committee was satisfied that the requirements of regulations 10(1) and 22(5) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations ('CDR') as to service had been complied with.

9. Having satisfied itself that service had been effected in accordance with the regulations, the Committee went on to consider whether to proceed in the absence of Mr Mustafa. The Committee bore in mind that the discretion to do so must be exercised with the utmost care and caution.

10. The Committee was satisfied that Mr Mustafa was aware of the hearing and noted in particular that he had not made any application for an adjournment. He had failed to engage with ACCA in relation to this hearing despite repeated

attempts. In those circumstances, there was no reason for concluding he would attend on a further occasion if the hearing was adjourned, and accordingly there would be no benefit in doing so. Given the need to progress this matter expeditiously, the Committee was satisfied it was in the interests of justice to proceed in the absence of Mr Mustafa.

HEARSAY

11. The Committee also noted that in connection with Case 1, a witness statement of Person A had been provided, and contemporaneous evidence had been provided in the Case 1 bundle. However, Person A had not been called to give evidence.

12. The Committee heard submissions from Ms La Roche. She outlined that Mr Mustafa had been provided with a copy of this witness statement on a number of occasions and he had had an opportunity to challenge Person A's evidence and / or seek Person A's attendance to question them but had not done so. The Case Management Form asks whether the member requires the attendance of any witnesses, but Mr Mustafa had not completed that form. In those circumstances, ACCA's usual procedure would not be to call the witness but to rely on their written evidence. The Committee considered Person A's statement and concluded that it had no questions for them. The Committee accepted the legal advice and confirmed it was happy to proceed.

ALLEGATIONS

13. The allegations faced by Mr Mustafa were as follows:

Case 1 - Case [REDACTED]

Mr Kashif Mustafa ('Mr Mustafa'), at all material times an ACCA member:

1. On or about 18 January 2022 and/or 17 June 2022, and over several years (from 2022 to about April 2025 on Facebook), offered and/or provided ACCA Practical Experience Record (PER) completion services (as particularised in Schedule A below) for a fee.

2. Mr Mustafa's conduct in relation to the matters referred to in Allegation 1 above was:

a) Dishonest in that he knew the submission of written Performance Objectives was part of ACCA's Practical Experience Requirement to be based on an ACCA trainee's own work experience, and as such the Performance Objectives should not be drafted, written or otherwise completed by a third party;

b) Dishonest in that he knew the Ethics and Professional Skills Module was part of ACCA's trainee qualification process and that it should be completed by the trainee and not by a third party on the trainee's behalf;

c) In the alternative, in respect of his conduct referred to in Allegation 2a) and/or 2b), Mr Mustafa failed to demonstrate integrity by failing to uphold the ethical standards of an ACCA member by compromising the authenticity of ACCA's Practical Experience Requirement and/or ACCA's trainee qualification process.

3. Failed to co-operate with ACCA's Investigating Officer in breach of the Complaints and Disciplinary Regulations 2014 Regulation 3(1), in that he failed to respond fully or at all to any or all of ACCA's correspondence dated:

a) 24 January 2024;
b) 08 February 2024;
c) 16 May 2024;
d) 25 April 2025;
e) 26 June 2025.

4. By reason of his conduct, Mr Mustafa is:

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

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

Schedule A

The services appeared to include:

a) Draft the Performance Objectives Statements, part of the Practical Experience Requirement for an ACCA trainee; and:

b) Complete the Ethics and Professional Skills module, a part of the trainees' qualification process.

Case 2 - Case [REDACTED]

Mr Kashif Mustafa FCCA, an ACCA member, and at all material times a Registered Mentor for students submitting Research and Analysis Projects ("RAPs") for the BSc (Hons) in Applied Accounting degree at Oxford Brookes University (OBU):

1. On 27 June 2022, offered to provide to Person A a completed RAP for his submission to the University.

2. Mr Mustafa's conduct in relation to the matters referred to in Allegation 1 above was:

    2.1. Dishonest in that he knew RAPs submitted by students should be the students' own work, and not prepared by their Registered Mentors, in accordance with the OBU Student Conduct Regulations on cheating and plagiarism.

    2.2. In the alternative, in respect of his conduct referred to in Allegation 2.1 Mr Mustafa failed to demonstrate integrity.

3. By reason of the above, Mr Mustafa is:

    3.1. Guilty of misconduct pursuant to bye-law 8(a)(i), or in the alternative

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

BACKGROUND

14. Mr Mustafa first registered as an ACCA member on 16 October 2015 and has been a Fellow since 16 October 2020.

15. The full factual background was set out in the Case 1 and Case 2 bundles, and a summary is produced herein:

Case 1

16. On 06 March 2023, ACCA's Investigation Department received a referral from the Professional Development Team regarding concerns that Mr Mustafa had been drafting Performance Objective statements for trainees' Practical Experience Records (PER) and completing the Ethics and Professional Skills Module (EPSM) on their behalf, in exchange for a fee.

17. The referral followed the discovery that Mr Mustafa had been advertising these services on Facebook, where he promoted assistance with ACCA PER and membership applications, using ACCA's name and logo without authorisation.

18. The Facebook Profile name can be seen as 'ACCA PER Guidance Service' and the page advertises 'Guidance for ACCA PER/Membership requirements', including, 'Performance Objectives' and 'Ethics and Professional Skills Module (EPSM).

19. Contact details are provided on the Facebook profile and the phone number advertised was the same as Mr Mustafa's former ACCA registered contact number.

20. On 24 January 2022, ACCA's Regional Head of Customer Service, Person A emailed ACCA's Professional Development Team stating 'I have spoken to him (being Mr Mustafa) pretending to be an affiliate and asked about his services, in return he confirmed that he do [sic] provide services to ACCA affiliates by drafting objectives for them which they can copy and paste and primarily he is completing EPSM module…'

21. Person A provided a witness statement to ACCA setting out his interactions with Mr Mustafa and provided copies of WhatsApp messages between himself and Mr Mustafa.

22. From the information provided by Person A, ACCA were able to locate details for seven students and members on ACCA's database who had apparently used Mr Mustafa's services, and these were sent to the Investigating Officer. On 04 July 2024, the Investigating Officer sent an email to those seven

individuals asking them a series of questions surrounding their knowledge of Mr Mustafa and his PER services. Two of those individuals responded, one of whom provided evidence that Mr Mustafa had provided him with PER services.

23. Following a referral of this matter to ACCA's Investigations Team, a number of attempts were made to contact Mr Mustafa to assist with the ACCA investigation. Mr Mustafa did not engage with ACCA. At a later stage, ACCA discovered that Mr Mustafa's had changed his email address registered with ACCA and ACCA emailed him on his new email address. Mr Mustafa did not respond. Attempts were also made to call Mr Mustafa on the telephone number registered to ACCA but were unsuccessful.

Case 2

24. Mr Mustafa has been a OBU Registered Mentor since 2020.

25. On 27 June 2022, Person A who had been enrolled onto the OBU accountancy degree course came across an advertisement from a "Kashif Mustafa ACCA" on Facebook who advertised himself as a "Registered (OBU-UK) Mentor". There were no details of the services on offer.

26. Person A contacted Mr Mustafa via WhatsApp to enquire about his service as a Registered Mentor as he was seeking a mentor as required for his RAP.

27. Mr Mustafa replied by WhatsApp message that he offered services for "*preparing the whole project*" for a charge of 100k PKR (approximately: £307.00); with "*35% of the service charges as advance in order to start the project*".

28. He also said that "*in addition, I do also share Turnitin plagiarism index report for the project to my students on delivery of the completed project*".

29. When Person A told Mr Mustafa that he wanted to complete the project himself, Mr Mustafa said "*it would be up to you*".

30. When Person A then told Mr Mustafa that he believed it was unethical to prepare RAPs for his students, Mr Mustafa replied, "*it was just your own thinking*".

31. Screenshots dated 13 April 2023 of the website used by Mr Mustafa to advertise his services showed he offered three different packages as OBU Mentor for students, for three different prices. It included the following in his "Premium" package "complete OBU RAP for submission". "I'll write research project that will pass first submission (99% chance)."

32. On 12 January 2023, ACCA put the allegations to Mr Mustafa. Mr Mustafa denied the allegations but focussed on the fees he proposed to charge rather than completing the RAP for students. He said "I absolutely deny […] that I have been making full projects for the students" […] "I am fully aware that the work must be the student's own […]" Mr Mustafa stopped engaging with ACCA following his response to ACCA on 08 February 2023.

DECISION ON FACTS / ALLEGATION(S) AND REASONS

33. The Committee considered the documents before it, the submissions of Ms La Roche on behalf of ACCA and the advice of the Legal Adviser. The Committee bore in mind that the burden of proving an allegation rests on ACCA and the standard to be applied is proof on the balance of probabilities.

Case 1 - Case [REDACTED]

Allegation 1

On or about 18 January 2022 and/or 17 June 2022, and over several years (from 2022 to about April 2025 on Facebook), offered and/or provided ACCA Practical Experience Record (PER) completion services (as particularised in Schedule A below) for a fee.

34. The Committee determined that there was clear and compelling evidence in this case that Mr Mustafa had offered and provided PER services for financial gain over a sustained period of time. The Committee had regard to Person A's evidence of their interactions with Mr Mustafa. Person A in their evidence states that Mr Mustafa "*[…] provides services to ACCA affiliates by drafting objectives for them which they can copy and paste. Primarily he confirmed that he is also completing EPSM module on behalf of ACCA affiliates and charging PKR 220,000 for his services which he also confirmed via WhatsApp with different examples with actual certificates to strengthen his offering*".

35. The Committee also took into account the contemporaneous evidence in the form of WhatsApp messages where Mr Mustafa stated: "*Yes I am providing ACCA PER completion, OBU UK BSc Hons project mentor declaration submission and CV drafting services […] I am sharing with you some of my recent achievements as to my ACCA PER services [...].*" The Committee considered that Mr Mustafa's services were wide ranging and affected a wide variety of affiliates, by reference to the images provided of applications for membership which had been approved by ACCA.

36. The Committee also had regard to further evidence collated by ACCA of members who had benefited from Mr Mustafa's services. Notably, the evidence of Person B was illustrative:

"*I came across with Mr Kashif Mustafa at the time at the time when I was about to start my preparation of PER statement […]*

He then asked me whether I had sufficient work experience and I answered him yes. He said he can help me with my PER statement with fee to be charged. He asked for fee to be paid by two instalments with final instalments before his work submission […]

I did pay Mr Kashif Mustafa fee for his consultation and PER statements, but I did not adopt his work completely for my PER submission….He said he can help with my submission of PER statement as long as I gave him the login details, but it was rejected by me as I was not intended to adopt his work completely. A couple days later, I told him I received the confirmation from ACCA that my application of membership was approved, and he asked me not to disclosed his PER works to anyone else as it is specially written based on the answers and work experiences I provided, he was just providing the drafting services and he has been providing such services to affiliates for couple years already".

37. The Committee considered that the evidence underpinning Allegation 1 was cogent and reliable and was adduced from multiple sources, which were corroborative. The Committee found therefore that on the balance of probabilities, Allegation 1 was proven.

Allegation 2

Mr Mustafa's conduct in relation to the matters referred to in Allegation 1 above was:

a) Dishonest in that he knew the submission of written Performance Objectives was part of ACCA's Practical Experience Requirement to be based on an ACCA trainee's own work experience, and as such the Performance Objectives should not be drafted, written or otherwise completed by a third party;

b) Dishonest in that he knew the Ethics and Professional Skills Module was part of ACCA's trainee qualification process and that it should be completed by the trainee and not by a third party on the trainee's behalf;

38. In relation to Allegation 2a) and 2b), the Committee first considered Mr Mustafa's state of mind and determined that as an experienced ACCA Member, Fellow and Supervisor, he had full awareness that the PER was based on an ACCA trainee's own work experience and should not be drafted by a third party and that the Ethics and Professional Skills Module should not be completed by a third party on the trainee's behalf. The Committee considered that Mr Mustafa was motivated by financial gain to offer PER completion services in contravention of the regulatory requirements.

39. The Committee considered that when applying the objective test for dishonesty, the ordinary decent person would consider Mr Mustafa's actions to be dishonest with the purpose of financial gain. He was offering services which amounted to cheating for ACCA trainees and objectively this was dishonest. Therefore, the Committee found Allegation 2a) and 2b) proven.

40. As Allegation 2c) was drafted in the alternative, the Committee did not consider this Allegation further.

Allegation 3

3. Failed to co-operate with ACCA's Investigating Officer in breach of the Complaints and Disciplinary Regulations 2014 Regulation 3(1),

in that he failed to respond fully or at all to any or all of ACCA's correspondence dated:

a) 24 January 2024;
b) 08 February 2024;
c) 16 May 2024;
d) 25 April 2025;
e) 26 June 2025.

41. In determining this allegation, the Committee had regard to the contemporaneous evidence within the Case 1 bundle. The Committee was satisfied that ACCA had made multiple attempts at engaging with Mr Mustafa following referral to ACCA's Investigations Team. The Committee was further satisfied that Mr Mustafa had been warned that the Complaints and Disciplinary Regulations 3(1) (CDR) requires Mr Mustafa's cooperation.

42. The Committee was satisfied that on each of the dates listed within the Allegation, ACCA had written to Mr Mustafa and Mr Mustafa had failed to respond. ACCA went further to check Mr Mustafa's contact details and on discovery of a recent change made a further attempt to contact Mr Mustafa by email (to his new email address) and by telephone. The Committee determined that Mr Mustafa failed to engage to any of ACCA's attempts, with knowledge that this a breach of ACCA's regulations.

43. The Committee determined that Allegation 3 was proven.

Allegation 4

4. By reason of his conduct, Mr Mustafa is:

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

44. The Committee first considered Allegation 4a), having regard to its earlier findings in connection with Allegation 1 – 3. The Committee considered that Mr Mustafa's actions constituted misconduct and his conduct fell seriously short of the appropriate standard of a member and fellow. Dishonest misconduct for financial gain was deplorable and at the highest level of seriousness.

45. As the Committee found misconduct, it did not consider Allegation 4b) as an alternative allegation.

Case 2- Case [REDACTED]

Allegation 1

1. On 27 June 2022, offered to provide to Person A a completed RAP for their submission to the University.

46. The Committee determined that there was clear contemporaneous evidence available in this case of Mr Mustafa having offered to provide to Person A, a completed RAP as a commercial service for financial gain. They had regard to the WhatsApp messages between Person A and Mr Mustafa where Mr Mustafa replied by WhatsApp message to Person A that he offered services for 'preparing the whole project" for a charge of 100k PKR (approximately: £307.00); with "35% of the service charges as advance in order to start the project". The Committee had regard to the detailed breakdown provided by Mr Mustafa on WhatsApp of the services which appeared to be a completed RAP. It included details of the format in which each part would be produced, together with the agreed word count. It also stated that a Turnitin plagiarism report would be produced. These details would not be relevant unless Mr Mustafa was drafting the documents himself.

47. The Committee considered further evidence from services offered by Mr Mustafa on a website which included a "Premium" Tier for £630.04 for a "*Complete OBU Rap For Submission – I'll write research project that will pass in first submission (99% chances)*". The Committee considered that this was further evidence of Mr Mustafa providing a completed RAP service, which was offered to Person A.

48. Therefore, the Committee found that Allegation 1 was proven.

Allegation 2

2. Mr Mustafa's conduct in relation to the matters referred to in Allegation 1 above was:

2.1. Dishonest in that he knew RAPs submitted by students should be the students' own work, and not prepared by their Registered Mentors, in accordance with the OBU Student Conduct Regulations on cheating and plagiarism.

49. In relation to Allegation 2.1, the Committee first considered the state of Mr Mustafa's mind and determined he had full awareness that RAPs submitted by students should be the students' own work as he confirmed this position to ACCA in his email of 08 February 2023 where he states "*3- I am fully aware that the work must be of the student's own and the mentor can just assist in preparing the RAPS, not to prepare RAPS for them*." The Committee also noted that Mr Mustafa had completed the OBU Mentor's training course, had been a mentor since 2020 and had confirmed his understanding that the mentor must not write any part of the student's work.

50. The Committee considered when applying the objective test for dishonesty, the ordinary decent person would consider Mr Mustafa's actions to be dishonest. They were assisted by Mr Mustafa's interactions with Person A in this regard. They noted that when Person A confronted Mr Mustafa, stating that to complete a RAP for students would be unethical, Mr Mustafa did not defend himself against this allegation but instead questioned the perception of Person A for considering this to be unethical: "*it was just your own thinking*". The Committee considered that Mr Mustafa could have made it clear that he was not offering the service as perceived by Person A but did not do so because his conduct was intended for financial gain.

51. As Allegation 2.2 was brought in the alternative, the Committee disregarded this Allegation in light of their finding in connection with Allegation 2.1.

Allegation 3

52. The Committee next considered whether the facts proven would constitute misconduct pursuant to Allegation 3.1. The Committee determined that the allegations found proven do constitute misconduct, as Mr Mustafa's actions were a grave departure from the professional standards expected of him as a member.

53. He had acted dishonestly in offering RAPs to be conducted by him personally for his own personal financial gain. The Committee considered that Mr

Mustafa's actions fell well below the standards of ACCA's members and could be described as deplorable and brought discredit to the profession and therefore did constitute misconduct. Therefore, Allegation 3.1 is proven.

54. As Allegation 3.2 is an alternative allegation, the Committee did not consider this further.

SANCTION(S) AND REASON(S)

55. The Committee considered the submissions from Ms La Roche in relation to sanction. 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.

56. The Committee accepted the advice of the Legal Adviser.

57. The Committee considered both the aggravating and mitigating factors in this case.

58. The Committee considered that there were a number of aggravating factors present. The Committee determined that Mr Mustafa's conduct had been ongoing for a number of years in different forms even after ACCA initiated an investigation. The Committee also considered that Mr Mustafa's misconduct had an adverse impact on the profession as conduct of this nature would allow members to obtain an unfair advantage within the profession and the integrity of ACCA professional qualifications could be undermined. The Committee also found that there was no insight shown by Mr Mustafa and he had largely failed to cooperate with ACCA's investigations.

59. In mitigation, the Committee took into account that Mr Mustafa had no previous disciplinary history.

60. Having found that Mr Mustafa's actions amounted to misconduct, taking no further action was clearly not appropriate. The Committee therefore considered the available sanctions in ascending order of seriousness.

61. The Committee had regard to the GDS. Given the seriousness of the allegations, the serious departure from the relevant professional standards and the adverse impact on the public, the Committee considered neither an admonishment nor reprimand would be an appropriate sanction.

62. The Committee considered severe reprimand. Whilst a severe reprimand could be applied for misconduct of a serious nature, the Committee noted that there were no particular circumstances of the case or mitigation advanced that would satisfy it that there was no continuing risk to the public. This misconduct was intentional, it caused indirect harm, there was no insight and only very limited cooperation at an early stage in Case 2.

63. The Committee then considered exclusion. The Committee determined that Mr Mustafa's misconduct was fundamentally incompatible with being a Member. His behaviour over a number of years was a significant departure from the professional standards expected of a Member. He had acted dishonestly and abused his position as a Member to seek an unfair advantage in a number of ways as outlined in the proven allegations in Case 1 and 2. The Committee bore in mind the GDS guidance on dishonesty and the body of case law which indicates that removal is the appropriate sanction in such cases.

64. The Committee determined that exclusion was the most appropriate and proportionate sanction to apply to protect the public and maintain public confidence in the accountancy profession.

COSTS AND REASON(S)

65. ACCA applied for costs in the sum of £2,899.00 for Case 1 and £5,907.50 for Case 2. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the investigation and hearing.

66. The Committee considered that in principle a costs order should be made in favour of ACCA. It was satisfied that the costs sought were appropriate and had been reasonably incurred. Mr Mustafa had not provided any information in respect of his means.

67. The Committee determined that the appropriate order was that Mr Mustafa pay ACCA's costs across Case 1 and 2 in the sum of £8,800.

EFFECTIVE DATE OF ORDER

68. The Committee determined that the effective date of the order will be immediate, pursuant to CDR 20(1)(b).

Carolyn Tetlow
Chair
28 October 2026