

## HEARING

### DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

#### REASONS FOR DECISION

**In the matter of:** Ms Nur Adam

**Heard on:** Thursday & Friday, 16 & 17 April 2026

**Location:** Remotely via Microsoft Teams

**Committee:** Ms Avril O'Meara (Chair)  
Ms Andrea White (Accountant)  
Ms Victoria Smith (Lay)

**Legal Advisor:** Mr David Marshall

#### Persons present

**And capacity:** Mr Stuart Brady (Case Presenter on behalf of ACCA)  
Ms Aimee Murphy (Hearings Officer)  
Ms Nur Adam (Member)

**Summary:** Dishonesty, recklessness and lack of integrity not proved. Misconduct found.  
Member reprimanded

**Costs:** £6000

1. The Committee heard an allegation of misconduct against Ms Adam. Mr Brady appeared for ACCA. Ms Adam was present and represented herself with the assistance of an interpreter [REDACTED].  
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2. The Committee had a main bundle of papers containing 167 pages, a tabled

additional bundle of 3 pages, an Excel spreadsheet expenses claim and a service bundle containing 23 pages. During the course of the hearing Ms Adam submitted two 'snapshot review' documents totalling 10 pages, and two documents relating to her relocation expenses.

## PRELIMINARY MATTERS

3. In the case management form Ms Adam had requested that all her case be heard in private. She did not give reasons. At the start of the hearing she confirmed that she did not ask for the entire hearing to be in private, but only confidential personal matters such as health or family matters of a sensitive nature. That would be the Committee's normal practice and it was followed in this case where necessary. Subject to that, the hearing was held in public.
4. Mr Brady applied to amend the Allegations as follows (the words crossed out were to be deleted from the original and the words underlined were to be added):
  1. ~~Between 9 January 2024 and 22 February 2024, while she was employed at the Firm, improperly claimed expenses amounting to about £2,200.64 in breach of Firm A's Travel and Expenses Policy. Whilst employed by Firm A, claimed expenses relating to the period 9 January 2024 to end of February 2024, that she was not entitled to and/or that were contrary to Firm A's Travel and Expenses Policy.~~  
Whilst employed by Firm A, claimed expenses relating to the period 9 January 2024 to end of February 2024, that she was not entitled to and/or that were contrary to Firm A's Travel and Expenses Policy.
  2. Ms Adam's conduct in respect of the matters described in Allegation 1 above was:
    - (a) Dishonest, in that Ms Adam claimed expenses from Firm A when she knew she was not entitled to them; or, in the alternative:
    - (b) Reckless, in that Ms Adam failed to properly consider Firm A's expenses policy before making her expenses claims.
    - (c) Such conduct demonstrates a failure to act with integrity.

5. Ms Adam did not object. The Committee was satisfied that these amendments could not prejudice Ms Adam and made the case clearer. The Committee allowed the amendments.

### **ALLEGATION(S)/BRIEF BACKGROUND**

6. Ms Adam has been a member of ACCA since 04 December 2015. At the relevant time she had been employed by a well-known firm of accountants and professional consultants ('Firm A') in the [REDACTED]. Before that she had been employed by the [REDACTED] arm of the same firm for more than ten years, in audit. In the [REDACTED] she was employed as a [REDACTED] in audit. [REDACTED] she was dismissed for gross misconduct in connection with an expenses claim for £2,200.64 arising from work done on site during a particular audit. For this audit there was a more senior manager above her and the person ultimately in charge was the audit partner. Her internal appeal was dismissed on 26 July 2024.
7. Ms Adam faced the following allegations, as amended:

#### ***Allegations***

*Ms Nur Adam, an ACCA member:*

1. *Whilst employed by Firm A, claimed expenses relating to the period 09 January 2024 to end of February 2024, that she was not entitled to and/or that were contrary to Firm A's Travel and Expenses Policy.*
2. *Ms Adam's conduct in respect of the matters described in Allegation 1 above was:*
  - (a) *Dishonest, in that Ms Adam claimed expenses from Firm A when she knew she was not entitled to them; or, in the alternative:*
  - (b) *Reckless, in that Ms Adam failed to properly consider Firm A's*

*expenses policy before making her expenses claims.*

*(c) Such conduct demonstrates a failure to act with integrity.*

3. *In relation to allegation 1 above, Ms Adam was summarily dismissed from Firm A for gross misconduct on [REDACTED], being a fact or matter indicating that she may have become liable to disciplinary action within the meaning of bye-law 10(b).*
4. *In relation to allegation 3 above, Ms Adam failed to bring promptly to the attention of ACCA this fact or matter contrary to bye-law 10(b), ACCA only having been notified of it by Ms Adam on 18 October 2024.*
5. *By reason of any or all of the above, Ms Adam is:*
  - (a) guilty of misconduct pursuant to bye-law 8(a)(i); or in the alternative:*
  - (b) liable to disciplinary action pursuant to bye-law 8(a)(iii).*

## **DECISION ON FACTS/ALLEGATION(S) AND REASONS**

8. Mr Brady relied on the documentary evidence. He did not call any witnesses. Ms Adam gave evidence and was questioned by Mr Brady and by the Committee. Although an interpreter was available, Ms Adam chose to give much of her evidence in English.

### **Allegation 1**

9. The Committee had the expenses claim in the form of an Excel spreadsheet. It also had a letter from Firm A to Ms Adam dated 16 July 2024 giving the outcome of the disciplinary meeting. These documents set out the expenses claims in detail. They fell into two categories.
10. The first three expenses claims, totalling £447.84 were said to have been

incurred in relation to work on the audit site on 09 to 11 January 2024. Ms Adam's evidence was that this claim was simply a mistake. The on-site audit work for which the expenses were claimed was due to start on 09 January but she had later realised that in fact there had been a delay because the client was not ready. The work actually started a week later. She fully accepted that the claims should not have been made but said that at the time she believed the claims were correct. The Committee was satisfied that in this respect she claimed expenses that she was not entitled to.

11. The remaining claims related to work on the same site. The Committee had Firm A's Travel & Expense Policy for [REDACTED] 'Effective February 2024'. For meals it stated that 'up to' £35 could be claimed in specified circumstances. For taxis and minicabs, including Uber, 'a receipt should always be requested from the driver'. Mr Brady submitted that it was clear from the policy that expenses could only be claimed for actual expenditure supported by receipts. He acknowledged that he did not have the policy which would have applied to claims in January 2024 but he submitted that it was implausible that it could have proceeded on a different basis. The Committee decided that it was more likely than not that the policy before February 2024 was not significantly different from the one the Committee had seen. It would have followed the principle of reimbursement based on receipts.
12. Ms Adam said that she submitted a supporting receipt for an Uber cab claim for the first day on site, which was 16 January 2024. Thereafter she claimed exactly the same amount for each journey (there or back) for which she had paid. For meals she claimed a standard amount of £35 for each meal she had paid for. In some case she had paid more but still claimed £35.
13. Although Ms Adam did not make any formal admissions, and she strenuously denied dishonesty, she did accept that she had made the expenses claims listed by ACCA and had made them on the basis of claiming a standard amount each time. She said that at the time she believed it was the correct way of claiming. With the benefit of hindsight she accepted that the claims submitted were not in accordance with Firm A's Travel and Expenses Policy. The Committee found Allegation 1 proved.

## **Allegation 2**

14. The first three expenses claims, totalling £447.84, fell into a different category from the others. Ms Adam fully accepted that the claims should not have been made but she said that at the time she believed the claims were correct. She was cross-examined at length about this but explained why it had not been easy for her to establish the precise start date. Audit staff do not record time spent on a client site in the firm's diary, because they are still working and contactable during that time. Clients are billed an agreed fee for the whole audit so it is not necessary to record days on site for billing purposes. She had not been involved in deciding the start date: that was done by her manager. The time when she had made the expenses claim was a very busy one at work and she had simply made a mistake. The Committee found her evidence credible and accepted it. It did not find that she was dishonest, reckless or lacking in integrity in claiming expenses for these dates. The Committee went on to consider the remaining expenses claims.

### **Allegation 2(a): dishonesty**

15. Mr Brady submitted that Ms Adam must have known that expenses claims had to be on the basis of sums actually incurred, supported by receipts, whereas she had claimed a standard sum for every journey and meal. She was an experienced accountant and auditor. It was her job to understand rules and policies. It was not credible for her to have read the policy and then believed she could claim a standard sum. She must have known she was claiming sums to which she was not entitled. Therefore she was dishonest.
16. Ms Adam said that in her previous employment with the firm in [REDACTED] expenses for on-site audit work were claimed on the basis of a standard allowance. She said that the staff did keep receipts but you could use a single receipt to establish the standard allowance. She said that when she joined the [REDACTED] arm of Firm A she did not receive formal training or on-boarding. She said she did look at the relevant [REDACTED] policy before she first

claimed but she also relied on her previous experience. She obtained a receipt for her first journey to the site in the sum of £57.14. Firm A had a corporate Uber account and she used that. She said she provided the receipt for that expense and it was approved with the January 2024 expense claim. Thereafter she claimed exactly £57.14 every time she claimed expenses for a journey to or from the site. She did not claim for every journey she made because sometimes the taxi was shared with another member of the team who would pay for and claim it. Because the claims for 09-11 January were made by mistake, the first journey would have been on 16 January 2024. She did not notice that when she made the claim for 09-11 January. For meals, Ms Adam claimed a standard sum of £35 for every meal, even where she had paid more. The figure of £35 came from the expenses policy, although in fact £35 was a maximum figure, not a standard allowance.

17. Ms Adam submitted her first expenses claim on 29 January 2024 and it was approved. Given this claim was approved and had not been challenged or further information requested, she assumed that she was calculating her expenses correctly. The expenses claim for February was not submitted until May 2024. It used exactly the same rates per journey and per meal as the previous claim.
18. Ms Adam's evidence about the expenses policy in the [REDACTED] arm received support from a reference she submitted. This was from a senior employee in the [REDACTED] arm who was both her line manager and was appointed by Firm A in the [REDACTED] to act as a mentor to her and hereafter described as her mentor. Ms Adam's mentor had also transferred to the [REDACTED] arm of Firm A from another arm: [REACTED]. Her mentor said that in [REDACTED], the policy or practice of claiming an allowance rather than actual costs was the same as Ms Adam had described for [REDACTED].
19. Under Allegation 1 the Committee found that Ms Adam claimed expenses that she was not entitled to and/or that were contrary to Firm A's Travel and Expenses Policy. Under this Allegation 2(a) the Committee had to decide what was her state of mind when she made the relevant claims. The Committee was reminded of the law as stated in *Ivey v Genting Casinos* [2017] UKSC 67. The

Committee had to decide as a fact the 'actual state' of her knowledge or belief as to the facts. 'The reasonableness or otherwise of [her] belief is a matter of evidence ... but it is not an additional requirement that [her] belief must be reasonable; the question is whether it is genuinely held.'

20. Mr Brady submitted that Ms Adam must have known that she was not entitled to the sums set out in the expenses claim. The Committee did not accept that. Ms Adam's evidence was consistent and credible and supported by the known facts. The Committee accepted it. The Committee accepted that the policy or practice in [REDACTED] was different from the [REDACTED]. The Committee accepted that, in her words, '*I misunderstood the application of the policy but I made my claims consistently and they were approved*'. It is not acceptable for an experienced professional accountant to claim expenses otherwise than in accordance with the relevant policy but that does not mean that she was acting fraudulently. The Committee did not find it credible that Ms Adam was motivated by gain. Any gain she could have made would have been trivial in the circumstances. In fact she made little or no financial gain. Her mentor confirmed that she made repayment as soon as the irregularity was brought to her attention. To do this she recalculated the expenses claims using actual costs rather than standard allowances. She was not able to provide figures for the Committee because everything was held on the devices that she had to return to Firm A when she left. ACCA made no attempt to show how much, if anything, she had gained by making incorrect claims. Ms Adam's best estimate was that overall she had paid back about £200, which was deducted from her pay. Presumably the corrected expenses claim did not include over £400 which she had agreed at the time was claimed by mistake for 09-11 January. If she only had to return £200 it implies that she may have **under**-claimed for the other expenses. There was one instance of this referred to in evidence and at her disciplinary hearing. According to her, on 31 January 2024 Ms Adam paid for a meal for the whole team costing £126 but claimed only £35 because she thought she could only claim the fixed allowance.
21. The Committee was satisfied that Ms Adam's conduct, although incorrect, was not dishonest.

### **Allegation 2(b): recklessness**

22. This Allegation as drafted was that Ms Adam's conduct was 'Reckless, in that Ms Adam failed to properly consider Firm A's expenses policy before making her expenses claims' (emphasis added).
  
23. Clearly Ms Adam could not have considered, and absorbed the contents of, the expenses policy with sufficient care to understand that the practice in the [REDACTED] arm was significantly different from the one she was used to. However, the Committee was advised and understood that the term 'reckless' required more than just failing to exercise sufficient care. It involved something like a wilful disregard of duty. The Committee did not accept that Ms Adam had been reckless in her approach to her expenses claims. She was wrong but she did take account of the policy in arriving at the figure for meals of £35 and she limited herself to it when the actual expenses were greater. Leaving aside what the Committee has accepted was a mistake about the start date, she only claimed for expenses actually incurred, even though the figures might have been slightly different if calculated in accordance with the policy. The Committee also took account of the positive references from two senior accountants who had worked with her in the [REDACTED] arm, one being her mentor. Recklessness would have been entirely out of character for the person described in those references. There was nothing in the evidence to suggest a reason why Ms Adam would have behaved recklessly in this instance.

### **Allegation 2(c): failure to act with integrity**

24. For the reasons already given, the Committee was not satisfied, even on the balance of probabilities, that Ms Adam was guilty of a lack of integrity. She was mistaken, perhaps through carelessness, but there was nothing to indicate that she lacked the integrity that is required of a professional accountant. The references suggested that she was a person of great integrity. The Committee found Allegation 2 not proved.

### **Allegation 3**

25. It was common ground that Ms Adam was summarily dismissed from Firm A on [REDACTED] and that the reason given was gross misconduct. The Committee was satisfied that this was a 'matter indicating that she may have become liable to disciplinary action within the meaning of bye-law 10(b)'. The Committee found Allegation 3 proved.

### **Allegation 4**

26. Ms Adam did report her dismissal but the duty imposed by bye-law 10(b) was to report 'promptly'.
27. The Committee considered that the reason for requiring such matters to be reported is to protect the public. A finding of this nature raises the possibility that the member might pose a danger to the public. That had to be brought to ACCA's attention so that it could be investigated and appropriate action taken, including perhaps interim action.
28. The Committee considered that the meaning of the word 'promptly' had to be considered in the context of the purpose for which the duty to report existed. The seriousness of the allegation is a more important matter than the ease with which the member can comply with the duty. Ms Adam was dismissed on 12 July 2024. Her appeal was dismissed on 26 July 2024. Ms Adam did not formally report the dismissal to ACCA until 18 October 2024. However, she called ACCA to discuss the matter on 01 October 2024. That was an interval of about two months. The Committee was satisfied that she did not report 'promptly' given how serious Firm A's disciplinary finding appeared to be.
29. Ms Adam gave evidence that she was heavily engaged in dealing with the consequences of the termination of her employment and [PRIVATE]. The Committee accepted her evidence and recognised that she would have been [PRIVATE] and in practical terms, with other matters. However, the duty to report was not onerous. It would have required one email, in which she could

have explained her difficult situation if necessary. The Committee found Allegation 4 proved. It would take into account the evidence given in private as mitigation at the next stage of its consideration.

#### **Allegation 5(a): misconduct**

30. The Committee has already stated that it is not acceptable for an experienced professional accountant to claim expenses otherwise than in accordance with the relevant policy. Ms Adam in effect claimed in accordance with a policy which was not applicable to this particular employment and was inconsistent with Firm A's [REDACTED] policy. That was a serious departure from the standards expected of an ACCA member and had to be marked by a finding of misconduct.
31. Ms Adam's failure to report her dismissal promptly was an additional and separate departure from the standards expected. The Committee considered that it should also be marked by a finding of misconduct.

#### **Allegation 5(b): Liability to disciplinary action**

32. This was in the alternative to 5(a) so did not have to be considered.

#### **SANCTION(S) AND REASONS**

33. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. It first sought to identify any aggravating and mitigating factors.
34. The Committee did not consider that there were aggravating factors in this case. The financial loss, if any, was very small and quickly rectified. No-one suffered significant adverse consequences. There were no wider implications. The same applied to some extent to the delay in reporting the dismissal.
35. The Committee considered that there was significant mitigation. In relation to

the expenses, as stated, no significant harm resulted. Ms Adam corrected the figures in question immediately the inaccuracy came to her attention. She had no previous disciplinary findings against her in a period of membership of more than ten years. She had engaged with the investigation fully and promptly. She produced very positive testimonials from senior accountants who had worked with her at the relevant time. Ms Adam also submitted appraisals from employment with another major accountancy firm she had worked for after her return from the [REDACTED] in 2024. These indicated that she had performed to a high standard and impressed her employer with her integrity. The Committee was satisfied that this was an isolated incident, was not deliberate, and that there was no risk of repetition. She had demonstrated to the Committee some insight into her actions and she had explained the enhanced steps she now took to ensure that her expenses claims were beyond criticism. She checks the expenses policy carefully, ensures the accuracy of her figures and obtains the relevant evidence. She also has her claims checked and reviewed before submitting them.

36. With regard to the delay in reporting, the Committee accepted Ms Adam's evidence given in private. There were personal reasons which must have made it very difficult for her to give sufficient attention to reporting and could have led her to delay unduly.
37. The Committee considered whether a sanction was required in this case. A finding of misconduct is, in itself, a serious step for a regulator to take and demonstrates that the conduct in question is not acceptable. However, in this case there were two findings of misconduct, in respect of two separate types of conduct (although arising out of the same isolated incident). The Committee did not consider it was adequate to close the case with no further action.
38. It first considered the sanction of admonishment. Most of the factors set out in the Guidance were present in this case but, as the guidance says, the Committee must decide whether an Admonishment is a sufficient sanction in all the circumstances of the case. Given the two separate findings the Committee decided that admonishment did not sufficiently mark the seriousness of the facts found proved.

39. The Committee next considered the sanction of reprimand. The Guidance states that 'This sanction would usually be applied in situations where the conduct is of a minor nature and there appears to be no continuing risk to the public.' The Committee considered that this was such a case. The factors suggested were present except that the conduct was not the result of misfortune, but mistake. The Committee concluded that a reprimand was the appropriate sanction, and that severe reprimand would be excessive and disproportionate to the facts found proved. It was not necessary to impose a fine in addition to the reprimand. The Committee determined to impose a reprimand.

#### **COSTS AND REASONS**

40. Mr Brady applied for costs totalling £13,334. However, he recognised that the costs schedule included the costs of an abortive hearing on 3 February 2026. That hearing did not proceed due to lack of time allowed. This Committee had a copy of the reasons for that decision. In accordance with its normal practice ACCA had sent out a case management form for Ms Adam to complete. Section 9 of the form deals with time estimates. ACCA gives its estimate and there is a space for the member to give an estimate. Normally ACCA estimates time in days, usually one day. In this case, inexplicably, ACCA gave an estimate of 1 hour. There are no circumstances in which this case could have been concluded in an hour even in ideal conditions with everything agreed. The conditions for hearing this case were not ideal. Ms Adam was in [REDACTED] with a time difference of 8 hours when the [REDACTED] is on GMT and 7 hours when it observes [REDACTED]. The Committee on 3 February had no alternative but to postpone the case. It directed that it be re-listed for two four-hour days starting at 08:00 in the UK. In February 2026 that would have been hearing hours of 16:00 to 20:00 in [REDACTED]. For this hearing in April the equivalent times in [REDACTED] were 15:00 to 19:00. Clearly ACCA had to bear the costs of the abortive hearing on 03 February 2026. The direct costs were about £4,000 and there could have been other savings if the case had been properly listed.

41. Ms Adam submitted that a significant element of the costs claimed in relation to correspondence was the result of her trying to get progress in the case at a time when ACCA admitted there was a significant backlog in its case handling. The Committee considered that there was force in this submission.
42. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to its costs, subject to a reduction for the matters referred to above. However the Committee did not calculate a precise figure because it was clear that Ms Adam [REDACTED]. She had completed a detailed statement of financial position in the form of a live spreadsheet, which was helpful. She also made submissions on costs. The Committee accepted her figures and bore in mind that it should not fix costs at a level which would cause severe financial hardship. The Committee determined that the appropriate contribution was £6,000.

### **ORDER**

43. The Committee ordered as follows:
- (a) Ms Nur Adam shall be subject to a reprimand;
  - (b) Ms Nur Adam shall pay costs of £6,000.

**Avril O'Meara**  
**Chair**  
**17 April 2026**