



**SINGLE MEMBER OF THE REGULATORY TRIBUNAL
DECISION SHEET**

RICS Regulatory Tribunal Rules 2022

Part VI, Regulatory Tribunal Single Member Decision

Regulated Member: Laurent Dubos

Single Member Decision of: Deborah Fajoye

Case Number: CON003726

Date of Decision: 16 February 2026

CHARGE

“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 Rules 1 and 2 of the Rules of Conduct 2022.

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

ALLEGED RULE/S BREACH

RICS’ requirements in respect of Continuing Professional Development (“CPD”) are set out in the document ‘CPD Requirements and Obligations’. They include requirements that “All members must undertake a minimum of 20 hours CPD each calendar year (January to December)” and that “Members must record their CPD activity online by 31 January”.

Contrary to Rules 1 and 2 of the Rules of Conduct 2022.

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

MATERIALS CONSIDERED

- RICS Investigation report with associated statements and exhibits
- Rules of Conduct 2022
- Rules of Conduct for Members 2020
- RICS Bye-law 5.2.2
- RICS CPD Requirements and Obligations
- RICS CPD FAQs
- RICS Regulatory Tribunal Rules version 3 (Part VI)
- RICS Sanctions Policy: Guidance to RICS Regulatory Tribunal Rules version 9
- RICS Single Member Decisions Guide 2022

BACKGROUND

RICS requirements in respect of CPD are set out in the RICS document 'CPD Requirements and Obligations'. They include requirements that *"all members (AssocRICS, MRICS and FRICS) must record their CPD online"*.

The key requirements are:

- All members (AssocRICS, MRICS and FRICS) must undertake a minimum of 20 hours CPD each calendar year (January to December).
- Of the 20 hours at least 10 hours must be formal CPD. The remainder can be informal CPD.
- 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.
- Members must record their CPD activity online by 31 January every year

Laurent Dubos ("Mr Dubos") is a member of RICS ("MRICS") and was first admitted on 28 July 2014 and they practice in Europe.

It is noted that Mr Dubos recorded CPD in 2014, 2016, 2017, 2019, 2020, 2022 (recorded late 2018 and 2021), which demonstrates that they are aware of CPD requirements and capable of compliance.

Mr Dubos recorded 0 hours of CPD online for 2024 and they do not have any exemption or concessions on record for that year. As such, they were required to complete and record CPD.

The evidence demonstrates that this is Mr Dubos' third breach of CPD requirements (2015, 2023 and 2024) contrary to Rule 6 of the Rules of Conduct for Members (versions 6 and 7) and currently set out as a core obligation in the Rules of Conduct 2022.

FINDINGS OF FACT

I have carefully considered the investigation report and disciplinary bundle provided by RICS. These clearly set out Mr Dubos' alleged failings regarding CPD requirement. I have made the following observations:

- I have reviewed the statements and records provided by RICS. The statements set out Mr Dubos' CPD activities from 2014 onwards. Mr Dubos recorded their CPD activities online in 2014, 2016, 2017, 2019, 2020 and 2022 (with the 2018 and 2021 entries recorded late), which demonstrates that they are cognisant of their obligations in relation to completing and recording their CPD activities online.
- The records show that Mr Dubos recorded less than 20 hours of CPD in 2015, with 0 hours submitted online. This was treated as a first breach, and they received a caution issued in 2016. In 2024, Mr Dubos received a caution and a fine for a second breach, having recorded only one hour of CPD for 2023.
- RICS confirmed Mr Dubos has not settled the fixed penalty fine issued in 2024 for CPD non-compliance in 2023. However, it is notable that they have paid their membership fees in 2024/2025, which indicates their intention to continue practising.
- Mr Dubos recorded 0 hours of CPD online for 2024. The evidence demonstrates that they did not have any relevant CPD exemption and/or concession for that year. As such, they were required to complete and record a minimum of 20 hours of CPD.
- This is Mr Dubos' third breach of CPD requirements within a 10-year period.
- At the time of making the statements, RICS confirmed that Mr Dubos has recorded 0 hours of CPD for the current CPD year 2025 (deadline being 31 January 2026).

- Having been a member since 2014 and having been subject to two previous CPD-related sanctions (2015 and 2023), I am satisfied that Mr Dubos would have been fully cognisant of their obligations with respect to CPD.
- The records indicate that Mr Dubos should have received six written communications from RICS, serving as reminders regarding their CPD obligations, both before and after the due date for 2024. These communications were sent to Mr Dubos' registered email address and were issued between November 2024 and March 2025. According to the information provided, Mr Dubos has not responded to any of these communications.
- The evidence suggests that, at all material times, Mr Dubos' registered email was not updated. Additionally, there is no evidence before me that any of the written correspondence was returned to RICS as undelivered. As such, I am satisfied that RICS effectively reminded Mr Dubos about the 2024 CPD, and that they had ample opportunity to submit their CPD activities online by the relevant due date of 31 January 2025. Notwithstanding this, as a regulated member, it remains Mr Dubos' responsibility to ensure that they keep abreast of, and adheres to, RICS rules including CPD requirements.
- On 1 December 2025, RICS sent a "2024 CPD Disciplinary Proceedings" letter to Mr Dubos, which included the CPD disciplinary bundle, listing questionnaire, statement of means form, and schedule of costs. Mr Dubos has not responded to this letter, nor have they provided any submissions offering an explanation for their third CPD breach.
- In the absence of any submissions from Mr Dubos, I have no evidence of mitigation or insight.

In light of the above, I find the facts as set out in the investigation report proved.

LIABILITY FOR DISCIPLINARY ACTION

The requirement to complete and record CPD is a mandatory and core obligation of RICS membership (unless exempt). It is designed to ensure that a member has the required up-to-date competence and knowledge to practice safely within their area of expertise and ultimately ensure public protection.

Mr Dubos failed to record the minimum required hours of CPD in 2015, following two consecutive years of non-compliance in 2023 and 2024. They recorded 0 hours of CPD online for 2015, 2023, and most recently 2024. As such, this constitutes their third breach of CPD requirements in accordance with Rules 1 and 2 of the Rules of Conduct 2022.

RICS Sanctions Policy, February 2022 (version 9) suggests that even a single breach of CPD requirements is sufficient to give rise to liability to disciplinary action.

In light of the above, I have determined that Mr Dubos' failure to comply with those requirements is sufficiently serious to give rise to liability to disciplinary action.

REGULATORY SANCTION

This is Mr Dubos' third breach of RICS CPD requirements. Therefore, I find that they are liable to regulatory sanction. There is a presumption of expulsion for a third breach, subject to the circumstances of the case and any mitigating or aggravating factors.

I have carefully considered RICS Sanctions Policy and the aggravating and mitigating factors in this case.

I have taken into account the following aggravating factors:

- It is noted that this is Mr Dubos' third CPD breach within a 10-year period of receipt of a caution. As such, the alleged breach is not an isolated failure.
- RICS have confirmed that Mr Dubos has not settled the fixed penalty fine issued for CPD non-compliance in 2023, although they have paid their membership fees for 2024/25. This suggests that they intend to continue practising without complying with CPD requirements.
- Mr Dubos has been a regulated member since 2014 and recorded CPD between 2014 and 2022, with the exception of 2015 when no CPD was recorded. They have recorded no CPD after 2022 and have received two previous sanctions for CPD breaches. As such, it is reasonable to conclude that Mr Dubos is fully cognisant of CPD requirements.
- The evidence demonstrates that Mr Dubos' actions were deliberate and indicate a flagrant disregard for RICS regulatory rules and CPD requirements.

In particular, they have failed to record CPD for two consecutive years (2023 and 2024) and, to date, none for 2025.

- I have no evidence that Mr Dubos has engaged with the CPD process since 2022, when they last recorded CPD activities online.

Mr Dubos has not responded to these allegations nor have they provided any submissions. Therefore, I have not identified any mitigating factors.

I bore in mind that the purpose of sanctions is not to be punitive, although they may have that effect. The purpose of sanctions is to uphold and declare the standards of the profession, safeguard the reputation of the profession and of RICS as its regulator, and protect the public. Sanctions must be appropriate and proportionate to the matters found proved. I considered sanctions starting at the lowest level, and only if I determined that the sanction was not appropriate, I moved to the next level of sanction. I also bore in mind that more than one sanction may be imposed.

Given that this is the third sanction issued to Mr Dubos for breaches of CPD requirements, I have determined that a caution, reprimand, or fine, whether individually or in combination, would not adequately reflect the seriousness of this case. In particular, I do not consider that a further financial penalty would ensure future compliance with CPD requirements, as Mr Dubos was already issued a fixed penalty fine for CPD non-compliance in 2023, which they have not settled to date, and they committed a further breach the following year.

I do not consider that either a condition or an undertaking is appropriate in this case, as CPD is a mandatory requirement for RICS membership.

I recognise that expulsion is the ultimate sanction and should be reserved for those categories of cases where there is no other means of protecting the public or the wider public interest. Given the serious and repetitive nature of this breach, I have determined that Mr Dubos be subject to expulsion from membership. I consider that an expulsion is the most appropriate and proportionate outcome to maintain public protection and meet the wider public interest. In reaching my decision, I carefully balanced the wider public interest against the interests of Mr Dubos and their professional standing. I acknowledge that expulsion may have a significant impact on Mr Dubos' livelihood. However, in the absence of evidence of insight at a fundamental level and/or compelling mitigation represented by Mr Dubos, I cannot be satisfied that they would not commit a further breach. Subsequently I consider that the wider public interest by far outweighs Mr Dubos' interests.

Finally, I have not been presented with any evidence that would justify deviating from the presumption in paragraph 22.1 of the Sanctions Policy, which stipulates that expulsion is likely where there is a third breach of Rule 2 of the Rules of Conduct within a 10-year period of receipt of a caution for breach of the same rule(s).

ORDER MADE

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

That Mr Dubos be expelled from RICS membership.

TAKING EFFECT OF ORDER

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

Costs

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

In the absence of any statement of means and/or documentary evidence of Mr Dubos' financial or personal circumstances, I have been unable to identify any reason for reducing the costs. As such, I have concluded that the costs are fair and reasonable.

I therefore order that Mr Dubos pay the costs of £350.

PUBLICATION

In accordance with Part VI of the Regulatory Tribunal Rules, the Single Member's record of Decision will be published following the expiry of 14 days from service of the Single Member's Decision upon the Regulated Member.