

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Miss Kadijatu Conteh

Heard on: 08 September 2026

Location: Remotely via Microsoft Teams

Committee: Mr Gerard Wareham (Chair)
Ms Dinisa Kandasamy (Accountant)
Dr Jackie Alexander (Lay)

Legal Adviser: Ms Katrina Hyde (Legal Adviser)

**Persons present
and capacity:** Mr Mazharul Mustafa (ACCA Case Presenter)
Ms Aimee Murphy (Hearings Officer)

Summary: Misconduct found proved.
Exclusion from membership with immediate effect.

Costs: £4000

PRELIMINARY APPLICATIONS/SERVICE OF PAPERS

1. The Disciplinary Committee ("the Committee") convened to consider allegations against Miss Conteh, who did not attend and was not represented.
2. The papers before the Committee were in a bundle numbered 1 to 263, plus a memorandum and agenda of 2 pages, a supplementary bundle of 68 pages, a

service bundle of 25 pages, Miss Conteh's statement of financial position of 2 pages, a simple costs schedule and a detailed costs schedule.

3. The ACCA Case Presenter, Mr Mustafa, made an application to proceed in the absence of Miss Conteh.

PROCEEDING IN ABSENCE

4. The Committee first considered whether the appropriate documents had been served in accordance with the Complaints and Disciplinary Regulations ("the Regulations"). The Committee took account of the submissions made on behalf of ACCA and also accepted the advice of the Legal Adviser.
5. Mr Mustafa set out that service by email was permitted by Regulation 22 of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 (amended 01 January 2025) and overall, ACCA's position was that service had been properly carried out.
6. Firstly, the Committee considered the documents in the service bundle. These included the Notice of Hearing which had been sent to Miss Conteh, to the email address she had registered with ACCA. The Notice of Hearing included all the details required by the regulations. These included the time, date and venue for the hearing and also Miss Conteh's right to attend the hearing, in person or on the phone, and to be represented. In addition, the Notice provided details about applying for an adjournment and the Committee's power to proceed in Miss Conteh's absence, if considered appropriate. Also on 11 August 2026, ACCA had emailed a link to Miss Conteh for the purposes of attending the hearing and this was on page 9 of the service bundle. Confirmation of delivery of the email was also in the bundle.
7. In correspondence, Miss Conteh had informed ACCA that she could not attend because she would not have a sufficiently stable internet connection. ACCA informed her that it would be possible to attend by telephone link. This offer had been repeated in several emails. To this, ACCA received no reply. ACCA also telephoned Miss Conteh on her registered telephone number. The line was busy and there was no voicemail facility. However, on 07 September 2026 Miss

Conteh emailed ACCA to apologise for not receiving the telephone calls, but stated that she would not be attending the hearing.

8. The Committee took this information from Miss Conteh into account. It also took into consideration that she had completed and returned the case management form, and in it, she had said that she would not be attending the hearing.
9. Overall, the Committee was satisfied that Miss Conteh had been properly notified of the hearing, in accordance with the Regulations. It was clear that she was aware of the hearing date from her correspondence. The Committee was also satisfied that the 28-day notice requirement had been met under Regulation 10.
10. The Committee next considered the issue of whether to proceed in Miss Conteh's absence. The Committee bore in mind that although it had a discretion to proceed in her absence, it should exercise that discretion with care and caution.
11. On balance, the Committee considered that an adjournment would not serve any useful purpose because in light of the matters set out above at paragraphs 6 and 7, it seemed unlikely that Miss Conteh would attend on any other occasion. In addition, she had not applied for an adjournment.
12. The Committee considered the fairness of the proceedings. It concluded that there was a clear public interest in the case being heard without additional delay. Looking at the matter in the round, the Committee decided that it was in the interests of justice that the matter should proceed, notwithstanding the absence of Miss Conteh.

ALLEGATIONS/BRIEF BACKGROUND

13. Kadijatu CONTEH ('Miss Conteh'), at all material times an ACCA trainee:
 - 1) Applied for membership to ACCA on or about 10 June 2022 and in doing so purported to confirm in relation to her ACCA Practical Experience training record she had achieved the following Performance Objectives:

- Performance Objective 1: Ethics and professionalism
- Performance Objective 2: Stakeholder relationship management
- Performance Objective 3: Strategy, innovation and sustainable value creation
- Performance Objective 4: Governance, risk and control
- Performance Objective 5: Leadership and management
- Performance Objective 13: Plan and control performance
- Performance Objective 20: Review and report on the findings of an audit or assurance engagement

2) Miss Conteh's conduct in respect of the matters described in Allegation 1 above was:

- a. In relation to Allegation 1, dishonest in that Miss Conteh knew she had not achieved all or any of the performance objectives referred to in Allegation 1 above as described in the corresponding performance objective statements.
- b. In the alternative, any or all of the conduct referred to in Allegation 1 above demonstrates a failure to act with Integrity.

3) In the further alternative to Allegations 2a) and 2b) above, such conduct was reckless in that Miss Conteh paid no or insufficient regard to ACCA's requirements to ensure that the performance objective statements referred to in paragraph 1 had to be in her own words as required by ACCA;

4) By reason of her conduct, Miss Conteh is guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at 1 to 3 above.

Glossary

14. The following terms have been abbreviated for ease:

- Practical Experience Requirement ("PER")

- Practical experience: 36 months' practical experience in a relevant role ("Practical Experience")
- Performance Objectives ("PO")
- The Chartered Certified Accountants' Membership Regulations 2014, amended 01 January 2026 ("Membership Regulations")
- Practical Experience Supervisor ("PES")

Brief Background

15. Kadijatu Conteh became an ACCA member on 16 June 2022. Under Regulation 3 of the Membership Regulations, one of the requirements for eligibility for ACCA membership is that an individual cannot become a member of ACCA until they have completed 3 years of supervised work experience, in accordance with ACCA's PER. [Regulation 3(a)(ii).] Persons undertaking practical experience are often referred to as ACCA "trainees" and that term is used herein to describe Miss Conteh's status, prior to membership.
16. ACCA's PER requires trainees to achieve nine POs. ACCA requires that for each PO, the trainee must complete a personal statement in support, illustrating how that PO has been met. Each PO must be signed off by the trainee's PES. It is a trainee's responsibility to find a PES, who must be a qualified accountant recognised by law in the trainee's country and/or a member of an IFAC body with knowledge of the trainee's work.

Summary of ACCA's position

17. In Miss Conteh's case, ACCA conceded that information she had given regarding having been employed at a particular firm (the "Firm") appeared to be genuine.
18. However, ACCA's position as set out in the bundle and before the Committee was that the PO was required to be a description of the trainee's own experience. Therefore the supporting statement should be unique to them. ACCA relied on the fact that significant and easily accessible online guidance is available to all trainees which makes it clear that supporting statements must be personalised to a trainee's specific experience and POs.

19. Certain PO statements received by ACCA were reviewed at a later stage by ACCA's Professional Development Team. ACCA alleged that Miss Conteh's PO statements numbered 1 to 5, 13 and 20 were significantly similar to those of other trainees. There was clear evidence that Miss Conteh had copied parts of the text, as they were identical to others. Completing the supporting statements for the POs properly, and in line with ACCA requirements, was part and parcel of the PER. It could not be said that Miss Conteh had properly completed her POs and by extension, the PER, if she had not completed unique and personal supporting statements. Based on these alleged facts, ACCA had also been careful to check whether Miss Conteh's submissions had been received first in time. As they had not been the first to be received, and others were significantly similar, ACCA submitted that it was most likely that Miss Conteh had been dishonest, failed to act with integrity or was reckless. On the basis of any of these, ACCA submitted that it was clear that she was guilty of misconduct.
20. As part of its investigation, ACCA had approached an individual who advertised online that they provided "ACCA PER completion services." In their correspondence with ACCA, they had supplied a screenshot. The Committee, of its own motion expressed concerns about the strength, quality and provenance of this material. In submissions before the Committee, Mr Mustafa accepted that there was no evidence regarding the chain of custody for this screenshot before the Committee. The Committee considered this issue having regard to the interests of justice and also fairness to Miss Conteh. In the circumstances the Committee directed itself to have no regard to this evidence.

Summary of Miss Conteh's position

21. In the ACCA case management form, Miss Conteh made it clear that she did not accept any of the allegations. In addition, Miss Conteh responded in correspondence to questions asked by ACCA. She also provided copies of letters from her employer; these were regarding starting her role with the Firm as [REDACTED] on [REDACTED] and regarding her promotion to the position of [REDACTED], effective from [REDACTED].
22. She had also stated that she had been working since [REDACTED] and;

“...as such all what was written in my PER are personal experience sought by me. I have attached to this form evidence of my [REDACTED] statement detailing the time I was register to the scheme base on my employment history.”

DECISION ON FACTS/ALLEGATIONS AND REASONS

23. The Committee considered all the evidence presented and the submissions made by the ACCA Case Presenter. The Committee took into account that there had been no admissions from Miss Conteh and it accepted the advice of the Legal Adviser.
24. The Committee reminded itself that it was for ACCA to prove the facts alleged and to do so on the balance of probabilities. It was not for Miss Conteh to disprove them. The Committee took account of Miss Conteh’s previous good character with regard to her credibility.
25. The Committee considered the witness statements in the main bundle from two ACCA personnel. The evidence set out detailed background context regarding the implementation and monitoring of the PER, the process whereby trainees gained sufficient experience to apply for membership, and the operation of the ACCA online records system for trainees to record their POs and other data.
26. In one of the ACCA witness statements before the Committee, it was stated that:

‘POs are designed to set the minimum standard of work that a trainee is expected to achieve and the level of competence they will need to demonstrate to their qualified supervisor. [The POs] set out the kind of work activities a trainee may carry out and highlight the values and attitudes ACCA trainees are expected to possess and to demonstrate as a trainee accountant.’

27. In addition, the evidence stated that the August 2020 Guidance for trainees in completing and submitting POs stated that:

'...Your situation and experience are unique to you, so we do not expect to see duplicated wording, whether from statement to statement, or from other trainees. If such duplication occurs, then it may be referred to ACCA's Disciplinary Committee.'

28. ACCA had also relied on the guidance available to trainees regarding how to complete their POs. Within the "myACCA" online tool, the following guidance was given:

'How do I complete my performance objectives?

All the performance objectives are made up of a description, elements and a statement. For each performance objective, you have to do the following:

- *write a short statement describing your experience*
- *get your supervisor to confirm that you are competent in all of the elements*
- *have the performance objective signed off by your supervisor*

You only need to cover the description of the performance objective in your statement. You don't need to summarise all the activities you carried out to achieve the individual elements. We'll need details of one or two tasks that you've been involved with for each performance objective statement. The tasks should relate to closely to the objective's description.

Your statement should:

- *Be in your own words*
- *Be clear and concise*
- *Provide evidence and examples to help illustrate your experience*
- *Avoid repetition or reference to other statements*
- *Not provide any private or sensitive information*
- *Be a true and accurate reflection of your work'*

29. In analysing Miss Conteh's submitted POs, ACCA had carried out a comparison to those of other trainees. It had set out each of her POs in a table alongside the POs of other trainees.
30. The Committee carefully analysed the evidence before it. It gave detailed consideration to allegation 1 as a starting point. It examined the comparison tables in detail. Having done so, it concluded that some of the text in both sets of POs was identical, and some was different. It appeared that certain sections of the text of Miss Conteh's POs had been personalised by her. The Committee noted she had provided some examples of experience she had gained at work. However, large tracts of the text were identical to that submitted by other students and the Committee considered that this was significant.
31. In relation to ACCA's submission, that completing a personal statement for each PO was an intrinsic part of the PER, the Committee was persuaded by this.
32. Miss Conteh's had written to ACCA and set out her position regarding the similarities between her PO and those of other trainees. She stated:
- "Don't have any idea as I have never met with any of the members names stated i did my work bases on my overall experience obtain from my working career and related them specifically to the organization I am currently working with.."*
33. Having considered all the available evidence, the Committee concluded that Miss Conteh's explanation was not persuasive or plausible. It stood to reason that an ACCA trainee would understand how important the PER was. Overall, the Committee was not satisfied that Miss Conteh had completed hers properly. A significant amount of the text she submitted was identical to the POs of other trainees. On the balance of probabilities, the Committee reached the conclusion that she had failed to reflect properly and in a meaningful way on her work experience. The Committee also took account of the extensive guidance available online to trainees about how to correctly complete the PER. On balance, the Committee considered that Miss Conteh had failed to submit PO records that were unique to her and thereby had failed to complete the PO

as required. Therefore, the Committee was satisfied that, on the evidence produced by ACCA allegation 1 was proved.

34. In relation to allegation 2(a) the Committee applied the test in the case of *Ivey v Genting Casino* and found that it was most likely that Miss Conteh had behaved dishonestly. The Committee reached the conclusion on the balance of probabilities that Miss Conteh knew she was required to submit statements that were wholly her own work. Despite this she knowingly copied from others. The Committee was of the view that it was clear that “ordinary, decent” people would consider her actions to be dishonest.
35. The Committee did not consider allegation 2(b) as it was in the alternative. In addition, the Committee did not go on to consider allegation 3 as it was in the alternative to allegations 2(a) and (b).

Misconduct

36. Having found the facts as set out above proved, along with allegation 1 and allegation 2(a), the Committee then moved on to consider whether Miss Conteh was guilty of misconduct under allegation 4. Many ACCA members worked extremely hard for many years to pass the requisite exams and gain the proper experience for membership. Miss Conteh’s conduct flew in the face of that. She had shown a complete disregard for the integrity of ACCA membership. Moreover her behaviour had the potential to undermine public confidence and trust in the profession. Overall, the Committee was satisfied that her conduct fell far short of the conduct that was expected from a member of ACCA. For these reasons the Committee was satisfied that Miss Conteh was guilty of misconduct.

SANCTION AND REASONS

37. The Committee considered the appropriate sanction in line with the framework set out in the updated Guidance for Disciplinary Sanctions (10 February 2026) (the “Sanctions Guidance”).

38. Firstly, the Committee considered seriousness. In relation to the Sanctions Guidance, the Committee considered that in Section F, a number of the criteria applied to Miss Conteh's case. It noted, in particular, that she had sought to mislead her own professional regulator. In addition, the misconduct had been planned, in that it was not a spontaneous action, and the POs clearly had taken some time to prepare. Overall, the Committee concluded that Miss Conteh's misconduct had been very serious.
39. The Committee also considered aggravating factors and mitigating factors. It took care not to engage in double counting. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the Sanctions Guidance stated:
- "The principal function of sanctions is not punitive but to protect the public interest"*
40. In terms of mitigation, the Committee took the lack of prior disciplinary proceedings against Miss Conteh into account. It also took account that she had co-operated with the ACCA investigation to an extent, in that she had answered emails and responded to questions, although co-operation with the regulator's investigations was required.
41. In relation to aggravating factors, the Committee concluded that that Miss Conteh had not shown insight, in that she had not shown that she understood the gravity of her actions and the allegations.
42. The Committee gave detailed consideration to sanctions, starting with the lesser sanctions; no further action, admonishment or reprimand. It was satisfied that it would not be in the public interest to take no further action. Neither admonishment nor reprimand were suitable – the Sanctions Guidance criteria did not fit Miss Conteh's case. There had not been a genuine expression of remorse or insight/acceptance from her. In addition, the seriousness of her misconduct meant that such sanctions would not be sufficient to protect the public. Looked at in the round, the Committee concluded that none of these lesser sanctions would be appropriate.

43. Next the Committee analysed the sanction of severe reprimand. The Committee concluded that, again, there was no evidence that Miss Conteh had insight into her failings, nor of genuine regret. Moreover she had not provided evidence of any remediation or corrective steps taken. Therefore, it was clear that this was not an appropriate sanction.
44. The Committee reminded itself that it was dealing with a case of dishonesty. It had specific regard to Section E2 of the Sanctions Guidance in relation to that. Overall, it was of the view that Miss Conteh's misconduct was fundamentally incompatible with membership of ACCA. Therefore, the most appropriate and proportionate sanction was that Miss Conteh be excluded from membership.
45. In relation to the timing of the removal, the Committee considered that in the specific circumstances of the case, and taking into account the finding of dishonesty, there was a need for the removal to be immediate as there was a risk involved in Miss Conteh continuing to hold herself out as a member.

COSTS AND REASONS

46. Mr Mustafa, on behalf of ACCA, made an application for costs. The Committee took into account the ACCA Guidance for Costs Orders. It was satisfied that, in principle, ACCA was entitled to receive its costs.
47. Miss Conteh had provided information about her means in the form of a completed "Statement of Financial Position." The Committee also had regard to a payslip which Miss Conteh had submitted as evidence. The Committee noted that this payslip was not contemporaneous. However, it was persuaded by the fact that the figure was in line with what Miss Conteh had submitted in her Statement of Financial Position.
48. The Committee made a reduction from the amount stated in the costs schedules, because the hearing took less time than had been anticipated. [REDACTED]. The final costs order, which the Committee concluded was proportionate, would be £4000.

EFFECTIVE DATE OF ORDER

49. The Committee directed that the removal take place with immediate effect

SUMMARY

50. The Committee ordered as follows:
- (a) Miss Conteh shall be excluded from membership with immediate effect.
 - (b) Miss Conteh shall pay costs to ACCA assessed at £4000.

Gerard Wareham
Chair
08 September 2026