

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Ms Yuwen Zou
Heard on:	Wednesday, 04 March 2026
Location:	Remotely via Microsoft Teams
Committee:	Miss Sahima Qamar (Chair) Dr David Horne (Accountant) Ms Victoria Smith (Lay)
Legal Adviser:	Mr Ashraf Khan (Legal Adviser)
Persons present and capacity:	Ms Kimberley Clifton (ACCA Case Presenter) Miss Mary Okunowo (Hearings Officer)
Summary	Removed from the student register.
Costs:	£4,665.00

INTRODUCTION

1. The Disciplinary Committee (“the Committee”) met on 04 March 2026 to hear allegations brought by the Association of Chartered Certified Accountants (“ACCA”) against Ms Yuwen Zou, an ACCA student.

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2. Ms Zou did not attend the hearing and was not represented.
3. ACCA was represented by Ms Kimberley Clifton, Case Presenter.
4. The papers before the Committee consisted of a Service Bundle (21 pages) and the Disciplinary Committee Hearing Bundle (74 pages).

SERVICE OF PAPERS

5. Before considering the allegations, the Committee first considered whether notice of the hearing had been properly served on Ms Zou in accordance with the Complaints and Disciplinary Regulations 2014 (“CDR”).
6. The Committee had regard to Regulation 22, which governs the service of documents. The Committee noted that Regulation 22 permits service by email to a student’s registered email address. Where service is effected by email, Regulation 22(8) provides that service is deemed to take place on the day the email is sent.
7. The Committee also considered Regulation 10, which requires that a student be given not less than 28 days’ notice of the hearing, together with details of the hearing and the allegations.
8. The Committee considered the Service Bundle and noted that a Notice of Hearing dated 02 February 2026 had been sent by email to Ms Zou’s registered email address.
9. The Committee was satisfied that this was the email address recorded on ACCA’s register and that there was no evidence that the email had been returned undelivered.
10. The Committee further noted that the hearing was listed for 04 March 2026, providing more than 28 days’ notice of the hearing.
11. The Committee was satisfied that the Notice of Hearing set out the date, time and format of the hearing, the allegations against Ms Zou, and informed her of her right to attend and be represented, together with the documentation upon which ACCA intended to rely.

12. The Committee therefore determined that the Notice of Hearing had been properly served in accordance with Regulation 22, and that the notice requirements under Regulation 10 had been satisfied.

PROCEEDING IN ABSENCE

13. Having determined that service had been properly effected, the Committee next considered whether it was fair and appropriate to proceed in Ms Zou's absence.
14. The Committee accepted the advice of the Legal Adviser and reminded itself that the discretion to proceed in the absence of a respondent must be exercised with care and caution, the overriding consideration being fairness.
15. The Committee had regard to the principles set out in *R v Jones (Anthony)* [2002] UKHL 5.
16. The Committee noted that Ms Zou had been properly notified of the hearing but had not responded to the Notice of Hearing.
17. The Committee also noted that further attempts had been made to contact Ms Zou prior to the hearing, including additional emails and telephone calls, but no response had been received.
18. No request for an adjournment had been made, and no explanation had been provided for Ms Zou's absence.
19. The Committee considered whether an adjournment would be likely to secure Ms Zou's attendance. In the absence of any communication or engagement, the Committee concluded that there was no reason to believe that an adjournment would secure her attendance.
20. The Committee also considered whether proceeding in her absence would cause unfairness or prejudice.
21. The Committee also noted that the case was largely documentary in nature and that Ms Zou had been given the opportunity to provide written representations but had not done so.

22. Balancing fairness to Ms Zou with the public interest in the expeditious disposal of disciplinary proceedings, the Committee concluded that Ms Zou's absence appeared to be voluntary.
23. The Committee therefore determined that it was fair and appropriate to proceed in Ms Zou's absence.

ALLEGATIONS

1. On 08 March 2024 before and during a centre-based Financial Management exam ('the exam'), Ms Yuwen Zou, an ACCA student:
 - (a) Was in possession of and used and/or attempted to use unauthorised materials, namely pre-written notes containing formulas, contrary to Exam Regulation 4 and therefore intended to gain an unfair advantage in within the meaning of Exam Regulation 6(a).
2. Ms Yuwen Zou's conduct in respect of allegation 1(a) above:
 - (a) Was dishonest, in that Ms Yuwen Zou possessed and intended to use and/or did use the pre-written notes to gain an unfair advantage in her examination attempt for herself, or others, in the exam and/or a future exam; or in the alternative:
 - (b) Demonstrates a lack of integrity.
3. Contrary to Regulation 3(1) of the Complaints and Disciplinary Regulations 2014, Ms Yuwen Zou has failed to co-operate fully with the investigation of a complaint in that she failed to respond, fully or at all, to any or all of ACCA's correspondence as set out in Schedule A.
4. By reason of her conduct, Ms Yuwen Zou is:
 - (a) Guilty of misconduct pursuant to bye-law 8(a)(i) in respect of any or all of the matters set out above; or in the alternative:
 - (b) Liable to disciplinary action pursuant to bye-law 8(a)(iii) in respect of any or all of the matters set out in allegation 1 and/or 3.

Schedule A

24 September 2024

09 October 2024

25 October 2024

13 November 2024

15 November 2024

13 January 2025

BACKGROUND

24. Ms Zou registered as an ACCA student on 21 October 2021. By virtue of her registration with ACCA, Ms Zou is bound by ACCA's Bye-laws, Regulations and Code of Ethics and Conduct.
25. On 27 March 2024, ACCA received a complaint referral alleging that Ms Zou had been found to be in possession of unauthorised material, namely pre-written notes, during a centre-based Financial Management examination on 08 March 2024.
26. Ms Zou first registered as an ACCA Foundations in Accountancy student on 21 October 2021 and is currently registered as an ACCA Qualification student. The Committee noted that Ms Zou had previously attempted the Financial Management examination in or around December 2023.
27. On 08 March 2024, Ms Zou attended an ACCA examination centre to sit a Financial Management examination, which commenced at 9:00am. Prior to sitting examinations, candidates are required to familiarise themselves with the ACCA Examination Regulations and Guidelines.
28. Following the examination, ACCA's examinations department received an incident report from the examination centre alleging that Ms Zou had been found to be in possession of pre-written notes containing formulas during the examination.
29. The centre provided ACCA with a SCRS 1B incident report, completed by the invigilator shortly after the incident.

30. The SCRS 1B form recorded that the invigilator was patrolling the examination room at approximately 11:52am when they noticed “something white and tissue-like covered by the scrap paper” at Ms Zou’s desk. The invigilator explained that when they attempted to move the scrap paper away, Ms Zou attempted to press down the scrap paper with both hands.
31. The invigilator continued to move the scrap paper aside and discovered three A4 sheets comprising six pages of notes, which were immediately confiscated. The invigilator noted that the notes were placed directly under the scrap paper and appeared to be on paper different from that provided to candidates during the examination.
32. The matter was referred to a supervisor, and Ms Zou was asked to complete a SCRS 2B form before leaving the examination centre. ACCA subsequently obtained an official translation of the SCRS 2B form.
33. In the SCRS 2B form, Ms Zou accepted that she had been in possession of unauthorised materials during the examination and stated that the notes had been discovered by the invigilator at approximately 11:55am.
34. Ms Zou confirmed that the material was relevant to the syllabus being examined, explaining that the notes consisted of a formula sheet. She stated that she had brought the notes into the examination room because she could not memorise all the formulas and wanted to be able to find the formula if needed.
35. Within the SCRS 2B form, Ms Zou indicated that she could not recall whether she had used the unauthorised material and answered “no” when asked whether she had attempted to use or intended to use the material. However, she answered “yes” when asked whether she had intended to gain an unfair advantage from the material. She also accepted the invigilator’s account of the incident when completing the form.
36. On 28 March 2024, Ms Zou was notified of the complaint made against her and the matter was referred to ACCA’s investigations department.
37. On 24 September 2024, the matter was assigned to an Investigations Officer, and Ms Zou was formally notified of the investigation via her registered ACCA email address. She was invited to provide further information regarding the

- complaint by 08 October 2024 (pages 48–51). Ms Zou did not respond to that correspondence.
38. On 09 October 2024, Ms Zou was reminded of her duty to cooperate and asked to provide a response by 23 October 2024.
 39. On 25 October 2024, Ms Zou was sent a final reminder of her duty to cooperate and asked to provide a substantive response by 08 November 2024.
 40. On 13 November 2024, the Investigations Officer attempted to contact Ms Zou using her registered mobile number but was unable to reach her. A further attempt to contact Ms Zou by telephone was made on 15 November 2024, also without success.
 41. On 13 January 2025, Ms Zou was notified via her registered email address of ACCA's intention to refer the matter to an independent assessor. A further email was also sent to the email address recorded on the completed SCRS 2B form, requesting that the recipient access their ACCA registered email account in order to respond to correspondence. No response was received.

SUBMISSIONS ON BEHALF OF ACCA

42. The Committee received submissions from Ms Kimberley Clifton, who appeared on behalf of ACCA.
43. Ms Clifton invited the Committee to find the allegations proved. She submitted that the evidence demonstrated that Ms Zou had been in possession of unauthorised material during the Financial Management examination.
44. Ms Clifton relied on the SCRS 1B incident report completed by the invigilator, which described how the invigilator noticed suspicious material under scrap paper at Ms Zou's desk and subsequently discovered three sheets of pre-written notes containing formulas relevant to the examination syllabus.
45. Ms Clifton submitted that the material had been deliberately concealed beneath scrap paper, which was consistent with an attempt to avoid detection.
46. Miss Clifton further relied upon the SCRS 2B form completed by Ms Zou, in which Ms Zou accepted that she had brought the notes into the examination

- room and confirmed that the material related to the Financial Management syllabus.
47. Ms Clifton submitted that the evidence therefore established that Ms Zou had been in possession of unauthorised material relevant to the syllabus, which engaged Regulation 6(a) of the Examination Regulations.
 48. Ms Clifton reminded the Committee that Regulation 6(a) provides that where a candidate is found in possession of unauthorised material relevant to the syllabus, it will be assumed that the candidate intended to use the material to gain an unfair advantage, unless the candidate can provide an explanation sufficient to rebut that inference.
 49. Ms Clifton also relied upon Ms Zou's answer in the SCRS 2B form in which she answered "yes" to the question asking whether she had intended to gain an unfair advantage.
 50. In those circumstances, Ms Clifton submitted that the evidence demonstrated that Ms Zou had brought the notes into the examination room with the intention of using them to gain an unfair advantage.
 51. Ms Clifton further submitted that such conduct amounted to dishonesty, applying the test *in Ivey v Genting Casinos [2017] UKSC 67*, as deliberately bringing concealed notes into a professional examination would plainly be regarded as dishonest by the standards of ordinary decent people.
 52. Ms Clifton also submitted that Ms Zou had failed to cooperate with ACCA's investigation, noting that despite repeated correspondence and attempts to contact her, no response had been received.
 53. Ms Clifton therefore invited the Committee to find the allegations proved and that Ms Zou was liable to disciplinary action.

SUBMISSIONS BY / ON BEHALF OF MS ZOU

54. Ms Zou did not attend the hearing and was not represented.
55. The Committee noted that Ms Zou had not provided any written submissions for the purposes of the hearing.

56. The Committee did, however, take into account the explanation provided by Ms Zou in the SCRS 2B form completed at the examination centre, in which she stated that the notes found in her possession comprised a formula sheet and that she had brought the material into the examination room because she could not memorise all of the formulas.
57. The Committee also noted that within the SCRS 2B form Ms Zou stated that she could not recall whether she had used the material during the examination and answered “no” when asked whether she had attempted to use or intended to use the material.
58. The Committee had taken this explanation into account when considering the evidence and determining the allegations.

DECISION ON ALLEGATIONS AND REASONS

59. The Committee carefully considered all of the evidence before it, including the documentary evidence contained within the hearing bundle, the submissions made on behalf of ACCA, and the explanation provided by Ms Zou in the SCRS 2B form completed at the examination centre.
60. The Committee reminded itself that the burden of proof rests on ACCA and that the standard of proof is the balance of probabilities. This means that the Committee must be satisfied that it is more likely than not that the alleged conduct occurred. The Committee also had regard to Examination Regulation 6(a), which provides that where a candidate is found to be in possession of unauthorised material relevant to the syllabus, it may be inferred that the candidate intended to use that material to gain an unfair advantage unless there is evidence capable of displacing that inference.

Allegation 1

61. The Committee first considered whether Ms Zou had been in possession of unauthorised material during the examination.
62. The Committee considered the SCRS 1B incident report completed by the invigilator shortly after the incident. The report recorded that the invigilator noticed suspicious material beneath scrap paper at Ms Zou’s desk and, upon

- moving the scrap paper, discovered three sheets of pre-written notes containing formulas.
63. The invigilator also recorded that when the scrap paper was moved, Ms Zou attempted to press down the scrap paper with both hands, which the Committee considered was consistent with an attempt to conceal the material.
 64. The Committee also considered the photocopies of the confiscated material, which showed handwritten notes containing formulas relevant to the Financial Management syllabus.
 65. The Committee further considered the SCRS 2B form completed by Ms Zou, in which she accepted that she had been in possession of the notes during the examination and confirmed that the notes comprised a formula sheet relevant to the syllabus being examined.
 66. The Committee therefore found that Ms Zou had been in possession of unauthorised material relevant to the examination syllabus during the Financial Management examination.
 67. The Committee next considered the issue of intention to gain an unfair advantage.
 68. The Committee had regard to Regulation 6(a) of the Examination Regulations, which provides that where a candidate is found to be in possession of unauthorised material relevant to the syllabus, it will be assumed that the candidate intended to use that material to gain an unfair advantage, unless there is evidence capable of displacing that inference.
 69. The Committee considered whether there was any evidence capable of displacing the inference that the material was intended to be used to gain an unfair advantage.
 70. The Committee noted that Ms Zou explained in the SCRS 2B form that she had brought the notes into the examination room because she could not memorise all of the formulas and wished to be able to find the formula if required.
 71. The Committee also noted that Ms Zou answered “yes” to the question asking whether she had intended to gain an unfair advantage from the material.

72. In addition, the Committee noted the placement of the notes beneath scrap paper and Ms Zou's attempt to press down the scrap paper when the invigilator approached, which the Committee considered indicative of concealment.
73. Taking all of the evidence together, the Committee concluded that Ms Zou had brought the formula sheets into the examination room with the intention of using them to gain an unfair advantage.
74. The Committee therefore found Allegation 1 proved.

Allegation 2(a) – Dishonesty

75. The Committee next considered whether Ms Zou's conduct was dishonest.
76. In determining dishonesty, the Committee applied the test set out in *Ivey v Genting Casinos*.
77. The Committee first considered Ms Zou's state of knowledge or belief as to the facts. The Committee was satisfied that Ms Zou knew that bringing notes into the examination room was prohibited, given the Examination Regulations and the nature of the examination environment.
78. The Committee then considered whether ordinary decent people would regard the conduct as dishonest.
79. The Committee concluded that deliberately bringing concealed notes containing formulas into a professional examination in order to gain an advantage would be regarded as dishonest by the standards of ordinary decent people.
80. The Committee therefore found Allegation 2(a) proved.
81. In light of its finding that dishonesty had been established, the Committee did not need to determine Allegation 2(b) (lack of integrity).

Allegation 3 – Failure to Cooperate

82. The Committee next considered whether Ms Zou had failed to cooperate with ACCA's investigation, contrary to Regulation 3(1) of the Complaints and Disciplinary Regulations 2014, which requires students to cooperate fully with ACCA in the conduct of investigations.
83. The Committee noted that ACCA had sent a number of communications to Ms Zou inviting her to provide a response to the complaint and to assist with the investigation.
84. The Committee also noted that ACCA had sent reminders and attempted to contact Ms Zou by telephone, but that no response had been received.
85. The Committee therefore concluded that Ms Zou had failed to cooperate with ACCA's investigation.
86. The Committee accordingly found Allegation 3 proved.

Misconduct

87. Having found the allegations proved, the Committee next considered whether the conduct amounted to misconduct.
88. The Committee had regard to Bye-law 8(a)(i) and reminded itself of the guidance given in *Roynance v General Medical Council [2001] 1 AC 311* that misconduct involves a serious departure from the standards expected of members of the profession.
89. The Committee concluded that cheating in a professional examination is inherently serious misconduct, as it undermines the integrity of the qualification process and public confidence in the profession.
90. The Committee also considered that failure to cooperate with a regulator's investigation is itself a serious matter.
91. The Committee therefore concluded that Ms Zou's conduct amounted to misconduct.

92. The Schedule of Allegations also pleads, in the alternative, that Ms Zou is liable to disciplinary action under Bye-law 8(a)(iii) by reason of a breach of ACCA's regulations. In light of the Committee's finding that the conduct proved amounts to misconduct under Bye-law 8(a)(i), it was not necessary for the Committee to determine the alternative allegation.

SANCTION AND REASONS

93. Having found the allegations proved and that Ms Zou's conduct amounted to misconduct, the Committee next considered the appropriate sanction.
94. The Committee had regard to its powers under Regulation 13 of the Complaints and Disciplinary Regulations 2014.
95. The Committee also considered the ACCA Guidance for Disciplinary Sanctions (10 February 2026) ("the Sanctions Guidance").
96. The Committee reminded itself that the purpose of sanction is not to punish the individual, but to protect the public interest, maintain confidence in the profession and uphold proper standards of conduct.
97. In determining the appropriate sanction, the Committee considered the available sanctions in ascending order of seriousness, taking into account the Sanctions Guidance and the particular circumstances of this case.
98. The Committee first considered whether it would be appropriate to take no further action, or to issue a reprimand or severe reprimand. The Committee concluded that such outcomes would be inadequate given the seriousness of the misconduct found proved.
99. The Committee noted that the misconduct involved dishonesty in a professional examination, which strikes at the heart of the integrity of the examination process and the standards expected of those seeking to enter the profession.
100. In determining the appropriate sanction, the Committee considered the aggravating and mitigating features of the case in accordance with the Sanctions Guidance.
101. The Committee identified the following aggravating factors:

- The misconduct involved dishonesty in a professional examination.
 - The unauthorised material consisted of pre-prepared notes containing formulas relevant to the examination syllabus.
 - The material had been concealed beneath scrap paper, which indicated deliberate conduct.
 - Ms Zou had accepted in the SCRS 2B form that she intended to gain an unfair advantage from the material.
 - Ms Zou failed to cooperate with ACCA's investigation and did not engage with the disciplinary proceedings.
102. The Committee considered whether there were any mitigating factors.
103. The Committee noted the absence of any previous disciplinary findings. The Committee also noted that Ms Zou completed the SCRS 2B form at the examination centre and acknowledged that she had been in possession of the unauthorised material. However, beyond this, Ms Zou had not engaged with the investigation or the disciplinary proceedings, and no further mitigation had been provided.
104. The Committee therefore concluded that the aggravating factors significantly outweighed the limited mitigation available.
105. The Committee also considered whether a period of suspension from the student register would be sufficient. However, the Committee concluded that suspension would not sufficiently address the seriousness of the conduct or the need to maintain confidence in the integrity of ACCA examinations.
106. In all the circumstances, the Committee concluded that the appropriate and proportionate sanction was Removal from the Student Register.
107. The Committee determined that this sanction was necessary in order to maintain public confidence in the integrity of the ACCA qualification process and uphold proper professional standards.
108. The Committee therefore directed that Ms Zou be removed from the ACCA Student Register.

COSTS

109. ACCA applied for an order for costs in the sum of £5,445, as set out in the schedule of costs provided to the Committee.
110. The Committee considered the application for costs and had regard to the Guidance for Costs Orders (2023).
111. The Committee noted that it has the power to make an order for costs where allegations have been proved and that the purpose of such an order is to enable ACCA to recover the reasonable costs incurred in investigating and presenting the case.
112. The Committee noted that the allegations in this case had been proved in full and that the proceedings had therefore arisen as a result of Ms Zou's conduct.
113. The Committee considered the schedule of costs and was satisfied that the majority of the costs claimed were reasonable and proportionate in light of the investigation and preparation required.
114. However, the Committee noted that the hearing had concluded more quickly than anticipated and therefore concluded that it was appropriate to make a modest reduction to the costs claimed.
115. In all the circumstances, the Committee determined that it was fair and proportionate to order Ms Zou to pay costs in the reduced sum of £4,665.
116. The Committee therefore directed that Ms Zou pay costs to ACCA in the sum of £4,665.

EFFECTIVE DATE OF ORDER

117. The Committee considered whether the sanction of Removal from the Student Register should take immediate effect.
118. The Committee determined that the sanction should not take immediate effect.

119. In accordance with Regulation 20 of the Complaints and Disciplinary Regulations 2014, the sanction will therefore take effect upon the expiry of the period permitted for the lodging of an appeal, or, if an appeal is lodged, upon the final determination of that appeal.
120. The Committee therefore directed that the order for Removal from the Student Register shall take effect in accordance with Regulation 20 of the Complaints and Disciplinary Regulations 2014.

Miss Sahima Qamar
Chair
04 March 2026