



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

**RICS Regulatory Tribunal Rules 2024**

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

**Regulated Member: Neil Morrison**

**Single Member Decision of: Jane Bishop**

**Case Number: CON005914**

**Date of Decision: 2 March 2026**

### **CHARGE**

The formal charge against the Regulated Member (Mr Morrison) 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 he was 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; ..."*

Mr Morrison 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."*

Mr Morrison is therefore liable to disciplinary action under Bye-law 5.2.2(c).

## **REFERRAL TO A SINGLE MEMBER OF THE REGULATORY TRIBUNAL**

On 19 February 2026, Mr Morrison's case was referred to me for consideration. On 20 February 2026, I received an email from Mrs Maria Choudhury-Rahman (RICS Regulatory Tribunal Executive) stating that Mr Morrison had contacted her on the telephone and wanted to provide submissions on or before 23 February 2026. Mrs Choudhury-Rahman stated:

*He has advised that he was unaware of this matter, as all previous correspondence had been directed to his junk folder...*

On 21 February 2026, I advised Mrs Choudhury- Rahman that I would postpone making a decision until I had received Mr Morrison's submissions.

On 24 February 2026, Ms Jae Berry (RICS Regulatory Tribunal Manager) sent Mr Morrison's submissions, and I have had regard to them.

## **MATERIALS CONSIDERED**

I have had regard to the RICS' bundle of documents consisting of 34 pages and Mr Morrison's post-referral submissions.

## **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 hours CPD each calendar year (January to December);
  - ii. of the 20 hours at least 10 hours must be formal CPD. The remaining 10 hours can be informal CPD;
  - iii. all Members must maintain a relevant and current understanding of the professional and ethical standards during a rolling three-year

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

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

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 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 8 December 2025, states Mr Morrison became a RICS Member on 8 July 2002, he was not granted a CPD concession (exemption) for the 2024 CPD year and his relevant recorded CPD hours were as follows:

Year	Formal Hours	Informal Hours	Total CPD hours recorded
2014	15	5.5	20.5
2015	39	0	39
2016	21	0	21
2017	10	15	25
2018	13	16	29
2019	12.25	9.5	21.75
2020	10	14.5	24.5
2021	10.75	15	25.75
2022	0	0	0
2023	0	0	0
2024	0	0	0

6. Jody Arnold's statement was consistent with the relevant RICS' records.
7. Mr Morrison's evidence is that he completed 14 formal CPD hours and 9 informal CPD hours in 2024 (a total of 23 CPD hours) and 17 formal CPD hours and 11 informal CPD hours in 2025 (a total of 28 CPD hours). Mr

Michael Caulfield's (Managing Director of the company Mr Morrison works for) letter dated 23 February 2026 confirmed Mr Morrison had at no time failed to undertake professional development. I accept Mr Morrison did undertake the required CPD hours in 2024. However, he did not record them and has 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 Mr Morrison has been proved on the balance of probabilities.

## **LIABILITY FOR DISCIPLINARY ACTION**

9. Mr Morrison completed, recorded and exceeded his CPD requirements from 2014 to 2021. He did not record at least 20 CPD hours in 2022 and Jody Arnold states he was cautioned for his first breach. He did not record at least 20 CPD hours in 2023 and Jody Arnold states Mr Morrison was cautioned and fined for his second breach. Jody Arnold states RICS' records indicate Mr Morrison's RICS 2024/2025 membership fees were paid but his fine was not.
10. Mr Morrison became a RICS Member on 8 July 2002 and he has undertaken and recorded his CPD hours since 2013 for a period of nine (9) years. I am satisfied Mr Morrison is, and was, aware of his ongoing CPD requirements in 2024. Those requirements are not onerous and must be incorporated into his professional activities.
11. I am satisfied the RICS requirement to complete and record 20 hours of CPD 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 Mr Morrison is liable to disciplinary action under Bye-law 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 8 December 2025 states RICS sent emails to Mr Morrison on 13 November 2024, 11 December 2024, 15 January 2025, 19 February 2025, 26 February 2025 and 12 March 2025 reminding him to record at least 20 CPD hours. Those reminders referred to RICS' Sanctions Policy, that this was the Members third breach within 10 years and the likelihood of expulsion.

16. On 8 December 2025 RICS unsuccessfully attempted to contact Mr Morrison on the telephone to discuss his failure to record CPD hours.

17. On 8 December 2025, RICS sent Mr Morrison an email informing him that a report had been prepared for the Head of Regulation to decide whether the matter should be referred to a Single Member. Mr Morrison was provided with the bundle of evidence, schedule of costs, invited to complete and return the listing questionnaire, invited to complete a statement of means and invited to respond to the allegation. RICS received a notice that the email had been delivered but Mr Morrison did not respond. On 18 February 2026, RICS sent an email to Mr Morrison confirming that no response had been received and that his case had now been prepared for consideration by a Single Member.<sup>3</sup> RICS received a notice that the email had been delivered and Mr Morrison confirmed he became aware of these proceedings in his letter dated 23 February 2026.

18. Mr Morrison states he wasn't aware RICS had been attempting to contact him or that he was subject to disciplinary action. He cannot recall and

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<sup>3</sup> I note the Head of Regulation letter dated 17 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 Mr Morrison made it clear the matter would be determined under RICS Regulatory Tribunal Rules Version 3 and he was provided links to that document. I am satisfied Mr Morrison was afforded procedural fairness and was not disadvantaged by this error.

cannot locate RICS' emails. If he had seen RICS' emails, he wouldn't have ignored them. He believes RICS' emails didn't reach him or were filtered.

19. The email address recorded on RICS' database as Mr Morrison's preferred contact email, and the email address RICS sent all its correspondence to, is the same email address Mr Morrison sent his submissions from. Mr Morrison is responsible for ensuring his RICS' preferred contact details are correct, RICS is not responsible for reminding Mr Morrison to meet his professional obligations and RICS received confirmation that at least two of the emails sent to Mr Morrison had been delivered. I find it improbable RICS' emails did not reach Mr Morrison's email account. However, I accept Mr Morrison, for whatever reason, failed to read those emails.
20. Mr Morrison did not provide a clear explanation for failing to record his 2024 CPD hours but said, over recent years, he has had a particularly difficult time personally and struggled at times with wider aspects of focus and remembering things. Mr Caulfield's letter confirmed Mr Morrison had experienced, over the past several years, significant personal and family challenges in the context of increased professional responsibilities. I accept Mr Morrison has experienced significant personal and familial difficulties over recent years.
21. Mr Morrison states he would not have willingly got himself into this position and I accept that submission.
22. This is Mr Morrison's third breach of non-compliance with RICS' CPD requirements. He was aware of RICS' CPD requirements and, as a long-standing Member of RICS, obligated to abide by RICS' rules. Despite being cautioned and cautioned and fined he has failed to record his 2024 CPD activities.
23. 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. Mr Michael Caulfield categorised Mr Morrison's non-compliance with his CPD requirements as related to communication and administrative oversight. I do not accept Mr Morrison's non-compliance with his CPD requirements was related to communication, but I do accept it was related to an administrative oversight. I have accepted Mr Morrison:
  - (a) did undertake his required 2024 CPD hours;

- (b) experienced significant personal and familial challenges over recent years that affected his focus and memory;
- (c) failed to read RICS' emails;
- (d) was unaware of the caution, and the caution and fine, and
- (e) would not willingly put himself in this position.

24. I have found Mr Morrison 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. Mr Caulfield states he has known Mr Morrison for over 20 years and "*consistently found him to be diligent, ethical, conscientious, and fully committed to maintaining the highest professional standards expected of a Chartered Surveyor and member of RICS*". I accept Mr Caulfield's categorisation of Mr Morrison's character. I accept Mr Morrison is honest and acts with integrity.

25. Considering the above findings and all the circumstances of the case, including the purpose of RICS' CPD requirements, I make a hair's breadth call and find the presumption of expulsion for a third breach of RICS' CPD requirements has been rebutted. However, imposing no sanction or another caution would not be appropriate given the seriousness of the breach. Nor would an undertaking be appropriate given compliance with RICS' CPD requirements is a Member's professional obligation. I consider an appropriate and proportionate sanction in this case is a reprimand, a substantial fine and an order that all outstanding fines be paid.

#### **ORDER MADE**

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

- i. Mr Morrison is reprimanded for failing to meet Professional Obligation 1 and record his 2024 CPD hours.**
- ii. Mr Morrison is fined £1,500 which must be paid to RICS on or before 4:00pm on 10 April 2026.**
- iii. Mr Morrison must pay to RICS all his outstanding fines on or before 4:00pm on 10 April 2026.**

#### **TAKING EFFECT OF ORDER**

27. 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 Mr

Morrison, unless notification in writing is received from Mr Morrison or RICS stating that they consider that the findings and/or the Regulatory Sanction imposed by me are wrong.

## **COSTS**

28. RICS has applied for costs in accordance with Supplement 2 to the Sanctions Policy: Fines, Costs and Administrative Fees. Mr Morrison was found liable to disciplinary action and despite being invited to do so he has made no submissions regarding his financial circumstances.
29. To ensure the cost of bringing these proceedings do not burden the whole RICS Membership it is appropriate Mr Morrison bear RICS' reasonable costs.
30. In accordance with Part VI of the Regulatory Tribunal Rules 2024 Version 3, I make the following order in respect to costs:
  - iv. Mr Morrison must pay RICS' costs of £350 on or before 4:00pm on 10 April 2026.**

## **PUBLICATION**

31. 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 Mr Morrison.