

## HEARING

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

#### REASONS FOR DECISION

**In the matter of:** Mr Abdullah Zeb Khan

**Heard on:** Tuesday, 19 May 2026

**Location:** Hearing held remotely

**Committee:** Mr Tom Hayhoe (Chair),  
Mr Trevor Faulkner (Accountant),  
Ms Caroline Robertson (Lay Member)

**Legal Adviser:** Mr Richard Ferry-Swainson

**Persons present**

**and capacity:** Mr Richard Ive (Case Presenter)  
Mr Abdullah Zeb Khan (ACCA Trainee)  
Ms Anna Packowska (Hearings Officer)

**Summary:** Allegations 1 and 3 found proved. Allegation 2 found not proved. Misconduct proved and severe reprimand imposed. Costs of £1000 to be paid to ACCA.

**ACCA**



+44 (0)20 7059 5000



info@accaglobal.com



[www.accaglobal.com](http://www.accaglobal.com)



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

## **INTRODUCTION/SERVICE OF PAPERS**

1. The Disciplinary Committee (“the Committee”) convened to consider a number of Allegations against Mr Zeb Khan. Mr Ive appeared on behalf of ACCA. Mr Zeb Khan attended and represented himself.
2. The papers before the Committee were in a main bundle numbered 1 to 292 and a separate bundle numbered 1 to 92. There was also a Service bundle and a tabled additional bundle of 11 pages. The Committee was also provided with a costs schedule provided by ACCA and a financial means form provided by Mr Zeb Khan.

## **ADMISSIONS**

3. Mr Zeb Khan admitted Allegation 1 and the Chair announced that those facts were therefore found proved. Mr Zeb Khan also admitted Allegation 3. However, since a finding on Allegation 3 was dependent on any finding in relation to Allegation 2, at this stage the Committee noted Mr Zeb Khan’s admission, but made no formal finding in relation to it.

## **ALLEGATIONS/BRIEF BACKGROUND**

4. It is alleged that Mr Zeb Khan is liable to disciplinary action on the basis of the following Allegations:

Mr Abdullah Zeb Khan (‘Mr Zeb Khan’), at all material times an ACCA trainee:

- 1) Applied for membership to ACCA on or about 25 March 2023 and in doing so claimed in his ACCA Practical Experience Training Record that he had achieved the following eight Performance Objectives:

- *Performance Objective 1: Ethics and professionalism*
- *Performance Objective 2: Stakeholder relationship management*
- *Performance Objective 3: Strategy and innovation*

- *Performance Objective 4: Governance, risk and control*
- *Performance Objective 5: Leadership and management*
- *Performance Objective 18: Prepare for and plan the audit and assurance process*
- *Performance Objective 19: Collect and evaluate evidence for an audit or assurance engagement*
- *Performance Objective 20: Review and report on the findings of an audit or assurance engagement*

- 2) Mr Zeb Khan's conduct in respect of the matters described in Allegation 1, or any of it, demonstrates a failure to act with integrity given that the corresponding statements to the performance objectives were not written in his own words as required by ACCA.
- 3) In the alternative to Allegation 2) above, such conduct was reckless in that Mr Zeb Khan paid no or insufficient regard to ACCA's requirements that the corresponding statements to the performance objectives referred to in Allegation 1 had to be in his own words as required by ACCA.
- 4) By reason of his conduct, Mr Zeb Khan is guilty of misconduct pursuant to ACCA Bye-law 8(a)(i) in respect of any or all of the matters set out at 1 to 3 above.
5. Mr Zeb Khan became an ACCA student on 14 April 2013 and an Affiliate on 14 January 2019.
6. Upon an ACCA student completing all their ACCA exams, they become an ACCA affiliate. However, in order to apply for membership, they are required to obtain at least 36 months' practical experience in a relevant role ('practical experience'). It is permissible for some or all of that practical experience to be obtained before completion of ACCA's written exams.

7. A person undertaking practical experience is often referred to as an ACCA trainee, this being the term used to describe Mr Zeb Khan's status in the Allegations, the report, and this determination.
8. An ACCA trainee's practical experience is recorded in that trainee's Practical Experience Requirement (PER) training record which is completed using an online tool called 'MyExperience' which is accessed via the trainee's MyACCA portal.
9. As part of their practical experience, each trainee is required to complete nine performance objectives (POs) under the supervision of a qualified accountant. An accountant is recognised by ACCA as a qualified accountant if they are a qualified accountant recognised by law in the trainee's country and or a member of an IFAC body (International Federation of Accountants). Once a trainee believes they have completed a PO, they are required to provide a statement in their PER training record describing the experience they have gained in order to meet the objective. Given this is a description of their own experience, the statement should be unique to them. Through the online tool, the trainee then requests that their practical experience supervisor approves that PO.
10. In addition to approval of their PO's, the trainee must ensure their employment, where they have gained relevant practical experience (being a minimum of 36 months) has been confirmed by the trainee's line manager who is usually also the trainee's qualified practical experience supervisor. This means the same person can and often does approve both the trainee's time and achievement of POs.
11. If the trainee's line manager is not qualified, the trainee can nominate a supervisor who is external to the firm to supervise their work and approve their POs. This external supervisor must have some connection with the trainee's firm, for example as an external accountant or auditor. Similarly, if the trainee's line manager is not qualified the trainee can nominate a supervisor who is internal to their firm to supervise their work and approve their POs.

12. Once all nine POs have been approved by the trainee's practical experience supervisor (whether internal or external) and their minimum 36 months of practical experience has been approved, the trainee is eligible to apply for membership - assuming they have also passed all their ACCA exams and successfully completed ACCA's Ethics module.
13. During 2023 it came to ACCA's attention that 10 ACCA trainees based in Pakistan and largely employed at two firms had submitted very similar or identical PO statements as each other. As a result, these trainees were all referred to ACCA's Investigations Team. One such trainee was Mr Zeb Khan.
14. Person E, Senior Administrator in ACCA's Member Support Team, provided a statement explaining ACCA's membership application process. She stated that once an application is received, this is recorded in ACCA's PROD database by an automated process. Person E exhibited to her statement a sample record. The corresponding record for Mr Zeb Khan could not be retrieved due to an administration error but an email from Mr Zeb Khan, received on 25 March 2023, indicated he had applied for membership on or about 25 March 2023. His application remains on hold given the matters which are the subject of this case. Mr Zeb Khan is therefore currently an Affiliate, having been admitted to the Affiliate Register on 14 January 2019.
15. Person D, employed as the Professional Development Manager with the Professional Development team, part of the Quality and Recognition department within Professional Qualifications at ACCA, provided an overview of the PER process as follows:
  - POs and ACCA's exams are closely linked so that the knowledge and techniques the trainee develops through their studies, are relevant in their workplace. The tasks and activities a trainee will be asked to demonstrate in the POs are also closely related to the type of work they will undertake on a regular basis in an accounting or finance role.

- Each PO comprises 3 parts; (i) a summary of what the PO relates to; (ii) 5 elements outlining the tasks and behaviours a trainee must demonstrate to be able to achieve the PO; and (iii) a 200 to 500-word concise personal statement in which a trainee must summarise how they achieved the PO.
- In total a trainee is required to complete nine POs. The POs numbered 1 to 5 are compulsory. There are then a number of optional 'Technical' POs from which the trainee needs to choose four. ACCA recommends to trainees that they choose the technical POs that best align to their role so that it is easier to achieve the PO. In that regard the ACCA's requirements as published in the 2019 guide, and subsequently, explain the following:

*'The performance objectives you choose should be agreed with your practical experience supervisor. You should consider the following points when selecting which performance objectives to target...*

*... ..*

*Match any business objectives you have been set at work with the performance objectives. This will allow you to work towards your business objectives and your PER at the same time.'*

- In their personal statement for each PO, a trainee needs to provide a summary of the practical experience they gained. They must explain what they did, giving an example of a task. They must describe the skills they gained which helped them achieve the PO, and they must reflect on what they have learned including what went well or what they would have done differently.
- A trainee's personal statement for each PO must be their own personal statement that is unique to them and their own experience. This has been consistently referred to in ACCA's published guides which Person D exhibited to her statement. Trainees must not therefore use a precedent or template or another trainee's personal statement, which would undermine the PER training record element of the ACCA qualification. The 2019 published guide concludes:

*'Your situation and experience are unique to you, so we do not expect to see duplicated wording, whether from statement to statement, or from other trainees. If such duplication occurs, then it may be referred to ACCA's Disciplinary Committee.'*

- Although the Guides are printed in English, all trainees will have taken their exams in English and therefore it would follow that they have a reasonable command of the English language.
- A practical experience supervisor means a qualified accountant who has worked closely with the trainee and who knows the trainee's work. 'Qualified accountant' means a member of an IFAC member body and or a body recognised by law in the trainee's country.
- A practical experience supervisor is usually the trainee's line manager. However, where the trainee's manager is not IFAC qualified, the trainee can appoint a supervisor who is. That supervisor can be internal to the trainee's firm or external. In that regard, ACCA's PER guide as exhibited to Person D's statement states:

*'If ... .. your organisation does not employ a professionally qualified accountant who can sign-off your performance objectives then you could ask an external accountant or auditor who knows your work, to be your practical experience supervisor and work with your line manager to sign off your objectives.'*

- Trainees must enter their practical experience supervisor's details using their ACCA MyExperience online recording tool which generates an invitation to their nominated supervisor to act as their supervisor. If the supervisor accepts that invitation, the supervisor is required to record their details using the same recording tool.
- All practical experience supervisors have to be registered with ACCA.

16. The Committee was provided with a copy of the PER training record for Mr Zeb Khan. It records he obtained his experience while employed at one firm, namely Company A. In particular, it records the following:
- Mr Zeb Khan was employed at Company A from 24 June 2019 to 23 June 2022 in the role of Audit Associate.
  - 36 months of relevant practical experience has been claimed, which relates to the period of employment referred to in the above paragraph. This therefore meets ACCA's minimum experience requirement.
  - His PER training record lists his supervisor as Person F which records that Person F was authorised to approve Mr Zeb Khan's objectives and time.
  - The Supervisor details for Person F record he registered as Mr Zeb Khan's supervisor on 29 September 2022 and did so as his IFAC qualified line manager. As such Person F was authorised to approve Mr Zeb Khan's time and objectives, as reflected in his PER training record.
  - Mr Zeb Khan requested that Person F approve his time/experience of 36 months on 19 October 2022. Person F is recorded as approving that time/experience on 28 November 2022.
  - In relation to his role as Audit Associate at Company A, Mr Zeb Khan requested that Person F approve his performance objectives on various dates between 19 October 2022 and 7 January 2023. Person F is recorded as approving all of Mr Zeb Khan's performance objectives either on 28 November 2022 or 13 January 2023.
17. As referred to by Person D, all PO statements should be unique and must not be copied from other trainees or from templates as this undermines the PER training record element of the ACCA qualification.

18. Where PO statements are the same or significantly similar to the PO statements of any other trainees, this would suggest at the very least, the trainee has not met the objective in the way claimed or possibly at all. That further, the practical experience claimed, has not been supervised by a practical experience supervisor, who would or should have knowledge of the trainee's work.
19. In this case, ACCA is not saying that Mr Zeb Khan was not supervised or that he did not meet the performance objectives. It follows that in this case, ACCA is not alleging that Mr Zeb Khan obtained ACCA membership in a dishonest manner, i.e., that he deliberately set out to mislead ACCA when completing the PO statements set out in allegation 1.
20. ACCA's case is that he fell below the standard to be expected of an ACCA trainee in that he failed to comply with the strict requirement that the corresponding statements to the POs in the PER training record must be in the trainee's own words to reflect their unique experiences.
21. In carrying out the analysis of Mr Zeb Khan's PER training record, ACCA has been careful to record the PO statement for any one PO which was first in time, on the basis this statement may be original and therefore written by the trainee based on their actual experience, unless there is evidence suggesting otherwise.
22. The 'first in time date' is the date the trainee requested that their IFAC qualified line manager approve the PO in question within their PER. This is on the basis that as soon as the PO narrative had been uploaded to the PER, the trainee would have then requested approval. In most of the cases within this cohort, the supervisor approved the POs on the same day, or if not very soon thereafter.
23. In relation to Mr Zeb Khan the analysis revealed:
  - One of his PO statements appeared to be unique (PO11).

- Eight of his PO statements were identical or significantly similar to the PO statements contained in the PERs of other ACCA trainees from this cohort, all of which predated those of Mr Zeb Khan's.
- Mr Zeb Khan's PO1 statement is identical or significantly similar to the PO1 statement in the PER training record for three other trainees.
- Mr Zeb Khan's PO2 statement is identical or significantly similar to the PO2 statement in the PER training record for five other trainees.
- Mr Zeb Khan's PO3 statement is identical or significantly similar to the PO3 statement in the PER training record for four other trainees.
- Mr Zeb Khan's PO4 statement is identical or significantly similar to the PO4 statement in the PER training record for five other trainees.
- Mr Zeb Khan's PO5 statement is identical or significantly similar to the PO5 statement in the PER training record for four other trainees.
- Mr Zeb Khan's PO18 statement is identical or significantly similar to the PO18 statement in the PER training record for five other trainees.
- Mr Zeb Khan's PO19 statement is identical or significantly similar to the PO19 statement in the PER training record for six other trainees.
- Mr Zeb Khan's PO20 statement is identical or significantly similar to the PO20 statement in the PER training record for six other trainees.

24. Following referral of this matter to ACCA's Investigations Team, a member of that team sent an email to Mr Zeb Khan on 16 October 2024 attached to which was a letter, and other documents, as referred to above. The letter clearly set out the complaint and requested that Mr Zeb Khan respond to a number of questions by 30 October 2024.

25. On 30 October 2024, Mr Zeb Khan emailed his response with a number of attachments evidencing his employment at Company A. In relation to his employment by Company A and supervision by Person F, Mr Zeb Khan said:

*'The document provided on Company A letterhead, dated October 10, 2023, specifies that I worked under the direct supervision of Person F. He was directly supervising my work as I was involved with the same clients which he was directly managing, and my performance reviews were also conducted by him.'*

26. Mr Zeb Khan provided 'a screenshot of his annual performance review, which confirmed that Person F had been responsible for assessing his performance. Mr Zeb Khan also provided ACCA with certificates of training courses he completed at Company A.

27. In relation to his PO statements, Mr Zeb Khan said, *'As English is not my first language, I may have referred a document for guidance on structuring responses to performance objectives and discussed it with colleagues as well. While certain wording may be similar or even be the same with another ACCA trainee, but this does not mean that my submission does not reflect my genuine experience.'*

28. Mr Zeb Khan also provided a letter on Company A headed notepaper signed by Person G, Partner/Head of Office Management, [REDACTED] dated 10 October 2023. The letter confirmed Mr Zeb Khan commenced his training full-time with Company A, "the firm" at their [REDACTED] office on 24 June 2019. The letter went on to say:

*'Mr Abdullah Zeb Khan was engaged as a trainee student of ACCA for a duration of three years, spanning from 24 of June 2019 to 24 June 2022. Subsequently, following the successful completion of his training, he was retained in the capacity of Assistant Manager - effective from 27 June 2022. He is currently working in the capacity as [REDACTED] - Audit and Assurance.*

*During his tenure with the Firm Mr Abdullah Zeb Khan was actively involved in a diverse range of audit engagements, encompassing various sectors such as*

*Telecommunications, Hospitality, Real Estate, Information Technology, Manufacturing, Financial Services, and Community and Social Services. He also attended various training courses arranged by the Firm.*

*Throughout his progression, Mr. Abdullah Zeb Khan held various positions, starting from [REDACTED] - after being retained as an employee.*

*Mr. Abdullah Zeb Khan worked under the supervision of Person F. (Senior Manager Audit and Assurance till 30 June 2023).*

*Mr. Abdullah Zeb Khan's duties and responsibilities during his training was to assist in overall job management including audit planning, testing and completion of audits including preparation of draft audit report reports. Ensure good working relationship with the client and coordinate with responsible individuals in order to meet the timelines. (Sic)*

*This certificate is being issued on the specific request of Mr Abdullah Zeb Khan without any responsibility or liability on part of the Firm or its Partners.”*

29. ACCA then sent an email to Mr Zeb Khan on 1 November with further questions. Mr Zeb Khan responded in an email of 5 November 2024. Below are ACCA's questions followed by Mr Zeb Khan's responses in italics:

### **Question 1**

You state you 'may have referred a document for guidance on structuring responses to performance objectives and discussed it with colleagues as well'. Although you may have discussed your POs with colleagues, this would not have resulted in the statements supporting eight of your POs being identical.

You will note from the Separate Bundle:

The earliest PO statements (PO1, PO2, PO3, PO4 and PO5) were submitted by [GA] on 27 May 2019.

The earliest PO statements (PO18, PO19 and PO20) were submitted by [SA] on 17 June 2021.

Your earliest PO statements were submitted 19 October 2022.

It therefore remains ACCA's view that you would have copied these eight PO statements from others. Please therefore explain how this happened.

*'I have previously attempted to clarify that while the wording of my PO (Performance Objective) statements may closely resemble those of other individuals, this does not imply that the experiences I have detailed are not genuine. It is possible that the document I used for reference contained responses already submitted by ACCA members, as noted in your prior communication, of which I was unaware. When using this document as a guide, I found that no modifications were necessary, as the response accurately reflected the training I had undertaken, which explains the similarities in my PO statements.'*

## **Question 2**

Please provide any evidence you have that you discussed these PO statements with colleagues, i.e., texts, emails etc.

*'I do not possess any evidence of discussing PO statements with colleagues, as these were informal, verbal conversations rather than structured meetings. The discussions occurred spontaneously as part of broader conversations about PER (Practical Experience Requirements) with various colleagues.'*

## **Question 3**

You state you 'may' have discussed the PO's with other colleagues. Assuming you did, please provide me with the names of those colleagues.

*'As mentioned in point 2, I am unable to provide specific names of colleagues involved in these discussions, as they included multiple individuals. It has been*

*almost 2 years, and the batch typically comprises 40–60 trainees. I do not want to risk providing inaccurate information.'*

#### **Question 4**

Please provide me with the 'document' you state you referred to 'for guidance' to assist you in writing the statements supporting your performance objectives.

*'I will need to search for the document in question, as it was not retained after I submitted my PO statements. I can, however, describe its content: it contained sample responses to PER objectives. I am unsure of the origin of these responses or whether they were created for illustrative purposes or were actual submitted PO statements.'*

30. ACCA sent a follow up email to Person F dated 21 November 2024, with the following question:

*'If you locate the document you are referring to, please provide me with a copy. In the meantime, please provide me with further details about this document. For example, you say you used it as a template, but where did you obtain it from? Did you obtain it from a website, social media, or from a particular person? Furthermore, why did you think it was appropriate to rely on this document in your responses when ACCA makes it clear in its guide that statements need to be written by a trainee in their own words?'*

31. Mr Zeb Khan provided his response to this, in an email dated 28 November 2024. This stated:

*'I obtained it from a person in the firm I don't remember who. Furthermore, I would say that it is a shortcoming on my part as I was unclear regarding the objectives to be written in my own words. But as I said, when I read the document, I felt like I had gone through the same training therefore just merely changing the words and keeping the same meaning is of no use.'*

32. As referred to above, the IFAC qualified supervisor who approved Mr Zeb Khan's POs in his PER training record was Person F. ACCA's investigating officer emailed Person F to ask him to provide confirmation that he acted as Mr Zeb Khan's supervisor and that being so whether he was aware the statements supporting Mr Zeb Khan's POs had been copied from others.
33. Person F responded confirming he had acted as Mr Zeb Khan's supervisor, as well as for other ACCA trainees, some of whom shared the same PO statements. Person F provided the period for that supervision which accords with the period in Mr Zeb Khan's PER training record.
34. In relation to Mr Zeb Khan's PO statements being copied from others, Person F stated:

*'I have a total of 22 trainees linked to my ACCA supervisor portal... I would like emphasize that I am human, and I do not have a photographic memory which would highlight that the wording used by trainees may have been identical to the one used by me or someone else, however, I have always carefully evaluated my trainees' achievements of performance objectives after which I approved their POs on the ACCA portal. ... I cannot guarantee that in the future I may approve a trainee's performance objective which may have a similar wording with someone else, however, I can assure you that I will keep this consideration in mind.'*

#### **DECISION ON FACTS/ALLEGATION AND REASONS**

35. The Committee considered with care all the evidence presented and the submissions made by Mr Ive and those made by Mr Zeb Khan. The Committee accepted the advice of the Legal Adviser and bore in mind that it was for ACCA to prove its case and to do so on the balance of probabilities. The Committee also took into account the written responses provided by Mr Zeb Khan during the course of the investigation (as referred to above) and his oral evidence provided to the Committee at this hearing.

### **Allegation 1 - proved**

36. The Committee found Allegation 1 proved on the basis of Mr Zeb Khan's admission. The Committee noted that Allegation 1 was purely factual and did not allege any wrongdoing.

### **Allegation 2 - not proved**

37. The Committee then considered whether the behaviour found proved in Allegation 1 demonstrated a failure to act with integrity, given that the corresponding statements to the performance objectives were not written in Mr Zeb Khan's own words as required by ACCA.
38. The Legal Adviser advised that the leading authority on integrity is the case of Wingate and Evans v SRA [2018] EWCA Civ 366. This combined appeal focused on the concepts in relation to separate breaches of the Solicitors Code of Conduct; in particular whether the integrity expected from professionals, particularly those in professions which adhere to ethical standards (such as solicitors and in this case accountants), requires more than mere honesty. Jackson LJ distinguished honesty and integrity, stating that honesty is "*a basic moral quality which is expected of all members of society*". Integrity, on the other hand is "*a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members*". He also accepted however that the duty of integrity does not require professional people to be "*paragons of virtue*".
39. The Legal Adviser further advised that it is generally accepted that integrity is a broader concept than honesty. However, it is also a more nebulous concept than honesty and thus less easy to define. In professional codes of conduct, the term "integrity" is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members, as referred to by Jackson LJ in the above case. The underlying rationale is that the professions have a privileged and trusted role in society and in return they are required to live up to their own professional standards.

40. Accordingly, the Committee had to decide whether Mr Zeb Khan, by not being more careful about the way in which he went about submitting his POs, failed to live up to the professional standards expected of him as a Trainee of ACCA and went beyond being reckless.
41. There is extensive advice online on how an ACCA trainee must complete their PER training record, which makes it clear that statements supporting performance objectives must be written by trainees in their own words and as such must be unique and not duplicated wording used by other trainees. However, Mr Zeb Khan said he could not remember many years later what he had and had not looked at the time, but did say that if he had been aware of the guidance why would he have not used his own words, given he had carried out the necessary practical experience.
42. In all the circumstances, the Committee was not persuaded that Mr Zeb Khan must have known the corresponding statements to the POs should have been written in his own words to reflect his unique experiences. He said that at the time it was audit season and he was working very hard. It was now many years later and he could not remember who had provided him with the Word documents that he then used. He could not remember if he had been aware at that time of the requirement to use his own words as he could not remember if he looked at the guidance before submitting his POs. He emphasised that he had carried out the practical experience reflected in all of the POs and that they had all been signed off by his supervisor. He also highlighted the fact that his employer had no issues with him and that he had been retained notwithstanding this process and indeed had been made a manager.
43. The Committee was in no doubt that Mr Zeb Khan's behaviour was reckless, but was not satisfied that ACCA had demonstrated that he had failed to act with integrity.
44. Accordingly, the Committee found Allegation 2 not proved.

**Allegation 3 - proved**

45. Having found Allegation 2 not proved, the Committee accepted Mr Zeb Khan's admission to Allegation 3.
46. Accordingly, the Committee found Allegation 3 proved.

#### **Allegation 4 - proved**

47. Having found the facts proved in Allegations 1 and 3, the Committee then considered whether they amounted to misconduct.
48. As an ACCA Trainee it was incumbent upon Mr Zeb Khan to be familiar with the above referred to guidance issued by ACCA and he should have made sure he knew the necessary requirements before submitting his POs. He has admitted acting recklessly in not doing so. Professionals should not act recklessly, particularly with regards to something as important as ACCA's admissions process.
49. Mr Zeb Khan admitted, and the Committee found proved, that he submitted eight POs that were copied from a template or other Trainee's account and that were not written in his own words, as required. Such conduct subverts and undermines the integrity of ACCA's PER training process, even if he had completed the necessary training experience (and this was not in doubt). Completion of the PER training process is a precursor and condition precedent to membership of ACCA. Such behaviour undermines the integrity of the membership process and the standing of ACCA. It brings discredit upon Mr Zeb Khan, the profession and ACCA and falls far short of the standard expected of an ACCA Trainee. The Committee considered this behaviour to be serious and that it amounted to misconduct.
50. The Committee therefore found Allegation 4 proved.

#### **SANCTION AND REASONS**

51. In reaching its decision on sanction, the Committee took into account the submissions made by Mr Ive and those made by Mr Zeb Khan. The Committee

referred to the Guidance for Disciplinary Sanctions issued by ACCA and had in mind the fact that the purpose of sanctions was not to punish Mr Zeb Khan, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct, and that any sanction must be proportionate. The Committee accepted the advice of the Legal Adviser.

52. When deciding on the appropriate sanction, the Committee carefully considered the aggravating and mitigating features in this case.
53. The Committee considered the misconduct involved the following aggravating features: a lack of insight; conduct undermining the integrity, and thereby undermining public confidence, in ACCA's membership process.
54. The Committee considered there to be the following mitigating factors: the absence of any previous disciplinary history with ACCA; co-operation with ACCA throughout the investigation; early admissions to the facts ultimately found proved; a willingness to submit POs in his own words; a positive testimonial.
55. The Committee did not think it appropriate, or in the public interest, to take no further action or order an admonishment in a case where a member had recklessly disregarded the membership requirements when submitting information in connection with his PER.
56. The Committee then considered whether to reprimand Mr Zeb Khan. The guidance indicates that a reprimand would be appropriate in cases where the conduct is of a minor nature, there appears to be no continuing risk to the public and there has been sufficient evidence of an individual's understanding, together with genuine insight into the conduct found proved. The Committee did not consider Mr Zeb Khan's conduct to be of a minor nature and he had shown insufficient insight into his reckless behaviour. Accordingly, the Committee concluded that a reprimand would not adequately reflect the seriousness of the conduct in this case.

57. The Committee then considered whether a severe reprimand would adequately reflect the seriousness of the case. The guidance indicates that such a sanction would usually be applied in situations where the conduct is of a serious nature but where there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public and there is evidence of the individual's understanding and appreciation of the conduct found proved. The Committee considered most of these criteria to be met. The guidance adds that this sanction may be appropriate where most of the following factors are present:

- the misconduct was not intentional and no longer continuing;
- evidence that the conduct would not have caused direct or indirect harm;
- insight into failings;
- genuine expression of regret/apologies;
- previous good record;
- no repetition of failure/conduct since the matters alleged;
- rehabilitative/corrective steps taken to cure the conduct and ensure future errors do not occur;
- relevant and appropriate references
- co-operation during the investigation stage.

58. The Committee considered that the majority of these factors applied in this case and that accordingly a severe reprimand would adequately reflect the seriousness of Mr Zeb Khan's behaviour. His misconduct was reckless rather than intentional and was no longer continuing. He had by his admissions shown some insight, albeit limited as to the impact of his behaviour on the profession. He does have a previous good record and shown a willingness to take corrective action by completing POs in his own words. He had provided a positive reference and it is clear his employer, Company A, has confidence in him as they retained him at the conclusion of his training period, notwithstanding this ongoing case, and have gone so far as to promote him to a management position. He had also co-operated during the investigation stage.

59. For all these reasons, the Committee decided that a severe reprimand was the most appropriate and proportionate sanction in this case. It would send out a clear message that ACCA Trainees must not act recklessly, they must complete POs in their own words and they must follow ACCA guidance.
60. The Committee therefore ordered that Mr Zeb Khan be severely reprimanded.

### **COSTS AND REASONS**

61. ACCA applied for costs in the sum of £7,476 to cover the costs of this case. The Committee was provided with a schedule of costs. The Committee was satisfied that the costs claimed were appropriate and reasonable. However, the costs were based on the hearing lasting a whole day when, in the event, it did not take quite that long. Accordingly, the Committee made a reduction to reflect the time actually taken.
62. The normal position is that a relevant person against whom an allegation has been found proved, should pay the reasonable and proportionate costs of ACCA in bringing the case. This is based on the principle that the majority of members should not be required to subsidise the minority who, through their own failings, have found themselves subject to disciplinary proceedings. However, this is a discretionary power and the Committee is entitled to take into account the relevant person's means when considering costs.
63. Mr Zeb Khan provided a statement of means. It was apparent from that statement of means that Mr Zeb Khan's [REDACTED]. He also provided a copy of his most recent payslip supporting his statement of means. The Committee noted the costs [REDACTED] and to make an Order for costs in the full amount would be unjustifiably punitive in this case and may prevent Mr Zeb Khan from becoming a member of ACCA. The Committee acknowledged that he had waited a long time for this case to be heard and as a consequence his earning potential had been compromised. The Committee therefore considered it appropriate and proportionate to reduce the costs requested to reflect Mr Zeb Khan's [REDACTED].

64. In deciding the appropriate and proportionate order for costs the Committee took into account the above factors and decided to make an Order for costs in the sum of £1,000.

**EFFECTIVE DATE OF ORDER**

65. This Order will take effect at the conclusion of the appeal period.

**Mr Tom Heyhoe**  
**Chair**  
**19 May 2026**