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HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Miss Ruijia Li**
Heard on:	**Tuesday, 30 June 2026 & Tuesday, 20 October 2026**
Location:	**Remote via Microsoft Teams**
Committee:	**Ms Avril O'Meara (Chair)** **Ms Fiona MacNamara (Accountant)** **Professor Roger Woods (Lay)**
Legal Adviser:	**Mr Robin Havard**
Persons present and capacity:	**Mr Mazharul Mustafa (ACCA Case Presenter)** **Miss Nicole Boateng (Hearings Officer)** **Miss Ruijia Li (Student Member)** **Ms Junling Gao (Interpreter on 30 June 2026)** **Mr Yali Quan (Interpreter on 20 October 2026)**
Summary	**Allegations 1, 2(a) & 3(a) proved** **Sanction – Removal from the Student Register with immediate effect.**
Costs:	**£0**

PRELIMINARY APPLICATIONS

Amendment to allegations

1. The Committee had considered the following documents: a hearing Bundle (pages 1 to 100) and a Service Bundle (pages 1 to 17). The Committee had listened to the submissions from Mr Mustafa and Miss Li. It had also considered legal advice which it had accepted.

2. There were certain parts of the allegations which required minor amendments.

3. In the heading to the allegations, the word “his” was replaced with “her”.

4. In the stem to the allegations, the typographical error regarding the word “Strategic” was rectified and the words “Examination Regulation” were added before “6(a)”.

5. Following further discussions with regard to Allegation 1, and the fact that it was in two parts, the Committee was concerned that Miss Li fully understood the significance of both, namely the breach of Exam Regulation 4, which must be proved by ACCA, and Exam Regulation 6(a), where the burden of proof is on Miss Li to prove that she had not sought to gain an unfair advantage.

6. Mr Mustafa proposed that Allegation 1 was amended to delete the reference to Exam Regulation 6(a) as that is effectively the basis on which the allegation of dishonesty had been framed.

7. In addition, Mr Mustafa acknowledged that, even though the words “or in the alternative” are included at the end of Allegation 2(a), no alternative had been included.

8. Mr Mustafa referred the Committee to page 89 of the hearing Bundle which was the section of the Case Management Form (“CMF”) in which the allegations appeared. It could be seen that, when the CMF was sent to Miss Li, it included at paragraph 2(b) an allegation which was in the alternative to the allegation of dishonesty, namely that Miss Li’s conduct demonstrated a failure to act with

integrity. Mr Mustafa applied to amend the allegation to add the allegation in the alternative that Miss Li had failed to act with integrity.

9. Having considered the matter, the Committee was satisfied that the amendments would cause no prejudice to Miss Li in the conduct of her case. The proposed addition to Allegation 2 was already stipulated in the CMF sent to Miss Li and to which she had responded. Furthermore, the evidence on which the allegations were based remained the same.

10. The applications to amend the allegations were granted.

ALLEGATIONS (as amended)

Miss Ruijia Li ('Miss Li'), a student of the Association of the Chartered Certified Accountants (ACCA) in respect of her centre-based Strategic Business Reporting ('SBR') examination taken on 5 June 2025 ('the Exam'):

1. Was in possession of and/or used or intended to use unauthorised materials, in the form of written notes, during the Exam, contrary to Examination Regulation 4.

2. Miss Li's conduct as referred to above was:

    a) Dishonest, in that Miss Li used or intended to use any or all of the unauthorised materials to gain an unfair advantage in the exam or in the alternative,

    b) Such conduct demonstrates a failure to act with integrity.

3. By reason of her conduct, Miss Li is:

    a) Guilty of misconduct and liable to disciplinary action pursuant to Bye-law 8(a)(i), or in the alternative,

    b) Liable to disciplinary action pursuant to bye-law 8(a)(iii) in respect of Allegation 1 and/or 2.

DECISION ON FACTS, ALLEGATIONS AND REASONS

11. In reaching its findings in respect of Allegations 1, 2 and 3, the Committee had considered the following documents: a hearing Bundle (pages 1 to 100) and a service bundle (pages 1 to 17). In advance of the hearing on 20 October 2026, the Committee had been provided with a transcript of the hearing on 30 June 2026 (pages 1 to 35) and a Service Bundle (pages 1 to 9).

12. The Committee had listened to the submissions from Mr Mustafa and the evidence and submissions of Miss Li. It had also considered legal advice which it had accepted.

Allegation 1

13. This allegation was admitted by Miss Li and the Committee found it proved.

14. In order to understand the background to this matter, the Committee made the following additional findings of fact, based on ACCA's report, the submissions of Mr Mustafa, the evidence of Miss Li, and the documentation contained within the hearing Bundle.

15. Examination Regulation 4 states as follows:

"You are not permitted to possess (whether at your desk or on or about your person), use or attempt to use any notes, books or other written materials (whether in electronic form or otherwise) except those expressly permitted within the Exam Guidelines. These are known as 'unauthorised materials'."

16. On 20 February 2023, ACCA registered Miss Li as a student. As such she is, and was at the material time, bound by the Association's Bye-laws and Regulations, including the Examination Regulations and Examination Guidelines.

17. On 5 June 2025, Miss Li sat her SBR Examination at the Exam Centre. The Examination Regulations and Guidelines were set out in an exam docket which Miss Li had sight of before commencing the Exam.

18. The Exam commenced at 9am and the incident to which these proceedings relate, occurred on or around 12:18**.**

19. The exam centre Supervisor and Invigilator stated in a report headed *"SCRS1B – Unauthorised Material"* that Miss Li arrived for the exam on time, was in possession of her examination attendance docket and that she had put her personal belongings in the waiting room.

20. The SCRS 1B Form stated at question 4 that Miss Li was in possession of unauthorised materials, namely "*an A4 sized, double-sided crib sheet with typed notes*" found under Miss Li's keyboard by the Supervisor.

21. The Supervisor and Invigilator were asked to confirm whether they believed the unauthorised materials had been used by Miss Li and, if so, to provide evidence of the material being used. The Supervisor stated:

    "The crib sheet may be used by the student, because she left the test room for a toilet break. Before the test began, her seat had been checked by invigilators, making sure there were no unauthorised materials."

22. In the form completed by the Invigilator, it stated:

    "The sheet may be used by the student. Before the test began, her workstation was checked by the invigilator, making sure there were no unauthorised material."

23. The Supervisor confirmed that they had obtained the original unauthorised materials and taken a photograph of it.

24. In response to the question about how they were first alerted to Miss Li having the unauthorised material, the Supervisor stated, "*When the exam ended, Supervisor collected the scratch paper and checked the keyboard, finding the unauthorised material*."

25. The Supervisor stated the following about Miss Li's behaviour, "*She first denied taking it into the test room, and then admitted she brought it in, but she claimed*

that she hadn't read or used it during the exam. When she was asked to fill in the SCRS2B form, she was quite nervous and pleaded for not being reported. Supervisor refused her pleading patiently and then the student left the test room."

26. The Invigilator stated, "*The student first denied taking it into the test room, but then admitted that she brought it in and claimed that she hadn't used it or read it during the exam. When she was asked to fill in the SCRS2B form by supervisor she was nervous with tears and pleaded S not to report it to ACCA. Supervisor refer her patiently and the student left the test room*."

27. The Supervisor was asked to provide a full and detailed account of the incident. The Supervisor explained, "*Supervisor found the crib sheet when collecting the scratch paper and checked the keyboard at the end of the exam at 12:18. The student's crib sheet was collected by the Supervisor and the student was asked to fill in the SCRS2B form. The student wanted to get the crib sheet and cried to ask Supervisor not to report it to ACCA. The Supervisor tried to calm the student and finally have the student leave the test room. The student even threatened to write the name of the Supervisor* [REDACTED]*. The Supervisor tried to make the student calm down and told her that she could complain to ACCA via writing an email or making a phone call. All invigilators for both AM and PM session on June 5 2025 witnessed the incident."*

28. The Invigilator explained in answer to the first question, "*The sheet with notes was collected by the supervisor and she asked the student to fill in SCRS2B form. The student went outside of the test room after filling in part of the form and then entered the test room again. She was quite emotional and asked the Supervisor not to report it to ACCA while crying. The Supervisor explained the test rules gently and patiently and tried to calm the student down. But the student kept asking the supervisor's name. The Supervisor told her that she should make complaints to ACCA via email or telephone call. Then the student left the test room after 15 minutes*."

29. The Supervisor explained that the SCRS2B was provided to Miss Li but that she did not complete all of it and Miss Li explained that this might be the last chance for her to take the exam.

30. Miss Li partially completed an SCRS2B form. She confirmed she was present when the Supervisor's announcements were made and signed the form and confirmed that the facts specified were a true reflection of the incident.

31. On this basis, and on the basis of Miss Li admitting she had taken the unauthorised material into the exam, the Committee found Allegation 1 proved.

Allegation 2(a)

ACCA's case

32. Whilst Miss Li had admitted that she had taken the unauthorised material into the exam, and that the material had been discovered under her keyboard, she denied using the material.

33. To succeed with Allegation 2, Mr Mustafa submitted that ACCA must show that Miss Li was in possession of and/or used or intended to use unauthorised materials. Mr Mustafa submitted that this can be proved by reference to the evidence. Mr Mustafa suggested that there were four strands of evidence.

34. Firstly, there was the evidence from the Invigilator and the Supervisor which had not been challenged by Miss Li and who both confirmed the existence of the unauthorised material under the keyboard. Both say that the unauthorised material comprised of an A4 doubled-sided sheet with notes. As to whether the Invigilator and Supervisor believed Miss Li had used the materials, they both say in their forms that she may have used them.

35. ACCA submitted that when the content of the forms completed by the Supervisor and Invigilator were considered, which were not disputed by Miss Li, and when Miss Li's responses were taken into account, whereby she accepted to the Investigation Officer that she possessed unauthorised materials, the possession point was established.

36. The real factual issue was whether the unauthorised materials were used.

37. Although Miss Li had said on the first day of the hearing that the usage point was admitted, in her responses to ACCA she claimed that she had not used them.

38. ACCA maintained that the fact that she had used the notes was established by the examiners report.

39. The examiner had examined the script and answered *"yes"* to the following three questions set out in their report:

"1. The material is relevant to the syllabus for your paper.

2. The material is relevant to this particular examination.

3. The notes have been used when the student was attempting this examination."

40. The examiner had gone on to provide some analysis to support their answers.

41. The examiner found that, when answering two questions in the script, the precise wordings from the crib sheet had been used by Miss Li in her answers.

42. The examiner in the review clearly stated which paragraphs had been uplifted and had put the words in italics. This review by the examiner had not been disputed by Miss Li.

43. In the absence of any challenge to the review, ACCA submits the usage point is proved by this document.

44. Having set out the primary facts, Mr Mustafa turned to Allegation 2(a) and sought to apply the facts to the test set out in *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.

45. Firstly, in respect of the subjective limb, Mr Mustafa submitted that the Committee would have to decide Miss Li's state of knowledge or belief as to the facts when she sat the exam on 5 June 2025. The second limb was to

determine whether, on the basis of the Committee's findings, her conduct was dishonest by the standards of ordinary decent people.

46. Allegation 2(a) was framed in the alternative. It alleged that Miss Li used the material or intended to use them, in both instances in order to gain an unfair advantage.

47. As for the usage point, and her state of mind, the examiner's review suggested she used the crib sheet as she copied words from it into her script. It must follow that Miss Li would have known she was copying material from her crib sheet onto her script.

48. Mr Mustafa referred the Committee to Miss Li's responses to the Investigation Officer in her response to ACCA's letter of 27 August 2025.

"Question "11. If you do not accept that the unauthorised materials are relevant to the syllabus being examined, please explain why."

Response "It's relevant."

Q."12. Please confirm the purpose for which you had the unauthorised materials in your possession."

R."My original intention was not to cheat. [REDACTED]*, and I am worried that new words will affect my performance. The content of this subject itself is too difficult for me. I have prepared for this exam for more than eight months. Carrying a small copy is to relieve psychological stress. But I know I made a mistake. I'm ashamed of it. I will be strict with myself in the future."*

Q"13. Please confirm whether you used the unauthorised materials that were found in your possession, providing an explanation for your answer."

R"I have never tried or intended to use the unauthorised materials, nor have I tried to gain an unfair advantage. During the exam, I took the initiative to hand over the materials to the supervisor to cooperate with the investigation."

49. ACCA alleged that the crib sheet was for more than relieving psychological stress, firstly because of the nature of the content of the crib sheet. The lay out had been thought out very carefully and some planning went into preparing the crib sheet so that it could act as a quick aide memoire in an exam situation.

50. Secondly, what Miss Li said in response to question 12 provided every incentive for her to go into the exam with the intention of using the unauthorised material.

51. Therefore, ACCA maintained that her state of mind at the very least was that she had the intention to use the crib sheet even if the Committee did not find she actually used it. When giving her evidence, Miss Li had admitted that she had taken the crib sheet into the exam with the intention of using it in order to gain an unfair advantage. Therefore, on this basis, the allegation was established although ACCA maintained that the evidence supported a finding that she had actually used the crib sheet in the course of the exam.

52. ACCA says that the evidence and the admission of Miss Li satisfied the subjective element of the test for dishonesty.

53. As for the second limb, ordinary and decent people would consider that a person taking into an exam room a crib sheet is a person who either cheated in her exam or attempted to do so and therefore acted dishonestly.

Miss Li's case

54. In the course of her written representations, Miss Li had accepted that she had taken the unauthorised material into the exam with her on 5 June 2025. However, Miss Li had denied that she intended to cheat, as illustrated in the answers she gave to ACCA as set out above, rather that the crib sheet was *"to relieve psychological stress."*

55. Miss Li stated that Mr Mustafa had mentioned that the reason ACCA believed she used the crib sheet was by drawing a comparison between the exam script and the crib sheet. ACCA believed Miss Li used the crib sheet but she disagreed. Miss Li accepted that it was wrong to take the crib sheet into the

exam but she did not use it and, because of the tight schedule, she did not get the chance to use it.

56. Miss Li stated in her oral evidence that when she prepared the script, the material on the crib sheet was already embedded in her mind. She gambled that certain questions would come up in the exam and so she prepared those questions.

57. In answer to questions from Mr Mustafa, Miss Li said that she understood that, whether the crib sheet was used or not, once she had taken it into the exam, she was guilty and so whether she used it or not was not important.

58. Miss Li repeated that she had prepared very well for certain questions and she was certain that some sentences may be identical to the preparation materials. She had memorised some of the content which she then wrote in the exam script. The reason she had not said this before was because no one had asked her.

59. Miss Li said in her evidence that carrying the notes to the exam already proved she was wrong and that she was a cheat but given the level of this exam, bringing the notes to the exam gave her a sense of relief. She said that she had prepared the notes and accepted that she had to think about it and plan a lot. She agreed that the notes were relevant to the syllabus and exam. She was worried about her performance in the exam and had told the examiner that she found this exam too difficult. She maintained that she had taken the notes into the exam as a *"stress reliever".*

60. Miss Li said that the only difference was that ACCA claimed that she had used the notes and she said that she did not. However, Miss Li accepted at the conclusion of her evidence that she admitted it was dishonest because she brought unauthorised material into the exam with the intention of using it, and that this was to gain an unfair advantage.

Decision of the Committee in respect of Allegation 2(a)

61. In reaching its decision on whether Miss Li had acted dishonestly, the Committee had relied on the test for dishonesty as prescribed by the Supreme Court in the case of *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.

62. The Committee relied on its findings of fact in respect of Allegation 1.

63. The Committee found the following facts which were not in dispute.

64. Miss Li had admitted that she had taken unauthorised materials, namely a crib sheet, into the exam on 5 June 2025. Miss Li was aware of the Examination Regulations and Guidelines as they were set out in an exam docket which Miss Li had sight of before commencing the Exam. Miss Li had already sat a number of ACCA exams.

65. Miss Li confirmed that she had planned the content of the crib sheet. She had concealed it under her keyboard. The content of the crib sheet was relevant to the exam. The examiner had found that certain of the words in her answers on her exam script were the same as those on the crib sheet.

66. Miss Li confirmed that she knew at the time of the exam that it was dishonest to take a crib sheet into the exam with the intention of gaining an unfair advantage and had admitted that was indeed her intention.

67. However, the Committee was satisfied, on the balance of probabilities, that she used the crib sheet to assist her in answering exam questions in order to gain an unfair advantage.

68. The crib sheet was hidden under her keyboard, as opposed to being located in a pocket for example. It was therefore easily accessible to Miss Li. Whilst it may be the case that Miss Li was capable of recalling certain words from the crib sheet without referring to it, the examiner had found a number of examples of identical wording being used in Miss Li's exam script. Furthermore, the assertion that she had memorised words that were common to the crib sheet and the exam script had only been mentioned for the first time when she gave

evidence, although it was fair to say that she had not been asked about this issue in the course of the investigation. Nevertheless, it had still been open to Miss Li to volunteer this information beforehand.

69. Finally, the Committee did not find Miss Li's evidence that she did not have sufficient time to access the crib sheet to be plausible, nor that she had concealed the crib sheet under the keyboard as a *"stress reliever".*

70. Consequently, the Committee found that Miss Li had taken the crib sheet into the exam on 5 June 2025, knowing that she was not permitted to do so, and she had used it to gain an unfair advantage for herself.

71. The Committee was satisfied that, by the standards of ordinary decent people, such behaviour would be considered dishonest.

72. Even if the Committee had concluded that Miss Li had not used the crib notes but, as admitted by Miss Li, had intended to use them to gain an unfair advantage, the Committee would also have found that, by the standards of ordinary decent people, such behaviour would be considered dishonest.

73. The Committee, therefore, found Allegation 2(a) proved.

Allegation 2(b)

74. On the basis that this allegation was pleaded in the alternative to Allegation 2(a), the Committee made no finding in respect of it.

Allegation 3(a)

75. Taking account of its findings in respect of Allegations 1 and 2(a) regarding Miss Li's conduct during the examination on 5 June 2025, to include a finding of dishonesty, the Committee was satisfied that this was very serious and she was guilty of misconduct. The Committee was concerned that such behaviour risked compromising the integrity of the examination process and it could properly be described as deplorable. In the Committee's judgement, it brought discredit to Miss Li, the Association and the accountancy profession.

76. Therefore, the Committee found Allegation 3(a) proved.

Allegation 3(b)

77. On the basis that this allegation was pleaded in the alternative to Allegation 3(a), the Committee made no finding in respect of it.

SANCTION AND REASONS

78. The Committee considered what sanction, if any, to impose, taking into account all it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions, and the principle of proportionality. It had also listened to the submissions of Mr Mustafa and Miss Li and received legal advice from the Legal Adviser which it accepted.

79. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate to conclude the case with no order.

80. The Committee was mindful of the fact that its role was not to be punitive and that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.

81. The Committee considered whether any mitigating or aggravating factors featured in this case.

82. The Committee accepted that there were no previous findings against Miss Li.

83. Miss Li had expressed remorse and insight which the Committee considered to be genuine. It noted that certain admissions had been made from the outset by Miss Li with regard to her conduct. Whilst she had denied using the crib sheet in the course of the exam, she had admitted that she recognised her dishonest conduct in taking the crib notes into the exam with the intention of using them in order to gain an unfair advantage.

84. The Committee was satisfied that Miss Li now recognises the seriousness of her conduct and how such conduct can have an adverse impact on the integrity of the academic process and on the reputation of ACCA. Again, when making her submissions in mitigation, the Committee accepted that this process had had a profound effect on Miss Li and had caused her genuine upset and anxiety. It also recognised that the outcome would have a lasting effect on her future career.

85. Finally, the Committee accepted that there was no evidence to suggest that the events on 5 June 2025 were anything other than an isolated incident, and Miss Li had cooperated fully with ACCA in the course of its investigation and had participated fully in these proceedings.

86. However, other than what had been said by Miss Li in her oral submissions, the Committee had little information regarding the personal circumstances of Miss Li. The Committee had not been provided with any testimonials or references as to Miss Li's character.

87. In terms of aggravating factors, the Committee had found Miss Li to have acted dishonestly during the course of an exam which the Committee considered to be very serious.

88. It was also evident that the preparation of the crib notes and their concealment under the keyboard was deliberate and indicated a level of premeditation and planning. The use of the crib notes also was with a view to personal gain in relation to an exam which Miss Li had indicated she found difficult. It may have resulted in Miss Li having passed the exam when not competent to do so. This led to a potential risk to the public.

89. On the basis of its findings, the Committee concluded that neither an admonishment nor a reprimand would represent a sufficient and proportionate outcome. Neither sanction would adequately reflect the seriousness of the Committee's findings.

90. The Committee then considered whether a severe reprimand would be an appropriate sanction. Again, taking account of the seriousness of its findings,

and reflecting on the criteria suggested in the Guidance, the Committee did not consider that a severe reprimand would be sufficient or proportionate.

91. The whole purpose of the Exam Regulations was to maintain the integrity of the process to ensure that the process is fair and that it represented a proper test as to a person's competence to become an accountant.

92. In its judgement, and on the basis of its findings, the Committee was not satisfied that Miss Li had behaved in a manner expected of a member of ACCA. The Committee found that Miss Li's dishonest conduct was fundamentally incompatible with being a student member of ACCA.

93. The Committee had considered whether there were any reasons which were so exceptional or remarkable that it would not be necessary to remove Miss Li from the student register but could find none.

94. The Committee concluded that the only appropriate, proportionate and sufficient sanction was to order that Miss Li shall be removed from the student register.

COSTS AND REASONS

95. The Committee had been provided with a Simple Costs Schedule (1 page) and a Detailed Costs Schedule (2 pages) relating to ACCA's claim for costs. It had also been provided with a Statement of Financial Position (1 page) which Miss Li had lodged in advance of the hearing on 30 June 2026. Miss Li confirmed that her financial situation remained the same.

96. The Committee concluded that ACCA was entitled to be awarded costs against Miss Li, all allegations having been found proved. The amount of costs for which ACCA applied was £10,207**.** However, the Committee was concerned that the hearing had lasted two days, first on the basis that a considerable amount of time had been taken up in regularising the allegations at the hearing on 30 June 2026. Secondly, the Committee did not consider that Miss Li should bear the expense of the hearing going into a second day on the basis that it

was necessary to retain the services of an interpreter which inevitably would extend the length of a hearing.

97. The Committee calculated that costs of the second day amounted to £4,000 which reduced the claim for costs to £6,207.

98. As stated above, Miss Li had provided ACCA with a Statement of Financial Position but had not submitted any documentary evidence to support the information contained in the Statement.

99. [REDACTED].

100. Whilst Mr Mustafa submitted that it would have been possible for Miss Li to produce a statement [REDACTED] or produce bank statements, the Committee was prepared to accept that the financial circumstances outlined by Miss Li was credible.

101. In all the circumstances, and in exercising its discretion, the Committee considered that it was unreasonable to expect Miss Li to be able to repay any amount in respect of costs and therefore decided that there would be no award of costs in favour of ACCA.

EFFECTIVE DATE OF ORDER

102. The Committee had considered whether the order should have immediate effect. ACCA applied for such an order and, taking account of the finding of dishonesty and Miss Li's removal from the student register, the Committee concluded it was in the interests of the public to make an order which takes effect immediately.

Ms Avril O'Meara
Chair
20 October 2026