Think Ahead ACCA

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Mr Knowell Rudhumbu**
Heard on:	**Tuesday, 08 September 2026**
Location:	**Virtual hearing via Microsoft Teams**
Committee:	**Mr Steven Chandler (Chair)** **Ms Ruby Devit (Accountant)** **Mr Damian Kearney (Lay)**
Legal Adviser:	**Mr Charles Apthorp**
Persons present and capacity:	**Ms Joanna La Roche (ACCA Case Presenter)** **Ms Anna Packowska (ACCA Hearings Officer)** **Mr Knowell Rudhumbu (ACCA Member)**
Summary:	**Allegations 2, 3 and 7a admitted and proved** **Allegations 1, 4a, b and 7a found proved.** **Allegations 5, 6 and 7b not proved as alternatives**
Sanction:	**Exclusion from membership. Mr Rudhumbu ordered to pay £9,000 towards ACCA's costs.**

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1. The Disciplinary Committee ("the Committee") convened to consider the case of Mr Knowell Rudhumbu ("Mr Rudhumbu").

2. Ms Joanna La Roche ("Ms La Roche") represented the Association of Chartered Certified Accountants ("ACCA"). Mr Rudhumbu attended and was not represented.

3. The Committee confirmed that it was not aware of any conflicts of interest in relation to the case.

4. In accordance with Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ("the Regulations"), the hearing was conducted in public.

5. The hearing was conducted remotely through Microsoft Teams.

6. The Committee had considered the following documents: a Hearing Bundle (pages 1 to 180); a Service Bundle (pages 1 to 17) and a tabled additional bundle (pages 1 to 16).

7. The Committee noted that the Notice had been sent to Mr Rudhumbu's registered email address held by the ACCA. As the notice of hearing was sent by email, the Committee noted that service may be proved by confirmation of delivery of the notice, which had been provided to the Committee, and that the notice would be deemed as having been served on the day that it was sent. The Committee noted that this was more than 28 days prior to the date listed for hearing and in its view complied with the other requirements of the Regulations.

8. The Committee was satisfied that this was effective service in accordance with the Regulations.

9. The Committee found that service of the notice of hearing had been affected in accordance with Regulations 10 and 22 of the Regulations.

Schedule of Allegations

Mr Knowell Rudhumbu, a Fellow member of the Association of Chartered Certified Accountants;

1. On or about the 25 February 2025, prepared working papers for a CASS 5 Insurance Mediation Workbook FY24 for a financial services entity which were inaccurate and/or intentionally false.

2. On or around 25 February 2025 failed to carry out sufficient and/or appropriate audit work for a financial services entity FY24 in accordance with the International Standard on Auditing (UK) 500.

3. By reason of the above Mr Rudhumbu failed to comply with ACCA's Code of Ethics – Professional Competence and Due Care then in force.

4. In respect of Allegation 1 and/or 2, Mr Rudhumbu was dishonest in that he sought to represent that:

   a. Sufficient and/or appropriate audit work for 2024 had been carried out when it had not; and/or

   b. Bank payments and receipt samples related to YE24 when in fact they were copied from the prior year working papers.

5. In the alternative, in respect of the conduct referred to in allegation 1 and/or 2, Mr Rudhumbu failed to demonstrate integrity.

6. In the further alternative the conduct referred to in allegation 1 and/or 2 above was reckless.

7. By reason of his conduct, Mr Rudhumbu 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).

10. At the outset of the hearing Mr Rudhumbu informed the Committee that he accepted the facts of allegation 1 but denied that his preparation of the working papers was, as alleged, intentionally false.

11. Mr Rudhumbu admitted allegation 2 and 3, which the Committee found proved on his admission. Mr Rudhumbu accepted that he was guilty of misconduct, which was a matter for the determination of the Committee. Rudhumbu denied allegations 4a and b, 5 and 6.

BRIEF BACKGROUND

12. Mr Rudhumbu became an ACCA Member on 16 June 2017 and a Fellow on 16 June 2022.

13. On 2 July 2025, BDO wrote to ACCA about Mr Rudhumbu's conduct. Mr Rudhumbu was employed by BDO as an Audit Manager, based in the London office between November 2021 and April 2025.

14. During the audit of an insurance entity, it was noted by the Engagement Quality Reviewer ("EQR") that the bank payments and receipts sample testing from the prior year working papers appeared to have been copied, with only the year having changed, 2023 changed to 2024. Mr Rudhumbu accepted that these were the working papers he prepared. Further, the electronic record showed Mr Rudhumbu signed off the "CASS 5 Insurance Mediation Workbook FY24" as prepared on 25 February 2025.

15. On 4 March 2025, BDO wrote to Mr Rudhumbu notifying him that he had been suspended with immediate effect as of 28 February 2025 and that an investigation would be opened. On 21 March 2025, Mr Rudhumbu was interviewed.

16. In the interview Mr Rudhumbu stated:

"I did use the prior evidence, I did use it. I rolled it forward from the prior year. I understand this client; I know how they work, and I know their controls. I have been doing it for 4 years, and I knew it [i.e., the bank testing] would be fine. It was an error of judgement, but it is what it is."

17. In the same interview, Mr Rudhumbu stated *"The client has a tendency of being late, you can see who signed what, when. This client pays good fees; this client doesn't bring anything on time. So there are lots of time pressures. Because I know them personally, I did everything crucial that was in my mind that I thought needed to be done. I thought the bank testing would be OK, so I rolled it forward, and it was an error in my judgement. I should have told AB* (the Engagement Quality Reviewer)*, but I didn't, and when he went to the file, he saw the figures"*

18. In the same interview, the interviewer asked *"To clarify, you didn't pick a new sample for these tests; you copied from last year and just updated the date, so they looked as if they were current…"* to which Mr Rudhumbu responded *"Correct. I know exactly what I did."*

19. A disciplinary meeting was held following which Mr Rudhumbu was summarily dismissed. He appealed the decision to dismiss him, the grounds of appeal were:

    a. *No Intent to Deceive*

    As discussed in the investigation and outcome meetings, I acknowledge that the testing for payments and receipts was not refreshed at the time the file was reviewed. However, this was not done with intent to falsify or mislead. The testing was reused under time pressure with the clear intention to be updated before sign-off. Client evidence had been obtained and the area was still being finalised when the review began.

    b. *Issue Was Identified Before Completion*

The issue was picked up before any reliance was placed on the file. I explained that the work was still in progress, and this was also reiterated during the 9 April meeting. While I accept I should have labelled the incomplete section clearly, I did not conceal it.

c. *No Client Harm or Misstatement*

There is no evidence of harm to the client or any breach of regulatory requirements. The file in question was not signed off, and the opinion itself was never affected. The outcome letter and meeting notes do not suggest that my actions resulted in reputational or financial damage.

d. *Clear and Consistent Mitigation Presented*

Throughout the process, I remained transparent, admitted the lapse, and provided honest context:
Lack of junior staff or team support Overlapping audit deadlines Pressure from client delay
My being under a Performance Improvement Plan (PIP) with high expectations

These points were not raised as excuses, but as relevant context. While the outcome meeting referred to differences between my conversations with the EQR and during the hearings, these were not attempts to mislead but reflections of how the issue evolved under scrutiny. I maintained a consistent core message: this was a work-in-progress error, not a dishonest act

e. *Commitment to Ethical Standards*

I take the principles of integrity and audit quality seriously. I have expressed remorse for this judgment lapse and reaffirmed my dedication to professional values throughout the process. I believe this context, especially as this was a first incident, should be considered in alignment with proportionality *principles in your policy.*

20. In May 2025 BDO wrote to Mr Rudhumbu informing him that his appeal had been unsuccessful.

21. Following notification by BDO to ACCA, a Senior Investigations Officer wrote to Mr Rudhumbu on 29 October 2025. On 11 November 2025, Mr Rudhumbu responded to ACCA's requests as follows:

    In response to *"Do you agree that in the interview on 21 March 2025, you confirmed that you did not pick a sample for the financial year ending 14 October 2024, but instead used the 2023 sample? If so, why did you do this and why did you alter the dates so that the work appeared to relate to 2024?"*

22. Mr Rudhumbu responded:

    "In that interview, I confirmed I reused the 2023 sample due to client delays in data submission, staffing shortages (no allocated team), and significant time pressure while acting as both preparer and manager. At the time, I was managing four audits concurrently. Staff rolled off other engagements, which left me preparing a file I was expected to manage. I escalated this to the engagement partner, and a senior manager was brought in late to assume the formal manager role while I continued as preparer. The audit was severely delayed, with client evidence still arriving close to the signing deadline (the same day as partner and EQR reviews). I had selected the 2024 samples and amended dates while awaiting the final evidence for the last two tabs—payments and receipts—out of more than twenty tabs completed. My intention was to refresh and complete those tabs before sign-off once the late evidence arrived. Unfortunately, the EQR review occurred before that update. I acknowledge this was an error in judgment, not an attempt to deceive. My focus was on completing key regulatory testing (CASS compliance), and the audit opinion remained unaffected… I should have refreshed the sample fully and escalated the delay earlier."

EVIDENCE AND SUBMISSIONS OF ACCA

23. Ms La Roche submitted that Mr Rudhumbu's conduct was dishonest as he would have known that submitting or causing to be submitted accounting information which was inaccurate would be regarded as dishonest by the standards of ordinary decent people, particularly as Mr Rudhumbu as an ACCA qualified accountant, would have been aware that the audit work books he prepared should be accurate.

24. It was submitted by Ms La Roche in the alternative that Mr Rudhumbu’s conduct lacked integrity in that it fell below the higher standards to be expected of a professional accountant. In the further alternative she submitted that the conduct was reckless.

25. It was further submitted by Ms La Roche that misconduct is a matter of judgment for the Disciplinary Committee and not a matter of proof. Nonetheless, if any or all of the facts relied upon are found proved, ACCA submitted that misconduct is made out, particularly as Mr Rudhumbu has acted in a manner which brings discredit to himself, ACCA and the accountancy profession.

EVIDENCE AND SUBMISSIONS OF MR RUDHUMBU

26. Mr Rudhumbu attended but was not represented. He had provided an extensive response to BDO and to ACCA as part of their investigations, which the Committee have had regard. He gave evidence and was cross examined by Ms La Roche in which he explained the background, his working practices and that he was able in the subsequent interviews and responses to provide a more detailed account of his actions. Mr Rudhumbu stated that the recent accounts provided to BDO and ACCA were accurate and the earlier response to BDO on the 21 March 2025 was not a complete account.

27. As Mr Rudhumbu had denied allegations, the burden of proof in respect of those

matters not admitted, therefore remained on ACCA.

DECISIONS AND REASONS OF THE COMMITTEE

28. The Committee considered the oral and written submissions made on behalf of ACCA, reviewed the exhibits, took account of the responses of Mr Rudhumbu both in the ACCA investigation, to BDO and in his oral evidence.

29. The Committee received advice from the Legal Advisor, which it accepted, which included reference to the applicable burden and standard of proof.

30. The Legal Advice included reference to the case of Enemuwe v NMC [2013] EWHC 2081 (Admin) in which it was stated that the opinions and conclusions of other investigations were not relevant to the determination of the Committee.

Allegation 1 - proved

31. In relation to Allegation 1, the Committee noted that Mr Rudhumbu admitted that the contents of the work book he prepared were inaccurate but denied that his conduct was intentionally false. In reaching its decision the Committee noted that the work book had not been corrected at 5.30pm on the day it was due to be reviewed by the Responsible Individual ("RI") and by the Engagement Quality Reviewer ("EQR") who were responsible for signing off the audit.

32. The Committee noted that Mr Rudhumbu had been placed on an improvement plan and concluded he was under some pressure to complete the audit. The Committee also noted that there was no evidence that Mr Rudhumbu had requested the required information from the client. The Committee considered Mr Rudhumbu's account that he intended to go back and correct the audit to be implausible. It was 5.30pm on the day the audit had to be completed and had no information from the client with which to complete the audit.

33. The Committee also determined that the initial account provided by Mr Rudhumbu to BDO was more likely to be a true account of what had occurred

and what was in his mind. In the Committee's view Mr Rudhumbu's subsequent accounts provided to BDO as part of the investigation were an attempt to mitigate his misconduct and did not reflect what had occurred. The Committee therefore determined that the conduct in the preparation of the work book was intentionally false.

34. Accordingly, the Committee found Allegation 1 in its entirety to be proved.

Allegation 2

35. Allegation 2 was proved on the admission of Mr Rudhumbu.

Allegation 3

36. Allegation 3 was proved on the admission of Mr Rudhumbu. The Committee noted that this was a very serious ethical failure in respect of audit work for a financial services entity. The Committee noted that Mr Rudhumbu had an adequate opportunity to update the workbook, he had placed no notes on the workbook to highlight the fact the entries were from the previous years. It also noted he had removed the flags, which would have prompted further inquiry by the reviewers. The Committee also noted its findings in respect of allegation 1 that the entries in the workbooks were intentionally made as false entries.

Allegation 4a and b

37. The Committee having found at allegation 1 that the conduct in the preparation of the work book was intentionally false, noted Mr Rudhumbu was aware that he had entered the previous year's information into the work book and had changed the years to the current year. Mr Rudhumbu was aware that the information was not correct and that there was no evidence he had requested the correct information from the client.

38. The Committee noted that he had an opportunity to inform the RI and EQR that the information in the Work Book had not been updated to the current year. It therefore followed that he presented the work book to his senior management

in the expectation they would sign it off as complete, when he knew that it was prepared using the previous year's information. The Committee also noted that Mr Rudhumbu presented the work book to the two reviewers who would have trusted him to have audited the 2024 bank payments and receipts, whereas he had not obtained those documents and reconciled them. If this error had not been picked up by the EQR a clean audit report for the year 2024 would have been signed off.

39. The Committee having determined what was Mr Rudhumbu's knowledge and belief when he prepared the work book went on to apply the second limb of the Ivey v Genting test. It determined that the knowing provision of false audit documentation to the EQR and RI would be considered to be dishonest by ordinary decent members of the public.

Allegations 5 and 6

40. The Committee did not go on to consider allegations 5 and 6 which were put in the alternative.

Allegations 7 a and b

41. The Committee considered the seriousness of the allegations found proved and admitted. It determined that the breaches found proved were serious failures and not minor or technical breaches It determined that the submission to the RI and EQR of an audit which was prepared using the previous year's information fell far below the standards expected of a professional accountant. It therefore determined that the misconduct was serious and found Allegation 7a proved.

42. The Committee did not go onto consider Allegation 7 b as it was put in the alternative.

SANCTION AND REASONS

43. In reaching its decision on sanction, the Committee took into account the

evidence that it had already heard and the further submissions made by Ms La Roche and Mr Rudhumbu.

44. Ms La Roche highlighted Mr Rudhumbu’s membership history with ACCA and confirmed that he had an unblemished regulatory record.

45. The Committee accepted the advice of the Legal Adviser, who referred it to Regulation 13(1) of the Regulations, relevant caselaw and the ACCA document ‘Guidance for Disciplinary Sanctions’. The Committee bore in mind that the purpose of any sanction was not to punish Mr Rudhumbu, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct, and that any sanction must be proportionate.

46. When deciding on the appropriate sanction, the Committee first determined the seriousness of the conduct and carefully considered whether there were any aggravating and mitigating features in this case.

47. The Committee considered the misconduct to be a very serious matter, given it related to dishonesty in the preparation and submission of an audit.

48. It found the aggravating features to be as follows:

    a. There was an element of personal gain given Mr Rudhumbu was at the relevant time on a performance improvement plan ("PIP");
    b. Breach of trust, given his role as audit manager;
    c. Evidence of planning and premeditation;
    d. A lack of full insight;

49. The Committee considered the following to be mitigating features in this case:

    a. Mr Rudhumbu had a previous unblemished career;
    b. He had cooperated with both the internal investigation by BDO and ACCA;

50. The Committee considered the available sanctions in increasing order of severity.

51. The Committee first considered whether to take no further action but considered that such an approach was not appropriate given the seriousness of the misconduct.

52. The Committee considered that neither admonishment, reprimand nor severe reprimand would be appropriate. The Committee considered that these sanctions would be insufficient to mark the seriousness of the misconduct, to provide adequate protection of the public and to address the wider public interest.

53. The Committee considered that exclusion from membership was the appropriate sanction in this case because Mr Rudhumbu's conduct:

c. was fundamentally incompatible with being an ACCA member;
d. amounted to a very serious departure from professional standards;
e. was indicative of a continuing lack of insight into his conduct;
f. there was, because of a lack of insight, a risk of repetition of the conduct.

54. The Committee was mindful that the sanction of exclusion from membership was the most serious sanction that could be imposed and recognised that it could have negative consequences for Mr Rudhumbu in terms of his reputation and financial circumstances. However, the Committee considered the sanction to be proportionate in the circumstances, given the seriousness of the misconduct, the need to protect the public, and the wider public interest in upholding proper professional standards and maintaining public confidence in ACCA and the accountancy profession.

55. Accordingly, the Committee decided to exclude Mr Rudhumbu from membership with immediate effect.

56. The Committee did not deem it necessary to impose a specified period before which Mr Rudhumbu could make an application for readmission as a Member.

COSTS AND REASONS

57. Ms La Roche made an application for Mr Rudhumbu to make a contribution to the costs of ACCA. Ms La Roche applied for costs totalling £10,039. The Committee was provided with a Schedule of Costs providing a breakdown of the activity undertaken by ACCA and the associated costs. Ms La Roche submitted that the costs claimed were appropriate and reasonable. However, she did acknowledge that the hearing today had taken slightly less time than that allocated to it on the Schedule of Costs.

58. The Committee accepted the advice of the Legal Adviser who referred the Committee to Regulation 15(1) of the Regulations and the ACCA document 'Guidance for Costs Orders' (01 January 2021).

59. The Committee was satisfied that ACCA was entitled to costs in principle and had been justified in investigating these matters. However, it considered that there should be a reduction to reflect the fact that the hearing had taken slightly less time than that which it was allocated.

60. The Committee noted Mr Rudhumbu's financial and personal circumstances and the details of those circumstances set out in the additional bundle.

61. In deciding the appropriate and proportionate order for costs, the Committee took into account the above matters and decided to make an order for costs in the sum of £9,000. The reduced amount reflected the removal of 3 hours of the time allocated for the Case Presenter and 2 hours of the time allocated for the Committee Officer and Mr Rudhumbu's financial position.

EFFECTIVE DATE OF ORDER

62. The Committee noted Mr Rudhumbu's current working arrangements which was reliant upon his continuing ACCA membership. The Committee, taking into account all of the circumstances determined it was in the interests of the public that this order shall take immediate effect.

ORDER

63. The Committee made the following order:

    a. Mr Rudhumbu shall be excluded from ACCA membership.

    b. The Order shall take effect immediately.

    c. Mr Rudhumbu shall make a contribution to ACCA's costs in the sum of £9,000.

Mr Steven Chandler
Chair
08 September 2026