

HEARING

**DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

In the matter of: Mr Raahim Raza

Heard on: Wednesday, 02 September 2026

Location: Remotely via Microsoft Teams

Committee: Ms Sahima Qamar (Chair)
Mr Abdul Samad (Accountant)
Ms Yvonne Walsh (Lay)

Legal Adviser: Mr Ashraf Khan (Legal Adviser)

**Persons present
and capacity:** Mr Richard Ive (Case Presenter on behalf of ACCA)
Miss Mary Okunowo (Hearings Officer)

Observers: Mr Alan Clamp (Appointments Board)

Summary Removed from the student register

Costs: £6,310.50 awarded to ACCA

INTRODUCTION

1. The Disciplinary Committee (“the Committee”) convened to hear allegations of misconduct made against Mr Raahim Raza. The hearing was conducted

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remotely through Microsoft Teams. The Committee had a bundle of papers numbered pages 1-150, 3 audio recordings, 1 video, an Additional email chain, and a Service Bundle, numbered pages 1 to 19. At the sanctions stage the Committee was provided with Detailed and Simple Costs Schedules.

PRELIMINARY APPLICATIONS / SERVICE OF PAPERS

2. Mr Raza did not attend the hearing and was not represented. The Committee first considered whether notice of the hearing and the relevant documents had been properly served.
3. The notice of hearing was sent to Mr Raza on 04 August 2026 at the email address registered with ACCA. It notified him that the hearing would take place remotely by Microsoft Teams on Wednesday, 02 September 2026 at 08:30am UK time. The notice set out the allegations, his rights and warned him that the hearing could proceed in his absence. The hearing papers were made available electronically. A delivery confirmation dated 04 August 2026 confirmed that the notice had been delivered to that email address. ACCA sent follow-up emails on 18 and 24 August 2026.
4. On 27 August 2026, Mr Raza confirmed by telephone that he would attend the hearing, he indicated he did not require an interpreter and wished the examination video and audio logs to be played. The remote hearing link was sent to him on 01 September 2026. His emails on the morning of the hearing demonstrated that he had actual knowledge of the hearing.
5. The Committee accepted the Legal Adviser's advice. It had regard to Regulations 10(1)(a) and 10(1)(b) of the Complaints and Disciplinary Regulations 2014, as amended ("CDR"), and to the provisions for electronic service in CDR 22(1), 22(5)(c), 22(6), 22(7)(b) and 22(8)(b). It was satisfied that the required notice and documents had been sent at least 28 days before the hearing, by a permitted method, to Mr Raza's registered email address, and that delivery had been confirmed. The Committee therefore determined that Mr Raza had been properly served.

APPLICATION TO ADJOURN

6. At 08:13am, on the date of the hearing, 02 September 2026, Mr Raza emailed ACCA stating that he was unable to attend because he had a class which he

could not miss and asked to be kept informed of further meetings. When ACCA sought clarification and enquired whether he required an adjournment, he emailed at 08:24am expressly asking for the hearing to be adjourned.

7. ACCA opposed the application. It submitted that the application was made at the last moment despite Mr Raza having confirmed on 27 August 2026 that he would attend. Mr Raza had provided no evidence concerning the class, no explanation of why it took priority over the hearing and provided no dates on which he would be available to attend an adjourned hearing.
8. The Committee accepted the Legal Adviser's advice. The question was whether an adjournment was justified in all the circumstances. The Committee considered Mr Raza's application and ACCA's representations, his right to participate, the reason and timing of the application, whether an adjournment was likely to secure his attendance, the disadvantage caused by his absence, the available evidence, the history of his engagement, the consequences of delay and the public interest in the fair and timely disposal of regulatory proceedings.
9. The Committee acknowledged that this was Mr Raza's first application for an adjournment, that he was unrepresented and that, if present, he could have given oral evidence and explained what the video and recordings showed. However, a first application did not create an automatic entitlement to an adjournment. The notice of hearing had explained what an adjournment application should contain. Mr Raza's application was made only minutes before the hearing after being prompted by ACCA, it was unsupported, gave no adequate explanation for the timing of the request or why the class could not be missed, and provided no future availability. This was inconsistent with his confirmation five days earlier that he would attend.
10. The Committee gave Mr Raza credit for having provided written responses during the investigation, but his engagement had otherwise required repeated prompting. His detailed written account of the material events was before the Committee, together with the examination video, audio recordings and documentary evidence. No witnesses were to be called and there was no issue of fading recollection. In the absence of any future availability or other assurance, the Committee was not satisfied that an adjournment would secure his attendance on another date. It concluded that the disadvantage to Mr Raza

did not make it unfair to refuse the application. The application to adjourn was therefore refused.

PROCEEDING IN ABSENCE

11. Having determined that Mr Raza had been properly served and having refused his application to adjourn, the Committee considered separately whether to proceed in his absence under CDR 10(7).
12. The Committee accepted the Legal Adviser's advice that this discretion had to be exercised with the utmost care and caution. Fairness to Mr Raza was a prime consideration, to be balanced against fairness to ACCA and the public interest in the timely determination of disciplinary proceedings. The Committee applied the principles in *R v Jones (Anthony) (No 2) [2002] UKHL 5* and *GMC v Adeogba; GMC v Visvardis [2016] EWCA Civ 162*. It took account of the nature and circumstances of the absence, the explanation provided, Mr Raza's request for an adjournment, whether his absence amounted to a voluntary choice, whether an adjournment was likely to secure his attendance, his lack of representation, the extent to which his case was available in writing, the forensic disadvantage caused by his inability to give evidence, the nature of the video, audio and documentary evidence, the effect of delay and the wider public interest. It recognised that the seriousness of the allegations was not itself a factor for or against proceeding.
13. The Committee did not consider it necessary to decide that Mr Raza had deliberately waived his right to attend. It acknowledged the disadvantage caused by his inability to give oral evidence and answer questions about his use of the phone. Nevertheless, his detailed explanations and denials were before it and could be considered in full. The principal evidence was the contemporaneous examination video, the proctor's records, the chat log, the telephone recordings and the documents. There were no witnesses whose recollection or availability would be affected. For the reasons given when refusing the adjournment, there was no proper basis for concluding that a further hearing date would secure Mr Raza's attendance.
14. Balancing all those matters, the Committee determined that a fair hearing could take place and that it was fair and in the public interest to proceed in Mr Raza's absence. It reminded itself throughout that his absence was not an admission, was not evidence supporting ACCA's case and was not an aggravating feature.

It scrutinised the evidence carefully and considered all of Mr Raza's written material in making its decision.

APPLICATION TO AMEND ALLEGATION 5(i)

15. ACCA applied under CDR 10(5)(a)(i) to amend Allegation 5(i) by replacing the word "authorised" with "unauthorised". ACCA submitted that this was to correct a typographical error and caused no prejudice to Mr Raza.
16. The Committee accepted the Legal Adviser's advice and granted the application. Allegations 2 to 4, the applicable Exam Regulations and ACCA's case throughout all concerned an unauthorised mobile phone. Mr Raza's written responses addressed his use of that phone, the allegation that he photographed examination content, his alleged intention to gain an unfair advantage and dishonesty. The amendment introduced no new factual allegation, evidence or basis for dishonesty, did not increase the seriousness of the case and did not alter the defence he had advanced. The Committee was satisfied that Mr Raza was not prejudiced in the conduct of his defence in granting the amendment.

BRIEF BACKGROUND

17. Mr Raza was registered as an ACCA student on 25 March 2022. He was therefore bound by ACCA's Bye-laws and Regulations, including the Examination Regulations and Examination Guidelines.
18. On 04 September 2025, Mr Raza sat a remotely invigilated Financial Reporting examination ("the Exam"). The examination session was recorded and lasted approximately 55 minutes.
19. During the initial room inspection, the proctor required Mr Raza to move from his bedroom because posters were visible. Mr Raza moved his computer and examination equipment to the dining room. Before releasing the Exam, the proctor reminded him to place his mobile phone on silent and out of arm's reach. Mr Raza acknowledged that instruction.
20. The Exam began approximately 29 minutes into the recording. The video subsequently recorded Mr Raza handling a mobile phone on a number of

occasions. At approximately 32:40, 35:42 and 38:55, he raised the phone horizontally and directed it towards the computer screen.

21. At approximately 40:20, the proctor telephoned Mr Raza and told him that he had been observed using a mobile phone. Mr Raza indicated that he had been replying to a message. The proctor instructed him to put the phone out of arm's reach and not to access it again. Mr Raza replied that it was out of his arm's reach.
22. The video thereafter recorded Mr Raza raising the phone horizontally towards the computer screen on at least four further occasions, at approximately 46:40, 48:00, 48:35 and 50:28. The proctor contacted him again, stated that he had been seen continually using the phone and taking pictures of the Exam, and terminated the examination attempt.
23. The matter was referred to ACCA's Regulation and Conduct Department on 21 October 2025. ACCA reviewed the examination video, proctor reports, chat and activity logs and three telephone recordings. On 07 November 2025, ACCA notified Mr Raza of the matters under investigation and invited his response. Following further correspondence, he provided an initial response on 07 January 2026 and a substantive response on 21 January 2026.
24. Mr Raza accepted that he had read the Examination Regulations and Guidelines and that he had used his mobile phone during the Exam. He explained that, having unexpectedly moved to the dining room, he used messaging platform, Snapchat, to ask his [PRIVATE] not to enter the area or make noise. He said that the messages were no longer available because they disappeared after being received.
25. Mr Raza denied taking photographs or recordings of examination content and denied using the phone to obtain an unfair advantage. He said that he had panicked because the Exam was expensive and he feared it would be terminated. He apologised for using the phone and provided further written material concerning his personal circumstances.

DECISION ON FACTS / ALLEGATIONS AND REASONS

Submissions on behalf of ACCA

25. Mr Ive presented the case on behalf of ACCA. He relied upon the Report and supporting bundle, including the Examination Regulations and Guidelines, the proctor reports, the chat and activity logs, the three telephone recordings, the 55-minute examination video, still images taken from that video and Mr Raza's written responses during the investigation.
26. ACCA's case was that Mr Raza had read and understood the Examination Regulations and Guidelines before sitting the Exam. Mr Raza accepted in his written responses that he had used his mobile phone during the Exam. Accordingly, the principal issues in dispute were the purpose for which he had used the phone, whether he had photographed or recorded examination content and whether his conduct was dishonest.
27. In relation to Allegation 1, Mr Ive submitted that the Examination Guidelines required Mr Raza to place his mobile phone out of arm's reach. Exam Regulations 1 and 2 also required him to comply with the Guidelines and with the proctor's instructions. Before the Exam began, the proctor expressly reminded Mr Raza to place his phone on silent and out of arm's reach. The video nevertheless showed the phone in his hand during the Exam. When the proctor later instructed him to put it out of reach and not access it again, Mr Raza continued to use it.
28. In relation to Allegation 2, Mr Ive submitted that a mobile phone with a camera was an unauthorised item within Exam Regulations 5(a) and 5(b). Mr Raza's admitted use of the phone, together with the video and telephone recordings, established breaches of those Regulations.
29. Mr Ive referred the Committee to Exam Regulation 6(b). He submitted that, once a breach of Exam Regulation 5 was established, it was presumed that Mr Raza intended to use the unauthorised item to gain an unfair advantage. Mr Raza was required to rebut that presumption.
30. ACCA did not accept Mr Raza's explanation that he had used Snapchat only to ask [PRIVATE] not to enter the dining room or make noise. Mr Ive submitted that the explanation concerned only two messages, whereas the video showed

considerably more instances of telephone use. It did not explain why Mr Raza repeatedly held the phone horizontally with its camera directed towards the examination screen or why he continued to do so after the proctor's warning. ACCA submitted that Mr Raza had not rebutted the presumption under Exam Regulation 6(b).

31. In relation to Allegation 3, ACCA relied upon the second telephone recording. After telling Mr Raza that he had been observed using the phone, the proctor instructed him to put it out of arm's reach. Mr Raza replied, "it is out of my arm's reach". He was then told not to access it again. The video showed him using the phone on at least four further occasions. Mr Ive submitted that the phone had not been put out of reach and that Mr Raza's statement to the proctor was false or misleading, contrary to Exam Regulation 3.
32. In relation to Allegation 4, Mr Ive relied particularly upon the examination video and the still images. ACCA's case was that Mr Raza repeatedly raised the phone in landscape orientation, pointed its camera towards the examination screen and then lowered it from view. Mr Ive submitted that this conduct was consistent with taking photographs or recordings of live examination content and was inconsistent with Mr Raza's explanation that he was typing messages to family members. ACCA therefore alleged a breach of Exam Regulation 13.
33. In relation to Allegation 5(i), Mr Ive submitted that Mr Raza knew that he was prohibited from possessing or using the phone during the Exam. He had read the relevant rules and had been expressly reminded of them by the proctor. ACCA submitted that his repeated use of the phone below the normal field of view, raising it briefly towards the screen and then lowering it, demonstrated that the conduct was deliberate and covert. ACCA contended that he had used the phone to photograph or record examination content with the intention of obtaining an unfair advantage for himself in the Exam and/or a future exam.
34. In relation to Allegation 5(ii), Mr Ive submitted that Mr Raza knew that the phone had not been put out of arm's reach when he told the proctor that it had. ACCA alleged that he gave that assurance to persuade the proctor that he had complied with the instruction, notwithstanding his continued access to and use of the phone.
35. Applying the test in *Ivey v Genting Casinos (UK) Ltd* [2017] UKSC 67, ACCA submitted that Mr Raza's conduct under Allegations 5(i) and 5(ii) was dishonest

by the standards of ordinary decent people. In the alternative, ACCA submitted that the conduct demonstrated a failure to act with integrity under Allegation 5(iii).

36. Finally, ACCA submitted that the conduct amounted to misconduct under Bye-law 8(a)(i). It involved attempted examination cheating, the capture of confidential examination content, repeated disobedience of the proctor's instructions and a dishonest statement intended to mislead the proctor. ACCA submitted that this conduct fell seriously below the standards expected of an ACCA student and was capable of bringing discredit upon Mr Raza, ACCA and the accountancy profession. Allegation 6(ii), liability to disciplinary action under Bye-law 8(a)(iii), was advanced in the alternative.

Written submissions made by Mr Raza

37. Mr Raza did not attend the hearing and was not represented. The Committee therefore considered the written responses, explanations and supporting material he had provided during ACCA's investigation. He had not made any formal admissions to the allegations.
38. In his initial response of 07 January 2026, Mr Raza acknowledged the incident and apologised for violating the applicable code of conduct. He accepted that having the mobile phone in his possession had been wrong and assured ACCA that it would not happen again. Although he stated in an earlier email that he had not read the Guidelines carefully, in his substantive response he confirmed that he had read the Examination Regulations and Guidelines before sitting the Exam.
39. Mr Raza explained that he had originally intended to sit the Exam in his bedroom. During the preliminary checks, the proctor required him to move because posters were displayed in that room. He therefore relocated to the dining room, which was a common area connecting other parts of the family home. He said that his family had not expected him to sit the Exam there and did not know that they should avoid the area.
40. Mr Raza accepted that he used his mobile phone during the Exam. He said that, after moving to the dining room, he used Snapchat to ask his [PRIVATE] not to enter the area or make any noise because he was concerned that the Exam might otherwise be terminated. He said that he used the phone on a

second occasion after hearing his [PRIVATE] car arrive, because he did not know whether [PRIVATE] had told his [PRIVATE] that the Exam was taking place in the dining room.

41. Mr Raza maintained that these were the only reasons for his use of the phone. He denied using it to obtain an unfair advantage in the Exam or any future examination. When asked to provide copies or screenshots of the messages, he explained that he had used Snapchat and that the messages had disappeared after being received.
42. Mr Raza denied taking any photographs or recordings of examination content. He also denied retaining or distributing any examination material. When asked why the phone appeared to have been pointed towards the computer screen, he repeated that he had been attempting to contact members of his family and ask them not to use the dining room or hallway.
43. Mr Raza denied lying to the proctor. He said that he had been startled and had not properly explained the situation because he feared that the Exam would be cancelled. He emphasised that the Exam was expensive for him. He accepted that he had continued to use the phone after the proctor's intervention but maintained that he did so because he panicked and wished to contact his [PRIVATE].
44. Mr Raza also accepted that third parties could be seen in the background during the examination session. He explained that they were family members and people working within the home who were passing through the adjoining kitchen or hallway. He maintained that none of them remained in the examination area or provided him with assistance.
45. Mr Raza stated that the posters in his bedroom depicted comic characters and did not contain study material. He apologised for failing to prepare a suitable examination environment and for what he described as the "underhanded" or "sneaky" means by which he had attempted to prevent his family from disturbing the Exam. His position was that this description referred to his prohibited use of the phone to contact family members and not to any attempt to cheat.
46. Mr Raza explained that this had been his first remotely invigilated ACCA examination and that there was no examination centre available in his city. He

said that the unexpected requirement to change rooms caused him to become flustered and make a series of poor decisions. He asked ACCA to take account of matters of a personal nature and the supporting material he had provided.

47. Mr Raza apologised repeatedly for possessing and using the phone and asked to be given a further opportunity to continue his ACCA studies. However, he consistently denied photographing or recording examination content, seeking an unfair advantage or acting dishonestly.

Committee's Decision and Reasons

48. The Committee considered all the documentary evidence, the examination video, the still images and the three telephone recordings. It also considered ACCA's submissions and all of Mr Raza's written explanations and supporting material.
49. The Committee accepted the Legal Adviser's advice. It reminded itself that Mr Raza's absence was not an admission and did not provide evidence supporting ACCA's case. It treated as admissions only those matters which Mr Raza had accepted clearly and unequivocally in his written responses.
50. Under CDR 12(4)(g), ACCA bore the burden of proving each disputed allegation on the balance of probabilities, subject to the specific reverse burden created by Exam Regulation 6(b).
51. Where a breach of Exam Regulation 5 was established, Exam Regulation 6(b) presumed that Mr Raza intended to use the unauthorised item to gain an unfair advantage. Mr Raza could rebut that presumption by satisfying the Committee that this was not his intention. The presumption applied only to the question of intention specified in Regulation 6(b). It did not relieve ACCA of proving the remaining elements of any allegation, including the alleged taking of photographs or recordings, dishonesty and misconduct.
52. In determining dishonesty, the Committee applied the test in *Ivey v Genting Casinos (UK) Ltd* [2017] UKSC 67. It first considered Mr Raza's actual knowledge or belief as to the facts. It then determined whether his conduct was dishonest by the objective standards of ordinary decent people.

Allegation 1

53. The Committee was satisfied that the Examination Guidelines required mobile phones and other unauthorised items to be placed out of arm's reach. Exam Regulations 1 and 2 required Mr Raza to comply with the Guidelines and with the instructions of the proctor.
54. Mr Raza confirmed in his substantive written response that he had read the Examination Regulations and Guidelines before sitting the Exam. Before the Exam was released, the proctor expressly reminded him to place his phone on silent and out of arm's reach. Mr Raza acknowledged that instruction.
55. Mr Raza accepted that he used the phone during the Exam. The video and still images showed the phone in his hand and within his immediate reach on repeated occasions. During the Exam, the proctor again instructed him to put the phone out of arm's reach and not to access it. The video showed that he continued to access and use it.
56. The Committee therefore found that Mr Raza failed to keep and/or put his mobile phone out of arm's reach and failed to comply with the proctor's instructions. His conduct was contrary to Exam Regulations 1 and 2. Allegation 1 was proved.

Allegation 2

57. The Committee was satisfied that a mobile phone with a camera was an unauthorised item within Exam Regulations 5(a) and 5(b). Mr Raza accepted that he possessed and used the phone during the Exam. The video showed that his use was not confined to the two occasions described in his written explanation. It showed him accessing and using the phone repeatedly, both before and after the proctor's intervention.
58. The Committee therefore found that Mr Raza possessed and used an unauthorised item in breach of Exam Regulations 5(a) and 5(b). The presumption under Exam Regulation 6(b) was consequently engaged.
59. The Committee carefully considered Mr Raza's explanation that he used Snapchat to contact his [PRIVATE] after unexpectedly having to move to the dining room. It accepted that the change of room may initially have caused him

to wish to contact members of his family. It did not treat the absence of copies of the Snapchat messages, by itself, as disproving his account.

60. However, Mr Raza's explanation concerned only two messages and did not account for the considerably greater number of occasions on which the video showed him using the phone. Nor did it explain why he repeatedly held the phone horizontally, with the camera directed towards the examination screen, or why he continued to do so after the proctor had expressly told him not to access it again.
61. The Committee was not satisfied that Mr Raza's explanation rebutted the presumption under Exam Regulation 6(b). It found that he intended to use the unauthorised phone to gain an unfair advantage for himself in the Exam and/or a future examination. Allegation 2 was proved.

Allegation 3

62. The Committee relied upon the contemporaneous telephone recording of the conversation between the proctor and Mr Raza. After telling Mr Raza that he had been observed using a mobile phone, the proctor instructed him to put it out of arm's reach. Mr Raza replied, "it is out of my arm's reach". The proctor then instructed him not to access it again.
63. The Committee considered that exchange together with the examination video. Following his assurance, Mr Raza accessed the phone and pointed it towards the examination screen on at least four further occasions. The video did not show him moving away from his examination position to retrieve a phone which had been placed out of reach.
64. The Committee inferred from the contemporaneous recording, Mr Raza's immediate and repeated access to the phone and his continued use of it that the phone had not been put out of arm's reach when he said that it had. His statement was untrue and gave the proctor the misleading impression that he had complied with the instruction.
65. The Committee therefore found that Mr Raza gave the proctor false or misleading information, contrary to Exam Regulation 3. Allegation 3 was proved.

Allegation 4

66. The Committee viewed the examination video and still images carefully. They showed Mr Raza repeatedly raising the mobile phone in landscape orientation, directing its camera towards the examination screen and then lowering it below the field of view. This occurred on several occasions, including after the proctor had warned him not to access the phone again.
67. The Committee considered Mr Raza's explanation that he was typing messages to members of his family. It did not accept that this explained the manner in which the phone was being used. The repeated horizontal positioning of the phone, with its camera directed towards the examination screen, was inconsistent with the asserted typing of messages.
68. The Committee concluded from the repeated and distinctive movements shown by the contemporaneous video that Mr Raza was using the phone to take photographs and/or recordings of examination content.
69. The Committee therefore found that Mr Raza breached Exam Regulation 13. Allegation 4 was proved.

Allegation 5(i)

70. The Committee next considered Mr Raza's actual knowledge or belief. It found that he knew that the phone was an unauthorised item and that he was prohibited from possessing or using it during the Exam. He had read the relevant Regulations and Guidelines and had been expressly reminded of the requirement by the proctor both before and during the Exam.
71. The Committee found that Mr Raza deliberately raised the phone from below the normal field of view, pointed it towards the examination screen and then lowered it again. The manner in which he used the phone demonstrated that he knew his conduct was prohibited and was attempting to conceal it from the proctor.
72. In light of its findings under Allegations 2 and 4, the Committee found that Mr Raza used the unauthorised phone to take photographs and/or recordings of examination content with the intention of obtaining an unfair advantage for himself in the Exam and/or a future examination.

73. Applying the objective standards of ordinary decent people to Mr Raza's actual knowledge of the facts, the Committee found that conduct dishonest. Allegation 5(i) was proved.

Allegation 5(ii)

74. The Committee found that Mr Raza knew that the phone had not been put out of arm's reach when he told the proctor that it had. He knew what the proctor had required him to do and knew that he had not complied with that instruction.
75. His statement was intended to assure the proctor that he had complied and thereby enable him to continue the Exam. He thereafter continued to access and use the phone repeatedly.
76. Applying the standards of ordinary decent people, the Committee found that Mr Raza's knowingly false assurance to the proctor was dishonest. Allegation 5(ii) was proved.

Allegation 5(iii)

77. Allegation 5(iii), alleging a failure to act with integrity, was pleaded in the alternative. Having found Allegations 5(i) and 5(ii) proved, the Committee did not consider Allegation 5(iii).

Allegation 6(i)

78. The Committee considered separately whether the conduct found proved amounted to misconduct under Bye-law 8(a)(i). It had regard to the definition of misconduct in Bye-law 8(c) and to the principles in *Roylance v General Medical Council (No 2)* [2000] 1 AC 311.
79. The Committee found that Mr Raza repeatedly and covertly used an unauthorised mobile phone to take photographs and/or recordings of live examination content with the intention of obtaining an unfair advantage. He continued that conduct after receiving a direct warning and dishonestly misled the proctor about the location of the phone.
80. The conduct undermined the security, integrity and fairness of ACCA's examination process. It was unfair to other candidates and had the potential to

undermine public confidence in ACCA's examinations, its qualifications and the accountancy profession.

81. Dishonest examination cheating coupled with the dishonest misleading of a proctor constituted a serious departure from the standards expected of an ACCA student, such conduct brought discredit upon Mr Raza, ACCA and the accountancy profession and was sufficiently serious to amount to misconduct.
82. Allegation 6(i) was therefore proved.

Allegation 6(ii)

83. Allegation 6(ii) was pleaded in the alternative. Having found that Mr Raza was guilty of misconduct under Allegation 6(i), the Committee did not consider Allegation 6(ii).

SANCTION AND REASONS

84. Mr Ive referred the Committee to ACCA's Guidance for Disciplinary Sanctions dated 10 February 2026. He adopted a neutral position as to the particular sanction. He submitted that this was Mr Raza's first disciplinary hearing and that he had shown some engagement with the disciplinary process. He identified the dishonesty at the heart of the case as an aggravating feature.
85. The Committee accepted the Legal Adviser's advice. It had regard to its powers in relation to a registered student under CDR 13(4), the Guidance for Disciplinary Sanctions and the principle of proportionality. It considered the available sanctions in ascending order, beginning with no further action, and moved to a more serious sanction only where the preceding sanction was insufficient.
86. The Committee recognised that the purpose of a sanction was not to punish Mr Raza, although a proportionate regulatory sanction might have a punitive effect. It had regard to the public interest in maintaining confidence in ACCA and the accountancy profession and in declaring and upholding proper standards of conduct. It balanced those considerations against Mr Raza's interests and the effect that any sanction would have upon his studies and intended career.

87. In accordance with CDR 12(4)(i) and 12(5)(a), the Committee considered all the mitigation previously provided by Mr Raza and was informed that he had no previous ACCA disciplinary finding. It gave limited weight to his previous record because the misconduct occurred during his first ACCA examination.
88. The Committee gave Mr Raza some credit for providing written responses and information during the investigation. However, his engagement had required repeated prompting and was limited.
89. The Committee considered the matters of a personal nature and the supporting material contained in Mr Raza's written submissions. It accepted that he had [PRIVATE] at the relevant time. However, it gave those matters limited weight because Mr Raza had not explained how they caused or contributed to the dishonest conduct found proved.
90. Mr Raza had apologised for possessing and using the phone and for breaching the Examination Regulations. However, his apology was advanced on the basis that he had used the phone only to communicate with members of his family. It did not acknowledge the dishonest taking of examination content, the intended unfair advantage or the dishonest statement to the proctor. The Committee therefore found that Mr Raza had not demonstrated insight into, or remediation of, the misconduct actually found proved. It did not treat his decision to deny and contest the allegations as an aggravating feature.
91. In assessing the seriousness of the misconduct, the Committee took account of its deliberate, persistent and repetitive nature. Mr Raza used the phone on numerous occasions during the Exam, continued after a direct warning and gave a false assurance to the proctor. His actions were intended to conceal his continued access to the phone. The conduct created a potential risk to the security and integrity of ACCA's examination process and to public confidence in the resulting qualification. The Committee avoided double-counting the dishonesty which formed part of the misconduct itself.
92. The Committee first considered taking no further action. It concluded that this would be wholly inconsistent with the seriousness of the misconduct and would not protect the public interest, maintain confidence in ACCA or uphold proper professional standards.

93. The Committee next considered an admonishment. The conduct was not minor, inadvertent, isolated or promptly corrected. It was deliberate, repeated and dishonest. An admonishment would not adequately reflect the gravity of the misconduct.
94. The Committee then considered a reprimand. It concluded that a reprimand would also be insufficient because the case involved dishonest examination cheating and a dishonest attempt to mislead the proctor. Such an order would not adequately address the potential harm to the integrity of ACCA's examinations and qualifications.
95. The Committee carefully considered a severe reprimand, including whether it could be combined with an examination-related order. It had regard to section C4 of the Guidance. The misconduct involved two related forms of dishonesty, repeated and covert conduct after a direct warning and no demonstrated insight into the dishonest behaviour. The Committee was not satisfied that a severe reprimand, whether alone or combined with another available order, would sufficiently protect the public interest, maintain confidence in ACCA's examination process or uphold proper standards.
96. The Committee therefore considered removal from the student register under CDR 13(4)(c). It had regard to section C5 of the Guidance and to the specific guidance concerning dishonesty in section E2. Dishonesty undermines trust and confidence in the profession even where no direct harm or loss has resulted. The Committee considered whether the mitigation was so remarkable or exceptional as to justify an outcome other than removal. It concluded that it was not.
97. The Committee found that deliberately attempting to obtain an unfair advantage by capturing live examination content, repeatedly continuing that conduct after a warning and dishonestly misleading the proctor were fundamentally incompatible with continued registration as an ACCA student. A lesser sanction would not adequately reflect the seriousness of the misconduct or satisfy the public interest.
98. The Committee concluded that removal was the only sufficient and proportionate sanction. It therefore ordered that Mr Raza be removed from the student register.

99. The Committee made no order under CDR 13(4)(c) specifying a longer period before an application for readmission could be considered. The effect of Membership Regulation 14(2) is that Mr Raza may not apply for readmission until 12 months after the effective date of the removal order. The expiry of that period does not result in automatic readmission; it permits him to apply to the Admissions and Licensing Committee, which will determine any application in accordance with the applicable Regulations.

COSTS AND REASONS

100. ACCA applied for costs in the sum of £6,310.50 and provided the Committee with summary and detailed schedules of costs.
101. Mr Ive submitted that ACCA had succeeded on its substantive case and that the usual position was that a person against whom allegations were proved should pay the reasonable and proportionate costs incurred by ACCA in bringing the proceedings. He acknowledged that a minor reduction might be appropriate if the hearing concluded materially earlier than the five hours allowed for the Case Presenter's attendance.
102. The Committee accepted the Legal Adviser's advice. It had regard to its discretion under CDR 15 and to ACCA's Guidance for Costs Orders. It reminded itself that an award of costs was compensatory rather than punitive and was a separate consideration from sanction.
103. The Committee considered the nature and extent of the work identified in the schedules. ACCA had succeeded on all the substantive allegations advanced against Mr Raza. The Committee was satisfied that the work undertaken and the amounts claimed were reasonable and proportionate.
104. By the time the Committee had completed its deliberations, there had been no material saving in the hearing time estimated in the schedule. The Committee therefore found no basis for making a time-related reduction.
105. Mr Raza had not provided a statement of means or any other evidence concerning his financial circumstances or ability to pay. His status as a student did not, without supporting evidence, establish that he was unable to meet a costs order. In the absence of any such evidence, the Committee inferred that he was able to pay the costs assessed as reasonable and proportionate.

106. The Committee therefore ordered Mr Raza to pay ACCA's costs in the sum of £6,310.50.

EFFECTIVE DATE OF ORDER

107. Mr Ive submitted that removal should take immediate effect in the public interest. The Committee considered separately whether to make a direction under CDR 20(1)(b). An immediate order was not an automatic consequence of removal and could be made only if required in the interests of the public.

108. The Committee was not satisfied that immediate effect was required. ACCA had not identified any current activity undertaken by Mr Raza or any other particular information demonstrating that he presented an immediate risk during the appeal period. The Committee therefore declined to direct that the removal order take immediate effect.

109. The removal order will consequently take effect upon the expiry of the appeal period, unless Mr Raza gives notice of appeal within that period, in which case it will take effect, if at all, in accordance with the Appeal Regulations.

Ms Sahima Qamar
Chair
02 September 2026