

RICS Regulatory Tribunal Rules 2022

Part VI, Regulatory Tribunal Single Member Decision

Regulated Member: Michael Bellhouse

RICS Membership No: 1135647

Case Reference: CON002771

Single Member Decision of: Jason Tucker

Date of Decision: 02 December 2025

CHARGE

The charge against the Regulated Member is:

"Between 1 January 2024 and 1 February 2025, you have failed to comply with RICS' requirements in respect of Continuing Professional Development (CPD) in that you have not completed and recorded, or caused to be recorded, at least 20 hours of CPD on the RICS CPD portal."

Contrary to Rule 1 of the Rules of Conduct (October 2021).

The Regulated Member is therefore liable to disciplinary action under Bye-law 5.2.2(c).

ALLEGED RULES BREACH

Rule 1 of the Rules of Conduct (October 2021) states:

Members and firms must be honest, act with integrity and comply with their professional obligations, including obligations to RICS.

Appendix A to the Rules of Conduct set out 3 mandatory professional obligations for RICS Members, and professional obligation 1 states:

Members **must** comply with the CPD requirements set by RICS.

The specific CPD requirements and obligations are set out by RICS online (see [CPD requirements and obligations](#)).

MATERIALS CONSIDERED

In addition to the Bye-Laws, Rules and Policies referred to in this decision, I have also considered an evidence bundle that includes:

- RICS Investigation Report;
- Witness Statement of Koli Khatun (Regulatory Support & CPD Officer) dated 24/10/2025;
- Witness Statement of Damian McKeown (Regulation Support Team Manager) dated 24/10/2025;
- Record of telephone call from Koli Khatun to Michael Bellhouse;
- Copies of Mr Bellhouse's 'CPD Annual Summary', 'Contact Details' and 'Concessions' held on the RICS computer system;
- Correspondence between RICS and Mr Bellhouse relating to non-compliance with CPD requirements and these disciplinary proceedings;
- A Schedule of Costs;
- Head of Regulation Decision, by Claire Hoverd, to refer the matter for consideration by a Single Member of the Regulatory Tribunal dated 24/11/2025.

In addition, on 27/11/2025, Mr Bellhouse submitted an email to RICS setting out his response to the charge, which was accompanied by a series of email correspondence between Mr Bellhouse and RICS, and I have also considered these documents.

BACKGROUND

Michael Bellhouse became a RICS Member on 09/06/2003, and so is subject to the RICS CPD requirements and obligations, which state that:

1. *All Members must undertake a minimum of 20 hours CPD each calendar year (January to December).*
2. *Of the 20 hours at least 10 hours must be formal CPD. The remainder can be informal CPD.*
3. *All Members must maintain a relevant and current understanding of our professional and ethical standards during a rolling three-year period. Any learning undertaken in order to meet this requirement may count as formal CPD.*
4. *Members must record their CPD activity online by 31 January.*

Mr Bellhouse recorded CPD from 2014 to 2021. However, he failed to record any CPD in 2022, for which a caution was issued in 2023. Mr Bellhouse also failed to record any CPD for 2023, for which a caution and fine were issued in 2024.

Rule 8(c)(i) of the RICS Regulatory Tribunal Rules 2022 (version 3), effective from 14/03/2024, provides that a Single Member of the Regulatory Tribunal can consider the matter *"where a Regulated Member has failed to meet the requirements in respect of the*

Rules of Conduct obligation to comply with CPD requirements for a third or subsequent time, in accordance with paragraph 23 of the Sanctions Policy”.

FINDINGS OF FACT

The burden of proving the charge rests with RICS. The standard of proof is the civil standard (i.e. the balance of probabilities), and requires that the evidence establishes that it is more likely than not that a matter in issue occurred.

RICS relies upon the evidence provided by Koli Khatun and Damian McKeown. Although Mr Bellhouse’s response of the 27/11/2025 contends that he has complied with the relevant CPD requirements, he does not challenge the evidence provided by Koli Khatun and Damian McKeown. I, therefore, accept the evidence of Koli Khatun and Damian McKeown as being true and accurate, and I make the following findings of fact:

- i. Mr Bellhouse recorded 0 hours of CPD for the 2024 campaign.
- ii. No concessions are recorded for Mr Bellhouse.
- iii. The fine imposed by RICS in 2024 remains unpaid.
- iv. Mr Bellhouse paid his RICS membership fees for 2024/2025.
- v. For the 2024 CPD year, mailings were sent to RICS members via email.
- vi. Between 13/11/2024 and 12/03/2025, 6 email reminders were sent to RICS members who had not recorded 20 hours of CPD online (including 10 hours of formal CPD), and who were not recorded as being exempt from the requirement to complete CPD.
- vii. The reminders noted the risk of expulsion from RICS for a third sanctionable failure in relation to the CPD requirements.
- viii. The reminders were sent to each member’s email address, as registered with RICS.
- ix. Mr Bellhouse received the emails sent to him by RICS, as none of the emails sent to Mr Bellhouse’s address were ‘returned’ as undeliverable.
- x. On 22nd October 2025, Koli Khatun attempted to telephone Mr Bellhouse on his registered landline number, but the call rang out with no option to leave a voicemail.

I have noted what Mr Bellhouse has said in his response. Mr Bellhouse accepts that he has *“not submitted my CPD records for the past three years”*. Although he has set out his *“professional learning, leadership, training, and industry contribution”*, Mr Bellhouse has not particularised which activities relate to the 2024 CPD year, nor has he provided information on the purpose and outcomes of any structured learning or professional development that these activities supported. Therefore, having considered Mr Bellhouse’s response, I make the following additional findings of fact:

- xi. Mr Bellhouse was aware of the relevant CPD requirements and obligations.
- xii. Mr Bellhouse did not comply with the CPD requirements in the 2024 campaign, and this was his third consecutive failure to do so.

LIABILITY FOR DISCIPLINARY ACTION

It follows from my findings of fact that I am satisfied that, between 01/01/2024 and 01/02/2025, Mr Bellhouse failed to comply with RICS CPD requirements, as he did not complete and record (or cause to be recorded), at least 20 hours of CPD on the RICS CPD portal. Therefore, I find that the charge is proved, as a result of which Mr Bellhouse was in breach of Rule 1 of the Rules of Conduct (October 2021).

RICS Bye-Law 5.2.2(c) states that:

A Member may be liable to disciplinary action under these Bye-Laws, whether or not he was a Member at the time of the occurrence giving rise to that liability, by reason of:

- (a) ...*
- (b) ...*
- (c) a failure to adhere to these Bye-Laws or to Regulations or Rules governing Members' conduct;*
- (d) ...*

Therefore, as a result of breaching Rule 1, Mr Bellhouse may be liable to disciplinary action, and I am satisfied that the breach is sufficiently serious to give rise to a liability for disciplinary action.

In reaching this conclusion, I note that all RICS Members agree to adhere to the relevant Bye-Laws, Regulations and Rules, and accept that they may be subject to disciplinary action if they fail to do so. I also note that the purpose of the CPD requirements is to ensure that there are consistent standards within the profession, that Members maintain up to date knowledge in their area of expertise, in the interests of protecting the public and the wider public interest, and that Members ensure this is evidenced by the completion of a record at RICS. The importance of the CPD requirements is reflected in the fact that the Rules of Conduct, which are approved by the Standards and Regulation Board, place an express professional obligation on Members to comply with the CPD requirements set by RICS. In addition, the 'RICS Sanctions Policy: Guidance to RICS Regulatory Tribunal Rules' (version 9) makes it clear that even a single breach of CPD requirements is sufficient to give rise to a liability for disciplinary action.

My findings of fact mean that I am satisfied that Mr Bellhouse was aware of his professional obligations in relation to CPD, and that he received 6 reminder emails containing information about the risk of expulsion from RICS for a third sanctionable failure in relation to the CPD requirements.

REGULATORY SANCTION

Having determined that Mr Bellhouse is liable for disciplinary action, I must decide the appropriate sanction. RICS is a professional membership organisation and sets standards for its Members as a condition of membership. Undertaking CPD is an

essential part of RICS membership, and is a commitment by RICS Members to continually update their skills and knowledge so as to remain professionally competent. The recording of CPD is the means by which RICS monitors to ensure compliance, and in turn protect the public. Compliance is not optional. It is not difficult to record CPD online, nor is it unreasonable for RICS to impose sanctions on members who do not do so. The CPD requirements are not dependent on RICS sending reminders to its Members.

In deciding what, if any, sanction, should be imposed, I have taken account of the RICS Sanctions Policy: Guidance to RICS Regulatory Tribunal Rules (version 9), which states at paragraph 22.1 that the policy for CPD breaches is as follows:

- a) *first breach – Fixed Penalty (caution)*
- b) *second breach within 10 years of receipt of a caution – Fixed Penalties (caution and fine)*
- c) *third breach within 10 years of receipt of a caution – referral to Single Member or Disciplinary Tribunal with presumption of expulsion.*

The purpose of any sanction is not to be punitive, although it may have that effect. The purpose is to declare and uphold the standards of the profession, to safeguard the reputation of the profession and of RICS, and to protect the public. Sanctions must be proportionate to the breach and all the circumstances, and a decision should be reached having taken account of any mitigating and/or aggravating factors.

In terms of mitigating factors, I note that, in relation to his disciplinary record, Mr Bellhouse has no sanctions, other than those relating to CPD requirements, recorded against him. Whilst Mr Bellhouse's record evidences compliance with the CPD requirements in each of the years from 2014 to 2021, this does not mitigate the seriousness of this matter, as he has recorded no CPD for 3 years.

I consider the following aggravating factors are present in this case:

- Mr Bellhouse has been a Member of RICS since 2003, and understands the CPD requirements and process of recording, having successfully logged his hours from 2014 to 2021.
- Mr Bellhouse failed to pay a fine issued in 2024, indicating a disregard for the RICS CPD requirements and regulatory sanctions, which is also reflected in his observation that *"the tone and process of this review has been disheartening after two decades of dedicated membership"*.
- Mr Bellhouse was sent 6 reminders to record his CPD and failed to respond.
- Mr Bellhouse has not taken responsibility for his failings, instead opting to blame a *"change in role structure, combined with a transition to a new PA"*.
- Although he refers to being *"fully committed to resolving this promptly and constructively"*, Mr Bellhouse has taken no action to rectify the position, despite the fact that he must have been aware of the issues in relation to his CPD compliance since 2023, when he was first cautioned.

In deciding on sanction, I have considered each available sanction, starting with the least serious, until the appropriate and proportionate sanction is reached. I have concluded that, given the seriousness of the breach, imposing *no sanction* would be neither proportionate nor appropriate.

As for the options of a *caution*, *reprimand* or *fine*, I have concluded that, similarly, these would not reflect the seriousness of Mr Bellhouse's repeated failure to comply with the requirement to undertake and record CPD, particularly given that the previous cautions and a fine do not appear to have achieved Mr Bellhouse's sustained compliance with the CPD requirements. Imposing such sanctions in these circumstances would also undermine public confidence and the deterrent effect on other members of the profession.

I have considered the options of *imposing undertakings* or *conditions on membership*, but have taken the view that imposing such in respect of obligations to which Mr Bellhouse is already expected to adhere, and which have been breached three times, would be ineffective, as well as insufficient to satisfy the wider public interest.

I, therefore, determine that *expulsion* from membership of RICS is both the proportionate and appropriate sanction in this case. In reaching my decision, I note that the aggravating factors identified significantly outweigh the mitigating factors. I have also balanced Mr Bellhouse's interests with the need to protect the public and to uphold professional standards. I have had regard to the impact expulsion may have on Mr Bellhouse. However, in the absence of evidence of insight at a fundamental level and/or compelling mitigation from Mr Bellhouse, I cannot be satisfied that he will not commit a further breach. Therefore, I conclude that the wider public interest outweighs Mr Bellhouse's interests. Accordingly, I can find no reason to depart from the presumption in the Sanctions Policy of expulsion for a third breach of the CPD requirements within 10 years of receipt of a caution.

ORDER MADE

In accordance with Part VI of the Regulatory Tribunal Rules, I make the following order:

Mr Michael Bellhouse is expelled from membership of RICS.

TAKING EFFECT OF ORDER

In accordance with Part VI of the Regulatory Tribunal Rules, this order will take effect 14 days from the service of the Single Member's decision upon Mr Bellhouse, unless notification in writing is received from Mr Bellhouse or RICS stating that they consider the findings and/or the Regulatory Sanction imposed by the Single Member to be wrong.

COSTS

I have taken into account the schedule of costs totalling £350, which is in accordance with the RICS Sanctions Policy: Supplement 2 (Fines, costs and administration fees). In the absence of any statement of means and/or documentary evidence of Mr Bellhouse's financial or personal circumstances, I am satisfied that the costs claimed are proportionate and reasonable.

In accordance with Part VI of the Regulatory Tribunal Rules, I make the following order in respect of costs:

Mr Michael Bellhouse must pay costs in the sum of £350.

PUBLICATION

I find no good reason to depart from the approach set out in the RICS Sanctions Policy: Supplement 3 (Publication of regulatory/disciplinary matters). Therefore, in accordance with Part VI of the Regulatory Tribunal Rules, this Record of Decision will be published following the expiry of 14 days from service of the Single Member's decision upon Mr Bellhouse.