

## HEARING

**ADMISSIONS AND LICENSING COMMITTEE OF THE  
ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

**In the matter of:** Ms Sanaah Mohamed Juneja

**Heard on:** Thursday, 07 November 2024

**Location:** Held remotely, via MS Teams

**Committee:** Mr Maurice Cohen (Chair)  
Mr Trevor Faulkner (Accountant)  
Ms Diane Meikle (Lay)

**Legal Adviser:** Ms Jane Kilgannon

**Persons present**

**and capacity:** Mr Ben Jowett (ACCA Case Presenter)  
Miss Sofia Tumburi (Hearings Officer)  
Ms Sanaah Mohamed Ashraf Juneja (Applicant)

**Summary:** Application for re-admission to the student register is refused

1. The Admissions and Licensing Committee (the Committee) of the Association of Chartered Certified Accountants (ACCA) convened to consider the application of Ms Sanaah Mohamed Ashraf Juneja (Ms Juneja) to be re-admitted to the ACCA student register.

## ACCA



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2. In correspondence prior to the hearing, Ms Juneja had confirmed that her full name is Ms Sanaah Mohammed Ashraf Juneja, but that she does not generally use all four names at once. Therefore, for example, in some documentation she is referred to as Ms Sanaah Mohamed Juneja, and in other documentation, as Ms Sanaah Mohamed Ashraf.
3. Mr Ben Jowett (Mr Jowett) represented ACCA. Ms Juneja attended and was not represented.
4. The Committee had confirmed that it was not aware of any conflicts of interest in relation to the case.
5. In accordance with Regulation 3(7)(a) of the Chartered Certified Accountants' Authorisation Regulations 2014 (the Authorisation Regulations), the hearing was conducted in public.
6. The hearing was conducted remotely through Microsoft Teams.
7. The Committee had considered in advance the following documents:
  - a. A hearing bundle (pages 1 to 71);
  - b. A 'Tabled Additional's' Bundle (pages 1 to 4);
  - c. A second 'Tabled Additional's' Bundle (pages 1 to 2); and
  - d. A Service Bundle (pages 1 to 17).

#### **PRELIMINARY MATTERS**

8. Ms Juneja made an application for parts of the hearing that related to her health to be heard in private.
9. Mr Jowett did not oppose the application.
10. The Legal Adviser had reminded the Committee that Regulation 3(7) of the Authorisation Regulations provides that hearings of the Committee must be

held in public unless the Committee is satisfied, having heard from the parties and the Legal Adviser, that the particular circumstances of the case outweigh the public interest in holding the hearing in public, which may include but are not limited to prejudice to any of the parties.

11. The Committee took into account the representations of Ms Juneja and Mr Jowett and accepted the advice of the Legal Adviser.
12. The Committee decided to hold any part of the hearing relating to Ms Juneja's health in private on the basis of the potential prejudice to Ms Juneja in those parts of the hearing being heard in public.

### **BACKGROUND**

13. Ms Juneja registered as a Foundations in Accountancy (FIA) student in February 2021 and completed five examinations as a foundations student.
14. Ms Juneja commenced work with Company A on 14 June 2021, initially as an intern and then later as an employee.
15. On 01 February 2023 Ms Juneja joined ACCA's student register and then transferred to the ACCA qualification.
16. On 11 February 2023, Ms Juneja contacted ACCA seeking exemptions from the 'F1' (Business Technology) and 'F3' (Financial Accounting) examinations. She enclosed transcripts for her O level ("*International General Certificate of Secondary Education*") and A level ("*General Certificate of Education – Advanced Subsidiary*") examinations taken at Company B in June 2020 and June 2022 respectively.
17. On 15 February 2023 ACCA responded, stating that it was unable to award any exemptions based on the O level and A level examinations because these could only be used to meet the minimum registration requirements. Later the same day Ms Juneja sent an email to ACCA asking what kind of qualifications can be used for exemptions.

18. On 27 February 2023, Ms Juneja made a further request for exemptions, attaching a BA Accounting and Finance certificate from Company C dated 29 June 2022. ACCA assessed the certificate and noted a number of apparent discrepancies:
- a. The name and date appeared to be in a different font as compared to the rest of the text on the document;
  - b. The information on the stamp appeared to have been pasted over something else;
  - c. Ms Juneja is a resident of Kenya, but the certifying authority on the stamp was "*Knowledge and Human Development Authority, Dubai*"; and
  - d. Ms Juneja would have been 19 years old or younger at the time she received the BA award (29 June 2022), which is the same month that she was also issued with her A level certification.
19. ACCA has stated that Company C subsequently confirmed that the certificate was not issued by them. However, ACCA has not been able to locate that correspondence to provide it to the Committee.
20. On 28 March 2023, ACCA administratively removed Ms Juneja from the student register on the basis that her application for an exemption was based on false documentation and, when she had registered as an ACCA student, Ms Juneja had signed a declaration acknowledging that ACCA could take such action in the event that she was found to have made an application for an exemption based on a "*false document*". On the same date ACCA wrote to Ms Juneja informing her of her removal from the student register.
21. Later that day Ms Juneja responded stating:
- "I am surprised upon seeing this email!*
- I am extremely sorry on what happened.*

*The above document sent was not sent by me and it seemed like someone has tampered with my email address [PRIVATE] I believe someone had something to do with it. I have recently [PRIVATE].*

*I apologize [sic] wholeheartedly and take full responsibility for any inconvenience caused to you.*

*Kindly do not de register me from my account, I am a student and have current exams going on.*

*Incase [sic] of paying re registration fees, I am ready to pay that too due to inconveniences caused, but kindly I beg you to give me my account back on humanity grounds”.*

22. On 12 May 2023 Ms Juneja submitted an application for re-admission as a student member. She provided an application form, a police clearance certificate and an employer reference.
23. In her application, Ms Juneja provided more detail about the circumstances that led to her removal from the student register:

*“[PRIVATE], malicious incidents took place that I was unaware of. Some document [sic] were sent to your offices under this email address of which I was totally unaware of [...]*

*My email account was hacked by one of my relatives who knew I am pursuing [sic] the Acca course and tried to tamper with all this,[PRIVATE] This may sound new but I apologize [sic], and I am embarrassed as this is [PRIVATE].*

*I do not know how else to prove this but I am a God fearing student who has no intention on any malicious intent and believe He knows the entire truth. However, I have now factored [sic] authentication on my emails and other accounts and promise that this shall not be repeated again ever. I apologize [sic]. Human is to err and I believe everybody deserves second chances so please please consider me on humanity & re register me as per my old account and don't punish me for an act not committed by me but rather evil intentions by someone else.*

*I am extremely sorry and wholeheartedly apologize for the above act that took place [...].*

24. In response to the question “*What was your attitude at the time and now?*”, Ms Juneja responded:

*“I was and am extremely sorry and ashamed. Everyone deserves a second chance so please accept my request and apology and re register my account back with the papers it had before, so that I can continue my other papers for which payment is due [...].*

*Note that I was [PRIVATE] for the past 6 months as mentioned above”.*

25. In response to the question “*Why do you consider you should be admitted as an ACCA [...] registered student?*”, Ms Juneja responded:

*“I am hardworking and God-Fearing student with goals to achieve. Acca has been my first choice and I want to complete it. I want ACCA to give me a second chance to prove myself because I believe everyone deserves a second chance. I have always paid my fees and registrations on time. [PRIVATE]. On humanitarian grounds, I politely and humbly request your offices to accept my justifications and re-register me back into ACCA”.*

26. The police clearance certificate was dated 25 June 2024 and provided by the Directorate of Criminal Investigations in Nairobi (Kenya). It referenced “*Sanaah Mohamed Ashraf*” and indicated a nil response to all items searched.

27. The employer reference was dated 12 September 2024 and referenced “*Ms Sanaah Ashraf*”. It was provided by Person A, a director of Company A, where Ms Juneja works as an accountant. The reference was positive and supportive of Ms Juneja’s application for readmission to the student register. It commented upon Ms Juneja’s diligence, commitment, “*honesty and integrity*”, and “*exceptional professionalism*”. Mr Mohamed Ahmed confirmed that they were aware of Ms Juneja’s “*current situation regarding her ACCA case*” and that they “*believe her side of the story and fully support her request for another opportunity to continue her education*”.

28. Also dated 12 September 2024, Ms Juneja provided a written statement. In it she reiterated her “*sincere regret*” and apology “*for any misunderstanding or miscommunication that may have occurred*”. She also reiterated the explanation given previously, that someone other than herself had sent the documents in question to ACCA in an effort to defame her and sabotage her career. She added that “*completing my degree is not just a personal goal; it is a necessity for my family’s future*”.
29. On 12 October 2024, Ms Juneja provided a further written statement giving additional details about the events that led to her removal from the student register in March 2023. The statement included the following:

*“Following the submission of the BA Degree, I believe there may have been a motive for a family member to interfere with my account as I had previously communicated via email about my O level results and [PRIVATE]. Given my lack of editing skills, it would be impossible for me to edit or forge an entire degree.*

*Additionally, [PRIVATE]. This [PRIVATE] may have provided an opportunity for that family member to manipulate my career path [PRIVATE]”.*

#### **MS JUNEJA’S EVIDENCE**

30. Ms Juneja gave oral evidence to the Committee. Ms Juneja confirmed that she accepted that the Company C degree certificate submitted to ACCA was false, a forgery.
31. In relation to the circumstances of her removal from the student register, Ms Juneja re-iterated the explanation that she had given in correspondence but added further detail. Ms Juneja stated that had been very close to two cousins and that she had shared with them her email address and the passwords she used for her mobile phone, email and social media. However, [PRIVATE] and this had resulted in her cousins feeling animosity towards her. She stated that her status as a registered ACCA student member may have prompted jealousy amongst some family members. Ms Juneja said she believed that this animosity and jealousy provided a motive for her cousins to seek to sabotage her ACCA career.

32. Ms Juneja stated that she has always been honest throughout her ACCA studies and that she is hardworking and determined, having recently achieved 96 per cent in an ACCA 'F3' examination.
33. In response to questions from Mr Jowett, Ms Juneja accepted/stated that:
- a. She had asked ACCA in correspondence to award her an exemption based on humanitarian grounds, seeking a response from ACCA that was “*soft*” and compassionate;
  - b. She had not done any research as to what exemptions she might have been entitled to before getting in touch with ACCA and seeking exemptions;
  - c. She sat her O level examinations in [PRIVATE];
  - d. She sat her A level examinations in [PRIVATE];
  - e. The two cousins, with whom her relationship is now soured, are not accountancy students but have undertaken “*small*” accountancy courses;
  - f. The two cousins had been aware of how strict an organisation ACCA was because she had told them about the level of invigilation at ACCA examinations; and
  - g. She had not yet had the opportunity to confront her cousins about her suspicion that they had submitted the false degree certificate to ACCA, because they live in another city and when she had tried to contact them by mobile phone, they had hung up and then blocked her number.
34. When asked whether her cousins would have had access to her ACCA online account, Ms Juneja initially stated no. However, when her attention was drawn to the fact that the email seeking the exemption and submitting the false degree certificate had been an internal email from within her ACCA online account, she stated that her cousins must, in fact, have managed to gain access to her ACCA online account by using her email address and known passwords.



35. Ms Juneja acknowledged that the explanation that she had given as to how the false degree certificate had come to be submitted to ACCA was “*unbelievable*” and that a more likely explanation was that she had submitted the false certificate to obtain the exemptions. However, she stressed that, however unusual it sounded, this was, in fact, an act of sabotage by her cousins.
36. Ms Juneja stated that she has now changed all of her passwords. She also added that, if ACCA had granted her the exemption on the basis of the false degree certificate, she would have told ACCA that it was not her certificate because she would not have had the relevant accountancy knowledge.
37. In response to questions from the Committee, Ms Juneja stated that:
- a. At the relevant time, she had only about two or three different passwords in use across devices and accounts and her cousins were either aware of them or could have guessed them given their similarity to one another;
  - b. Sharing passwords is a “*Gen Z thing*”, which is for fun, depending on your trust level with your best friends or cousins;
  - c. She expressed regret and an apology to ACCA because she was embarrassed about what had happened;
  - d. She is currently working for a company that arranges construction projects; and
  - e. She had sat and passed ACCA examinations ‘F1’, ‘F2’ and ‘F3’, with the ‘F2’ examination having been taken since she had been removed from the ACCA student register.

### **ACCA’S SUBMISSIONS**

38. Mr Jowett referred the Committee to ACCA’s response document. He submitted that Ms Juneja had not discharged the burden of proving that she was of a general character and suitability to be eligible to be re-admitted to the ACCA student register.

39. Mr Jowett submitted that Ms Juneja's explanation for the submission of the false degree certificate was completely implausible, and that Ms Juneja's maintenance of that explanation amounted to blatant dishonesty. He drew the Committee's attention to the relevant dates and the sequence of events, stating that the submission of the false degree certificate came only a matter of weeks after Ms Juneja had been informed that her O level and A levels were insufficient to achieve an exemption and Ms Juneja had asked what qualifications might be sufficient.
40. Mr Jowett stated that Ms Juneja had not mentioned that her cousins had had access to her ACCA online account until her attention was drawn at today's hearing to the fact that the email submitting the false degree certificate was an internal email from her ACCA online account.
41. Mr Jowett stated that the only person that had anything to gain from the submission of the false degree certificate was Ms Juneja, in the obtaining of exemptions. He asserted that the Committee was being asked to believe an unlikely set of circumstances, in which Ms Juneja's cousins undertook a sophisticated set of steps - forging a degree certificate, accessing her ACCA account (using similar passwords from her personal email account) and then submitting the degree certificate as part of an application for examination exemptions, all in the hope that ACCA would discover that it was a forgery.
42. Mr Jowett flagged that, if true, the plan could have easily mis-fired on the cousins if the forgery had gone unnoticed and the exemptions had been granted to Ms Juneja. He stated that there must have been many much easier ways for Ms Juneja's cousins to seek to exact revenge.

### **MS JUNEJA'S SUBMISSIONS**

43. Ms Juneja submitted that she had been honest in all of her dealings with ACCA. She stated that she did not have the IT skills to forge a document. She drew the Committee's attention to her clear criminal record and the positive reference from her employer.
44. Ms Juneja explained that it was her dream to become a chartered accountant. She gave details of family members that look up to her and for whom she is

responsible, [PRIVATE]. She asked for the Committee to give her another chance to prove herself, and to grant her application for re-admission to the ACCA student register.

## **DECISION ON APPLICATION AND REASONS**

45. The Committee took into account the documentary and oral evidence, and the written and oral submissions of Ms Juneja and Mr Jowett.
46. The Committee accepted the advice of the Legal Adviser. The Committee bore in mind that, in accordance with Regulation 9(1)(b) of the Chartered Certified Accountants' Membership Regulations 2014 (Membership Regulations), the burden was on Ms Juneja to prove, to the civil standard (that is, on the balance of probabilities), that she is eligible to become an ACCA student. The Committee noted that Regulation 7(1) of the Membership Regulations provides that a person is eligible to be registered as a student member if, amongst other things, they have satisfied the Committee as to their "*general character and suitability*". The Committee noted that Regulation 14(1)(a) of the Membership Regulations provides that when considering an application for re-admission to the student register, the Committee must have specific regard to the circumstances of the cessation of the applicant's student membership. The Committee had regard to the ACCA guidance document 'Guidance for Admissions and Licensing Committee'.
47. The Committee found Ms Juneja's explanation for the submission of the false degree certificate to be implausible and improbable.
48. The Committee considered that the sequence and timing of events (Ms Juneja being told that her existing qualifications were insufficient for an exemption, subsequently asking ACCA what qualifications might gain her exemption and then a short number of weeks later the submission of a false degree certificate) was suspicious. Ms Juneja had an interest in obtaining exemptions and was clearly looking for a route to obtain exemptions at the relevant time.
49. The Committee found Ms Juneja's explanation about how her cousins might have been able to submit the false degree certificate to ACCA on her behalf to be inherently improbable. It rejected her explanation that her cousins would

have had free and unrestricted access to so many of her devices, accounts and passwords. This was on the basis that it is highly unusual for a person, of any generation, to willingly cede control over their personal accounts and information, given the risks involved in doing so.

50. The Committee noted that Ms Juneja's position had changed (in relation to access to her ACCA online account) during today's hearing, which it considered diminished the credibility of her account of events and the weight that should be afforded to it.
51. The Committee noted that Ms Juneja had apologised for what had happened. However, this seemed at odds with her explanation that she had done nothing wrong. The Committee noted that Ms Juneja had not provided the names of the cousins that she asserted had submitted the false degree certificate, nor any evidence that she had attempted to take any action against them (for example, reporting their conduct as a potential criminal, civil or regulatory offence, or even simply confronting them in person).
52. The Committee noted that Ms Juneja has no previous criminal record and had provided a positive reference from her employer. However, in relation to the reference, the Committee did not feel confident based only on the contents of the reference about what the employer had been told or knew about the circumstances of Ms Juneja's removal from the ACCA student register. On that basis, the Committee could give the reference only limited weight.
53. Given that Ms Juneja had maintained an improbable explanation for the events that had led to her removal from the ACCA student register, the Committee considered that she lacked insight into the seriousness of her conduct and its potential consequences. As such, the Committee could not be satisfied that Ms Juneja had understood or appreciated what she had done wrong or taken any corrective steps to remediate. The Committee was therefore concerned that there remained a high risk of repetition of similar conduct.
54. The Committee was mindful that in determining Ms Juneja's application, it is required to act in a way that is proportionate, having regard to both Ms Juneja's interests and the public interest. It was of the view that whilst Ms Juneja had a clear interest in being readmitted to the ACCA student register (to pursue her

ACCA studies and professional career), that was heavily outweighed by the public interest in this case (in relation to public protection, maintaining proper standards and in maintaining public confidence in the profession of accountancy).

55. Taking into account all of the evidence and submissions, the Committee was not satisfied that Ms Juneja has the general character or suitability for re-admission to the ACCA student register.
56. For these reasons, Ms Juneja's application to be re-admitted to the ACCA student register is refused.

### **ORDER**

57. The Committee made the following order:
  - a. Ms Juneja's application for re-admission to the ACCA student register is refused.

**Mr Maurice Cohen**  
**Chair**  
**07 November 2024**