Think Ahead ACCA

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Miss Rebecca Phillips**
Heard on:	**Friday, 30 October 2026**
Location:	**Remotely via MS Teams**
Committee:	**Mr Tom Hayhoe (Chair)** **Mr George Wood (Accountant)** **Professor Roger Woods (Lay)**
Legal Adviser:	**Ms Melissa Coutino (Legal Adviser)**
Persons present and capacity:	**Mr James Halliday (Case Presenter on behalf of ACCA)** **Miss Mary Okunowo (Hearings Officer)**
Summary:	**Excluded from membership with immediate effect**
Costs:	**£5,312.50**

1. The Committee met to consider allegations of misconduct against Miss Rebecca Phillips ("the Registrant"). Mr James Halliday appeared for ACCA. The Registrant did not attend and was not represented.

2. The Committee had before it the Report and Bundle (pages 1–228), the Service Bundle (pages 1–15), the incomplete Case Management Form, and the cost schedules.

Service and Proceeding in Absence

3. The Committee reviewed documentation within the Service Bundle. It had sight of a letter dated 30 September 2026 sent by Royal Mail to the Registrant's registered address: [REDACTED]. Tracking reference [REDACTED] confirmed delivery attempts.

4. Telephone attendance notes dated 13 October, 21 October, and 29 October 2026 evidenced repeated attempts by the Hearings Officer to contact the Registrant. Messages were left requesting contact and advising her of the hearing.

5. The Committee was satisfied that ACCA complied with Regulation 10(8)(d) of the Complaints and Disciplinary Regulations 2014 (as amended). Proper notice was given of the hearing at least 28 days in advance, so that the Registrant could prepare for it and attend. The Committee deemed that there had been every effort to effect good service.

6. The Registrant did not confirm attendance by the deadline (16 October 2026), did not respond to ACCA's communications, and made no adjournment request. The Committee was made aware that Mr Foster, ACCA Investigation Officer had created a Telephone Note of his conversation with Miss Phillips on 08 September. In that she confirmed that she tried to resign from ACCA and has no intention of returning to practice. She did not take any further calls from ACCA.

7. The Committee considered the matter with due care and caution. It concluded given the information before it, that the Registrant had voluntarily absented herself and that it was fair and appropriate to proceed. It determined that no purpose would be served by adjourning as there was no indication that Miss Phillips would be likely to attend on a future occasion.

Amendment of Allegation

8. Mr Halliday on behalf of ACCA applied to amend Allegation 5 by substituting the date of 2016 to 2017. This was characterised as a typographical error, given that the Money Laundering Regulations 2017 were not in force in 2016. Regulation 10(5) allows the Committee to amend the Allegation if no prejudice is caused.

9. The Committee was satisfied that it had the discretion to permit such an amendment where it did not materially alter the nature or gravity of the allegation and where no unfairness would be caused to the Registrant under Regulation 10(5). The amendment was made to ensure accuracy in the regulatory period during which Miss Phillips was required to comply with the Money Laundering Regulations 2017. The Committee accepted that the corrected timeframe more precisely reflected the statutory commencement of the Regulations and the evidence available to ACCA. As the Registrant had not engaged with the proceedings and the amendment narrowed rather than expanded the scope of the allegation, the Committee concluded that no prejudice arose and allowed the amendment.

Schedule of Allegations, as amended

1. Miss Rebecca Phillips, an ACCA member and MLRO for Firm A, on or about the 23 November 2021 submitted or caused to be submitted to ACCA an ACCA Anti-Money Laundering (AML) Risk Assessment Questionnaire representing that:

    a) A firm-wide risk assessment had been conducted;
    b) The firm-wide risk assessment was documented; and
    c) Firm A had documented AML Policies and Procedures in place.

2. In respect of allegation 1 above Miss Phillip's conduct was dishonest in that she sought to represent that:

    a) A firm-wide risk assessment had been conducted, that it was documented, and updated on a periodic basis, when she knew this was not true.

    b) Firm A had documented AML Policies and Procedures in place, which she knew not to be true.

3. Miss Phillips in respect of allegation 1 above, further:

   a) Failed to comply with Section B2 (Anti-Money Laundering) of ACCA's Code of Ethics and Conduct (as applicable from 2017 to 2021).

4. In the alternative, in respect of the conduct referred to in allegations 1 and 2 above, Miss Phillips failed to demonstrate int integrity.

5. Miss Phillips, an ACCA member, between 26 June 2017 and around 31 May 2023 failed on behalf of Firm A to demonstrate compliance with the requirements of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) (Regulations 2017), namely:

   a) Regulation 18 (Risk assessment by relevant person) and/or;
   b) Regulation 19 (Policies, controls and procedures) and/or;
   c) Regulation 24 (Training).

6. By reason of her conduct Miss Phillips is:

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

   b) Liable to disciplinary action pursuant to bye-law 8(a)(iii), in respect of allegation 3(a).

Background and Evidence

10. Miss Phillips is a member and fellow of ACCA and holds a practising certificate.

11. The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017) came into force on 26 June 2017. They apply to, amongst others, anyone providing accountancy services to other persons by way of business in the UK.

12. Miss Phillips is principal of, and Money Laundering Reporting Officer ("MLRO") of, Firm A a firm of accountants.

13. ACCA acts as Firm A's AML Compliance Supervisor and monitors Miss Phillips' and the firm's compliance with the MLRs 2017.

14. By virtue of regulation 18(1) of the MLRs 2017, from 26 June 2017 Miss Phillips was required to take appropriate steps to identify and assess the risks of money laundering and terrorist financing to which the firm is subject.

15. The Committee accepted the factual matrix set out in the investigation report, given sight of documentation to support it. Accordingly, the relevant matters are that:

- Miss Phillips is an ACCA member and MLRO for Firm A.
- She submitted an AML Risk Assessment Questionnaire for Firm A on 23 November 2021.
- She declared that a firm-wide risk assessment ("FWRA") and AML Policies & Procedures ("AML P&P") existed.
- The compliance review was delayed until 2023 because Miss Phillips [REDACTED]. It established that:

    - No FWRA documentation existed before 15 March 2023.
    - No AML P&P documentation existed before 15 March 2023.
    - No AML training had been undertaken by the MLRO or staff.

16. Miss Phillips admitted these failures in June 2023 correspondence.

17. She stated she was [REDACTED]. However, the declarations she had initially made were made in 2021.

18. The Registrant provided no witness evidence, and no defence statement.

19. She responded to the questionnaire sent by ACCA and provided limited clarification when asked to do so.

20. Ultimately, she conceded that there was a lack of documentation to evidence required procedures and policies, and that she had not undergone regular training for a number of years.

DECISION ON FACTS AND REASONS

Allegation 1: Representing that:

a) A firm-wide risk assessment had been conducted;

b) The firm-wide risk assessment was documented; and

c) Firm A had documented AML Policies and Procedures in place (PROVED)

21. In conducting a risk assessment that Regulation 18(2) of the MLRs required, Miss Phillips should have considered:

8.1. Information made available to her by ACCA under MLRs 17(9) and 47;

8.2. Risk factors including factors relating to the firm's: a) customers; b) the countries or geographic areas in which the firm operates; c) products or services; d) transactions; and e) delivery channels.

22. In deciding what steps were appropriate under regulation 18(1), Miss Phillips was required to consider the size and nature of the firm's business, keep an up-to-date written record of all the steps taken under regulation 18(1) of the MLRs 2017 and provide a risk assessment prepared and the information on which that risk assessment was based, to ACCA upon request.

23. By virtue of regulation 19 of the MLRs 2017, from 26 June 2017 Miss Phillips was required to establish and maintain policies, controls and procedures to mitigate and manage effectively the risks of money laundering and terrorist financing identified in any risk assessment undertaken under regulation 18(1).

24. Similarly, Miss Phillips was required to regularly review and update the policies, controls and procedures established under Regulation 19 of the MLRs and maintain a record in writing of: a) The policies, controls and procedures established under regulation 19 of the MLRs 2017; b) any changes to those policies, controls and procedures made as a result of the review and update; and c) the steps taken to communicate those policies, controls and procedures, or any changes to them, within the firm.

25. By virtue of Regulation 24 of the MLRs 2017, Miss Phillips was required to:

12.1. Take appropriate measures to ensure that its relevant employees are – a) Made aware of the law relating to money laundering and terrorist financing, and to the requirements of data protection, which are relevant to the implementation of these Regulations; and b) Regularly give training in how to recognise and deal with transactions and other activities or situations which may be related to money laundering or terrorist financing;

2.2. Maintain a record in writing of the measures taken under subparagraph (a), and in particular, of the training given to its relevant employees.

26. On 23 November 2021 Miss Phillips submitted, or caused to be submitted, an ACCA Anti-Money Laundering (AML) Risk Assessment Questionnaire confirming that the information submitted was true, accurate and complete to the best of her knowledge.

27. In answer to the question as to whether she, as the firm's MLRO, conducted a firm-wide risk assessment for the firm and documented it she responded, *'Yes – I have conducted it once'*.

28. In answer to the question as to whether the firm had documented AML Policies and Procedures in place, Miss Phillips selected the option *'Yes – I have conducted it once'*.

29. In answer to the question whether the MLRO had undertaken formal training in the past 2 years, Miss Phillips responded *'No'*.

30. On 04 October 2022, Mr Armstrong wrote to Miss Phillips to begin the AML Review process and requested the completion of the ACCA AML Compliance Review Assessment Form.

31. On 26 October 2022, Mr Armstrong was advised by the firm's deputy MLRO that Miss Phillips [REDACTED]. The review was therefore postponed until 2023.

32. The review was recommenced on 28 February 2023 and Miss Phillips submitted, or caused to be submitted, the AML Compliance Review Assessment Form on 17 March 2023.

33. In this form Miss Phillips confirmed that she had formally completed and documented a Firm-Wide Risk Assessment and uploaded a copy of the document.

34. Miss Phillips also confirmed that she had an AML policy and procedures (P&P) document in place and uploaded a copy of the same.

35. In answer to the question as to whether the MLRO had undertaken formal AML training and provided formal training to all relevant employees, Miss Phillips responded – *No formal training undertaken by MLRO or relevant employees*.

36. An additional request for documents and information was sent by email on 20 March 2023. On 03 April 2023 Mr Armstrong was informed by the deputy MLRO that Miss Phillips [REDACTED] and responded to the outstanding requests.

37. Mr Armstrong carried out the compliance review on 04 April 2023 noting that the firm displayed poor AML controls and were non-compliant in relation to FWRA, AML P&P and Training. In November 2021, Miss Philips in an AML Risk Assessment Questionnaire informed ACCA that a FWRA had been conducted and documented. During the review Miss Phillips was asked to provide a copy of the current and any previous versions of the Firm-Wide Risk Assessment. The only one was provided dated 15 March 2023. Mr Armstrong considered the metadata of this file which gives a creation date of 15 March 2023. The deputy MLRO confirmed that this document was produced in March 2023 and that there were no previous versions.

38. On 05 April 2023 Mr Armstrong referred Miss Phillips to ACCA's Assessment/Investigations Team in relation to potential breaches of the MLRs 2017.

39. On 02 June 2023 a Senior Investigations Officer wrote to Miss Phillips.

40. On 16 June 2023 and later on 29 June 2023. Miss Phillips responded stating that:

    a) Miss Phillips had herself [REDACTED] since August 2022.

    b) She accepted that no documented Firm-Wide Risk Assessment had been undertaken prior to 15 March 2023, however, she stated that the relevant risks had been identified and relevant procedures put into place.

    c) She further accepted that the firm did not have documented AML Policies and Procedures in place prior to 15 March 2023. She asserts that Procedures were in place to address identified risks but that these were not documented.

d) In relation to training she confirmed that formal training had not been undertaken at the required intervals, at the time the ACCA Anti-Money Laundering (AML) Risk Assessment Questionnaire was submitted on 23 November 2021. She explained that she had undertaken training between 2004 and 2015 but not since.

e) She stated that she undertook the relevant training in December 2021, but that this information was not recorded on the AML Compliance Review Form submitted on 17 March 2023 as [REDACTED] and the evidence of attendance had not been saved in the company's formal document area.

41. On 27 July 2023, Mr Armstrong confirmed to ACCA Investigations that the firm had regularised its position and provided confirmation that AML training had now been provided to relevant employees.

42. On 09 October 2023, Miss Phillips provided a response to the draft assessor's report provided for representations.

43. The Committee accepted the documentary evidence showing that Miss Phillips had initially declared that a FWRA had been conducted and documented and that Firm A had documented AML Policies and Procedures ("P&P"). The compliance review confirmed that neither existed before March 2023. Her subsequent admissions confirmed this.

44. The Committee found Allegation 1 proved.

Allegation 2 – Dishonesty

In respect of allegation 1 above Miss Phillip's conduct was dishonest in that she sought to represent that:

a) A firm-wide risk assessment had been conducted, that it was documented, and updated on a periodic basis, when she knew this was not true.

b) Firm A had documented AML Policies and Procedures in place, which she knew not to be true.

45. Applying *Ivey v Genting Casinos*:

    1. State of mind: Miss Phillips knew or must have known that no FWRA or AML P&P documentation existed in November 2021.

    2. Objective test: Ordinary decent people would consider knowingly submitting false regulatory declarations to ACCA to be dishonest.

46. The Committee found Allegation 2(a) proved. Miss Phillips initially indicated that a FWRA had been undertaken and that documentation for this and P&P existed. When asked for specifics and why her colleague had contradicted her, she then indicated that the information she had provided was not accurate and that there was no documentation. She had declared that the information she originally provided was accurate, and this was not true. While the Committee noted that her response did not indicate that this "documentation had been updated on a regular basis" and accordingly that part of the Allegation "*updated on a periodic basis,"* is not found, the remainder of the Allegation is found proved, and found to be dishonest. The Committee considered that she knew or must have known that at the time that the documentation was not in existence.

Allegation 3 – Breach of Section B2 (PROVED)

47. Section B2 (Anti *Anti-Money Laundering) of ACCA's Code of Ethics and Conduct (as applicable from 2017 to 2021)* requires compliance with AML law.

48. The legal requirements for FWRA, AML P&P, and Training are set out in Regulations 18, 19 and 24. Miss Phillips completed an AML Risk Assessment Questionnaire in November 2021, and informed ACCA that a FWRA had been conducted and documented. When asked to provide a copy, only one dated 15 March 2023 was provided.

49. Further AML P&P *written documentation* was required under the legislation, and Miss Phillips acknowledged that no such documentation existed before 2023. It is a legal requirement for a firm to provide regular AML training to relevant employees. The firm submitted the AML Risk Assessment Questionnaire on 23 November 2021. When asked whether she, as MLRO, had provided formal AML training in the past two years, Miss Phillips responded – '*No*'

50. Miss Phillips declared in the AML Compliance Review Assessment Form, submitted 17 March 2023, that such training had not been undertaken by the MLRO or relevant employees.

51. The firm is in breach of the MLRs 2017 in relation to the provision of training up to the December 2021.

52. Miss Phillips failed to comply with Regulations 18, 19 and 24 over several years. She admitted these failures.

53. The Committee found Allegation 3(a) proved.

Allegation 4 – Lack of Integrity (NOT REQUIRED)

54. Dishonesty having been found, the alternative allegation of lack of integrity did not require determination.

Allegation 5 – Breaches of MLRs 2017 (PROVED)

55. Between 26 June 2016 and around 31 May 2023 failed on behalf of Firm A to demonstrate compliance with the requirements of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017), namely:

a) Regulation 18 (Risk assessment by relevant person) and/or;
b) Regulation 19 (Policies, controls and procedures) and/or;
c) Regulation 24 (Training).

56. The evidence demonstrated:

- No FWRA until March 2023
- No AML P&P until March 2023
- No AML training until 2023

57. These are clear breaches of Regulations 18, 19 and 24.

58. The Committee found Allegation 5 proved.

Allegation 6 – Misconduct / Liability to Disciplinary Action (PROVED)

59. *"6. By reason of her conduct Miss Phillips is:*

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

    b) Liable to disciplinary action pursuant to bye-law 8(a)(iii), in respect of allegation 3(a)."

60. The Committee considered that Miss Phillips' dishonesty, prolonged statutory breaches, and misleading her regulator were very serious matters. Her conduct fell far below the standards expected of a registered member of ACCA and would be regarded as deplorable by fellow members of ACCA and the general public. The Committee was satisfied that Miss Phillips' actions in this respect amounted to misconduct. Allegation 6(b) was in the alternative so did not have to be considered.

SANCTION AND REASONS

61. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify any mitigating and aggravating factors.

62. The Committee was informed that Miss Phillips had no disciplinary history with ACCA and has acknowledged that there were legal requirements that she should have complied with.

63. There were significant aggravating features. The Sanctions Guidance suggests harm or adverse impact and a pattern of misconduct over a period of time as typical aggravating factors. They were present in this case. Failing to conduct an appropriate risk assessment, meet AML requirements or undertake the relevant training increases the likelihood of any unlawful activity going undetected. This clearly has potential to cause harm and damage the reputation of the profession.

64. The Committee was quite satisfied that a sanction was required in this case. It considered the available sanctions in order of seriousness.

65. The Committee first considered the sanctions of admonishment and then reprimand but the guidance made it clear that these were not sufficient. For reprimand, the guidance states 'This sanction would usually be applied in situations where the conduct is of a minor nature and there appears to be no continuing risk to the public'. Dishonestly submitting false information where legal requirements exist cannot be described as a minor matter.

66. The Committee next considered the sanction of severe reprimand. The guidance states that this sanction would usually be applied in situations where the conduct is of a serious nature but there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public, and there is evidence of the individual's understanding and appreciation of the conduct found proved. None of those elements was present in this case. The Committee went through the list of suggested factors but few, if any, of the factors supporting a severe reprimand were present. In any event, a severe reprimand would not be sufficient to mark the seriousness of the misconduct in this case.

67. The Committee considered that Miss Phillips' dishonest conduct was fundamentally incompatible with remaining as an ACCA member and that the minimum sanction it could impose was excluded from membership. Applying the principle of proportionality, the Committee recognised that its decision does not allow the Registrant to practise as an accountant but noted that the Registrant no longer wishes to be a member of ACCA and work as an accountant.

68. Mr Halliday submitted that the Committee should consider the extending the 12-month period from which Miss Phillips could reapply to ACCA. The Committee saw no reason for this to occur.

COSTS AND REASONS

69. Mr Halliday applied for costs.

70. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to its costs. It considered that the time spent and the sums claimed were reasonable, subject to a reduction for the fact that this hearing had not taken as long to prepare as had been estimated. Allowing for the reduced preparation and hearing time the Committee assessed the costs at £5,312.50.

71. Miss Phillips had not submitted a statement of financial position. The Committee had no information about her means. It could not speculate. The Committee was therefore not able to consider a reduction to the costs award based on inability to pay or hardship.

EFFECTIVE DATE OF ORDER

72. The dishonesty Miss Phillips had displayed meant that she was not fit to hold herself out as an ACCA member, even for the short period before the Committee's order took effect. The order would therefore take effect immediately.

ORDER

73. The Committee ordered as follows:

(a) Miss Rebecca Phillips shall be excluded from membership of ACCA with immediate effect.

(b) Miss Rebecca Phillips shall pay a contribution to ACCA's costs assessed at £5,312.50

Mr Tom Hayhoe
Chair
30 October 2026