

## HEARING

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

#### REASONS FOR DECISION

<b>In the matter of:</b>	<b>Ms Wafa Alshateri</b>
<b>Heard on:</b>	<b>Wednesday, 18 February 2026</b>
<b>Location:</b>	<b>Remotely via Microsoft Teams</b>
<b>Committee:</b>	<b>Ms Avril O'Meara (Chair) Ms Wanda Rossiter (Accountant) Mr Roger Woods (Lay)</b>
<b>Legal Adviser:</b>	<b>Ms Charlotte Pope-Williams</b>
<b>Persons present and capacity:</b>	<b>Ms Kimberley Clifton (ACCA Case Presenter) Ms Anna Packowska (Hearings Officer)</b>
<b>Summary:</b>	<b>Allegations 1(a), (b), (c); 2 (a) &amp; (b); 3 and 4(a) proved Removal from the Student Register made immediate</b>
<b>Costs:</b>	<b>Costs awarded to the ACCA in the amount of £8,000</b>

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1. The ACCA was represented by Kimberley Clifton. Ms Alshateri did not attend and she was not represented. The hearing was conducted remotely through Microsoft Teams.
2. The Committee had before it the following documents: (i) a bundle of papers of some 242 pages; (ii) a video recording of an examination dated 5 September 2024; (iii) a video recording of an examination dated 6 September 2024; (iv) a recording of a phone call relating to the 9 May 2024 examination; (v) two recordings of phone calls relating to the 6 September 2024 examination; (vi) an 18-page Service Bundle (vii) a 4-page simple costs schedule and (viii) a 2-page detailed costs schedule (together "**the bundle of documents and recordings**").

#### **SERVICE/PROCEEDING IN ABSENCE**

3. Having considered the Service Bundle and the Notice of Hearing dated 20 January 2026, the Committee was satisfied that notice of the hearing was served on Ms Alshateri in accordance with the Complaints and Disciplinary Regulations 2014 (amended 1 January 2025) ("**CDR**").
4. The Committee next considered whether it was in the interests of justice to proceed in the absence of Ms Alshateri. The Committee accepted the advice of the Legal Adviser. The Committee was mindful that Ms Alshateri has a right to attend the hearing and to participate and that the discretion to proceed in her absence must be exercised with the utmost care and caution.
5. The Committee noted that ACCA's Notice was sent on 20 January 2026 to the email address held for Ms Alshateri by ACCA, offering her the opportunity of attending via video or telephone link. There was no response to the Notice. On 12 February 2026 and 17 February 2026 the Hearings Officer sent further emails to Ms Alshateri regarding the hearing. The Hearings Officer did not receive any response from Ms Alshateri to those emails. The Committee noted that the date and time of the hearing were highlighted in bold in ACCA's written communications to Ms Alshateri. The Hearings Officer attempted to telephone Ms Alshateri twice on 17 February 2026 to ascertain whether she would be

attending the hearing. There was no answer on both occasions. The Hearings Officer therefore recorded a voicemail for Ms Alshateri informing her of the details of the hearing. The Committee noted there had been no engagement whatsoever from Ms Alshateri in respect of the proceedings.

6. The Committee was satisfied that all reasonable attempts have been made to secure Ms Alshateri's attendance/participation at the hearing. The Committee observed that there had been a history of non-engagement by Ms Alshateri and that ACCA had received no request for an adjournment from Ms Alshateri. The Committee was satisfied that Ms Alshateri has voluntarily waived her right to attend and was not persuaded that any adjournment would increase the chance of Ms Alshateri attending or participating further in the case. On the information before it and bearing in mind its duty to ensure the expeditious conduct of its business and the wider public interest, the Committee was satisfied that it was in the interests of justice to proceed in the absence of Ms Alshateri. The Committee reminded itself that her absence added nothing to ACCA's case and was not indicative of guilt.

## **ALLEGATIONS**

Ms Alshateri was an ACCA student member at the time of circumstances giving rise to these proceedings in September 2024.

### **Allegation 1**

1. On 5 September 2024 and 6 September 2024, in relation to a remotely invigilated Performance Management ("PM") and Financial Management ("FM") examination (together "the examinations"):
  - a) used, or permitted a third party to use, an unauthorised item with photographic functionality within the meaning of Exam Regulation 6(b), to take photos of live exam questions in breach of Exam Regulation 5(a) and/or Exam Regulation 11;

- b) sent, or permitted a third party to send, photographs of live exam questions to a third-party proxy exam taker in order to obtain assistance from the third party in answering those live exam questions, in breach of Exam Regulation 13;
- c) engaged in irregular conduct designed to assist her in the examinations in breach of Exam Regulation 10 by:
  - (i) engaging a third-party proxy exam taker to sit the examinations on her behalf; and:
  - (ii) communicating with a third-party proxy exam taker via WhatsApp during the examinations so that the third party could provide her with answers to the examination.

### **Allegation 2**

2. Ms Wafa Alshateri's conduct in respect of any or all of allegations 1(a) to (c) was:
- (a) Dishonest, in that she intended that a third-party exam proxy taker would sit the examinations on her behalf; and:
  - (b) Dishonest, in that she sought, and was provided with, answers to live exam questions from a third-party proxy exam taker during the examinations, thereby gaining an unfair advantage in the examinations; or in the alternative:
  - (c) such conduct demonstrates a lack of integrity.

### **Allegation 3**

3. Contrary to The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014, Regulation 3(1), Ms Wafa Alshateri failed to

cooperate with the consideration or investigation of a complaint in that she failed to respond to ACCA's correspondence dated:

(a) 17 July 2025;

(b) 20 August 2025;

(c) 18 September 2025.

#### **Allegation 4**

4. By reason of any or all of the above, Ms Wafa Alshateri 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).

#### **BACKGROUND**

7. Ms Alshateri was registered as an ACCA student on 24 April 2021. She is and was therefore bound by ACCA's Bye-laws and Regulations at the material time relevant to these proceedings.
8. On 5 September 2024 and 6 September 2024, it is alleged that Ms Alshateri engaged in irregular conduct during her Performance Management and Financial Management examination attempts. It is further alleged that Ms Alshateri engaged a third-party proxy, "Hire Exam Champs" (via WhatsApp) to sit the PM and FM examinations on her behalf. Hire Exam Champs is advertised as a proxy service offering various services, including online examination help.

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

9. The Committee carefully considered all the evidence before it.

10. The Committee took into account the oral submissions made by Ms Clifton and it accepted the advice of the Legal Adviser. The Committee kept in mind that the burden of proving the allegations rests with ACCA and that the standard of proof is the balance of probabilities.
11. The Committee had the option of hearing oral evidence from Person A from ACCA's Exam Production team, but it considered that this was unnecessary as Mr Smith had provided a clear and coherent written witness evidence. Further, the Committee considered whether to view the videos and recordings contained in the bundle of documents during the hearing. The Committee had viewed and listened to these prior to the hearing today and decided it did not need to do so again. The Committee found that the videos and recordings were of limited probative value as it was not possible to see and hear enough to help them ascertain whether Ms Alshateri had been engaging with a third-party proxy exam taker to assist her in taking the PM and FM examinations.
12. The Committee was satisfied that there is an abundance of evidence that it was Ms Alshateri that took the examinations on 5 and 6 September 2024. The Committee noted the examination history for Ms Alshateri, the unique access codes for the examinations, the images of Ms Alshateri in the bundle and the evidence from Person A, including but not limited to his evidence about the combination of questions in the examinations on those dates.

**Allegation 1(a)**

13. As to allegation 1(a) the Committee reflected carefully on the requirements of Exam Regulation 5(a) which prohibits the use of dictionaries, electronic devices and/or translators of any kind during an examination by a student member or any other person unless an examination is being conducted remotely in which case a mobile phone can only be used in accordance with ACCA's Exam Guidelines. The Committee noted that the ACCA's Exam Guidelines provided that mobile phones should be kept at arm's length and that those sitting examinations should not be using mobile phones.

14. The Committee also reflected on Exam Regulation 11 in relation to allegation 1(a) which prohibits the copying of exam content in any manner or photographs of a person's screen by them or anyone else when that person is taking a computer examination. The Committee considered that there was clear evidence that Ms Alshateri sat the examinations on 5 and 6 September 2024 and that she had used a device to take photographs of her PM and FM examinations to pass onto, a third party, namely Hire Exam Champs.
15. The Committee therefore found that allegation 1(a) had been proved.

**Allegation 1(b)**

16. In considering allegation 1(b) the Committee reflected carefully on Exam Regulation 13 which effectively prohibits the copying of ACCA exam content and the distribution or exploitation of it for commercial/personal gain and/or any other reason. The Committee considered the evidence of the WhatsApp transcripts contained in the bundle of documents and recordings which showed Ms Alshateri's communications with Hire Exam Champs before and during the examinations. The Committee found that those WhatsApp transcripts made it abundantly clear that Ms Alshateri had copied ACCA exam content in order to obtain assistance from a third party i.e., Hire Exam Champs, contrary to Exam Regulation 13. The Committee noted the following WhatsApp exchanges in particular:

9/4/24, 15:46 - Advisor: So I'm the one who can take your exam

9/4/24, 16:10 - Wafa HEG: Inshallah

9/4/24, 16:10 - Wafa HEG: For both papers

9/4/24, 16:11 - Wafa HEG: FM & PM

9/4/24, 16:11 - Wafa HEG: Right

9/4/24, 16:11 - Advisor: Yes

9/4/24, 16:12 - Advisor: So In order to cater your exam, I need to set-up your system first

...

9/4/24, 17:18 - Wafa HEG: I will take pics of the questions then you will share the answers.

17. The Committee also noted the clear and supportive evidence of Person A from ACCA's Exam Production Team in relation to its findings in relation to allegation 1(b) and more generally.
18. In the circumstances the Committee found that allegation 1(b) had been proved.

### **Allegation 1(c)**

19. As to allegation 1(c), the Committee carefully considered Exam Regulation 10 which prohibits irregular conduct designed to assist a member in any exam attempt or provide any improper assistance to any other exam entrant in any exam attempt.
20. The Committee considered that there was clear evidence of irregular conduct by Ms Alshateri since the evidence demonstrated that she engaged with Hire Exam Champs in a manner that was not usual or standard in the circumstances and with a design to seek assistance in her FM and PM examinations. As already set out above in relation to allegations 1(a) and (b) it is clear from the WhatsApp transcripts that Ms Alshateri engaged Hire Exam Champs to take her exams for her and during the examinations she shared content in order to receive answers to the questions in the examinations. The WhatsApp transcripts also clearly show responses by Hire Exam Champs to questions in the examinations.
21. The Committee was particularly struck by the fact that Ms Alshateri initially tried to give Hire Exam Champs remote access to her computer and the examinations on 5 and 6 September 2024. Having failed to do so, she sent pictures of the live exam questions to Hire Exam Champs so that they could provide her with answers during the examinations.
22. The Committee considered that there was therefore clear evidence of Ms Alshateri engaging with a third-party proxy exam taker i.e. Hire Exam Champs, to sit the FM and PM examinations on her behalf; and that she had been communicating with that third party proxy exam taker by WhatsApp during her

FM and PM examinations so that Hire Exam Champs could provide her with answers to the exam questions,

23. In the circumstances, the Committee found that allegation 1(c) had been proved.

#### **Allegations 2(a) and (b)**

24. Allegations 2(a) and (b) both related to dishonesty. The Committee reflected carefully on the legal test for dishonesty which required it to make a finding about the actual state of Ms Alshateri knowledge and belief as to the facts i.e. her subjective intention. The Committee then needed to consider whether Ms Alshateri's conduct was honest or dishonest applying the objective standard of ordinary decent people, applying the case of Ivey v Genting Casinos [2017] UKSC 67 ("Ivey").

25. In considering the first limb of the Ivey guidance as to Ms Alshateri's subjective state of mind, the Committee noted that there is clear evidence in the form of WhatsApp communications of (i) Ms Alshateri directing Hire Exam Champs to take the FM and PM examinations on her behalf and (ii) of her seeking and being provided with answers to the examinations. The Committee was satisfied that Ms Alshateri sought to gain an unfair advantage in the examinations for two main reasons. First, she intended that a third-party exam proxy taker would sit the examinations on her behalf. Second, she was provided with answers to live exam questions by the third-party proxy exam taker during the examinations. The Committee was therefore satisfied that the subjective limb of the Ivey Test had been satisfied.

26. The Committee considered the second limb of the Ivey guidance about whether an ordinary decent person would consider Ms Alshateri's actions to be dishonest. The Committee considered that in layperson's terms that an ordinary decent person would consider Ms Alshateri to have cheated in her FM and PM examinations. In the circumstances, the Committee reached the view that an ordinary decent person with knowledge of the facts and matters at the material time would consider that Ms Alshateri had been dishonest.

27. The Committee therefore found that allegations 2 (a) and (b) had been proved.

### **Allegation 2(c)**

28. On the basis that this allegation was pleaded in the alternative to Allegation 2(c), the Committee made no finding in respect of it.

### **Allegation 3**

29. As to allegation 3 the Committee found that ACCA had tried to contact Ms Alshateri on multiple occasions to no avail. The Committee also noted that the ACCA had clearly explained and set out Ms Alshateri's duty to cooperate in its 20 August 2025 and 19 September 2025 correspondence. Please check dates as don't match allegation. The Committee observed that it was an essential obligation of every professional to cooperate with their regulator to enable the regulator to properly investigate allegations brought before it and so that public confidence in the regulatory system can be maintained.

30. The Committee found that ACCA had taken care to ensure that communications were made using the contact details that it held for Ms Alshateri. The Committee considered that it was clear that Ms Alshateri had failed to cooperate with ACCA by not responding on each of the three dates set out in allegation 3.

31. The Committee therefore found allegation 3 had been proved.

### **Allegation 4**

32. As to allegation 4 the Committee, having regard to the legal definition of misconduct, asked itself whether the proven conduct amounted to misconduct.

33. The Committee found all of the allegations to be proven. The Committee noted that the failings involved breaches of the Exam Regulations, dishonesty and failing to cooperate with her regulator. The Committee determined that these failings were a serious falling short of the conduct expected of a student and

amounted to misconduct. The Committee considered Ms Alshateri's conduct to be at the upper end of seriousness where (i) all of the allegations had been proven, (ii) she had sought to gain an unfair advantage and (iii) where had she been successful in her endeavours to pass the examinations with the assistance of Hire Exam Champs, she may have been able to progress with her qualifications where that was not appropriate. The Committee considered Ms Alshateri's misconduct constituted a discredit to both her and the wider profession.

34. The Committee did not consider whether Ms Alshateri was liable for disciplinary action pursuant to bye-law 8(a)(iii) since this was an alternative allegation where no finding of misconduct was made.

#### **SANCTION AND REASONS**

35. The Committee considered what sanction, if any, to impose, taking into account all that it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions dated February 2025 (the "Sanctions Guidance"), and the principle of proportionality. The Committee also took account of submissions by Ms Clifton. It noted the advice from the Legal Adviser which it duly accepted.
36. The Committee considered that the conduct in this case was very serious. The Committee had specific regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour. Being honest is a fundamental requirement of any accountant or student member. Similarly, not co-operating with your regulator is a very serious failing.
37. The Committee considered whether any mitigating or aggravating factors featured in this case. The Committee did not identify any mitigating factors.
38. The Committee identified the following aggravating factors:
- No evidence of insight or genuine remorse.

- This was pre-planned, deliberate misconduct involving dishonesty and collusion with a third party.
  - Potential damage to the examination system.
  - Potential to undermine the reputation of the profession.
  - Two separate attempts to cheat on the FM and PM examinations in short succession on 5 and 6 September.
39. The Committee considered that Ms Alshateri's conduct could have serious adverse effects on third parties where she passed her examinations with the assistance of Hire Exam Champs in circumstances where she was not a fit and proper person to be an accountant.
40. Given the Committee's view of the seriousness of Ms Alshateri's conduct, it was satisfied that the sanctions of No Further Action, Admonishment, Reprimand and Severe Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. In considering a Severe Reprimand, the Committee noted that a majority of the factors listed in the guidance were not present and, in particular, there was no evidence of insight or genuine remorse. The Committee had regard to Section E2 of the Guidance on Dishonesty and the seriousness of such a finding on a professional. It considered the factors listed at C5 of the Guidance for removal of Ms Alshateri from the student register and was satisfied that her conduct was fundamentally incompatible with remaining on the register. The Committee was satisfied that only removal from the register was sufficient to mark the seriousness of the misconduct to the profession and the public.
41. Consequently, the Committee concluded that the appropriate, proportionate sanction was to order that Ms Alshateri be excluded from the register.

#### **COSTS AND REASONS**

42. The member has not submitted documents relating to their financial position for the Committee to consider.

43. The Committee had been provided with a Simple Costs Schedule and a Detailed Costs Schedule relating to the ACCA's claim for costs.
44. Having carefully considered the ACCA's Cost Guidance, and heard from the Legal Adviser, the Committee made the following decision as to costs.
45. The Committee concluded that ACCA was entitled to be awarded costs against Ms Alshateri since allegations 1(a), 1(b), 1(c), 2 (a), 2 (b), 3 and 4(a) were found proved. The amount of costs for which the ACCA applied was £8349.00. The Committee noted that the hearing had taken slightly less time than anticipated. Accordingly, the Committee reduced the figure of £8,349.00 to £8,000 and was satisfied that this amount was reasonable and proportionate in the circumstances.

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

46. The Committee was persuaded that the ground for imposing an immediate order was made out given the serious facts of this case and that there is a risk of Ms Alshateri holding herself out as an ACCA student and/or compromising the integrity of further examinations if an immediate order is not imposed.

**Ms Avril O'Meara**  
**Chair**  
**18 February 2026**