

## HEARING

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

#### REASONS FOR DECISION

<b>In the matter of:</b>	<b>Miss Nehal Gupta</b>
<b>Heard on:</b>	<b>Wednesday 5 November 2025 and Wednesday &amp; Thursday 22 &amp; 23 April 2026</b>
<b>Location:</b>	<b>Remote via Microsoft Teams</b>
<b>Committee:</b>	<b>Ms Carolyn Tetlow (Chair) Ms Joanne Royden-Turner (Accountant) Mr Damian Kearney (Lay)</b>
<b>Legal Adviser:</b>	<b>Mr Robin Havard (Legal Adviser)</b>
<b>Persons present and capacity:</b>	<b>Ms Lucie Danti (Case Presenter on behalf of ACCA) Ms Aimee Murphy (Hearings Officer) Miss Nehal Gupta (Student Member) Ms Sonika Bhalla (Interpreter)</b>
<b>Summary</b>	<b>Allegations 1, 2(a), 3, 4(a) &amp; 5(a) proved. Sanction – Removal from student register</b>
<b>Costs:</b>	<b>£500</b>

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## **PRELIMINARY APPLICATIONS**

### **APPLICATION FOR PART OF THE HEARING TO BE HELD IN PRIVATE**

1. In the Case Management Form (“CMF”), Miss Gupta had indicated that she may refer to issues relating to her health, and that she would wish such matters to be considered by the Committee in private. Miss Gupta repeated her request at the outset of the hearing. [PRIVATE]
2. Ms Danti confirmed that she would not object to Miss Gupta’s application as such topics were ordinarily considered to be private and exceptions to the presumption that regulatory hearings should be held in public.
3. The Committee had listened to Miss Gupta’s application and the submissions from Ms Danti, together with legal advice which it accepted. It was satisfied that those parts of the hearing during which reference was made to the specific health conditions from which Miss Gupta suffers, should be heard in private. However, the allegations to be considered by the Committee related to the falsification, alteration, and subsequent submission by Miss Gupta of a medical prescription. By its nature, this document related to Miss Gupta’s health. Consequently, and when necessary, the Committee would refer to Miss Gupta having certain health issues without providing any further detail of the nature of those health issues.
4. Such an order was in the interests of justice and would ensure that the private life of Miss Gupta with regard to any evidence relating to her health was protected. The Committee was also satisfied that such an order would not prejudice a fair hearing.

### **APPLICATION BY MISS GUPTA ON 22 APRIL 2026 FOR LATE SUBMISSION OF ADDITIONAL DOCUMENTS**

5. At the outset of the resumed hearing, and having completed her oral evidence on 05 November 2025, Ms Gupta stated that she would wish to introduce into

evidence some screenshots of certain messages by which she sought to explain her conduct during the course of an exam, her use of AI in the form of ChatGPT, and a video clip.

6. Ms Gupta was asked to explain why she had waited until now to submit these documents. Ms Gupta stated that she had understood at the end of the hearing on 05 November 2025 that she would have to apply for permission to send the documents to ACCA, as opposed to sending them after the hearing in November 2025 so that ACCA could consider their content before the recommencement of the hearing today.
7. Having taken legal advice, the Committee directed that the documents should be sent to Ms Danti and the legal advisor. Ms Danti would then take instructions on whether ACCA opposed the application.
8. Having taken instructions, Ms Danti confirmed that ACCA opposed the application and her position was as follows.
9. Ms Danti confirmed that, in accordance with the legal advice the Committee had received, for such evidence to be admitted there would have to be exceptional circumstances. She submitted that, in this case, Ms Gupta had not established that there were any exceptional circumstances. Reference to the use of AI by Ms Gupta for writing her emails came out in cross-examination; it was not exceptional that various matters would arise in the course of cross-examination. Ms Gupta may consider it was regrettable that these points came up but that was the nature of giving evidence. It was not the case that, when something arises in cross-examination, a witness gets a second opportunity to present new evidence. In any event, Ms Gupta would have known of the relevance of any alleged errors in her emails prior to the previous hearing date.
10. If Ms Gupta had indeed thought that this evidence was material, she had always been in a position to provide it within the relevant time periods.

11. Exceptional circumstances may arise when new information has come to light which could not have been known beforehand. This was not the situation in this case. Ms Gupta did have the opportunity to provide documents and had in fact done so before the hearing in November 2025. These additional documents could have formed part of that material but they did not.
12. Ms Danti submitted that the material Ms Gupta wanted to introduce comprised screenshots and a video. The screenshots were not dated and so there was no date to show when they were taken let alone when the AI “chat” took place. Therefore, the screen shots took the matter no further.
13. Ms Danti submitted that the video was very difficult to decipher and did not appear to be different to what was in the hearing bundle or in the screenshots. Therefore, the video did not take the matter further.
14. Therefore, she submitted, it was not in the interests of justice, nor was it in the public interest to allow the documents into evidence. Having regard to any prejudice to ACCA, there was prejudice as this was evidence which Ms Gupta sought to rely on after her oral evidence had concluded and therefore ACCA would not have the opportunity to cross-examine her on it.
15. Ms Gupta responded by stating that she had misunderstood the rules. She repeated that she thought she needed permission to introduce the documents. Before the hearing, she did not know the relevance of raising the point about AI-generated emails. As for there being no date on the screenshots, on ChatGPT it will not show the date at all. The time stamp was the time on the mobile phone and not ChatGPT.

#### **The Committee’s decision**

16. Before reaching its decision, it was agreed with Ms Danti and Ms Gupta that the Committee would view the material. If the Committee decided to refuse Ms Gupta’s application, then, as an experienced Committee, it would discount that material when reaching its decisions on the allegations.

17. In reaching its decision, the Committee had regard to the requirements of regulation 10(4)(c) of the Complaints and Disciplinary Regulations 2014 (as amended) (the Regulations).
18. Having considered the screenshots and video, and having listened to the explanation provided by Ms Gupta, the Committee concluded that the circumstances leading to their late submission could not be described as exceptional. Furthermore, Ms Gupta had not suggested that, although undated, the information contained in the documents had not been in existence before the commencement of the hearing on 05 November 2025. It had therefore been open to Ms Gupta to submit the material prior to the hearing, and she would or should have been aware of the relevance of the contents of her emails. Ms Gupta had now concluded her oral evidence, and the content of the documents were not sufficiently material to the issues that had to be resolved by the Committee to suggest that they should be admitted. Indeed, much of their content appeared in documents already before the Committee and the Committee accepted Ms Danti's submission that the screenshots and the video were undated.
19. To that extent, and considering the interests of Ms Gupta, the Committee was not satisfied that it was in the interests of justice or in the public interest for the documents and video to be admitted at this very late stage. It was also of potential prejudice to ACCA as Ms Danti had only had a brief amount of time to take instructions and, as stated, Ms Gupta had concluded her oral evidence over five months ago.

## **ALLEGATIONS**

Miss Nehal Gupta, a student of the ACCA:

1. On or before 07 November 2024 falsified or altered, or otherwise caused or permitted a third party to do so, a medical prescription (the Prescription) purported to have been issued to her on 15 October 2024.

2. Ms Gupta's conduct in respect of allegation 1 was:
  - (a) Dishonest, in that she intended to use the Prescription to mislead ACCA about the date it was alleged to have been issued to her; or the in the alternative:
  - (b) Such conduct demonstrates a failure to comply with the Fundamental Principle of Integrity, Subsection 111 of ACCA's Code of Ethics and Conduct (2024).
3. On or about 07 November 2024 and/or on 23 April 2025, during the course of an ACCA investigation into her conduct, submitted or caused to be submitted to ACCA, the said Prescription along with 2 images of medication and a handwritten note referring to that medication.
4. Miss Gupta's conduct in relation to allegation 3, or any of it, was:
  - (a) Dishonest, in that she knew the date on the Prescription was false and/or in that she intended to mislead ACCA as to the date of the Prescription; or in the alternative:
  - (b) Such conduct demonstrates a failure to comply with the Fundamental Principle of Integrity, Subsection 111 of ACCA's Code of Ethics and Conduct (2024-2025).
5. By reason of any or all of her conduct, Ms Gupta 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, ALLEGATIONS AND REASONS**

20. In reaching its findings, the Committee relied upon the documents contained in ACCA's report and bundle (pages 1 to 101); a Tabled Additional bundle (pages 1 to 12); a service bundle in advance of the hearing on 5 November 2025 (pages 1 to 18), and a service bundle in advance of the hearing on 22 and 23 April 2026 (pages 1 to 13). It was also provided with a video recording lasting 2 hours 14 minutes of Ms Gupta's examination on 29 October 2024. Prior to the resumed hearing on 22 April 2026 the Committee was provided with transcripts of the hearing on 05 November 2025. It had listened to Ms Gupta who gave oral evidence on her own behalf. The Committee had taken account of the submissions made by Ms Danti on behalf of ACCA, and Ms Gupta, on her own behalf. Finally, the Committee had received legal advice, which it accepted.
21. Ms Gupta was asked whether she admitted any of the allegations. She confirmed that she admitted allegations 1, 2(b), 3 and 4(b). The Chair therefore announced that those allegations were proved by admission.
22. At all times in reaching its findings in respect of the facts, and those allegations which were denied, the Committee bore in mind that the burden of proving the facts and allegations rested with ACCA and the standard of proof to be applied was the civil standard, namely on the balance of probabilities.

### **Allegation 1**

23. This allegation was admitted and the Committee found it proved.
24. In order to understand the background to this allegation, the Committee made the following additional findings of fact.
25. Ms Gupta was admitted as an ACCA student on 14 September 2021.
26. On 30 October 2024, ACCA's Professional Conduct Department received a referral from ACCA's CBE team regarding Miss Gupta's conduct during her

Corporate and Business Law (LW) exam on 29 October 2024. The Committee was not required to consider Ms Gupta's conduct during the exam as this was the subject of a separate investigation. However, it was relevant to these proceedings to the extent that such conduct related to a concern that Ms Gupta was moving her eyes regularly away from the screen.

27. On 07 November 2024, Ms Gupta submitted to ACCA a Prescription, purportedly issued to her by a doctor, Dr A, on 15 October 2024, and associated documents in support of an alleged medical condition, and in support of her explanation as to her conduct during the LW exam.
28. However, the prescription from Dr A submitted by Ms Gupta was originally dated 12 June 2024 and she had made a number of alterations to it. Ms Gupta altered the date of the prescription from 12 June 2024 to 15 October 2024. She had also altered her age, as her 21<sup>st</sup> birthday fell between June and October 2024.
29. When giving evidence, Ms Gupta confirmed that, when altering the prescription, she had used "Photoshop" to make the changes, and chose a background colour to match the original prescription dated 12 June 2024.

#### **Allegation 2(a)**

30. This allegation was denied.
31. In reaching its decision on whether Ms Gupta had acted dishonestly, the Committee relied on the test for dishonesty as prescribed by the Supreme Court in the case of *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.
32. The Committee relied on its findings of fact under allegation 1 above.
33. In response to a request from ACCA regarding her alleged conduct in the course of her exam, the explanation Ms Gupta provided to ACCA in her email of 07 November 2024 said as follows:

*"I am writing to provide clarification regarding an incident that occurred during my ACCA Law (Global) exam held on 29th October 2024. My ACCA ID is 5229480, and my name is Nehal Gupta.*

*During the exam, the invigilator requested to check my workspace as I was observed moving my eyes frequently [PRIVATE].*

*Please consider this issue while reviewing the incident. I am attaching a copy of my doctor's prescription and a list of the medications I am currently taking as supporting documentation.*

*Thank you for your understanding and attention to this matter. Please let me know if you need any further information or clarification."*

34. As stated, Ms Gupta had admitted allegation 1, and in oral evidence had explained how she had altered the prescription in the manner described above.
35. On 20 October 2025, Ms Gupta sent to ACCA a number of documents including a "Written Defence Statement" in which she provided the following explanation:

*"1. On 07 November 2024. while submitting medical evidence to ACCA, I mistakenly attached an edited version of my prescription instead of the original. At that time, I believed that a current month's prescription was required. However, I had not visited my doctor in that month, and [PRIVATE], I had earlier edited the date on an old prescription.*

*When I submitted the evidence on 07 November. my intention was not to upload the edited version. I believed I was attaching the original document. Unfortunately, I had accidentally deleted the original and was unaware that only the edited copy remained on my device. As a result, I unintentionally uploaded the edited version, believing it to be the correct one."(sic)*

36. In the course of her oral evidence, Ms Gupta suggested that she had been in possession of the original prescription in June 2024 but, in September 2024, she misplaced it. When asked how she had been able to edit the original prescription if she had misplaced it, Ms Gupta stated that, when she obtained the original prescription in June 2024, she had scanned it and sent it to her mother via WhatsApp. She was later able to recover a copy of the unaltered prescription from her mother.
37. The Committee did not find Ms Gupta to be a credible witness. In support of this conclusion, the Committee found Miss Gupta's evidence regarding the doctors she had consulted, and when she had done so, to be inconsistent. For example, Ms Gupta had stated that, in September 2024, she had consulted a different doctor, Dr B, but it was clear from the documents that she had not consulted Dr B until July 2025. When asked in cross-examination about this discrepancy in the dates, Ms Gupta then referred for the first time to a third doctor, Dr C, who she said she had consulted in September 2024. The Committee noted that there was no reference anywhere in the documents to a third doctor being consulted and there was no other evidence before the Committee in support of this explanation.
38. Similarly, again for the first time when Ms Gupta gave her evidence, she explained that her email of 23 April 2025 to ACCA which stated, "*I am sharing my medical prescription of 15 October 2024*" had been drafted for her by AI and that AI had inserted the (false) date of the prescription into that email. She said she had not checked the email before sending it. No mention had been made by Ms Gupta of her use of AI in the course of her correspondence with ACCA or in her Written Defence Statement and the Committee found that the explanations put forward by Ms Gupta lacked credibility.
39. In reaching its decision in relation to Miss Gupta's state of mind when she edited the prescription in the manner outlined above, the Committee noted what had been written by Ms Gupta in paragraph 1 of her Written Defence Statement. Even though she accepted in her oral evidence that ACCA had not requested her to provide a copy of her prescription, Ms Gupta stated that she

thought that *“a current month’s prescription was required.”* However, she had not visited her doctor in the month during which she sat her exam on 29 October 2024, and so she, *“edited the date on an old prescription”*, i.e. the prescription dated 12 June 2024.

40. In the course of her oral evidence, Ms Gupta was asked whether, by editing the date, she was trying to produce a prescription closer to the date of the exam to support her health condition and the explanation she had provided for her conduct during the exam. Ms Gupta replied saying:

*“I would say at the time I decided to edit the prescription I had something very similar in my mind.”*

41. Ms Gupta was then asked whether, when she edited the prescription, she was hoping that someone looking at it would believe the date was accurate.

42. In response, Ms Gupta stated:

*“Yes I was thinking like that at the time. But on 07 November I had no intention to upload those, upload the edited version and send.”*

43. Ms Gupta went on to say that she had no intention of misleading anyone and that she had not been thinking straight. The Committee did not accept Miss Gupta’s explanation. Whilst she may have found the circumstances stressful in responding to ACCA, the Committee was satisfied that the changes she had made to the prescription had required a level of sophistication and careful execution, and the reasons for those changes being made (including changing her age) had been thought through by her.

44. The Committee found, on the balance of probabilities, that the only realistic explanation for Ms Gupta editing the prescription of 12 June 2024 in the way that she did, was to mislead ACCA about the date on which the prescription was issued to her.

45. By the standards of ordinary decent people, the Committee found that this was dishonest.
46. On this basis, the Committee found allegation 2(a) proved.

### **Allegation 2(b)**

47. This allegation had been admitted by Ms Gupta and the Committee had therefore found it proved. However, this allegation was made in the alternative to allegation 2(a) and therefore the Committee made no further findings in respect of it.

### **Allegation 3**

48. This allegation was admitted by Ms Gupta and the Committee found it proved.
49. Again, in order to better understand the background to this allegation, as well as relying on its findings in respect of allegations 1 and 2(a) above, the Committee made the following additional findings of fact.
50. The Committee repeated its findings that, on 7 November 2024, Ms Gupta had sent an email to ACCA and attached to it the edited prescription. In the same email, she attached two images of medication and a handwritten note. The text of the email has been set out at paragraph 33 above.
51. Ms Gupta subsequently explained that the images were not of the actual medication in her possession and which she was taking but were examples of the same medication which she had bought online.
52. On 04 March 2025, ACCA sent an email to Ms Gupta attaching a letter from ACCA of the same date in which Ms Gupta was asked to provide a written note from her doctor or hospital confirming the medical condition set out at paragraph 5 of ACCA's letter, which stated:

*“You mentioned in your email of 07 November 2024, that you suffer from [a health condition] [PRIVATE]*

*Please could you provide me with a written note from your doctor/hospital confirming the above.”*

53. On 23 April 2025, Ms Gupta responded to the letter from ACCA stating that she had already submitted medical documents relating to her health condition, [PRIVATE] and stated that she had already sent her medical prescription.
54. In a second email also sent on 23 April 2025, and in answer to question 5 (set out above) in ACCA’s letter of 04 March 2025, Ms Gupta outlined her health condition and its effects. She stated as follows:

*“5. [PRIVATE]:*

*As mentioned in my previous email dated 07 November 2024, [PRIVATE] During the exam, I moved my eyes and looked down frequently to [PRIVATE]. I have provided medical documentation in support of this, along with photos of my setup, to explain my movements and posture during the exam.*

*I would like to clarify that I had consulted a doctor [PRIVATE] prior to the exam, and have now obtained a written note from the doctor confirming the same condition as it existed at the time of the exam.*

*I am sharing my medical prescription of 15 October 2024.”*

55. In the same email, Ms Gupta attached the medical prescription that she had falsified and edited, dated 15 October 2024 which she had already sent to ACCA over five months previously on 07 November 2024.

#### **Allegation 4(a)**

56. Again, in reaching its decision on whether Ms Gupta had acted dishonestly, the Committee had relied on the test for dishonesty as prescribed by the Supreme Court in the case of *Ivey v Genting Casinos t/a Crockfords* [2017] UKSC 67.
57. The Committee relied on its findings of fact under allegations 1, 2(a) and 3 above.
58. Ms Gupta subsequently sent an email to ACCA on 02 May 2025. In that email, Ms Gupta stated the following:

*"I am writing to clarify an important matter regarding the medical prescription I submitted earlier as part of my exam-related communication.*

*While reviewing my documents in preparation for the upcoming investigation, I noticed that the prescription I submitted was not the original document but an edited version. I would like to explain how this happened with complete honesty.*

*Back in October, when I received the email informing me that my exam result was being withheld, I was [PRIVATE] . At that time, I could not locate the original prescription I received in September, as it had unfortunately been misplaced. In a moment of panic and poor judgment, I edited an older prescription to match the relevant date, with the intention of replacing it later with the correct one.*

*However, due to my oversight, I ended up submitting the edited prescription in November and no longer had access to the original version, which I had mistakenly deleted. I now realize this was a serious error, and I deeply regret not handling the situation more responsibly.*

*I also want to mention that the September. I had consulted a different doctor in September, not the one whose prescription I submitted earlier. The doctor I consulted in September has practiced homeopathic medicine*

*I want to be clear that my intention was never to mislead the Committee, and I am bringing this to your attention because I do not wish to be dishonest in any part of this process. I sincerely apologise for submitting a modified document and accept full responsibility for that action.”(sic)*

59. In her Written Defence Statement, Ms Gupta suggested at paragraph 2 that she, “*made another mistake*” in attaching to her email of 23 April 2025 the version of the prescription she had falsified. She also provided further medical evidence in the form of a letter from Dr B, a homeopathic doctor, but this letter confirmed that Ms Gupta first consulted that doctor in July 2025.
60. In any event, at no stage had Ms Gupta provided any evidence to suggest that, at the time she submitted the falsified prescription on 07 November 2024 and then again over five months later, on 23 April 2025, she was not able to understand what she was doing. Indeed, Ms Gupta accepted in her oral evidence that, as at April 2025, she was not suffering from any [PRIVATE]. Miss Gupta’s explanation was merely that she did not check carefully the attachments she had sent to ACCA. There was then an attempt on her part, when giving her oral evidence, to blame AI for inserting the false prescription date into her email of 23 April 2025. The Committee did not find this explanation, or her failure to check this email, to be plausible.
61. The Committee was satisfied, on the balance of probabilities, that, at the time she submitted the falsified prescription to ACCA by email on 07 November 2024 and again on 23 April 2025, she knew that the date on the prescription was false. Moreover, Ms Gupta did so knowingly in an attempt to mislead ACCA with regard to the date on which the prescription was issued.
62. The only person to benefit from such a deception was Ms Gupta in that, in doing so, she was attempting to persuade ACCA that, at the time of the exam on 29 October 2024, she was suffering from a medical condition which explained her conduct during the exam.
63. By the standards of ordinary decent people, such conduct was dishonest.

64. Consequently, the Committee found allegation 4(a) proved.

**Allegation 4(b)**

65. This allegation had been admitted by Ms Gupta and the Committee therefore found it proved. However, this allegation was made in the alternative to allegation 4(a) and therefore the Committee made no further findings in respect of it.

**Allegation 5(a)**

66. Taking account of its findings that Ms Gupta had acted dishonestly, the Committee was satisfied that she was guilty of misconduct. Such conduct fell far below the standards expected of an accountant and a student member of ACCA. The editing of an official medical document with the aim of misleading her own regulator could properly be described as deplorable. In the Committee's judgement, it brought discredit to Ms Gupta, the Association and the accountancy profession.

67. On this basis, the Committee found allegation 5(a) proved.

**Allegation 5(b)**

68. This allegation was in the alternative to allegation 5(a). Therefore, the Committee made no finding in respect of it.

**SANCTION AND REASONS**

69. The Committee considered what sanction, if any, to impose, taking into account all it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions, and the principle of proportionality. It had also listened to the submissions of Ms Danti and Ms Gupta and taken account of legal advice from the Legal Adviser which it accepted.

70. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate to conclude the case with no order.
71. The Committee was mindful of the fact that its role was not to be punitive and that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.
72. The Committee had found Ms Gupta to have acted dishonestly by falsifying a document and submitting it to ACCA with the intention of misleading her regulator. The Committee determined that such misconduct was very serious.
73. The Committee considered whether any mitigating or aggravating factors featured in this case.
74. As for mitigating factors, the Committee accepted that there were no previous findings against Ms Gupta. It also acknowledged that, whilst at all times denying any dishonest intention to mislead, Ms Gupta had, of her own volition, reported her conduct to ACCA in relation to the falsification of the prescription. The Committee also recognised that Ms Gupta had cooperated with ACCA throughout the investigation and she had attended the hearing in person and given evidence.
75. Whilst Ms Gupta had indicated in her CMF that she denied all of the allegations, at the outset of this hearing, she had ultimately admitted all allegations save for dishonesty. The Committee accepted that this reflected a degree of insight into her conduct. She had also expressed remorse, although maintained that her conduct had been reckless rather than dishonest.
76. The Committee went on to consider whether any aggravating factors featured in this case.

77. The Committee was satisfied that this was a deliberate act which would have required a degree of planning. Falsifying a medical prescription, and the method adopted by Ms Gupta, suggested a level of sophistication and it was for her personal advantage in order to mislead ACCA regarding her conduct during the course of an exam. It also represented a breach of trust in that it is ACCA's expectation that all of its members, including student members, will do the right thing even in difficult circumstances.
78. The Committee also found that this misconduct could not be described as an isolated incident. Miss Gupta's attempt to mislead ACCA occurred when she submitted the falsified medical prescription on two occasions, namely 07 November 2024 and approximately five and a half months later on 23 April 2025.
79. It was suggested by Ms Gupta that she had acted in this way as a result of finding herself in a stressful situation. Based on its findings, the Committee was not satisfied that the risk of Ms Gupta repeating such behaviour had been reduced to a sufficiently low level.
80. On the basis of its findings, the Committee concluded that neither an admonishment nor a reprimand would represent a sufficient and proportionate outcome. Neither sanction would adequately reflect the seriousness of the Committee's findings.
81. The Committee then considered whether a severe reprimand would be an appropriate sanction. Again, taking account of the seriousness of its findings, the Committee did not consider that a severe reprimand would be sufficient or proportionate. The Guidance indicates that a severe reprimand is appropriate for serious misconduct only where there are *'particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public'*. No such circumstances had been identified by the Committee.

82. The Committee had found that Ms Gupta had acted dishonestly. This was very serious. It was of particular concern that Ms Gupta's dishonest conduct was designed to mislead her own regulator.
83. In the Committee's judgement, Ms Gupta's overall conduct was fundamentally incompatible with being a student member of ACCA and risked undermining the integrity of ACCA membership. The Committee adopted the Guidance which stated that the reputation of ACCA and the accountancy profession was built upon the public being able to rely on a member, including a student member, to do the right thing in difficult circumstances. It noted this was a cornerstone of the public value which an accountant brings.
84. The Committee had considered whether there were any reasons which were so exceptional or remarkable that it would not be necessary to exclude Ms Gupta as a member of ACCA but could find none.
85. The Committee concluded that the only appropriate, proportionate and sufficient sanction was to order that Ms Gupta shall be removed from ACCA's student register.

### **COSTS AND REASONS**

86. The Committee had been provided with a simple costs schedule (page 1) and a detailed costs schedule (page 1) relating to ACCA's claim for costs. Ms Gupta had also provided the Committee with a Statement of her financial position (pages 1 to 2).
87. The Committee concluded that ACCA was entitled to be awarded costs against Ms Gupta, all allegations having been found proved. The amount of costs for which ACCA applied was £14,238.50. The Committee did not consider that the claim was unreasonable, although only part of the third day of the hearing would be required.

88. Ms Gupta had provided ACCA with information relating to her means. Whilst she had not provided any supporting documentation, this was not a surprise as she was not in employment at present and was living at home, fully dependent on her family. On the basis of the information Ms Gupta had provided, the Committee was satisfied that her financial circumstances were very constrained.
89. In all the circumstances, and in exercising its discretion, the Committee considered that it was reasonable and proportionate to award costs to ACCA in the reduced sum of £500.00.

#### **EFFECTIVE DATE OF ORDER**

90. Taking account of Ms Gupta's status, and as she is currently not in employment, the Committee was not satisfied that it was in the interests of the public for this order to take immediate effect.
91. This order shall take effect at the expiry of the period allowed for an appeal in accordance with the Appeal Regulations.

**Ms Carolyn Tetlow**  
**Chair**  
**23 April 2026**