Response to consultation on the *Responsible use of AI* professional standard, 1ˢᵗ ed.

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Background

The Responsible Use of AI professional standard is a new, high-level conduct standard applicable to all members and regulated firms worldwide. The aim of the standard is to prepare the profession for the increasing use of AI systems in the delivery of surveying services and ensure responsible use of those systems, thereby securing the public advantage of surveying and ensuring the future security of the profession.

An expert working group composed of independent and professional members, representing both large and small/ medium businesses, was convened during 2024 and 2025, primarily to assist with the development of the draft text of the standard. RICS has been very fortunate to have had a high calibre of expertise available on the working group, which has a real depth of experience in public policy, regulation, ethics and law, as well as in residential property, commercial property, quantity surveying, estate management and building surveying.

Summary of consultation and post-consultation process

Consultation

Between 4 March and 29 April 2025 a full draft text of the standard was put out for public consultation (on the iConsult platform) to provide an opportunity for stakeholders to share their responses to the proposed standard. The consultation was supported by a communications strategy that included email, web and social media activity. Consultation engagement was high, and many comments on the standard were submitted.

The consultation comprised a questionnaire part (with respondents being able to provide comments alongside answers to particular questions) and a comment only part. A total of 71 respondents engaged with the consultation, filling out the questionnaire and/or providing comments on the standard. Additional outreach and engagement activities also took place to gather feedback from other interested and/or expert stakeholders, including insurers and AI developers.

There was good representation from around the world – with just under half (49%) of the member respondents working in the UK/ Ireland, 14% working in the Americas and Australasia, 13% working in Europe, 9% in the Middle East, 8% in Asia and 7% in North Africa and Sub-Saharan Africa. Nearly all respondents were individuals (92%).

The majority of respondent members have 20+ years of professional experience, with the remaining categories of experience level (0-5, 6-10 and 11-19 years) having about 20% representation in the consultation; and there is a near even split between members employed/ not employed in a regulated firm. These figures are highly encouraging, as they demonstrate a broad consensus across the membership to the answers to the consultation questions.

RICS wishes to thank everyone who took time out of their busy schedules to engage with the consultation.

Communications performance

This positive picture of engagement with the standard is also reflected in the performance data for the communication activities which supported the consultation phase. Content on the standard shared via social media had strong reach and visibility – vastly outperforming expectations, with 172.5k impressions made and almost half of the traffic being from international audiences; and the extremely effective nature of the simple, direct AI usage questions of the LinkedIn polls (3324 votes cast on these polls) demonstrate that the level of engagement with the subject matter was very high.

Similarly, the reaction to social media posts was very encouraging: positive comments, averages 'likes' per post (98 per post on LinkedIn), post shares and positive reactions from the launch post (292 from LinkedIn alone) all far exceeded (and, in some cases, doubled) expectations, demonstrating that the subject-matter is considered to have value and importance.

All this strongly indicates that it is the right time to be developing and delivering this professional standard.

Post-consultation

After the consultation had closed, all of the questionnaire responses and comments were collected and organised. Comments relevant to the substantive content of the standard were gathered together for review, analysis and discussion with the expert working group, and amendments to the draft were made accordingly.

The following sections provide a digest of the consultation responses and the responses and rationale of the expert working group. It is then outlined how the draft standard has been amended following consideration of consultation feedback.

Responses to consultation questions

This section provides, in respect of each consultation question on the standard, a digest of the answers received and any additional comments provided. Note that answers to the 'General Questions' part of the consultation questionnaire (concerning the identity of each respondent e.g. whether they are members or non-members, where in the world they are based, etc) have been incorporated into the 'Summary of Consultation and Post-consultation Process' section above. Since all substantive comments were discussed with the expert working group, how comments were dealt with vis-à-vis the draft standard is described in the 'Consultation Comments & Expert Working Group Response' section (below).

Q1 – Is the structure of the document clear?

Nearly all (94%) respondents responded 'Yes' to this question, which unequivocally supports the approach to drafting, and affirms the strong foundation of the document. The single 'No' answer came from an individual suggesting that the document be replaced by an ISO standard. The matter was raised for discussion with the working group and is therefore discussed further under the 'Respondent Comments' section below.

Q2 – Are the requirements set out in the standard regarding competence and/or conduct clear and easy to understand?

A very high proportion of respondents (86%) answered 'Yes' to this question. Comments here concerned the need for more detail in some areas (such as knowledge requirements) and greater simplification in other areas (such as due diligence) – matters which were discussed with the working group.

Q3 – Does the standard set realistic expectations – are the expectations deliverable / achievable?

Although a solid proportion of respondents agreed with this statement (61%), there were a number of comments submitted, principally concerning the need for guidance and practical tools to aid interpretation and understanding, and concerning the documentation demands (particularly on small firms), which were put to the working group.

Q4 – Could you adopt this standard?

Again, a good proportion of respondents agreed with this statement (64%). As one respondent pointed out, 'adoption depends on level of AI integration into surveying services' – so, given that the profession is, in general, currently in the early stages of AI use, the positive reaction of the respondents to the question of adoption indicates that the standard is suitably calibrated to the current state of the profession. Comments that were left under this question again mainly concerned the need for practical tools and the level of burden on small firms (topics already put to the working group and detailed further below). A comment querying whether the reliance and assurance provisions were up to the potential scale of the task was also discussed with the working group.

Q5 – How long would it take you to be able to adopt this standard and be fully compliant?

Answers to this question varied greatly, from 'at least 21 hours' to 24 months; however, the most common time frame mentioned was 3-6 months. This was in line with staff expectations, and RICS also sought the view of the expert working group.

Q6 – What further support and/or information in relation to the responsible use of AI, if any, would you like from RICS?

There were many suggestions provided in response to this question, including case studies, guidance, sample forms, CPD topics, training courses and regular updates of the standard. Supporting material – particularly in the form of case studies – has been developed to support the standard and further content relating to AI, including webclasses, is being developed by the relevant RICS teams. Some other suggestions, such as auditing, were put to the working group (covered in the next section).

Q7 – Do you have any other comments on the draft standard?

All comments relevant to the substantive content of the standard were put to the expert working group, covered in the next section below.

Q8 – Are you already using AI to provide surveying services?

Almost all answers to this question were divided between 'No' (36%) and 'Yes, but only generic tools, e.g. ChatGPT, CoPilot' (53%), which provided further clarification to what had already been discovered about the state of the profession through an informal member survey conducted during September 2024. The answers to this question were an important part of the overall picture regarding whether the standard had been pitched at the right level and how effective it might be to support the responsible use of AI in surveying practice.

Consultation comments & Expert working group rationale

All substantive comments on the draft text of the standard were put to the working group. Only key points discussed by the working group are reproduced in the table below, arranged by section. Where the working group indicated the need for an amendment to the text, those amendments were made accordingly; otherwise, other action was taken to address the concerns of the comments – e.g. passing information on to other relevant departments (such as the Products team to develop CPD).

Glossary	
Key consultation comments	Whether the definition of AI is too limited and to be tailored to surveying. How to address other terms used in this field.
Expert Working Group response / rationale	Change to OECD/ UK Government definition. Not a problem that the definition is not tailored – the definition is of AI, not AI in surveying. Only terms used in the standard should be in the main glossary. No distinction should be made between 'bespoke' and 'off-the

	shelf' systems, given that all AI tools are becoming, and look very likely to become, personalised to some extent.
PS 1.2	
Key consultation comments	The phrase 'materially impact' needs further definition. What to do with the record of AI systems and material impact. Documenting when AI does NOT materially impact their work creates unnecessary administrative work for surveyors, particularly small firms.
Expert Working Group response / rationale	The need for vague phrasing to allow regulatory flexibility is understood, but some sort of explanation would be useful. 'Material impact' is a phrase used in the International Valuation Standards (IVS) though note that use in that instance is tailored to valuation. Defining the phrase can be a simple explanation – do not want to be prescriptive, as it is often going to be a matter of judgement. Record keeping is a tool for consistency and responsible use, rather than for auditing purposes. Record only of AI systems that *do* materially impact, not those that don't.
PS 2	
Key consultation comments	Queries regarding specifying the knowledge requirements in greater detail and whether the requirements are sufficient for complex risks. Suggestion of use of a tiered approach to training, focusing on core competencies and specialized modules.
Expert Working Group response / rationale	It is a matter of individuals reasonably assuring themselves. Standard to acknowledge patchy levels of knowledge. Current areas of knowledge are adequate – the idea is an awareness of risks, not understanding of the technical problems. Privacy and data usage to be added to the s.2 (Baseline knowledge). Tiered upskilling becomes very complicated. RICS CPD working group has already explored this option over a couple of years and declined to go down this route.

PS 3.1	
Key consultation comments	Query whether training led by needs of the user and the AI systems being used should replace annual training approach. Whether IP protection provisions should be added. Whether provisions for data storage and associated matters to be added.
Expert Working Group response / rationale	Annual training is not a big/ onerous commitment. IP risks are commercial risks, and therefore not a responsible use issue. There are already legal requirements relating to these matters – data has to be managed and maintained, especially if the firm is listed or has customer data. A general provision can be inserted referring to, e.g., prevailing legislation.
PS 3.2	
Key consultation comments	Query regarding 'most appropriate tool' wording, given that professional services are built on a range of approaches. The extent to which only those with demonstrable and relevant expertise and experience should have access to the right tools, with a use-case justification.
Expert Working Group response / rationale	What is most appropriate would obviously encapsulate all facets and what is most appropriate for the individual or firm. Use of further wording (such as 'technical', 'administrative', 'professional practice') limits the provision and makes it less clear. The current wording is fine, and the provision already includes technical, administrative, and professional practice approaches. Given the widespread use of AI systems. this suggested approach is impractical and inappropriate.
PS 3.3	
Key consultation comments	AI Audit by a Recognized Third-Party Auditor. Whether a more risk-based approach, focusing on proportionate measures based on the specific AI tool and its intended use, is better and would reduce the documentation requirements.

	Whether regular reviews (e.g., biannually) tailored to the specific risk profile of each AI tool is preferable to quarterly reviews.
	Whether reasonable due diligence and risk awareness should be adopted instead of a risk register.
	Concern regarding paperwork on low-risk systems diverting resources from addressing high-risk situations.
	Whether human error is a bigger factor.
	Suggestion of the need for sample forms and templates.
Expert Working Group response / rationale	Audit provision would be too onerous and costly, making it off-putting to use AI. Limited provision for audit in this context at the present time. Open to a firm to request an audit, and some firms are already doing this.
	A risk-based approach is too subjective and would disable effective regulation. The current documentation requirements are not that extensive and set a minimum standard. The requirements of the standard are able to be tailored depending on use of AI.
	Quarterly risk reviews (by a risk committee) are very common and not onerous; indeed, at least quarterly reviews considered important in light of rapid AI development. It is suggested that supporting material/ CPD is created to assist with practical application.
	The risk register is important because it requires consideration of mitigation, which mere awareness (of risk) does not. Awareness is only the first step.
	The standard is all aimed at high risk – AI is high risk where its use will have a material impact on services provided by RICS members. Note that the standard only applies to AI that has a material impact.
	To an extent the standard tries to address the presence of human error in the context of AI use. Human error should already be addressed by, e.g., checking of work and quality assurance - human error is one of the (several) sources of risk that fall to be assessed as part of an AI risk assessment. This standard is about

	responsible use of AI and preserving the central role of human judgement.
	Sample forms are to be developed. RICS to consider providing training in some way to address understanding the content that goes into the forms and how to develop the right risk-based culture, particularly for smaller firms.
PS 4	
Key consultation comments	Whether AI risk assessment emphasis should be on fitness for purpose in respect of use for surveying services only. Concern regarding the issues that arise where the manufacturers are not prepared to hand over information about their AI systems.
Expert Working Group response / rationale	*Responsible* use goes beyond fitness for purpose – there is also, e.g., a public interest and sustainability dimension. The current carve-out provision is large and sufficient – i.e. where information is not available, risks of the missing information must be identified. Firms retain a choice to proceed on the information available, based on their judgement of the risks and being satisfied with their decision. RICS may consider training to strengthen procurement processes.
PS 4.1	
Key consultation comments	Concern regarding the burden of the sustainability impact of AI systems requirements. Concern regarding the general burden of the due diligence requirements – the focus should be on functionality, accuracy, data compliance, and ensuring adequate professional indemnity cover.
Expert Working Group response / rationale	Information regarding that impact is difficult, complex and sparse, and policymakers are trying to understand how the impact is measured; but consideration of environmental impact is a wise approach for businesses, especially those that are active in seeking to minimise their emissions. It is important that firms are cognisant of the fact that use of AI does not come without environmental impact. Important to retain reference to obtaining environmental information in a general way, even if unlikely to be

	provided presently, as the information is likely to become clearer with time. General approaches to such information are likely to change.
	This already seems to be the approach of the standard – functionality and accuracy require knowing about the data relied upon and the risks of using that data; compliance with data laws is a requirement of the standard, as is adequate PI cover.

PS 4.2	
Key consultation comments	Suggestion that it would be useful to reference the current ISO standard.
	Clear disclaimers should be sufficient when sharing AI-generated content.
	Ranges of uncertainty and information regarding model variability need to be included in the decision considerations.
	RICS Valuation – Global Standards (RICS 'Red Book') contains existing sign-off procedures that should be sufficient for artificial intelligence-assisted work.
	Query the implications of an AI tool inadvertently adopting corporate bias.
Expert Working Group response / rationale	Due to ISO publications being proprietary documents with access fees, a copy has not been obtained to assess suitability for inclusion.
	The requirement to make a decision about the reliability of the output and to document that decision is about keeping a human in the loop when making use of AI. Disclaimers are wholly inappropriate in this context. A balance needs to be struck. Using the system and applying human judgement to the outcomes is what is expected to be given to all clients, not only the ones that say no to the disclaimer (assuming the disclaimer is put in front of them).
	Uncertainty ranges and model uncertainty is a very wide spectrum and consensus on acceptable ranges is currently changeable in this area, so not to be used to inform the decision.

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| | Already reports created by others are signed off by a qualified surveyor and it is a qualified surveyor who is responsible from a PII perspective. Adding a sign-off procedure places more of an onus on the signing surveyor to be informed and part of the process. Such sign-off is a version of informed governance, underscoring a professional responsibility and encouraging effective oversight of AI use. RICS Global Red Book sign-off procedures to be added.

Risk of firm bias does not appear to be a genuinely differentiated risk. There is a risk of bias wherever the data comes from. |
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| **PS 4.3** | |
| **Key consultation comments** | Whether general information about artificial intelligence use in Terms and Conditions is sufficient.

The standard should go further and become more structured on how it is to be reported on when sending reports to clients. |
| **Expert Working Group response / rationale** | Inappropriate in this context of material impact.

Terms of engagement in some sectors (e.g. valuation) can be quite prescriptive. It is up to firms how to structure their terms of engagement. |
| **PS 5** | |
| **Key consultation comments** | The development of artificial intelligence should be left to the discretion of the member or regulated firm, subject to existing regulations and guidelines.

Provisions should not prejudice RICS members and/or regulated firms compared to third-party developers, nor prejudice smaller RICS regulated firms compared to large surveying practices.

Whether the sustainability requirement is of practical relevance. |
| **Expert Working Group response / rationale** | This standard represents the existing guidelines. The intention here is to have sensible and reasonable minimum standards. This provision will develop as the landscape develops. Provisions of the standard are required to align with aim of *responsible* development. Not having a development section would be an oversight. |

	The standards that have been set are not above those expected of the responsible development of AI. Developing AI responsibly should be the comparison. The current provisions do not appear to do not appear to cause prejudice.
	There is increasingly an expectation in the market that technology firms have a better understanding of the sustainability impact, so even without an expectation in the standard to definitively say what impact there is, consideration should be given to such impact.
General	
Key consultation comments	A single statement is needed to cover the key elements for sole traders.
	Suggestion that the standard is not needed in light of ISO 42001:2023.
	Query whether an AI financial modelling and/or financial services expert should be consulted.
Expert Working Group response / rationale	A separate standard for sole traders is not to be produced. A supporting document providing a ready summary of the standard is to be developed to assist sole traders.
	ISO publications are proprietary documents with access fees and IP rights attached, therefore access has not been available and wholesale use in the context of developing a professional standard would be impractical and complex.
	Although financial services may be interested in the use of AI in valuation, their input is not essential in this general, high-level standard on the responsible use of AI.

Consequent amendments to the standard

The table below summarises the changes made to each section (and sub-section) of the standard, following consideration of the consultation responses and further discussions of the

expert working group. Only changes of a substantive nature and changes suggested by the expert working group are included.

AI Standard section	Amendment
Glossary	Definition of Artificial Intelligence system changed. Sentence added regarding types and sub-sets of AI. New definitions added: Failure mode, Model lifecycle, Version control. Definition of private and confidential information changed. Point added to risk register definition.
1.1	Sentences added to second paragraph. Revised bullet points setting out the requirements set by the standard.
1.2	Revised paragraph describing the application of the standard to outputs with a material impact on the delivery of surveying standards. Detail added to define 'material impact'. Paragraph added to illustrate concept of 'material impact'.
2	Sentence added to acknowledge that the standard of knowledge within the profession is patchy. Failure modes, data usage and data risks added to baseline knowledge requirements.
3.1	New data provisions added to existing privacy and confidentiality provisions. Sub-section renamed to align with data focus.
3.2	'Privacy and confidentiality' risks (regarding consideration of appropriateness of AI tools) renamed 'Data risks' in light of changes

	to 3.1. Model lifecycle and version control added to risk register items. Sub-section renamed for clarity. Provision to consider inherent bias re-worded for clarity. Removal of requirement to consider possible weaknesses in the algorithms employed.
3.3	Risk register provision re-written to better connect with due diligence provision and to align with risk register definition.
4.1	Due diligence provision amended to require request for 'accuracy, relevance and diversity' information about datasets used to train the AI system.
4.2	Sign-off provision (derived from that used in RICS Valuation – Global Standards) added. Provision requiring adequate appropriate professional indemnity insurance removed as already covered by RICS Code of Conduct.
4.3	[no change]
4.4	Some rewording to align the relevant parts with the baseline knowledge section that it reflects.
5	Some rewording to clarify point at which certain information is to be recorded in writing. Provision requiring adequate and appropriate indemnity cover for development removed. Provision requiring adequate and appropriate product insurance added.

Concluding remarks

Due to the emerging and evolving nature of the subject matter, and the highly technical nature of AI, it was important from the outset to get the tone of this professional standard right and to get the requirements pitched at the right level.

To assist with this aim an informal member survey was conducted during the process of developing the standard. The member survey revealed significant inconsistency in the level of understanding and awareness of AI within the profession, as well as concerns about transparency. The survey fed directly into the discussions of the working group, particularly around upskilling, transparency, the need for good governance and the differences between large and smaller firms; and, generally, one overarching effect of the survey was a drive toward greater clarity within the standard – of language, of signposting and of the actions required by members and firms.

It was without doubt, however, the high calibre of expertise and level of care taken by the group in their considerations, as well as their diversity of knowledge and experience, that was of most value to the process of development in myriad ways – such as enabling technical discussions to be focused on practical effect, ensuring requirements set would be workable in the context of a varied membership, balancing the important priorities of the standard against burden on the membership and integrating professionalism into the standard.

The RICS team wishes to express deep gratitude to all members of the working group for so generously giving their time to assist in the development of this professional standard.

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We are RICS. As a member-led chartered professional body working in the public interest, we uphold the highest technical and ethical standards.

We inspire professionalism, advance knowledge and support our members across global markets to make an effective contribution for the benefit of society. We independently regulate our members in the management of land, real estate, construction and infrastructure. Our work with others supports their professional practice and pioneers a natural and built environment that is sustainable, resilient and inclusive for all.

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