Think Ahead ACCA

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Miss Srijanjeet Kaur**
Heard on:	**Thursday, 27 November 2025**
Location:	**Remote link via Microsoft teams**
Committee:	**HH Suzan Matthews KC (Chair),** **Mr George Wood (Accountant)** **Ms Deborah Fajoye (Lay)**
Legal Adviser:	**Mr Alastair McFarlane**
Persons present and capacity:	**Ms Michelle Terry (Case presenter ACCA)** **Miss Anna Packowska (Hearings Officer)** **Miss Kaur and** **Ms Bhalla (Interpreter)**
Outcome:	**Severe Reprimand and costs awarded to ACCA in the sum of £5,000.**

1. ACCA was represented by Ms Terry. Miss Kaur attended but was not represented. The Committee had before it a bundle of papers, numbered

pages 1 – 98, a video recording of the exam and 3 phone logs, and a service bundle numbered pages 1 – 18.

SERVICE

2. Having considered the service bundle, the Committee was satisfied that notice of the hearing was served on Miss Kaur in accordance with the Complaints and Disciplinary Regulations 2014 (“CDR”).

ALLEGATIONS

Miss Srijanjeet Kaur, a student of ACCA, in respect of her on-demand remotely invigilated Financial Reporting (FR) exam taken on 6 March 2025 (‘the Exam’):

1. **Failed to adhere to ACCA’s Exam Guidelines to ‘move mobile phones out of arm’s reach’ and/or possessed an item at her desk and/or on her person which was not on the list of permitted items in the Exam Guidelines, contrary to Exam Regulation 1.**

2. **Was in possession of and/or used an unauthorised item, namely a mobile phone with camera, during the Exam, contrary to Exam Regulation 5(a) and/or 5(b).**

3. **Used the above referenced unauthorised item to take photographs/recordings of the Exam content, contrary to Exam Regulation 13.**

4. **Gave the exam proctor false or misleading information about the said unauthorised item, contrary to Exam Regulation 3.**

5. Miss Srijanjeet Kaur's conduct in respect of any or all of the above was:

a) Dishonest, in that she intended to use or used an unauthorised item, a mobile phone with camera, during the Exam to gain an unfair advantage in the exam and/or a future exam; or in the alternative:

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

6. By reason of the above, Miss Kaur is:

a) guilty of misconduct pursuant to bye-law 8(a)(i) in respect of any or all of the conduct above; or in the alternative:

b) liable to disciplinary action pursuant to bye-law 8(a)(iii) in respect of any or all of the conduct in allegations 1 to 4 above.

BACKGROUND

3. Miss Kaur became an ACCA student on 3 May 2024.

4. On 6 March 2025 Miss Kaur sat an ACCA remotely invigilated Financial Reporting ("FR") exam. Under ACCA's Exam Regulations and Exam Guidelines candidates are required to move their mobile phone out of arms reach. If a candidate has a mobile phone or uses a mobile phone other than in accordance with the Exam Guidelines the mobile phone is an "unauthorised item".

5. The exam video, chat log and phone log from the exam were reviewed by the Investigations Officer. The Investigations Officer observed that at

multiple times during the exam the video recording showed Miss Kaur holding her mobile phone up to the screen.

6. The remote invigilator, the "proctor" and Miss Kaur are recorded on the video having the following interactions:

At 00.19.23, Miss Kaur is seen speaking to the proctor and saying, "Hello is anyone there, hello….hello, can you hear me."

• *At 00.20.07, the proctor responds and the following conversation takes place:*

Proctor: "Can you hear me?"

Miss Kaur: "yes I can hear you…actually I received a call from a person with….phone is kept that way, so ….

Proctor: "Please show me 360 degree"

Miss Kaur: "ok ok"

• *At 00.20.14 Miss Kaur is seen conducting a pan of the room. It is noted that there is a dressing table in the footage with no phone on it.*

and at:

• *At 01.45.16, Miss Kaur is again seen raising a hand and saying "are you there".*

• *The proctor responds and Miss Kaur says, "I just heard the vibration of the phone again, is anyone calling me?"*

• *The proctor is then heard saying "mam could you please show me where your phone is now?"*

• At 01.46.45 Miss Kaur is seen walking over to a mobile phone and says its on the dressing table (this appears to be the same dresser from 00.20.14 but which now has a mobile phone on it)

and between 01.47.05 and 01.54.36 the following conversation takes place:

Proctor: "So, at the beginning of exam you were noticed to be using your phone and taking pictures of exam screen which is prohibited. Why did you do that can I ask"

Miss Kaur: "the exam screen?"

Proctor: "Yes I saw that you are taking photos of the screen, I have to ask the reason."

Miss Kaur: "I haven't clicked the exam screen. I clicked them before the exam started."

Proctor: "Mam, er at the beginning of exam when the greeter started your exam the proctor noticed that you are using your phone to taking pictures of the screen"

Miss Kaur: "I didn't actually got up from my screen er sorry from the seat."

Proctor: "Mam have you took the photos of the screen"

Miss Kaur: "no no I haven't, that's what I'm saying"

Proctor: "Unfortunately we have seen that you are taking the pictures of exam and we just (unintelligible) I am forced to terminate your exam due to violation of ACCA policy. I have to end your exam now."

Miss Kaur: "but mam I didn't took the photos. I just show you the phone I am not sitting near it."

Proctor: "Please contact ACCA for more details, the situation will be reported to ACCA and now I am ending your exam. Go immediately to ACCA"

Miss Kaur: "But mam I didn't do it"

Proctor: "Unfortunately we have seen it um at the beginning of the exam"

Miss Kaur: "But the phone is kept far away from my seat"

Proctor: "We already notice it at beginning of exam. I have to report about the situation to ACCA, please contact with ACCA via their website on the contact us section and explain why your exam has been ended"

Miss Kaur: "But mam I didn't do it"

Proctor: "Mam we already notice and we have record it, please contact ACCA. Any questions"

Miss Kaur: "I just wanted to say I didn't do it, I just showed you that it is kept far away from my seat"

Proctor: "Mam we have records, the streaming has been recorded and we have seen that you are taking pictures of the exam screen. Its already been recorded."

Miss Kaur: "But mam I didn't do it…But what will happen after you terminate my exam, will I not be able to sit for the exam again?"

Proctor: "You have to contact with ACCA to know more details about the situation."

Miss Kaur: "Ok"

Proctor: "For now I just have to end your exam due to violation of ACCA policy"

Miss Kaur: "But mam I didn't do it, I swear. I just showed you that it is kept far away from my screen" "I wasn't taking…I haven't moved from my seat since the exam started."

Proctor: "Ok contact with ACCA please for now I have to end your exam"

At 01.54.36 the exam was terminated.

7. The Investigations Officer wrote to Miss Kaur's registered email address on 15 May 2025, requesting her comments and observations. On 24 May 2025 Miss Kaur responded. She denied any intention to cheat in her exam. She accepted that she had a mobile phone in breach of the exam regulations but maintained that she was using the calculator function on this and not cheating in anyway or attempting to take photographs of the exam questions. She accepts she was inaccurate in response to the proctor's questions said this was because of "panic". She apologised for her errors and contended that her use of the phone was "*a desperate attempt to manage my time during a challenging exam, and not an attempt to cheat."*

ACCA's SUBMISSIONS

8. In summary, ACCA's case was that Miss Kaur was in possession of an unauthorised phone in the exam that she used or intended to use to gain an unfair advantage in the exam on 6 March 2025. In effect, she was cheating or intending to cheat and this was dishonest conduct. As an alternative to dishonesty ACCA alleged a lack of integrity. Further, she lied to the proctor.

9. ACCA notes that Miss Kaur has admitted that she had a mobile phone which was not kept out of arm's reach as directed by the proctor. Miss Kaur has admitted that she had the phone in her pocket during the setup process. The exam footage shows that Miss Kaur raised the mobile

phone to the screen in a manner ACCA contends is consistent with taking photographs or recordings on several occasions.

10. Further, Miss Kaur then attempted to deceive the proctor by directing the proctor to, what she now admits, was a second device on her dresser. This second device did not appear on the dresser during the setup process and therefore must have been placed there sometime during the exam.

11. ACCA rely upon the assumption from the operation of Exam Regulation 6(b) that Miss Kaur intended to use the unauthorised item to gain an unfair advantage for herself or others in the exam and/or a future exam; it will be for Miss Kaur to prove that she did not intend to use the 'unauthorised item' for this purpose.

12. ACCA contended that Miss Kaur's explanation that she was using the phone as a calculator and had to hold it above the desk as the desk was too small is not consistent with the footage. It submitted that the more likely explanation is that Miss Kaur was taking photos or recording exam content. ACCA submits that this conduct would be deemed dishonest by the standards of ordinary decent people.

13. ACCA submitted that if the Committee does not make a finding of dishonesty, then it should find that Miss Kaur has acted without integrity.

14. ACCA contended that the dishonest conduct of trying to cheat in a professional exam clearly reached the threshold for misconduct. There was an alternative liability to disciplinary action.

MISS KAUR'S SUBMISSIONS

15. Miss Kaur admitted that she had an unauthorised mobile phone in her possession in the exam contrary to Exam Regulation 5. However, she

denied any attempt to gain an unfair advantage or that she was dishonest or lacking integrity as set out in the allegations.

16. In her email response to ACCA questions, dated 24 July 2025, Miss Kaur stated:

1. Please confirm whether you read the Exam Regulations and Guidelines before sitting the exam?

Yes, I confirm that I read and understood the Exam Regulations and Guidelines before sitting the exam. I am profoundly sorry for my actions that have inadvertently violated these regulations, and I take full responsibility for my lapse in judgement.

2. Do you admit or deny allegation 1, namely that you failed to adhere to ACCA's Exam Guidelines by not keeping your mobile phone out of arm's reach and possessing an item, namely a mobile phone, at your desk during the Exam?

Yes, I admit that I failed to adhere to ACCA's Exam Guidelines by not keeping your mobile phone out of arm's reach and possessing it during the Exam. I am extremely sorry for this oversight and the distress it has caused. I acknowledge that my actions were a breach of the rules, and I deeply regret them. I denied during the exam that I do not have the mobile phone as I panicked. I sincerely hope you can consider granting me another opportunity to prove my commitment to these regulations.

3. Do you admit or deny allegation 2, namely that you misled the exam proctor by giving false or misleading information in relation to the *possession and use of a mobile phone including when the matter was discussed as outlined at line 23 in the attached chronology of observations, including when you stated "I haven't clicked the exam screen" ", and "no I haven't , that's what I'm saying" and then I didn't do it" when this was not the case?*

Yes, I admit that I denied when asked by the proctor whether I have the mobile phone. I deeply regret my responses at the time. My statement was inaccurate and I sincerely apologise for not being fully transparent. This was a regrettable moment of panic, and I assure you it was not intended to deceive.

But, I deny the statement that I clicked the pictures of the exam screen. To clarify the situation, I used my mobile phone solely to utiise its calculator function, as I believed that I needed to save time during the exam. I know there is an on-screen calculator available during the exam but I used it to save my time during the exam as it takes a lot of time to perform calculations using the on-screen calculator.

White I understand this is not an excuse, it was the sole purpose. I can confirm, as seen in the video, that the mobile phone was not prominently displayed in front of the webcam. If I had to click the pictures I would have obviously kept my hand in front of the screen so that I can cover the whole screen to take a clear picture. But this was not the case, I solely used it for the calculator function. The nature of the Financial Reporting exam is practical, we cannot find hithe answers for such questions online.

4. *If so, please explain why you appear to have attempted to mislead the proctor?*

I am extremely sorry for my previous statement where I asserted that I do not have a mobile phone. At that moment, I panicked and regrettably denied possessing the item. I now fully realise that I should have been completely honest when asked about this, and I deeply apologise for my misleading statement. My intention was never to deceive, but rather a regrettable reaction driven by intense anxiety during the exam. I understand the gravity of misleading the proctor, and I assure you that I have learned an invaluable lesson from this experience. I truly hope that you can see beyond this momentary lapse and grant me the opportunity to redeem myself. I will not repeat this mistake.

5. *Do you admit or deny allegation 3, namely that you used an unauthorised item, namely a mobile phone, during the Exam and did so to gain an unfair advantage?*

   I admit that I used a mobile phone during the exam, and I sincerely regret this.

   However, I would like to clarify again that my intention was not to gain an unfair advantage or to search for answers online. I used the mobile phone solely to access its calculator function to perform calculations. As this was a Financial Reporting exam, which is inherently practical and involves significant calculations, we cannot easily search answers online for this exam. I relied on the calculator to manage my time effectively on the exam.

6. *Do you admit or deny allegation 4, namely that you used the unauthorised item, namely a mobile phone, to take photographs of live Exam content?*

I deny the allegation that I used the mobile phone to take photographs of the exam content. My only use of the mobile phone was to utlise its calculator function for the reasons previously explained. I understand the seriousness of this allegation, and I want to assure you that my actions were strictly limited to using the calculator and did not involve any attempt to capture exam content. I would never compromise the integrity of the exam in such a way.

7. *Please explain where your mobile phone was placed during the check-in process.*

   During the check-in process, my mobile phone was placed in my pocket. I deeply regret not having ensured it was completely out of reach and sight as per the regulations from the very beginning.

8. *Why were you using your mobile phone in the manner shown in the video? Please confirm exactly what you were doing at the time.*

   I sincerely apologise for using my mobile phone in the manner shown in the video.

   At that time, I was using the calculator application on my mobile phone. I raised it above the table level because I was using a small study table, and there was not enough space on the table surface to place the phone without it being an obstruction to my workspace. While this explains the physical action, it in no way excuses my decision to use an unauthorised item. I am truly remorseful for this poor judgement and the breach of exam integrity it represents. I fully understand that I should have adhered strictly to the permitted

resources. I assure you this was a desperate attempt to manage my time during a challenging exam, and not an attempt to cheat.

9. *If you did take photographs of ACCA exam content, please send these to me immediately. Once you have sent the photographs to me, you are required to delete any photographs/images of the exam questions in your possession and/or on an item or electronic communication device which you own.*

   I can state that I did not take any photographs of the exam screen or any ACCA exam content. I do not possess any such images or exam related data in any form on my phone or any other electronic device.

10. *Please confirm whether the photographs were distributed. If so, please confirm how many individuals you shared the photographs with. Please provide details of any persons with whom you shared the exam questions. If the photographs were distributed online, please provide further information in relation to the platform/group used.*

    As I stated previously and wish to reiterate, I have not clicked any photographs of the exam screen. Therefore, I can confirm with absolute certainty that I have not shared any exam related material with anyone, nor have I distributed anything online. My deepest apologies if my actions have caused any suspicion regarding the integrity of the exam process. I assure you my intentions were never to compromise it.

11. *If you did not take photographs of ACCA content but you did copy the content in another format, please provide further information regarding what was copied and whether the content was distributed.*

I can confirm that the exam content was neither shared nor copied in any format. My sole interaction with the exam was to attempt to complete the questions, with the regrettable exception of using the calculator application on my phone.

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12. *Were you seeking assistance with the Exam or seeking to assist others in taking the Exam?*

I was seeking assistance for myself, by using the calculator application on my mobile phone. This was done out of a misguided attempt to manage my time more efficiently during the exam, and not to seek external assistance with solving questions or to assist anyone else.

13. *Did you pay a third party to assist you with the Exam? If so, how was the assistance given?*

No, I did not pay any third party for assistance. My actions were entirely my own and solely involved the unauthorised use of the calculator on my mobile phone. I assure you that there was no external involvement or payment for any form of assistance.

14. *Did you receive payment or other reward for taking or facilitating the taking of photographs of ACCA exam questions, please provide details of who asked you to do this.*

No, I did not receive any payment or reward from anyone for taking or facilitating the taking of photographs of ACCA exam questions.

15. *Please provide me with any other comments you wish to be considered in relation to this complaint.*

The mobile phone that was seen on the dressing table was a different device and the one that I had in my pocket was a different mobile phone. I fully understand that any device other than the permitted laptop and mouse is strictly prohibited not during the remote exam and I am deeply remorseful for my failure to comply with the exam regulations. This experience has been a profound lesson for me, and I assure you that I will adhere to all regulations in the future.

I come from a middle-class family and I have poured countless hours of hard-work, dedication and financial resources into preparing for these exams. This opportunity means the world to me and my future. I have worked incredibly hard to prepare for these exams, and the thought of losing all that effort due to a moment of panic and poor judgement is truly devastating.

I sincerely apologise for the anxiety and inconvenience I have caused. I deeply regret my actions and the misleading statements made under pressure. I humbly request that you consider my genuine remorse, my commitment to learning from this mistake, and my earnest desire to pursue my ACCA qualification with integrity.

Please, I beg you to give me another chance to prove that I can and will uphold the high standards expected of ACCA candidates. I promise this will never happen again.

17. Miss Kaur gave oral evidence to the Committee and maintained her denial of dishonest conduct. She maintained that she had not used her phone to cheat but rather used it as a calculator.

DECISION ON ALLEGATIONS AND REASONS

18. The Committee accepted the advice of the Legal Adviser. The Committee reminded itself that the burden of proving the case was on ACCA and had regard to the observation of Collins J in Lawrance v General Medical Council on the need for cogent evidence to reach the civil standard of proof in cases of dishonesty. The standard of proof to be applied throughout was the ordinary civil standard of proof, namely the 'balance of probabilities'. The Committee reminded itself to exercise caution in relation to its reliance on documents.

19. The Committee heard that there had been no previous findings against Miss Kaur and accepted that it was relevant to put her good character into the balance in her favour.

Allegation 1.

Failed to adhere to ACCA's Exam Guidelines to 'move mobile phones… out of arm's reach' and/or possessed an item at her desk and/or on her person which was not on the list of permitted items in the Exam Guidelines, contrary to Exam Regulation 1.

20. This allegation was admitted by Miss Kaur and the Committee was satisfied that it was proved by virtue of her admission in accordance with CDR Regulation 12 (3).

Allegation 2

Was in possession of and/or used an unauthorised item, namely a mobile phone with camera, during the Exam, contrary to Exam Regulation 5(a) and/or 5(b).

21. This allegation was admitted by Miss Kaur and the Committee was satisfied that it was proved by virtue of her admission in accordance with CDR Regulation 12 (3).

Allegation 3

Used the above referenced unauthorised item to take photographs/recordings of the Exam content, contrary to Exam Regulation 13.

22. This allegation was denied by Miss Kaur. The Committee noted Miss Kaur's explanation that she used the mobile phone as a calculator and not to take photographs or recordings of the exam's content. It carefully considered her explanation and also had regard to the video evidence where she is shown holding the mobile phone. It noted that she explained there had been a difficulty using the on-screen calculator during previous exams and so used her phone calculator. The Committee paid particular attention to how Miss Kaur was shown holding the phone on the video and her explanation of the angle at which it was held and how this made taking photographs of the screen less likely. The Committee accepted her explanation as plausible and consistent with her written accounts. It was not persuaded that ACCA

had discharged the burden of proving this allegation. Accordingly, the Committee was not satisfied that Allegation 3 was proved.

Allegation 4

4. Gave the exam proctor false or misleading information about the said unauthorised item, contrary to Exam Regulation 3.

23. This allegation was admitted by Miss Kaur and the Committee was satisfied that it was proved by virtue of her admission in accordance with CDR Regulation 12 (3).

Allegation 5

5. Miss Srijanjeet Kaur's conduct in respect of any or all of the above was:

a) Dishonest, in that she intended to use or used an unauthorised item, a mobile phone with camera, during the Exam to gain an unfair advantage in the exam and/or a future exam; or in the alternative:

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

24. This allegation was denied by Miss Kaur.

25. The Committee first asked itself whether Miss Kaur's conduct was dishonest in that by using her mobile phone during the exam she intended to gain an advantage in the exam. The Committee asked itself what Miss Kaur's belief was as to the facts - what was her state of mind as to the facts at the time.

26. Miss Kaur confirmed that she knew the Regulations and knew that she should not have her mobile phone with her or use it during the exam. She had maintained consistently – even to the proctor at the time – that she was not cheating. The Committee was fully mindful of the operation of the reverse burden under Exam Regulation 6 b.

27. The Committee considered that Miss Kaur had given a plausible explanation to counter ACCA's case. Whilst the Committee was satisfied that Miss Kaur was extremely foolish to have had the phone with her during the exam and that she knew that this was in breach of the exam regulations, it considered that she had given a plausible, consistent and credible account of what she was doing with the phone.

28. The Committee accepted Miss Kaur's evidence that she did not intend to gain an unfair advantage. The Committee was satisfied that Miss Kaur had rebutted the assumption under Exam Regulation 6 that she had intended to gain an unfair advantage. The Committee considered that the most likely explanation for her possession of the phone was to use it as a calculator and not to use the unauthorised phone to gain an unfair advantage in the exam.

29. The Committee was satisfied, given its findings of fact, that Miss Kaur's state of mind was not to use the mobile phone with the intention of gaining an unfair advantage, in other words, to cheat. Accordingly, it was satisfied that Allegation 5 (a) was not proved. In the circumstances and its finding of fact the Committee was not satisfied that the conduct reached the threshold to be a want of integrity and therefore allegation 5 (b) was not proved.

Allegation 6

6. By reason of the above, Miss Kaur is:

a) guilty of misconduct pursuant to bye-law 8(a)(i) in respect of any or all of the conduct above; or in the alternative:

b) liable to disciplinary action pursuant to bye-law 8(a)(iii) in respect of any or all of the conduct in allegations 1 to 4 above.

30. The Committee next asked itself whether the admitted and proved allegations rendered Miss Kaur guilty of misconduct.

31. The Committee had regard to the definition of misconduct in Bye-law 8(c) and the assistance provided by the case law on misconduct. It was satisfied that Miss Kaur's actions brought discredit on her, the Association and the accountancy profession. It was satisfied that breaching the exam regulations and giving false information to the Proctor was deplorable conduct and reached the threshold of seriousness for misconduct. Her conduct therefore had the potential to undermine the integrity of ACCA's examination system and public confidence in those taking the examinations and thus the profession.

32. In the light of its judgment on misconduct, no finding was needed upon liability to disciplinary action. Accordingly, it was satisfied that Allegation 6 (a) was proved and did not consider the alternative of Allegation 6 (b).

SANCTIONS AND REASONS

33. The Committee noted its powers on sanction were those set out in Regulation 13(4). It had regard to ACCA's Guidance for Disciplinary

Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate. It accepted the advice of the Legal Adviser.

34. The Committee considered that the conduct in this case was very serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour.

35. The Committee identified the following mitigating factors:

- Miss Kaur was of good character with no previous disciplinary record
- She had made admissions.
- She has shown insight and expressed apology

36. The Committee identified the following aggravating factors:

- There was an attempt to cover up the misconduct
- This was pre-planned deliberate misconduct
- Potential damage to the examination system
- Potential to undermine the reputation of the profession

37. Given the Committee's view of the seriousness of Miss Kaur's conduct, it was satisfied that the sanctions of No Further Action, Admonishment, Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. The conduct could not be described as of a minor nature sufficient to justify a Reprimand. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the Guidance were present including that the conduct was isolated, she had cooperated and there was no repetition.

The Committee was satisfied that in the circumstances a Severe Reprimand was a sufficient and proportionate sanction given the seriousness of the conduct. The Committee was satisfied that this sanction was sufficient to mark the seriousness to the profession and the public.

COSTS AND REASONS

38. ACCA claimed costs of £5,717.50 and provided a schedule of costs. The Committee had regard to ACCA's guidance on costs and the submissions of both parties on costs. It noted Miss Kaur is in employment but that she had not provided a statement of means and there was no documentary evidence before it to support what she stated as to her income and savings. The Committee decided that it was appropriate to award costs in this case, and considered the costs claimed to be reasonably incurred. The Committee considered it appropriate to make some reduction in the costs given the fact that the case took less time today than anticipated and given that some of the allegations were not proved. Nonetheless it was satisfied that the majority of the costs were justified. It concluded that given the information before it, the proportionate and appropriate amount of costs was £5,000. Accordingly, it ordered that Miss Kaur pay ACCA's costs in the amount of £5,000.00.

HH Suzan Matthews KC
Chair
27 November 2025