



ROYAL INSTITUTION OF CHARTERED SURVEYORS

Disciplinary Panel Hearing

Case of

**Mr Charles Dring MRICS [0061131]
London W1F**

On

20 April 2026

At

Held remotely via Microsoft Teams

Panel

Ms Desirée Artesi (Lay Chair)
Professor Jason Tucker (Lay Member)
Mr Mark Griffin (Surveyor Member)

Legal Adviser

Mr Peter Steel

RICS Representative

Mr Christopher Geering (Barrister)

Mr Charles Dring

Mr Frank Maher (Solicitor)

Tribunal Executive

Ms Jae Berry

Introduction

1. Mr Charles Dring (“Mr Dring”) appears before the RICS Disciplinary Panel in connection with the following allegations:-

“Between 1 January 2023 and 1 February 2024, 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 and/or 2 of the Rules of Conduct

Mr Dring is therefore liable to disciplinary action under RICS Bye-Law 5.2.2 (c)”

Determination

Background to the case

2. Mr Dring MRICS has been a professional Member of RICS since 1 October 1982.
3. All Members of RICS are required to undertake a minimum of 20 hours of Continuing Professional Development (CPD) each calendar year. These requirements are set out on RICS’ website together with guidance.
4. Of the minimum 20 hours CPD, at least 10 hours must be formal CPD. The remainder can be informal CPD.
5. Members must not only complete the minimum required number of hours of CPD but must record their CPD activity online by signing into a secure portal. The activity must be recorded with RICS by 31 January of the following year.
6. By the deadline of 31 January 2024, Mr Dring had failed to record any hours of CPD for the calendar year 1 January 2023 to 31 December 2023. He did not have any concessions permitting him not to comply with the CPD requirements for that year. Mr Dring eventually uploaded his CPD activities for the 2023 CPD year in May 2025.
7. Mr Dring had breached RICS’ CPD rules on two previous occasions: in 2021, for which he received a caution in accordance with the Fixed Penalty scheme set out in RICS’ Sanction Policy Guidance; and again in 2022 for which he received a caution and a fine.

8. Mr Dring's CPD activities for 2021 and 2022 were uploaded to the RICS system in August 2025. He paid the fine in respect of the 2022 breach on 28 January 2026.
9. RICS' Head of Regulation referred the 2023 breach to a Single Member of the Regulatory Tribunal in accordance with Rule 8(c)(i) of the Regulatory Tribunal Rules 2022 Version 2 ('the Rules'). The Single Member found the charge proved on 10 February 2025 and imposed a sanction. Mr Dring exercised his right to reject the findings of the Single Member by way of an email on 11 February 2025 and so this Panel considered the matter afresh.

Findings of fact

10. Since this hearing is a reconsideration of the underlying facts, RICS bears the burden of proof.
11. At the outset of the hearing Mr Maher, acting on behalf of Mr Dring, said that his client admitted that he had not recorded any CPD hours for the calendar year 1 January to 31 December 2023.
12. The Panel also noted that RICS had also supplied statements by Koli Khatun, a Regulatory Support and CPD officer dated 20 January 2025; by Kieron Cathcart, a Regulatory Support and CPD Manager dated 20 January 2025; by Damien Mckeown, also a Regulatory Support and CPD Manager dated 26 November 2025; and by Tabrez Akhtar dated 2 March 2026 which confirmed the details set out above in the Background section.
13. Accordingly, the Panel found the allegation proved.

Liability to Disciplinary Action

14. Mr Geering, on behalf of RICS, briefly explained the background to the case, including Mr Dring's disciplinary history with RICS. He submitted that while RICS accepted that Mr Dring had belatedly uploaded his CPD activities, and that this might provide some mitigation, it did not completely remove his liability to disciplinary action. RICS cannot effectively regulate its Members without those Members logging their CPD in accordance with the requirements, of which Mr Dring was clearly aware.
15. Mr Maher acting on behalf of Mr Dring told the Panel that Mr Dring accepted that the Panel's findings made him liable to disciplinary action.
16. The Panel nonetheless carefully considered Mr Dring's liability to disciplinary action. The Panel noted that all practising Members agree to adhere to the RICS Rules, Regulations and Bye-Laws and accept that they may be subject to disciplinary action if they fail to do so. In

particular, all RICS practising Members are required to maintain their professional competence, as demonstrated, in part, by the completion and recording of CPD. The seriousness of any failure to comply with this core obligation is demonstrated by the fact that RICS' Sanctions Policy (Version 9 with effect from 2 February 2022) clearly states in paragraph 22.1.c that for a third CPD breach the matter should be referred to a Single Member or Disciplinary Panel with the presumption of expulsion.

17. The Panel was consequently satisfied that Mr Dring's failure to comply with the RICS requirement to complete and record CPD was sufficiently serious to give rise to a liability for disciplinary action.

Evidence

18. Mr Maher called Mr Dring to give evidence. Mr Dring confirmed the content of his two statements dated 30 January and 19 February 2026, in which he explained the reasons behind his failure to record his CPD for 2023.
19. Mr Dring told the Panel that he was now regularly undertaking CPD and recording it monthly. He said that he had currently completed 11 hours of CPD for this CPD year, 10 hours of which were structured CPD and 1 hour unstructured. Referring to the evidence in his first statement about the difficulties he had experienced in managing technology, Mr Dring said that he now had the RICS app on his phone, which made recording his CPD activities extremely easy.
20. Mr Dring offered his unreserved apologies to RICS and to the Panel. He said he was horrified at the situation he had put himself in by his failure to record his CPD. Mr Dring said he was very proud of his long association with RICS, and explained that he had contributed to the profession by employing many graduates. Mr Dring said that he had found the last 15 months (i.e. since the disciplinary proceedings had begun) extremely challenging. He said he would like to repeat his sincere apology for allowing this situation to arise.

Submissions on sanction

21. Mr Geering, on behalf of RICS, did not suggest any particular sanction.
22. He submitted that the Panel must act proportionately in deciding on sanction, which meant imposing the least restrictive sanction that was commensurate with the public interest.
23. Mr Geering reminded the Panel of the aggravating and mitigating features in the case. The important aggravating feature was that this was Mr Dring's third breach of the CPD requirements and he had previously been given two warnings.

24. Mr Geering told the Panel that the mitigating factors included that RICS accepted that Mr Dring's breach was in not logging CPD, rather than failing to undertake any CPD at all. Mr Geering observed that Mr Dring had apologised. He had also logged the missing CPD and had paid the fine in respect of the 2022 breach, albeit late.
25. In addition, Mr Geering said that Mr Dring's statement explained the effect of the pandemic on his business and the attempts he has made since his most recent breach of the requirements to remedy matters.
26. Mr Geering reminded the Panel that it should have regard to RICS' Sanctions Policy (Version 9 with effect from 2 February 2022) in arriving at its decision and in particular the policy regarding CPD breaches at paragraph 22 which indicates that there is a presumption of expulsion for a third breach. However he acknowledged that the guidance makes clear that this is not a rule and that the Panel could come to a different sanction in any individual case.
27. Mr Geering said that Mr Maher had referred to two RICS cases considering CPD breaches, *Milledge* and *Morrison*. However, he submitted that these cases did not establish a legal principle that expulsion was not a presumption following a third breach of the CPD requirements and each case turned on its own facts.
28. Mr Maher on behalf of Mr Dring referred the Panel to the points made in his written submissions. He reminded the Panel that, as Mr Geering had fairly acknowledged, this was a case of failure to record CPD, rather than of a failure to complete CPD.
29. Mr Maher said that Mr Dring's 43-year career was otherwise unblemished. Mr Dring had also contributed to the profession by bringing on other surveyors. Mr Maher said that expulsion would mean the loss of Mr Dring's livelihood.
30. Mr Maher reminded the Panel of the fines imposed in the case of *Milledge* and *Morrison* of £2500 and £1500 respectively. Mr Maher submitted that while he accepted that the RICS cases of *Milledge* and *Morrison* did not establish any precedent, they were relevant to proportionality in that they demonstrated how RICS had addressed similar failings.
31. As to the question of proportionality, Mr Maher said that in considering the seriousness of the breach and the risk to public, the Panel should take into account Mr Dring's admissions and subsequent conduct. He said that Mr Dring had shown insight and provided evidence of remediation which suggested there was no ongoing risk to the public.

Determination on sanction

32. The Panel accepted the advice of the Legal Adviser. It took into account the written and oral submissions on behalf of RICS and Mr Dring, the RICS Sanctions Policy, and Mr Dring's disciplinary history, namely the caution imposed for the breach of the 2021 CPD requirements and the caution and fixed penalty imposed for the 2022 breach.
33. The Panel bore in mind that the purpose of sanctions is not to be punitive, although it may have that effect. The purpose of sanctions is to declare and uphold the standards of the profession, to safeguard the reputation of the profession and of the RICS as its regulator and to protect the public. Sanctions must be proportionate to the breach and all the circumstances, and a decision should be reached having taken into account any mitigating and/or aggravating factors.
34. The Panel must first decide whether to impose a sanction. The Panel was mindful that if it decided that a sanction was required, it must adopt a proportionate approach in determining the appropriate sanction. This means that the Panel commences at the lowest sanction, and only if it decides that sanction is not appropriate does it consider further sanctions. The Panel bore in mind that sanctions may be combined together but that the overall sanction must be proportionate to the nature and seriousness of the conduct in question.
35. The Panel observed that the following aggravating factors were present in the case: it involved repeated failures to comply with the CPD requirements and as an experienced professional aware of the need for such a professional rule, Mr Dring clearly ought to have known and done better.
36. As to mitigating factors, the Panel took into account: Mr Dring's previous good character; his admission of the allegation; his expression of remorse; the effect of the pandemic on his business and ability to manage his professional affairs; and the subsequent efforts he had made to bring himself back into compliance with RICS regulation.
37. The Panel went on to consider whether to impose a caution. The Panel concluded that a caution would not adequately reflect the seriousness of the case, recognising the cumulative pattern of non-compliance and the fact that a caution had already been imposed for a previous breach. The Panel also considered the imposition of a reprimand but concluded that similarly this did not reflect the seriousness of Mr Dring's repeated failure to comply with the requirement to complete and record CPD on the RICS online portal.
38. In considering whether to impose an undertaking the Panel took into account the mandatory nature of the CPD requirements. The Panel noted that the CPD requirements are designed

to ensure that the skills and knowledge of RICS Members are kept up to date and ultimately to ensure public protection. The Panel concluded that it would not be appropriate or proportionate, in the absence of exceptional circumstances, to impose an undertaking given that Mr Dring should have been completing and recording his CPD online in any event. Even if an undertaking were to be combined with either a caution, reprimand or fine, the Panel concluded that imposing such a sanction would undermine public trust and confidence in the regulatory process..

39. The Panel then considered whether to impose a fine. The Panel was mindful that a fine was imposed on Mr Dring for failing to record his CPD hours for the year 2022. However, the Panel was satisfied that a further financial penalty would be an appropriate sanction. The Panel concluded that Mr Dring had benefitted for many years from the privilege of RICS membership, one of which is the vital requirement to maintain professional development. As he himself accepted he had badly let himself and the profession down by his failure to comply consistently with the obligations that come with that privilege.

40. The Panel decided that a fine of **£3,500** would adequately reflect the seriousness of Mr Dring's failings.

41. The Panel was conscious that paragraph 21.1 of the Sanctions Policy (Version 9 with effect from 2 February 2022) states that expulsion is likely where there is a third breach of Rule 2 of the Rules of Conduct within 10 years of a receipt of a caution for breach of the same Rule. It gave careful thought to whether the public interest demanded a more severe sanction than a fine, or whether a conditions order and a fine would better meet the justice of this situation.

42. However, having given significant weight to the efforts that Mr Dring had made in remedying his defaults and his contrition for allowing this situation to arise, the Panel narrowly concluded that to go beyond a fine would be disproportionate in the circumstances. In particular, the Panel accepted that in light of the evidence it had heard, there was a low risk of repetition of another CPD breach and so any conditions to secure compliance with the CPD requirements were unnecessary. However, the Panel were of the view that if Mr Dring were again to fail to undertake or record his CPD, that would undoubtedly attract a more severe sanction.

43. The Panel therefore ordered that Mr Dring pay a fine of **£3,500** to RICS within 28 days.

Publication and Costs

Publication

44. The Panel considered the policy on publication of decisions contained in the Sanctions Policy Supplement 3 - Publication of Regulatory Disciplinary Matters. It accepted the advice of the Legal Adviser. It was unable to identify any reason to depart from the presumption that decisions will be published on the RICS website. In any event, Mr Dring did not object to publication.

Costs

45. RICS applied for its costs in total £3,854, supported by a detailed schedule of costs.
46. The costs figure represents a contribution towards the costs incurred by RICS in preparation for the hearing and the hearing itself. The Panel noted Mr Maher's representations to the effect that the costs of the hearing were overstated, given that this hearing had not in the event lasted a full day. However, the Panel understood that Mr Dring had been consulted on the time estimate for the hearing in advance. The Panel had no reason to doubt that the costs application was a fair and reasonable one to make.
47. The Panel took full account of Mr Drings's statement of means and representations about his current earnings and assets. It concluded nonetheless that it was appropriate for Mr Dring to make a fair contribution towards the costs of bringing this case, otherwise the full cost of these proceedings would fall on the profession as a whole.
48. The Panel therefore ordered that Mr Dring pay the full costs in the sum of **£3,854** to RICS within 28 days. The Panel acknowledged that Mr Dring was likely to seek terms for the payment of the fine and costs from RICS. It is a matter for RICS and Mr Dring as to whether they can come to any such agreement before the full and final payment date is due.

Appeal Period

49. Mr Dring may appeal to an Appeal Panel against this decision within 28 days of notification of this decision, in accordance with Rule 152 of the Rules.
50. In accordance with Rules 166 and 167 of the Rules, RICS' Chair of Governing Council may require a review of this decision on the grounds of undue leniency within 28 days.