



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

## **RICS Regulatory Tribunal Rules 2024**

### **Part VI, Regulatory Tribunal Single Member Decision**

**Regulated Member: Alexander Manuel**

**Single Member Decision of: Jane Bishop**

**Case Number: CON005594**

**Date of Decision: 4 March 2026**

#### **CHARGE**

The formal charge against the Regulated Member (Alexander Manuel) 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/or recorded, or caused to be recorded, at least 20 hours of CPD on the RICS CPD portal."*

#### **ALLEGED RULE/S BREACH**

Bye-Law 5.2.2 provides: "A Member may be liable to disciplinary action under these Bye-Laws, whether or not they were a Member at the time of the occurrence giving rise to that liability, by reason of:

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

Alexander Manuel has contravened Rule 1 of the Rules of Conduct for Members 2021 requiring Members to be honest, act with integrity and comply with their professional obligations, including obligations to RICS. Appendix A to the Rules of Conduct for Members contain Members' professional obligations to RICS. Professional obligation 1 is *"Members must comply with the CPD requirements set by RICS."*

Alexander Manuel is therefore liable to disciplinary action under Bye-law 5.2.2(c).

## **MATERIALS CONSIDERED**

I have had regard to the RICS' bundle of documents consisting of 34 pages.

## **BACKGROUND**

1. The Rules of Conduct for Members 2021 *"...provide a structure for making ethical decisions about how to behave as a professional..."*.<sup>1</sup> Appendix A sets out the core professional obligations of Members and states *"Members must comply with the CPD requirements set by RICS."*<sup>2</sup>
2. RICS' CPD requirements are:
  - i. all Members must undertake a minimum of 20 CPD hours each calendar year (January to December);
  - ii. of the 20 CPD hours at least 10 must be formal CPD hours. The remaining hours can be informal CPD hours;
  - iii. all Members must maintain a relevant and current understanding of the professional and ethical standards during a rolling three-year period. Any learning undertaken to meet this requirement may count as formal CPD; and
  - iv. Members must record their CPD activity online by 31 January.
3. In some circumstances, Members can request RICS to grant them an exemption of their CPD requirements.
4. RICS' CPD requirements and obligations documentation sets out what happens if a Member fails to complete and/or record their CPD requirements. A Member's first breach will attract a Fixed Penalty caution and will remain on the Member's disciplinary record for a period of ten years. A Member's second breach (within ten years of the receipt of a caution) attracts a Fixed Penalty caution and a fine. A Member's third breach (within ten years of the receipt of a caution) attracts the potential to be referred to a Single Member of the Regulatory Tribunal which may

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<sup>1</sup> Paragraph 3 of the Introduction of the Rules of Conduct for Member 2021.

<sup>2</sup> Professional obligations to RICS number 1.

result in the Member being expelled from RICS Membership and costs being awarded against them.

5. Jody Arnold's (RICS Regulatory Support and CPD Officer) statement dated 5 January 2025,<sup>3</sup> states Alexander Manuel became a RICS Member on 9 January 2004 and was not granted a CPD exemption in 2024. The relevant recorded CPD hours are as follows:

| Year | Formal Hours | Informal Hours | Total CPD hours recorded |
|------|--------------|----------------|--------------------------|
| 2014 | 10           | 12             | 22                       |
| 2015 | 10           | 17.5           | 27.5                     |
| 2016 | 12           | 9              | 21                       |
| 2017 | 11           | 26.5           | 37.5                     |
| 2018 | 14           | 19             | 33                       |
| 2019 | 10           | 11.5           | 21.5                     |
| 2020 | 0            | 0              | 0                        |
| 2021 | 13           | 8              | 21                       |
| 2022 | 1            | 0              | 1                        |
| 2023 | 0            | 0              | 0                        |
| 2024 | 0            | 0              | 0                        |

6. Jody Arnold's statement was consistent with the relevant RICS' records. However, I note Alexander Manuel recorded 8 planned formal CPD hours in 2023 and one (1) planned formal CPD hour in 2024.
7. Whether Alexander Manuel did or did not complete 20 CPD hours in 2024 is unknown. However, I find Alexander Manuel did not record 20 CPD hours in 2024 and that means they have contravened Rule 1 of the Rules of Conduct for Members 2021.

## **FINDINGS OF FACT**

8. Based on the evidence before me, I find the charge against Alexander Manuel has been proved on the balance of probabilities.

## **LIABILITY FOR DISCIPLINARY ACTION**

9. Alexander Manuel has completed and recorded their CPD requirements from 2014 to 2019. They did not record at least 20 CPD hours in 2020 and Jody Arnold states they were cautioned for the first breach. They did not record at least 20 CPD hours in 2022 and 2023 and Jody Arnold states

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<sup>3</sup> Jody Arnold's statement refers to events as late as 18 December 2025. I am satisfied the actual date of Jody Arnold's statement was 5 January 2026.

Alexander Manuel was cautioned and fined for both breaches because of RICS' data issues. Jody Arnold states RICS' records indicate Alexander Manuel's RICS 2024/2025 membership fees and fines have been paid.

10. Alexander Manuel became a RICS Member on 9 January 2004 and they have undertaken, recorded and exceeded their CPD hours in the past. I am satisfied Alexander Manuel is, and was, aware of their ongoing CPD requirements. Those requirements are not onerous and should have been incorporated into their professional activities.
11. I am satisfied the RICS requirement to complete and record 20 CPD hours each year is reasonable. The CPD policy has been approved by RICS' Standards and Regulatory Board. The Rules of Conduct for Members and Members' professional obligations require Members to meet RICS' CPD requirements and a single breach can give rise to a liability to disciplinary action. The purpose of ongoing CPD is, in part, to ensure public protection by consistent standards within the profession and RICS Members have current knowledge in their area of expertise. RICS Members demonstrate compliance with their CPD requirements by recording their CPD activities online by 31 January following the CPD year.
12. Members of RICS agree to adhere to RICS' Rules, Regulations and Bye-Laws and accept that failure to do so could give rise to disciplinary action.
13. I am satisfied Alexander Manuel is liable to disciplinary action under Byelaw 5.2.2(c).

## **REGULATORY SANCTION**

14. The purpose of sanctions is not to be punitive, although it may have that effect. Their purpose is to uphold the standards of a profession, safeguard the reputation of the profession and, RICS as the regulator, to protect the public. Sanctions must be proportionate to the breach after considering all the circumstances of a case.
15. Damian Mckeown's (Regulation Support Team Manager) statement dated 5 January 2025<sup>4</sup> states RICS sent emails to Alexander Manuel on 13 November 2024, 11 December 2024, 15 January 2025, 19 February 2025,

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<sup>4</sup> Damian Mckeown's statement refers to events as late as 12 March 2025. I am satisfied the actual date of Damian Mckeown's statement was 5 January 2026.

26 February 2025 and 12 March 2025 reminding them to complete and record at least 20 hours of CPD. Those reminders referred to RICS' Sanctions Policy and the likelihood of expulsion for a third breach within 10 years. RICS sent another email on 26 June 2025 and attempted to contact Alexander Manuel on the telephone on 26 June 2025 and 18 December 2025 to discuss their CPD hours without success.

16. On 5 February 2026, RICS sent Alexander Manuel an email that a report had been prepared for the Head of Regulation to decide whether the matter should be referred to a Single Member. Alexander Manuel was provided with the bundle of evidence, schedule of costs, invited to complete and return the listing questionnaire, invited to complete and return a statement of means and invited to respond to the allegation. An email from the Mail Administrator confirmed the email was successfully delivered to its final destination. Alexander Manuel did not respond.
17. On 23 February 2026, RICS sent Alexander Manuel an email stating their case had now been prepared for consideration by a Single Member.<sup>5</sup> An email from the Mail Administrator confirmed the email was successfully delivered to its final destination.
18. Alexander Manuel is responsible for ensuring their preferred contact details are up to date on the RICS' database. I do not know if Alexander Manuel received RICS' emails, however I have found they were well aware of their RICS' CDP requirements. This is Alexander Manuel's fourth breach for non-compliance with RICS' CPD requirements and as a Member of RICS since 2004, they are obligated to abide by RICS' rules. Despite being cautioned and cautioned and fined twice (fines that have been paid) they have failed to record their CPD activities in 2024.
19. The breach is serious and RICS' Sanction Policy (Version 9 with effect from 2 February 2022) states there is a presumption of expulsion in the event of a third CPD breach within 10 years of receipt of a caution for a breach of the same rule. In the circumstances, imposing no sanction, another caution, fine or a reprimand would not be appropriate given the seriousness of the breach. Nor would an undertaking be appropriate

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<sup>5</sup> I note the Head of Regulation letter dated 23 February 2026 incorrectly stated the referral to a Single Member was made under RICS Regulatory Tribunal Rules Version 2. However, the bundle of documents and emails sent to Alexander Manuel made it clear the matter would be determined under RICS Regulatory Tribunal Rules Version 3 and they were provided links to that document. I am satisfied Alexander Manuel was afforded procedural fairness and was not disadvantaged by this error.

given compliance with RICS' CPD requirements is a Member's professional obligation.

20. Alexander Manuel has not engaged with the regulatory process and was on notice of the likelihood of expulsion. They have had ample opportunities to rectify their non-compliance but did not do so. Considering all the circumstances of this case, I am not satisfied the presumption of expulsion for a third breach of RICS' CPD requirements has been rebutted.

### **ORDER MADE**

21. In accordance with Part VI of the Regulatory Tribunal Rules 2024 Version 3 – Rule 107(f)(i) I make the following order:

**i. Alexander Manuel is expelled from the Membership of RICS.**

### **TAKING EFFECT OF ORDER**

22. In accordance with Part VI of the Regulatory Tribunal Rules 2024 Version 3, this order will take effect 14 days from service of this decision upon Alexander Manuel, unless notification in writing is received from Alexander Manuel or RICS stating that they consider that the findings and/or the Regulatory Sanction imposed by me are wrong.

### **COSTS**

23. RICS has applied for costs in accordance with Supplement 2 to the Sanctions Policy: Fines, Costs and Administrative Fees. Alexander Manuel was found liable to disciplinary action and despite being invited to do so, has made no submissions regarding their financial circumstances.

24. To ensure the cost of bringing these proceedings do not burden the whole RICS Membership, it is appropriate Alexander Manuel bear RICS' reasonable costs.

25. In accordance with Part VI of the Regulatory Tribunal Rules 2024 Version 3, I make the following order in respect to costs:

**ii. Alexander Manuel will pay RICS' costs of £350.**

## **PUBLICATION**

26. In accordance with Part V of the Regulatory Tribunal Rules 2024 Version 3, this decision will be published in accordance with the Publication Policy. That is, following the expiry of 14 days from service of this decision upon Alexander Manuel.