

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Mr Mulin Liu
Heard on:	Tuesday, 28 April 2026
Location:	Remotely by video conference
Committee:	Mrs Colette Lang (Chair) Mr George Wood (Accountant) Mr Geoff Baines (Lay)
Legal Adviser:	Mr Andrew Granville Stafford
Persons present and capacity:	Ms Joanna La Roche (ACCA Case Presenter) Ms Anna Packowska (Hearings Officer)
Summary:	Allegations 1, 2, 3(a), 4 and 5(a) proved Excluded from student membership. Costs of £7,500

PRELIMINARY

1. The Disciplinary Committee of ACCA ('the Committee') convened to consider a report concerning Mr Mulin Liu. Mr Liu is a student member of ACCA, having registered as a student member on 11 September 2019, and is resident in China.

ACCA



+44 (0)20 7059 5000



info@accaglobal.com



www.accaglobal.com



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

2. The Committee had before it a bundle of documents (pages 1 to 56), a Case Management Form and a service bundle (pages 1 to 18).

PROCEEDING IN ABSENCE

3. Mr Liu did not attend the hearing and was not represented.
4. The notice of hearing was sent by email to Mr Liu's registered email address on 31 March 2026. The Committee was provided with a delivery receipt dated the same day and timed at 12:46.
5. There has been no reply from Mr Liu to the notice of hearing, nor to subsequent emails sent by the Hearings Officer on 24 and 27 April 2026 asking him whether he intended to attend the hearing. The Hearings Officer attempted to contact him by telephone on 27 April 2026, but the call went unanswered and there was no opportunity to leave a voicemail.
6. The Committee was satisfied that the requirements of regulations 10(1) and 22(1) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ('CDR') as to service had been complied with.
7. Having satisfied itself that service had been effected in accordance with the regulations, the Committee went on consider whether to proceed in the absence of Mr Liu. The Committee bore in mind that the discretion to do so must be exercised with care and in light of the public interest in dealing with matters such as this fairly, economically and expeditiously.
8. The Committee considered that Mr Liu had made a conscious decision not to co-operate or engage with the disciplinary process. In those circumstances, no useful purpose would be served by adjourning this hearing. The Committee was mindful of the need to deal with matters of this nature expeditiously, and considered that, in the interests of justice, the hearing should proceed in Mr Liu's absence.

ALLEGATIONS AND BRIEF BACKGROUND

9. The allegations against Mr Liu are as follows:

Mr Mulin Liu, a student of ACCA, in respect of his Financial Reporting examination taken on 4 September 2025 ('the Exam'):

- 1. Was in possession of and/or used unauthorised materials, namely notes during the Exam, contrary to Exam Regulation 4.*
- 2. intended to use the unauthorised materials in Allegation 1 above to gain unfair advantage in the Exam.*
- 3. The conduct in respect of any or all of the above was:*
 - (a) Dishonest, in that Mr Mulin Liu intended to gain an unfair advantage in the exam; or in the alternative*
 - (b) Such conduct demonstrates a failure to act with integrity.*
- 4. Mr Mulin Liu failed to cooperate with ACCA's Investigating Officer in breach of Complaints and Disciplinary Regulations 2014, Regulation 3(1) in that he failed to respond fully or at all to ACCA's correspondence dated:*

03 November 2025;

20 November 2025;

2 February 2026
- 5. By reason of his conduct, Mr Mulin Liu is:*
 - (a) Guilty of misconduct pursuant to bye-law 8(a)(i), in respect of any or all of the conduct above: or in the alternative;*
 - (b) Liable to disciplinary action pursuant to bye-law 8(a)(iii), in respect of Allegation 1.*

10. Mr Liu is a student member of ACCA, having been admitted to student membership on 11 September 2019.

11. On 4 September 2025, Mr Liu attended an examination centre in China to sit the ACCA Financial Management examination. The exam commenced at 13.30pm and was due to last for 3 hours 20 minutes.
12. Prior to examinations, all candidates receive an attendance docket which contains ACCA's Examination Regulations and Examination Guidelines. These include the following:

Exam Regulation 4

You are not permitted during the exam to possess (whether at your desk or on or about your person), use or attempt to use any notes, books, or other written materials (whether in electronic form or otherwise) except those expressly permitted within the Exam Guidelines. These are known as 'unauthorised materials.'

Exam Regulation 6(a)

If you breach exam regulation 4 and the 'unauthorised materials' are relevant to the syllabus being examined; it will be assumed that you intended to use them to gain an unfair advantage in the exam. In any subsequent disciplinary proceedings, you will have to prove that you did not intend to use the 'unauthorised materials' to gain an unfair advantage in the exam.

13. ACCA alleged that, during the exam in question, Mr Liu was found to be in possession of revision notes which he used, or intended to use, to gain an unfair advantage.
14. ACCA relied on SCRS 1B reports prepared on the day of the exam by the supervisor and the usher. Both state that the incident occurred at 16.31 hours.
15. The supervisor says that Mr Liu was found to have notes 'under the draft paper'. They say that they saw Mr Liu 'flipping through' those notes. They took a photograph of the notes, a copy of which was included in the Committee's papers. They are on one sheet of paper, typed partly in English and partly in Chinese. The English words include a number of accountancy terms such as gross profit, revenue, asset turnover, inventory, cost of sales, working capital and gearing ratio.

16. The usher's report is in similar terms to that of the supervisor.
17. Mr Liu did not fully complete an SCRS 2B form, but in response to the question 'Where did you place your personal belongings (e.g. mobile phone, coat, bags etc?)' Mr Liu wrote 'accident.'
18. The usher states:

'The supervisor asked me to accompany him to fill out the forms in the waiting area. The student asked me how he could handle it. I said filling in truthfully and waited for the results from ACCA. The student asked me, "can it be considered as being absent from the exam." I said I have no right. The student refused to filling the form because he didn't know the words. Invigilator said you can use your phone. The student said I didn't have the phone.'
19. An ACCA examiner has been asked to look at the notes and prepare an irregular script report. The examiner says that the notes are relevant both to the syllabus and this particular examination. They are also of the opinion that Mr Liu had used the notes during the exam. They state:

'The notes are a crib sheet for ratio analysis. There is a mix of formula and generic analysis comments. The analysis comments in English would not attract marks on their own. There is, however, some text in Chinese and I am unsure what this is. The crib sheet could have been used in QID7494. The response did not attract a pass with the candidate scoring 4.5/20.'
20. CDR 3 requires a member to co-operate with an ACCA investigating officer. The duty to co-operate includes providing promptly such information, books, papers or records as the investigating officer may from time to time require.
21. On 1 October 2025, ACCA wrote to Mr Liu in relation to incident. Mr Liu did not provide a response.
22. On 3 November 2025, ACCA's Investigation Department wrote to Mr Liu to advise him of the complaint which had been received and requested his comments on it. Again, Mr Liu did not provide a response.

23. On 20 November 2025, ACCA wrote again to Mr Liu, informing him that a report was being prepared for internal review. On 2 February 2026, he was informed that the allegations were being referred to the independent assessor.

ACCA's CASE

24. ACCA submitted that Mr Liu has breached Examination Regulation 4 in that he was in possession of and/or used unauthorised materials in the exam. His purpose for doing so, ACCA submitted, was to use the unauthorised materials to gain an unfair advantage.
25. ACCA also relied on Exam Regulation 6(a). If a student is found in possession of unauthorised materials which are relevant to the exam in question, it will be assumed that they intended to use them to gain an unfair advantage unless they prove the contrary.
26. ACCA submitted that cheating or attempting to cheat in a professional exam would be regarded as dishonest by the standards of ordinary decent people. In the alternative, this conduct would be regarded as lacking in integrity.
27. CDR 3 imposes a duty on a member to co-operate with any investigating officer in relation to the consideration and investigation of any complaint. ACCA alleged that Mr Liu was in breach of this duty by failing to reply to ACCA correspondence.

MEMBER'S CASE

28. Mr Liu has provided no response to the Allegations.

DECISIONS ON ALLEGATIONS AND REASONS

29. The Committee considered the documents before it, the submissions of Ms La Roche on behalf of ACCA and the advice of the Legal Adviser. The Committee bore in mind that the burden of proving an allegation rests on ACCA and the standard to be applied is proof on the balance of probabilities. However, where a student is found to be in possession of unauthorised material during an exam the burden is reversed and the student is presumed to have intended to use

the material to gain an unfair advantage unless the contrary is proved (Exam Regulation 6(a)).

Allegation 1

30. The Committee had regard to the reports prepared by the supervisor and the usher. It also had regard to the photograph of the notes in question. The supervisor and usher both say that they saw Mr Liu flipping through the notes. They also say that his attitude after the exam was unco-operative.
31. The Committee was satisfied that Mr Liu was in possession of the notes. These were clearly revision notes and, accordingly, unauthorised material for the purposes of Exam Regulation 4. The Committee was further satisfied, on the basis of the reports of the supervisor and usher, that Mr Liu had been looking at the notes during the exam.
32. Therefore, the Committee found Allegation 1 proved.

Allegation 2

33. The Committee had found, in relation to Allegation 1, that Mr Liu was in possession of revision notes during the exam. The evidence of the examiner confirmed that they were relevant to syllabus. Therefore, in the absence of any evidence to the contrary from Mr Liu, the Committee must assume in accordance with Exam Regulation 6(a), he intended to use them to gain an unfair advantage.
34. Further, the Committee had evidence from the supervisor and usher, which it accepted, that Mr Liu was looking at the notes in the exam. It also had evidence from the examiner that the crib sheet could have been used in answering a particular question on the paper Mr Liu was sitting.
35. It was satisfied on the evidence that Mr Liu had not only intended to use but had in fact used the notes during the exam. In doing so, he had clearly attempted to obtain an unfair advantage.
36. Therefore, the Committee found Allegation 2 proved.

Allegation 3

37. The Committee noted that Mr Liu had taken a number of ACCA exams prior to this one. He was no doubt aware that taking revision notes into an exam was prohibited. The Committee was satisfied, therefore, that he knew what he was doing was dishonest.
38. Bringing revision notes into an exam room with the intent to gain an unfair advantage would be regarded as dishonest by ordinary and reasonable members of the public. The Committee found that Mr Liu's actions were dishonest and therefore Allegation 3(a) was proved.
39. As Allegation 3(b) was in the alternative, there was no need for the Committee to consider it.

Allegation 4

40. The Committee had regard to the correspondence sent to Mr Liu by ACCA on 3 November 2025, 20 November 2025 and 2 February 2026. It was satisfied that there had been no response at all from Mr Liu.
41. The letter of 3 November 2025 asked a number of specific questions, which required a response, and Mr Liu's failure to do so clearly constituted a breach of CDR 3(1).
42. The emails of 20 November 2025 and 2 February 2026, however, did not specifically require any response from Mr Liu.
43. Therefore, the Committee found Allegation 4 proved in relation to the letter of 3 November 2025 alone.

Allegation 5

44. The conduct found proved in this case involved not only cheating by Mr Liu in a professional exam but a failure to co-operate with his regulator. The Committee was in no doubt that this would be regarded as deplorable by fellow members of the profession. It brings discredit to Mr Liu, the profession and the Association.

45. The Committee was therefore satisfied that Mr Liu's conduct, as set out in Allegations 1, 2 and 3, amounts to misconduct. Accordingly, it found Allegation 4(a) proved.
46. As Allegation 4(b) was in the alternative, there was no need for the Committee to consider it.

SANCTION AND REASONS

47. The Committee considered what sanction, if any, to impose taking into account ACCA's Guidance for Disciplinary Sanctions ('GDS') and the principle of proportionality. The Committee bore in mind that the purpose of sanctions was not punitive but to protect the public, maintain confidence in the profession and declare and uphold proper standards of conduct and behaviour.
48. The Committee considered the following to be aggravating factors. This was deliberate and pre-meditated conduct for personal advantage. Mr Liu had failed to co-operate throughout, starting at the time of exam. In light of that, the Committee was satisfied he had failed to demonstrate any insight.
49. In mitigation, the Committee took into account that no previous findings had been made against Mr Liu.
50. Having found that Mr Liu's actions amounted to misconduct, taking no further action was clearly not appropriate. The Committee therefore considered the available sanctions in ascending order of seriousness.
51. Mr Liu's actions were not only a very serious departure from proper and acceptable standards but were deliberate. It would be inappropriate, given the nature of the behaviour in question, to admonish or reprimand Mr Liu.
52. The Committee went on to consider whether a severe reprimand would be an appropriate sanction. The GDS makes it clear that both dishonesty and failure to co-operate with the regulator are to be regarded as serious misconduct. In the absence of any insight or substantial mitigation, the Committee was satisfied that an order allowing Mr Liu to retain his student membership could not be justified. Considering the guidance in the GDS, the Committee decided

that a severe reprimand would not adequately mark the seriousness of the misconduct.

53. The Committee concluded that Mr Liu's actions not only constituted a serious departure from relevant standards but were fundamentally incompatible with being a student member of a professional association. The Committee did not feel that any order which allowed Mr Liu to retain his student membership of ACCA could possibly be justified.
54. The Committee considered that the conduct in this case was fundamentally incompatible with ACCA membership. Therefore, the Committee made an order under CDR 13(4)(c) of the Disciplinary Regulations removing Mr Liu from the student register.
55. The Committee did not consider that the public interest in this case required it to additionally make an order under CDR 13(4)(c) restricting Mr Liu's right to apply for readmission beyond the normal minimum period.

COSTS AND REASONS

56. ACCA applied for costs against Mr Liu in the sum of £7,970.50. The application was supported by a schedule providing a breakdown of the costs incurred by ACCA in connection with the investigation and hearing. Ms La Roche accepted some reduction may be appropriate to reflect the actual rather than estimated length of the hearing.
57. The Committee found that there was no reason in principle not to make an order for costs in ACCA's favour. Nor did it consider that the application was for an unreasonable amount, save for a small reduction for the reasons referred to above.
58. The Committee had no information about Mr Liu's financial circumstances.
59. In the circumstances, the Committee ordered Mr Liu to pay ACCA's costs in the sum of £7,500.

EFFECTIVE DATE OF ORDER

60. The order will come into effect from the date of expiry of the appeal period, namely after 21 days from service of this written statement of the Committee's reasons for its decision, unless Mr Liu gives notice of appeal in accordance with the Appeal Regulations prior to that.

Mrs Colette Lang
Chair
28 April 2026