

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: Mr Run Feng Zhao

Heard on: Friday, 17 April 2026

Location: Held remotely, via MS Teams

Committee: Ms Melissa D'Mello (Chair)
Ms Wanda Rossiter (Accountant)
Mr Andy Skelton (Lay)

Legal Adviser: Ms Jane Kilgannon

Persons present

and capacity: Ms Michelle Terry (ACCA Case Presenter)
Ms Anna Packowska (Hearings Officer)

Summary: Allegations 1(a), 1(b), 2(a), 2(b), 4(a), 4(b), 4(c) and 5(a)
were found proved
Exclusion from membership with immediate effect

Costs: Mr Zhao to pay £5,987.00 towards ACCA's costs

ACCA



+44 (0)20 7059 5000



info@accaglobal.com



www.accaglobal.com



The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom

1. The Disciplinary Committee (the Committee) convened to consider the case of Mr Run Feng Zhao (Mr Zhao).
2. Ms Michelle Terry (Ms Terry) represented the Association of Chartered Certified Accountants (ACCA). Mr Zhao did not attend 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 in advance the following documents:
 - a. a hearing bundle (pages 1 to 263);
 - b. a bundle of 'performance objectives relating to complaint against' Mr Zhao (pages 1 to 69); and
 - c. a service bundle (pages 1 to 18).

SERVICE OF PAPERS

7. The Committee considered whether the appropriate documents had been served on Mr Zhao in accordance with the Regulations.
8. The Committee accepted the advice of the Legal Adviser, who referred it to Regulations 10 and 22 of the Regulations, and in particular the requirement that notice of the hearing must be served no later than 28 days before the date of the hearing unless there are exceptional circumstances.

9. The Committee noted the written notice of the hearing scheduled for today, 17 April 2026, that had been sent by electronic mail (email) to Mr Zhao's registered email address on 20 March 2026. It also noted the subsequent emails sent to him with the necessary link and password to enable him to gain access to the letter and the documents relating to this hearing.
10. 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, that is, 20 March 2026. On the basis of that documentation, the Committee was satisfied that the notice of hearing had been served on Mr Zhao on 20 March 2026, 28 days before the date of today's hearing.
11. The Committee noted the contents of the notice of hearing and was satisfied that it contained all of the information required by Regulation 10 of the Regulations.
12. The Committee concluded that service of the notice of hearing had been effected in accordance with Regulations 10 and 22 of the Regulations.

PROCEEDING IN ABSENCE

13. Ms Terry made an application that the hearing proceed in the absence of Mr Zhao.
14. The Committee, having satisfied itself that the requirements of Regulations 10 and 22 of the Regulations had been complied with, went on to consider whether to proceed in the absence of Mr Zhao.
15. The Committee took into account the submissions of Ms Terry. The Committee accepted and took into account the advice of the Legal Adviser, who referred it to Regulation 10(7) of the Regulations, the ACCA document 'Guidance for

Disciplinary Committee hearings' and the relevant principles from the cases of *R v Jones* [2002] UKHL 5, and *GMC v Adeogba and GMC v Visvardis* [2016] EWCA Civ 162.

16. The Committee bore in mind that its discretion to proceed in the absence of Mr Zhao must be exercised with the utmost care and caution.
17. The Committee noted that ACCA had sent the notice of hearing to Mr Zhao at his registered email address and had sent further correspondence to Mr Zhao at that email address on 14 April 2026, 15 April 2026 and 16 April 2026, but received no response. It also noted that ACCA had made an attempt to contact Mr Zhao by telephone on 15 April 2026, but that the call had not been answered and a voicemail message was left.
18. On the basis of the evidence set out above, the Committee was satisfied that ACCA had made reasonable efforts to notify Mr Zhao about today's hearing and that Mr Zhao knew or ought to know about the hearing. The Committee noted that Mr Zhao had not applied for an adjournment of the hearing and there was no indication that such an adjournment would secure his attendance on another date. Furthermore, there was no evidence that Mr Zhao was absent due to incapacity or illness. The Committee therefore concluded that it was more likely than not that Mr Zhao had voluntarily absented himself from the hearing.
19. The Committee considered that any disadvantage to Mr Zhao in not being present at the hearing to provide his account of the relevant events could be addressed by the Committee's thorough assessment of the evidence presented by ACCA and the opportunity for Committee questions to test the evidence presented by ACCA.
20. The Committee was mindful that there is a public interest in dealing with regulatory matters expeditiously.

21. Having balanced the public interest with Mr Zhao's own interests, the Committee decided that it was fair, appropriate and in the interests of justice to proceed in Mr Zhao's absence.

ALLEGATIONS

Schedule of Allegations

Run Feng Zhao ('Mr Zhao'), at all material times an ACCA trainee,

1. *Applied for membership to ACCA on or about 12 February 2022 and in doing so purported to confirm in relation to his ACCA Practical Experience training record:*

a) *His Practice Experience Supervisor in respect of his practical experience training in the period from 5 September 2018 to 12 February 2022 was Person 'A' when Person 'A' did not supervise that practical experience training in accordance with ACCA's requirements as published from time to time by ACCA or at all*

b) *He had achieved the following Performance Objectives:*

- *Performance Objective 1: Ethics and professionalism*
- *Performance Objective 4: Governance, risk and control*
- *Performance Objective 5: Leadership and management*
- *Performance Objective 8: Analyse and interpret financial reports*
- *Performance Objective 9: Evaluate investment and financing decisions*
- *Performance Objective 10: Manage and control working capital*
- *Performance Objective 11: Identify and manage financial risk*

2. *Mr Zhao's conduct in respect of the matters described in Allegation 1 above was:*

- a) *In respect of Allegation 1a), dishonest in that Mr Zhao sought to confirm his Practical Experience Supervisor did supervise his practical experience training in accordance with ACCA's requirements or otherwise which he knew to be untrue.*
- b) *In respect of Allegation 1b), dishonest in that Mr Zhao knew he had not achieved all or any of the performance objectives referred to in Allegation 1b) above as described in the corresponding performance objective statements.*
- c) *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), 2b) and 2c) above, such conduct was reckless in that Mr Zhao paid no or insufficient regard to ACCA's requirements to ensure:*

- a) *His practical experience was supervised;*
- b) *His Practical Experience Supervisor was able to personally verify the achievement of the performance objectives he claimed and/or verify they had been achieved in the manner claimed;*
- c) *That the performance objective statements referred to in paragraph 1b) accurately set out how the corresponding objective had been met.*

4. *Failed to co-operate with ACCA's Investigating Officer in breach of Complaints and Disciplinary Regulation 3(1) in that he failed to respond fully or at all to any or all of ACCA's correspondence dated*

- a) *10 October 2023*
- b) *25 October 2023*
- c) *9 November 2023*

5. *By reason of his conduct, Mr Zhao is:*

a) Guilty of misconduct pursuant to ACCA bye-law 8(a)(i) in respect of any or all the matters set out at 1 to 4 above; in the alternative in respect of Allegation 4 only;

b) Liable to disciplinary action pursuant to bye-law 8(a)(iii).

BRIEF BACKGROUND

22. Upon an ACCA student completing all of their ACCA exams, they become an ACCA affiliate (also known as an ACCA trainee). However, in order to apply for membership, they are required to obtain at least 36 months' practical experience in a relevant role (practical experience).
23. The practical experience involves the completion of nine performance objectives (POs) under the supervision of a qualified accountant, which are recorded in a Practical Experience Requirement (PER) training record. In addition to approval of their POs, a trainee must ensure that their employment where they have gained relevant practical experience has been confirmed by the trainee's line manager who is usually also the trainee's practical experience supervisor (PES). This means that the same person can and often does approve both the trainee's time and achievement of POs.
24. If the trainee's line manager is not a qualified accountant, the trainee can nominate a supervisor who is external to the firm to supervise their work and approve their POs. This external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor.
25. Once all nine POs have been approved by the trainee's PES (whether internal or external) and their minimum 36 months of practical experience has been signed off, the trainee is eligible to apply for membership of ACCA.

26. ACCA became aware of 15 particular ACCA trainees and noted that:
 - a. they shared most of the same PO statements as each other and/or the same PES; and
 - b. the PO statements were all approved between 11 August 2021 and 17 October 2022.
27. Mr Zhao was one of those 15 ACCA trainees.
28. Mr Zhao became an ACCA affiliate on 17 July 2017. Following submission of a PER training record on 12 February 2022, Mr Zhao became an ACCA member on 17 February 2022.
29. Mr Zhao's PER training record included the following information:
 - a. Employment by Company A as an 'Equity Analyst' from 5 September 2018 to 12 February 2022, gaining 41 months of relevant practical experience;
 - b. Person A registering as Mr Zhao's 'IFAC qualified line manager' on 12 August 2017; and
 - c. Person A approving Mr Zhao's 41 months employment at Company A and all nine PO statements on 12 February 2022.
30. On 29 November 2023 ACCA contacted Person A by email, using the email address provided for Person A on Mr Zhao's PER training record. ACCA asked Person A about 12 ACCA trainees for whom they had approved PER training records. On 30 November 2023 Person A replied, confirming that they had supervised those ACCA trainees as set out in their PER training records and confirming that they had worked at two different organisations – Company A and Company B – for overlapping periods of time. On 21 December 2023 ACCA again wrote to Person A by email, asking for their consent to contact

Company A and Company B directly for verification of the information provided by Person A. On 22 December 2023 Person A replied, advising ACCA that Company A and Company B are not officially registered companies but, rather, *“private organization[s] set up by my friends and me. And both are no longer existing”*. They added that they were sorry to have caused trouble and that, considering that some of their behaviour had been inappropriate, they had decided to resign their ACCA membership.

31. On 16 January 2024 Person A sent another email to ACCA stating, *“I would like to be honest with you”* and confirming that they had not supervised any of the 12 ACCA trainees for whom they had provided PER training record approvals, and that Company A and Company B no longer exist and have had no connection with the PER training of the 12 ACCA trainees. They stated that *“those trainees or their representors contacted me through acquaintances or other channels, but I did not supervise their work (Sic). In the previous investigation phase, all the materials I provided to you were untrue, and I deeply apologize for this behavior”*. No further correspondence has been received from Person A.
32. In respect of Mr Zhao’s nine PO statements, ACCA’s analysis indicated that:
 - a. the content of two of the PO statements was the ‘first in time’ to be used in an ACCA membership application; and
 - b. the content of seven of the PO statements was identical or significantly similar to the PO statements contained in the PER training records of other ACCA trainees.
33. ACCA sent a letter to Mr Zhao by encrypted email on 10 October 2023 asking Mr Zhao to respond to a number of questions related to the concern about his PER training record by 24 October 2023. On the same day ACCA sent an unencrypted email alerting Mr Zhao to the encrypted email and asking him to

check if he had received it. ACCA's case management system indicated that the encrypted email was first opened at 04:36 on 12 October 2023.

34. As no reply was received from Mr Zhao, ACCA sent a further letter to Mr Zhao by encrypted email on 25 October 2023, requiring a response by 8 November 2023. On the same day ACCA sent an unencrypted email alerting Mr Zhao to the encrypted email and asking him to check if he had received it. ACCA's case management system indicated that the encrypted email was first opened at 13:26 on 26 October 2023.
35. ACCA attempted to contact Mr Zhao by telephone, using his registered telephone number, on 31 October 2023 but the call was not answered and an automated message stated that the line was busy.
36. As no reply was received from Mr Zhao, ACCA sent a further letter to Mr Zhao by encrypted email on 9 November 2023, requiring a response by 23 November 2023. On the same day ACCA sent an unencrypted email alerting Mr Zhao to the encrypted email and asking him to check if he had received it. No response was received.
37. ACCA again attempted to contact Mr Zhao by telephone, using his registered telephone number, on 14 November 2023 but the call was not answered and an automated message stated that the line was busy.
38. On 17 January 2024 ACCA's China office sent a mobile telephone message to Mr Zhao using his registered telephone number, alerting him to the ACCA encrypted emails sent to him on 10 October 2023, 25 October 2023 and 9 November 2023, and requiring a response. ACCA's China Office has provided a spreadsheet indicating that the text message was "*unsuccessfully*" delivered and "*blocked*".

39. On 27 November 2025 a Disciplinary Committee of ACCA found Person A guilty of misconduct and excluded him from ACCA membership with immediate effect.

DECISION ON FACTS AND REASONS

40. As no admissions had been made by Mr Zhao, it was for ACCA to prove its case in relation to each of the allegations put forward.
41. The Committee considered with care all of the evidence presented and the submissions made by Ms Terry on behalf of ACCA.
42. The Committee accepted the advice of the Legal Adviser. In relation to the factual allegations, the burden of proof rested on ACCA and the standard of proof was the civil standard, the balance of probabilities. In relation to the allegation of misconduct, there was no burden or standard of proof to apply. Whether any conduct found proved amounted to misconduct was a matter for the judgement of the Committee.
43. The Committee acknowledged the Disciplinary Committee determination in relation to Person A dated 27 November 2025 but placed no weight on it in relation to its decision-making in this case. The Committee instead relied on the relevant underlying documentation relating to Mr Zhao's ACCA membership application and ACCA correspondence with both Mr Zhao and with Person A.

Allegations 1(a) and 1(b) – Proved

44. The Committee noted that ACCA had received Mr Zhao's PER training record on 12 February 2022, submitted to ACCA as part of his application for ACCA membership. It included a claim of 41 months of practical experience and nine POs, all approved by Person A.

45. The Committee noted that seven of the nine POs set out in Mr Zhao's PER training record were those set out in Allegation 1(b), namely POs 1, 4, 5, 8, 9, 10 and 11.
46. The Committee also noted that Person A had responded to correspondence from ACCA stating that they had not supervised Mr Zhao's practical experience. Given that the account now provided by Person A appeared to be detailed, not? consistent with the available documentary evidence, and Mr Zhao had not responded to correspondence from ACCA to seek to challenge that account, the Committee found it more likely than not that Person A did not supervise Mr Zhao's practical experience.
47. Taking all of those matters into account, the Committee was satisfied that, when he applied for membership of ACCA, Mr Zhao had:
 - a. claimed to have undertaken 41 months practical experience supervised by Person A when, in fact, Person A did not supervise his practical experience; and
 - b. claimed to have achieved POs 1, 4, 5, 8, 9, 10 and 11.
48. Accordingly, Allegations 1(a) and 1(b) were found proved.

Allegations 2(a) and 2(b) – Proved

49. The Committee considered whether Mr Zhao had acted dishonestly when confirming that Person A had supervised the practical experience in his PER training record and when confirming that he had achieved POs 1, 4, 5, 8, 9, 10 and 11 as set out in his PER training record.
50. Given the account now provided by Person A, that he did not supervise Mr Zhao's practical experience and that Company A had no connection with the training of any ACCA trainee, the Committee found that Mr Zhao must have

known that when he told ACCA that he had completed 41 hours of practical experience at Company A, supervised by Person A, that he was making an inaccurate statement. The Committee noted that Mr Zhao had not responded to ACCA's correspondence asking him questions about his ACCA membership application. He had not provided an alternative, potentially innocent, explanation, and none of the available evidence appeared to indicate that there might be an alternative, potentially innocent, explanation for the inclusion of that inaccurate information in Mr Zhao's ACCA membership application.

51. The Committee noted the advice set out for ACCA trainees in ACCA's guidance document 'PER – Practical experience requirements'. In particular, the Committee noted the following statement in that document "*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*".
52. The Committee was provided with analysis by ACCA showing that seven of Mr Zhao's nine PO statements were the same or significantly similar to the POs of a number of other ACCA trainees and were not 'first in time'. The Committee reviewed those seven PO statements in Mr Zhao's PER training record and those of the other ACCA trainees and found that seven of Mr Zhao's nine PO statements (namely, in relation to POs 1, 4, 5, 8, 9, 10 and 11) were the same or significantly similar to the PO statements of a number of other ACCA trainees.
53. Given that seven of Mr Zhao's nine PO statements were the same or similar to the PO statements of other ACCA trainees, the Committee considered it to be inherently unlikely that the content of those seven PO statements was genuine and Mr Zhao's own work, as is required. In the absence of any alternative explanation from Mr Zhao, the Committee found, on the balance of probabilities, that the most likely explanation for the similarity between seven of Mr Zhao's nine PO statements and those of the other ACCA trainees, was that Mr Zhao had copied, or allowed to be copied, wording from that used in

the PER training record of others or had drawn wording from a shared pool of sample PO statements. On that basis, the Committee found that the content of those seven of Mr Zhao's nine PO statements was not a true reflection of his experience.

54. The Committee considered whether Mr Zhao would have been aware that he was required to submit his own objectives and could not use those of others, even as templates or precedents. Copies of the documents that would have been available to Mr Zhao prior to submission of his PER training record were reviewed. These documents included the 'PER – Practical experience requirements', referenced above. Having reviewed those documents, the Committee was satisfied that it would have been clear to Mr Zhao, if he had read those guidance documents, that the PO statements provided must be his own.
55. The Committee considered that it was reasonable for ACCA to have expected Mr Zhao to be able to understand this guidance provided in the English language. ACCA China has provided a number of pieces of relevant ACCA guidance on the PER in Mandarin, plus live webinars and WeChat groups also in Mandarin, providing additional assistance to ACCA trainees who were Mandarin speakers. Therefore, there would have been no reason for Mr Zhao to have been under any misapprehension that he was permitted to copy or borrow from the PO statements of other ACCA trainees when submitting his own PO statements.
56. Applying the test for dishonesty set out in the case of *Ivey v Genting Casinos (UK) Limited* [2017] UKSC 67, the Committee first considered what Mr Zhao's subjective state of mind was at the relevant time. The Committee noted that Mr Zhao was of previous good character and took this into account.
57. The Committee noted that the relevant documentation had been submitted to ACCA via Mr Zhao's 'My ACCA' online account. Given that only Mr Zhao, or persons to whom Mr Zhao had given his 'My ACCA' log on details and

password, would be able to access that account, the Committee was satisfied that Mr Zhao would have been aware of the documentation being submitted to ACCA in support of his ACCA membership application. Mr Zhao was also in a position to be fully aware of whether the practical experience, supervision and PO statements listed on ACCA documentation were a true reflection of his unique training experience or not. The Committee considered that, at the time that Mr Zhao submitted his PER training record, he would have been aware that Person A had not supervised 41 months of practical experience and that the wording he had used in seven of his nine POs was not his own wording. He would therefore have been aware that the information provided in his ACCA PER training record did not amount to an accurate description of his own unique practical experience. Therefore, when he submitted his PER training record, Mr Zhao would have been aware that the training record contained false information and that the false information could mislead ACCA into believing that he had undertaken 41 months of practical experience supervised by Person A and achieved the PO statements as set out in the training record, when he had not.

58. Applying the second stage of the test for dishonesty, the Committee considered whether an ordinary decent member of the public would find Mr Zhao's conduct to be dishonest by objective standards. The Committee considered that the public expected members of the accountancy profession to be truthful in all of their conduct, in particular in the course of their professional communications. For that reason, the Committee found that Mr Zhao's conduct, in knowingly providing his regulator with misleading information, was objectively dishonest.
59. Accordingly, Allegations 2(a) and 2(b) were found proved.
60. Given the Committee's finding in relation to Allegations 2(a) and 2(b), it was not necessary for it to consider the matters alleged in the alternative, namely Allegations 2(c) and 3(a), 3(b) and 3(c).

Allegations 4(a), 4(b) and 4(c) – Proved

61. Copies of the letters sent by email to Mr Zhao following the referral of the matter to ACCA's Investigation team were provided. They were dated 10 October 2023, 25 October 2023 and 9 November 2023. The Committee noted that the letters were each sent to the email address provided to ACCA by Mr Zhao as his registered email address, and that the letters dated 10 October 2023 and 25 October 2023 had each been opened within a day or two of being sent.
62. The Committee noted that reference is made in the emailed letters to the part of the Regulations that require ACCA members to cooperate with ACCA investigations.
63. Given that the three emails were sent to his registered email address, and that two of the three emails had been recorded on ACCA's system as having been opened, the Committee was satisfied that it was more likely than not that Mr Zhao did receive all three emails and, having read them, would have been aware of ACCA's investigation into his conduct and the requirement to respond to ACCA's questions.
64. The Committee noted that Mr Zhao was under a duty to cooperate with the ACCA investigation into his conduct. The Committee considered that cooperation with ACCA required a full and prompt response to ACCA's questions. As no response had been provided, the Committee considered that Mr Zhao had failed to discharge his duty to cooperate with ACCA's investigation.
65. Accordingly, Allegations 4(a), 4(b) and 4(c) were found proved.

Allegation 5(a) – Proved

66. The Committee found that, in dishonestly submitting false information to ACCA in his PER training record, Mr Zhao's conduct had fallen far short of what would

be expected of an ACCA member and was serious enough to amount to misconduct. Mr Zhao's dishonest behaviour enabled him to obtain ACCA membership without completing the requisite approved practical experience. As such, the conduct had put members of the public, employers and clients at risk of harm and had the potential to undermine public confidence in ACCA's qualifications and membership, and to bring the profession into disrepute.

67. The Committee found that, in failing to co-operate with ACCA's investigation into his conduct, Mr Zhao's conduct had fallen far short of what would be expected of an ACCA member and was serious enough to amount to misconduct. Mr Zhao's failure had the potential to undermine ACCA's ability to function effectively as a regulator and therefore risked bringing both ACCA and the profession into disrepute.
68. Accordingly, Allegation 5(a) was found proved in respect of Allegations 1(a), 1(b), 2(a), 2(b), 4(a), 4(b) and 4(c).
69. Given the Committee's finding in relation to Allegation 5(a), it was not necessary for it to consider the matter alleged in the alternative, namely Allegation 5(b).

SANCTION AND REASONS

70. In reaching its decision on sanction, the Committee took into account the submissions made by Ms Terry on behalf of ACCA. The Committee also referred to ACCA's 'Guidance for Disciplinary Sanctions'. The Committee accepted the advice of the Legal Adviser including the following principles:
 - a. The purpose of a sanction is not to punish, but to protect the public, maintain public confidence in the profession and to maintain proper standards of conduct;

- b. Any sanction must be proportionate, so the Committee must balance the interests of the member with the interests of wider ACCA membership and the public; and
 - c. The Committee must consider the available sanctions in order of severity, starting with the least severe first.
71. The Committee considered the following to be aggravating features of this case:
- a. Mr Zhao's conduct appeared to be pre-meditated and planned;
 - b. Mr Zhao derived a personal benefit from his dishonest conduct (ACCA membership and the associated permission to undertake work as a member for remuneration); and
 - c. Mr Zhao's conduct had the potential to undermine public confidence in ACCA qualifications and membership and ACCA's reputation as a regulator.
72. The Committee considered that a mitigating feature of the case was the absence of any previous regulatory findings against Mr Zhao.
73. The Committee had reference to Section F of the guidance document, which indicated that 'deceiving/misleading ACCA/statutory regulator' and 'failure to co-operate with a disciplinary investigation' would usually be regarded as 'very serious'. The Committee considered that there was no aspect of this case that would give it any reason to depart from that approach. Therefore, reflecting on its earlier findings and with reference to the relevant guidance, the Committee assessed the conduct found proved in this case – taken both individually and collectively - to be very serious.

74. The Committee considered taking no action against Mr Zhao. However, given the seriousness of his conduct, including dishonesty, the Committee considered that it would be inappropriate to take no action.
75. The Committee considered imposing an admonishment on Mr Zhao. The Committee noted that the guidance indicated that an admonishment would be appropriate in cases where most of the following are present: evidence of no loss or adverse effect on client / members of the public; early admission of the facts alleged; insight into failings; isolated incident; not deliberate; genuine expression of remorse/apology; corrective steps have been taken promptly; subsequent work satisfactory; and relevant and appropriate testimonials and references. The Committee considered that this was not a case where most of these factors were present. It was not an isolated incident because the matters found proved included a dishonest act to obtain ACCA membership in addition to a repeated failure to cooperate with an ACCA investigation. Mr Zhao had not provided any evidence of remorse/apology, insight, corrective steps, or satisfactory work and conduct since. There was no independent evidence indicating that Mr Zhao had acted unwittingly and there were no positive testimonials or references provided. Taking these matters into account, together with the seriousness of the misconduct found, the Committee concluded that an admonishment would be an inappropriate response.
76. The Committee considered imposing a reprimand on Mr Zhao. The Committee noted that the guidance indicated that a reprimand would be appropriate in cases where the misconduct is of a minor nature, there appears to be no continuing risk to the public and there has been sufficient evidence of an individual's understanding, together with genuine insight into the conduct found proved. None of these features were present in this case. The misconduct was of a very serious nature, no insight had been demonstrated by Mr Zhao and so there remained a continuing risk to the public. For those reasons, the Committee concluded that a reprimand would be inappropriate.

77. The Committee considered imposing a serious reprimand on Mr Zhao. The Committee noted that the guidance indicated that a severe reprimand would be appropriate in cases where the conduct is of a serious nature but where the circumstances of the case or mitigation advanced satisfies the Committee that there is no continuing risk to the public. The Committee considered that the conduct was of a very serious nature but that there was no relevant mitigation or circumstances that removed the continuing risk to the public. On that basis, the Committee concluded that a severe reprimand would be inappropriate because it would not provide adequate protection for the public, and nor would it adequately address public confidence and the need to uphold proper professional standards.
78. The Committee considered whether to exclude Mr Zhao from membership. The Committee noted that Mr Zhao's misconduct included dishonest conduct and a failure to co-operate with an ACCA investigation, both of which the Committee assessed to be very serious matters. The Committee referred to section C5.1 of the guidance document and considered that many of the factors listed appeared to be present in this case, including:
- a. Serious departure from relevant professional standards;
 - b. Dishonesty;
 - c. Abuse of trust/position;
 - d. Lack of understanding and insight into the seriousness of the acts/omissions and the consequences thereof;
 - e. Conduct continued over a period of time; and
 - f. Affected or had the potential to affect a substantial number of clients/members of the public.

79. Taking into account the seriousness of the conduct and the resultant ongoing risk to the public, the Committee concluded that the most appropriate sanction was exclusion from membership. With reference to section E2.3 of the guidance document (which relates to sanctions appropriate in cases of dishonesty), the Committee considered that there were no mitigating circumstances present that would warrant anything other than exclusion from membership. The Committee considered Mr Zhao's conduct found proved to be so serious as to be fundamentally incompatible with being an ACCA member.
80. The Committee considered that Mr Zhao's misconduct represented a significant and immediate risk to the public, in that Mr Zhao was currently able to present himself as an ACCA Member with all of the requisite approved experience, when he did not, in fact, possess such approved experience. As such, potential employers and clients could be misled, and Mr Zhao may also have the opportunity to supervise ACCA trainees himself.
81. The Committee acknowledged that exclusion from membership was the most severe sanction available and had the potential to cause professional and financial hardship to Mr Zhao. However, in the circumstances of this case, the Committee considered that the public interest (both in terms of public protection and in maintaining standards and confidence in the profession) outweighed Mr Zhao's own interests, and therefore exclusion from membership was the only appropriate and proportionate sanction available.
82. Accordingly, the Committee decided that the only appropriate and proportionate sanction to impose was an order excluding Mr Zhao from membership of ACCA.
83. The Committee decided that, given the circumstances of the case and the significant and immediate risk to the public, it was in the interests of the public that the order for exclusion from membership should have immediate effect.

84. The Committee considered that the circumstances of the case did not require an order restricting Mr Zhao's right to apply for re-admission to membership beyond the normal minimum period.

COSTS AND REASONS

85. Ms Terry, on behalf of ACCA, applied for Mr Zhao to make a contribution to the costs of ACCA in bringing this case. The application was supported by a schedule breaking down the costs incurred by ACCA in connection with the hearing. The schedule showed total costs in the sum of £6,427.00 but Ms Terry highlighted that those costs included a sum that had had to be estimated in relation to the length of today's hearing, and which could be reduced to reflect the fact that the hearing had taken less time than estimated.
86. Mr Zhao had been invited to provide the Committee with a completed Statement of Financial Position but had not done so.
87. The Committee accepted the advice of the Legal Adviser who referred the Committee to Regulation 15(1) of the Regulations and ACCA's 'Guidance for Costs Orders'.
88. The Committee was satisfied that ACCA was entitled to costs in principle and had been justified in investigating these matters. Having reviewed the schedule, the Committee considered that the costs claimed appeared to have been reasonably and proportionately incurred.
89. In light of the absence of information as to Mr Zhao's financial and personal circumstances, the Committee decided that it had no reason to reduce the amount of costs claimed on the basis of ability to pay.
90. In light of the fact that the hearing today had taken slightly less time than had been estimated in the ACCA schedule, the Committee determined that it would be appropriate to reduce the amount of costs awarded accordingly. It reduced

the costs claimed by ACCA by £440.00, comprising one hour of the Hearing Officer's time (charged at £80.00 per hour) and two hours of the Case Presenter's time (charged at £180.00 per hour).

91. Taking all of the circumstances into account, the Committee decided that Mr Zhao should be ordered to make a contribution to the costs of ACCA in the sum of £5,987.00.

ORDER

92. The Committee made the following order:
 - a. Mr Zhao shall be excluded from ACCA membership; and
 - b. Mr Zhao shall make a contribution to ACCA's costs in the sum of £5,987.00.

EFFECTIVE DATE OF ORDER

93. In accordance with Regulation 20(1)(b) of the Regulations, the Committee decided that, in the interests of the public, the order relating to exclusion from ACCA membership shall take effect immediately.
94. In accordance with Regulation 20(2) of the Regulations, the order relating to costs shall take effect immediately.

Ms Melissa D'Mello
Chair
17 April 2026