

CONSULTATION RESPONSE

RICS response to consultation on regulation of valuation practice

August 2024



1 Introduction

1. The Independent Review of Real Estate Investment Valuations (the Review) was commissioned by the RICS Standards and Regulation Board (SRB) to respond to concerns over the responsiveness of valuations to rapidly changing market dynamics and perceived lack of valuer independence. The purpose of the Review was to assess where changes may be necessary to re-establish public trust in such a fundamental sector of the UK economy and to futureproof practices in the valuation of real estate assets for investment purposes, in the public interest.
2. The Review was supported by an Expert Advisory Group and the Valuation Review Implementation Committee. Both groups were comprised of professionals reflecting a range of expertise across various sectors, such as valuers, investors, client representatives and audit professionals. The Review yielded 13 recommendations to improve valuation practice, including a recommendation to develop the Valuation Compliance Officer (VCO) role to specifically cover valuation process and conduct in RICS regulated firms, which were accepted by SRB. Recommendation 4 essentially proposes policy changes to two current RICS regulated schemes, namely the Valuer Registration scheme (VR scheme) and Firm Regulation (the Firm scheme); this recommendation states that ‘RICS should build on its existing “RICS Responsible Principal” obligation (as detailed in the Rules for the Registration of Firms) by developing a Valuation Compliance Officer role to specifically cover valuation process and conduct’.
3. We recently consulted on these proposals. Public consultation is part of the RICS SRB policy development process to ensure that any regulatory policy changes are appropriately assessed, and stakeholders have been engaged and given the opportunity to provide feedback on the proposals. The consultation document and proposals can be found on [iConsult](#).
4. As part of ongoing efforts to enhance the RICS regulatory schemes and operate in an open and transparent manner, we collected and reviewed public comments on whether the proposed amendments to the regulation of valuers and valuation firms to implement the Valuation Review, in particular the introduction of the Valuation Compliance Officer (VCO) role, were warranted and proportionate.
5. This response to consultation document does not attempt to summarise every consultation response, nor provide the full rationale for how RICS managed each response. However, in light of these public comments, this document outlines a proposed path forward, as well as

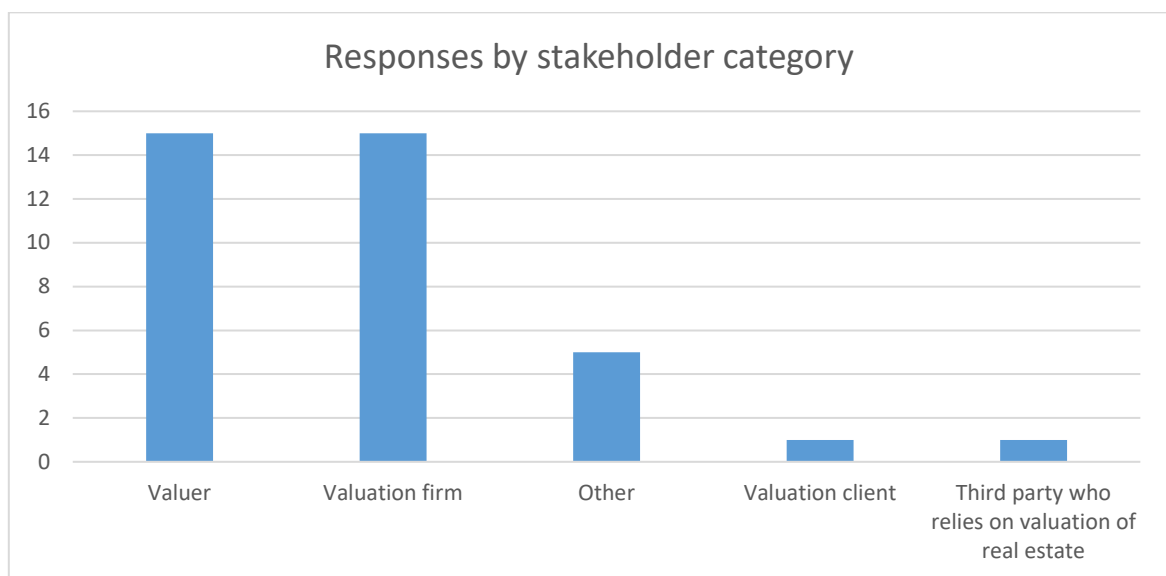
key matters to be addressed before decisions can be made about whether the VCO role should be implemented and/or a valuation scheme for RICS regulated firms should be introduced.

6. While the Valuation Review recommendations were accepted by SRB, we intend to use the evidence gathered from this public consultation to further shape the proposals and inform any planned implementation. Furthermore, we will consider all the elements of the proposals in detail with the Valuation Assurance Committee and present definitive, more detailed, recommendations to the SRB in due course.

2 Summary of responses and analysis

2.1 Consultation statistics

1. A period of public consultation took place from 13 September to 12 December 2023.
2. A total of 37 respondents formally responded to the consultation online or via email. The majority of the respondents (30 out of 37 or about 80%) were identified as either a valuer or a valuation firm. RICS also received responses from a valuation client, a third party who relies on valuations of real estate, and several stakeholders classified as 'other.'



3. The feedback from the valuers and the valuation firms included large firms as well as small- or medium-sized firms (SMEs).
4. The consultation process was facilitated through the use of iConsult, our interactive platform, where participants were encouraged to provide feedback on the draft document itself and respond to a questionnaire.
5. Virtual and in-person roundtable meetings with consultees were also held during the consultation period to give us the opportunity to meet with potential end users and gain a deeper understanding of the feedback received.
6. The consultation was supported by a comprehensive, far-reaching communications strategy, which included a dedicated webpage, a social media campaign and collaboration with industry partners to promote the consultation in their own newsletters. We also promoted the consultation at industry events and conferences.

2.2 Impact of the proposals

7. The Review recommended the creation of a formal VCO role within firms performing valuations. The proposed VCO is intended to provide assurance across a firm carrying out valuations, in particular that the valuers in the firm are:
 - behaving ethically
 - avoiding conflicts of interest
 - giving objective valuation advice free from inappropriate client pressure, and
 - complying with RICS valuation standards including [RICS Valuation – Global Standards](#) (*Red Book Global Standards*) and in the UK the [UK National Supplement](#) (*Red Book UK*).
8. Additionally, the Review sets out the role of a VCO as being specifically responsible for reviewing compliance with valuation standards, and also taking the lead on corporate integrity and ethics.
9. Finally, the Review recommended that RICS should set up a ‘dedicated independently led valuation regulatory quality assurance panel under the jurisdiction of the RICS Standards and Regulation Board.’ The aim of the group is to ensure ‘the best possible regulatory quality assurance regime for property investment valuers.’
10. For further information about the proposals, please review pages 4 to 11 of the consultation document.

Question 1: What impact would the proposals set out in this paper have on you?

Summary of responses

11. A combination of large firms and SMEs are broadly supportive of the VCO role. Several respondents in favour of the proposals mentioned that their practices already have controls in place, so the likely impact of implementing a VCO position would be minimal. Additionally, participants noted that the proposals would prevent individuals and practices without sufficient experience from performing valuations.
12. Some of the respondents expressed concerns about bureaucracy, costs and resources to implement the VCO role.
13. Respondents, particularly from multi-disciplinary firms, made comments about the eligibility criteria for RICS firm regulation, noting that the VCO role would only be required in RICS-regulated firms and RICS-regulated practice divisions.

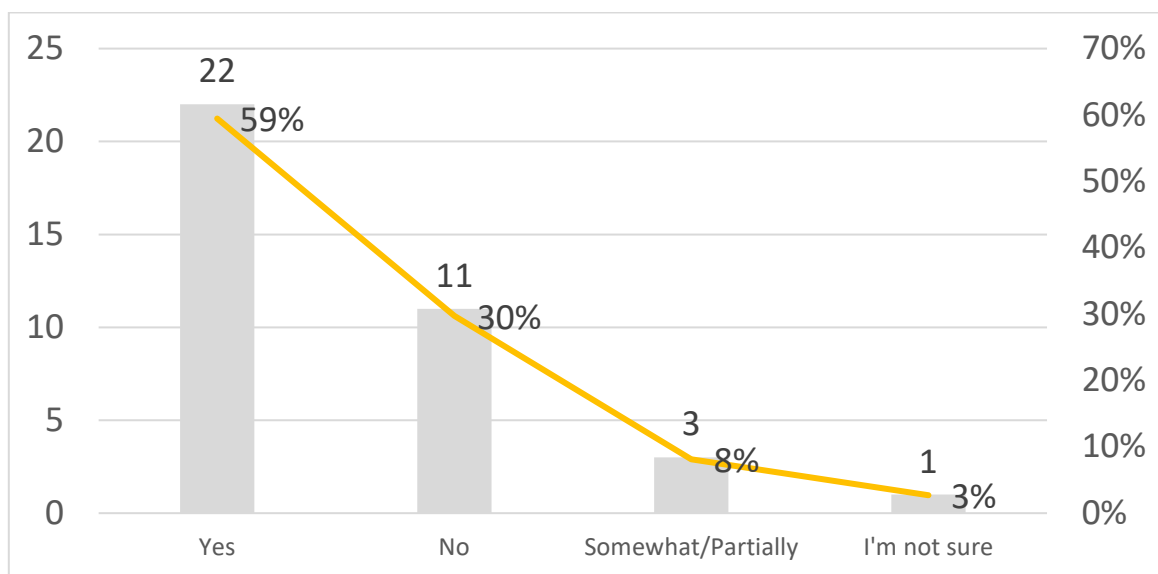
RICS response

14. We recognise the concerns about the impact of introducing a VCO role, although feedback suggests that the inclusion of a VCO at firms with quality internal controls and processes should have a minimal impact to the business, other than the initial setup phase to implement this new requirement. While there will be regulatory fees associated with this additional layer of regulation, the SRB will consider whether the impact of implementing a VCO role at RICS-regulated firms would be balanced by enhanced public confidence in the valuation services provided.
15. To alleviate any concerns, we will work with the firms, including practices with existing risk management/internal audit functions, to ensure that, if introduced, the VCO role can be incorporated in a proportionate manner across all valuation practices – SMEs as well as large firms.
16. We will also seek to further clarify and explain RICS' eligibility criteria for firm regulation and encourage surveying firms, particularly those with a valuation practice, who do not meet the standard threshold for full firm regulation to consider becoming an RICS-regulated practice division instead.

2.3 Explore need to identify valuation firms

17. An important precedent step to introducing the VCO role is to create and maintain a register of firms undertaking valuation work. It is proposed that these firms would be referred to as 'regulated valuation firms.'

Question 2: Do you agree that identifying firms that carry out valuation work is necessary in order to implement the recommendation to develop a Valuation Compliance Officer role?



Summary of responses

18. A majority of respondents (59%) were supportive of identifying firms in order to implement the VCO role.

19. The remaining respondents (41%) were not fully in favour of the VCO role and believed the role is not necessary for small valuation firms or practices with a low volume of valuation work.

RICS response

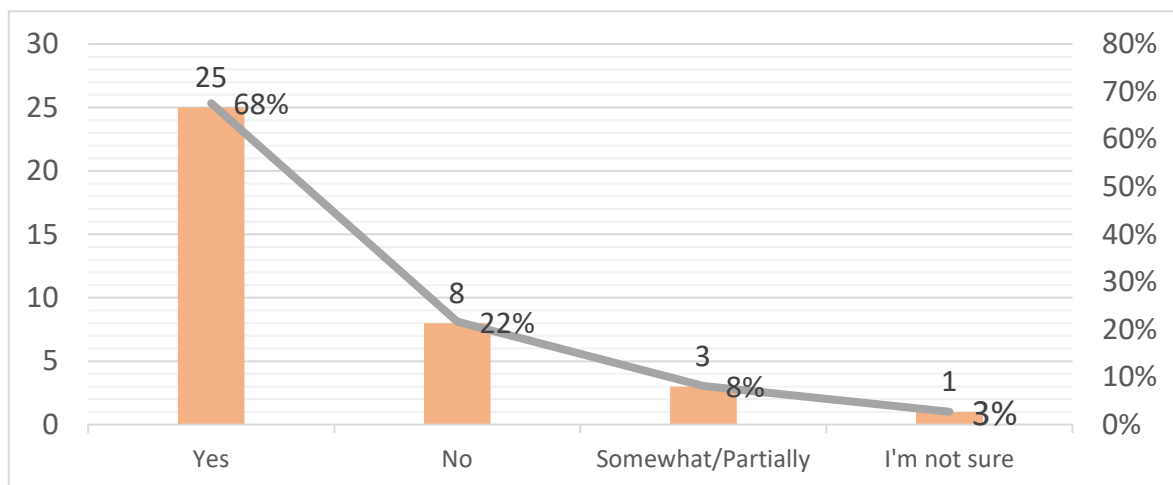
20. The proposal to register firms is intended to maintain public trust, so that clients and external stakeholders, such as lenders, investment companies and government, are aware of whether they are dealing with appropriately regulated valuation firms. There are many high-performing valuers and valuation firms in the marketplace, but the recommendations are focused on ensuring that poor-quality valuers and valuation firms do not damage the

overall reputation of the sector. Although a majority of respondents agreed with registering firms, we are gathering evidence at this stage and will consult with the Valuation Assurance Committee to determine the best course of action to enhance valuation process and conduct.

2.4 Register a valuation firm other than those exempted from VPS1-5

21. Firms that only undertake valuations which fall within the exceptions in VPS1-5 of *Red Book Global Standards* would not be required to register, ensuring alignment with the RICS VR scheme.

Question 3: Do you agree that the requirement to register as a valuation firm should apply to all firms undertaking valuations, other than those exempted from VPS1-5 of Red Book Global Standards?



Summary of responses

22. A majority of the respondents (25 out of 37, or nearly 70%) agree that the requirement to register as a valuation firm should apply to all firms undertaking valuations, other than those exempt from VPS1-5.

23. Some respondents who were not in agreement with this proposal maintained the following reasons. They:

- a. believed the RICS Valuer Registration scheme was adequate, with no reason to change it,
- b. had concerns about the disproportionate burden on small businesses, and

- c. viewed mandatory firm-level regulation as likely to add to financial and operational burdens, and believed implementation of the new VCO role could be achieved by other means.

RICS response

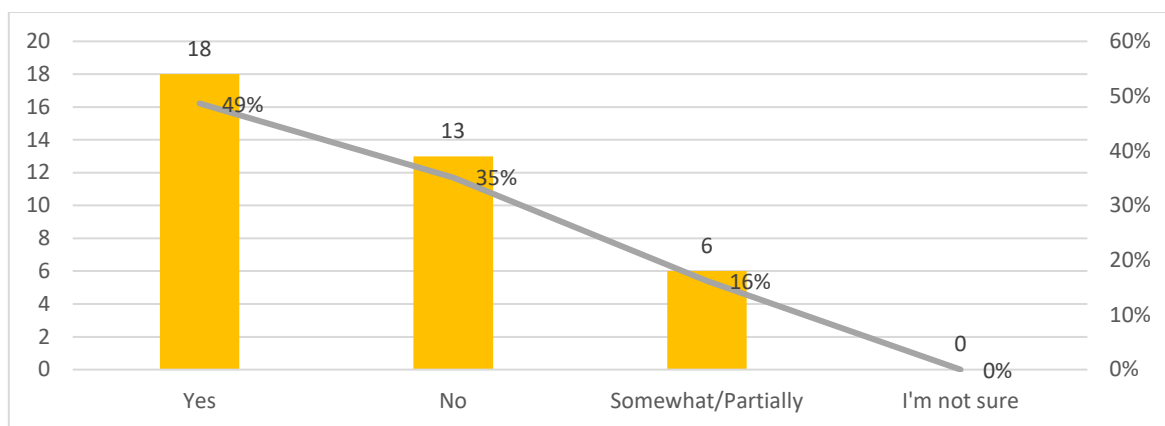
24. To address the concerns raised, we will work with the valuation firms (or valuation practice divisions at the firms) to ensure that, if introduced, the implementation of the VCO is proportionate across all practice sizes and, in particular, that an additional disproportionate burden is not placed on small businesses.

25. The Valuation Review believes the VCO role will resolve the perceived lack of valuer independence, and that the role would enhance our current Valuer Registration scheme.

2.5 Proportionate and appropriate – application to valuation firms globally

26. The Review focused predominantly on valuations of real estate assets in the UK on which third parties place reliance. However, the Review states that where it is proportionate and appropriate to do so, the principles identified should be extended to all valuation work internationally.
27. It is proposed that it is proportionate and appropriate for the VCO role, and therefore the registration of valuation firms, to apply globally and apply to firms undertaking all types of valuation (save those set out in the exceptions in VPS1-5). The aims of the recommendation are equally important for valuations conducted for other purposes – for example secured lending or investment decisions. Also, assurance and regulatory processes that are simplified and apply clearly and consistently provide more confidence to the public than those that involve complex definitions of the type of work covered or apply differently in different countries.

Question 4: Do you agree that it is proportionate and appropriate that the proposals to register as a valuation firm, and therefore have a Valuation Compliance Officer, should apply to valuation firms globally?



Summary of responses

28. About 50% of respondents agree that it is proportionate and appropriate for implementation to be carried out globally. Some respondents who work for global organisations also concurred that all practices worldwide should be held to the same standard.

29. Some of the respondents still believe RICS should not dictate that a VCO is required at all.
30. While many of the respondents agree in principle to implement globally, they believe it may be difficult to implement, monitor and enforce on an international basis from the outset. One respondent felt strongly that the VCO role should be implemented in the UK to pilot the programme before we look to mandate the changes globally. The reason the individual noted was that trying to enforce change globally before all other recommendations from the Review have been fully implemented may lead to various issues arising.

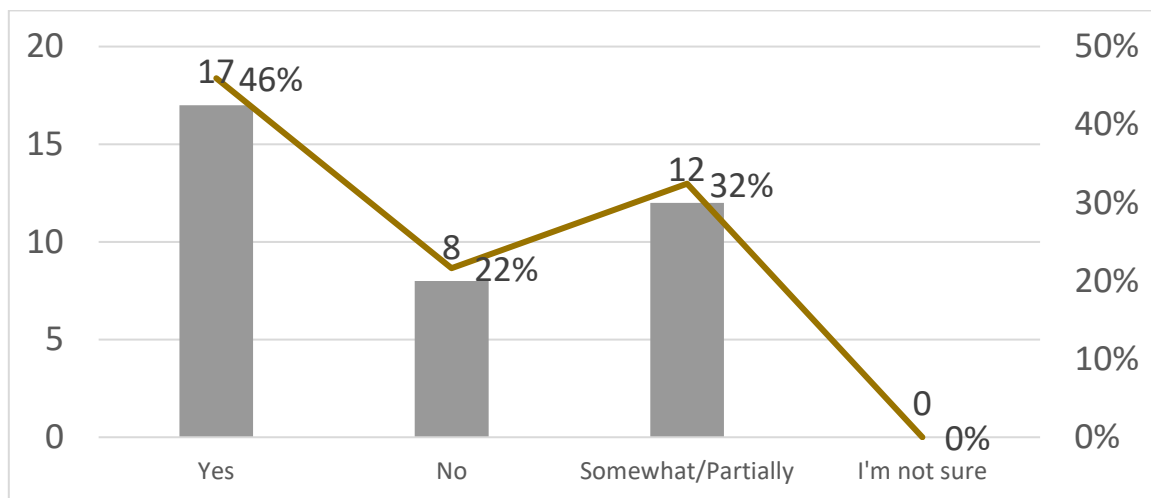
RICS response

31. RICS believes it is important to enhance valuation practice globally.
32. In consideration of the comments, we will determine where, if it is introduced, we should implement the VCO role – whether to implement solely for the UK market initially, select markets or all markets where the VR scheme is already in place.
33. The Review focused on enhancing the process and conduct for valuations of real estate for investment purposes on which third parties rely (or regulated purpose valuations). However, several practices perform valuations for a variety of purposes and value other asset classes. Although many of the principles of the VCO role, as well as recommendations from the Review, can be applicable to all valuation work, we would provide additional guidance about which valuations are covered.

2.6 Should an individual be responsible for compliance with valuation standards?

34. Under the proposals, all RICS-regulated firms that undertake valuation work would be required to provide information in their annual return about the valuation work they undertake, and to confirm who within the firm has responsibility for ensuring valuation compliance as well as appropriate ethical behaviour.

Question 5: Do you agree that all registered valuation firms should have an individual who is responsible for compliance with valuation standards and appropriate ethical behaviour?



Summary of responses

35. Nearly half of the respondents agreed that all registered valuation firms should have an individual who is responsible for compliance with valuation standards and appropriate ethical behaviour. However, some respondents questioned whether this responsibility should fall under a VCO, and if the role really needs differentiating from that of the existing Responsible Principal.

36. Several respondents commented that all individual valuers already agree to comply with valuation standards and standards of ethical behaviour, and they cannot offset/transfer their ethical obligation onto a compliance officer and therefore escape responsibility for poor valuation practices. Therefore, the responsibility sits with the individual valuer and compliance is already part of the RICS VR scheme.

37. Many practices noted that they already monitor compliance and believe that assigning this responsibility to an individual to ensure compliance to valuation standards and ethical behaviour could be an unnecessary layer of bureaucracy and costs.

RICS response

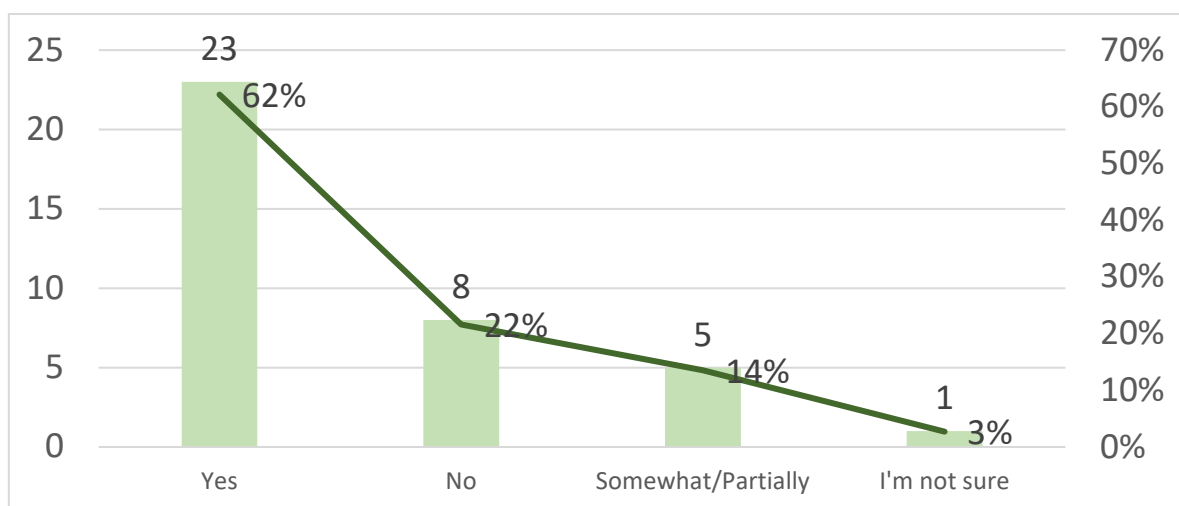
38. Based on the comments we received, we will seek further input from the firms and collaboratively determine who ultimately should oversee ethical behaviour related to valuation at RICS-regulated firms.

39. If the proposal is adopted, we would intend to produce additional guidance and differentiate between the roles of VCO and Responsible Principal. By adding a VCO where appropriate and separating out responsibilities from those of a Responsible Principal, this could produce a useful degree of clarity and separation of responsibility, especially for firms that provide multiple different surveying services.

2.7 Can the firm nominate an alternative officer for valuation compliance

40. The responsibilities of a Responsible Principal include 'taking reasonable steps to ensure the firm has implemented appropriate policies, systems and controls to ensure compliance with all RICS standards,' which would clearly include all valuation standards. However, a firm can opt to appoint a separate VCO to ensure compliance with all RICS valuation standards.

Question 6: Do you agree that the Responsible Principal of a registered valuation firm should adopt responsibility for valuation compliance unless the firm nominates an alternative officer?



Summary of responses

41. About 60% of the respondents agree that the Responsible Principal of a registered valuation firm should be responsible for valuation compliance unless the firm elects a separate VCO to ensure compliance with valuation standards specifically.
42. Several of the respondents currently believe the Responsible Principal is already ensuring valuation compliance at the firms and believe a separate VCO is not needed. Additionally, some small firms take responsibility for their own valuation compliance as RICS Registered Valuers.
43. A few respondents noted that if the Responsible Principal is responsible for valuation compliance, they should possess valuation experience, or be supported by others with

sound knowledge of the valuation process and Red Book requirements, in order to monitor and ensure compliance.

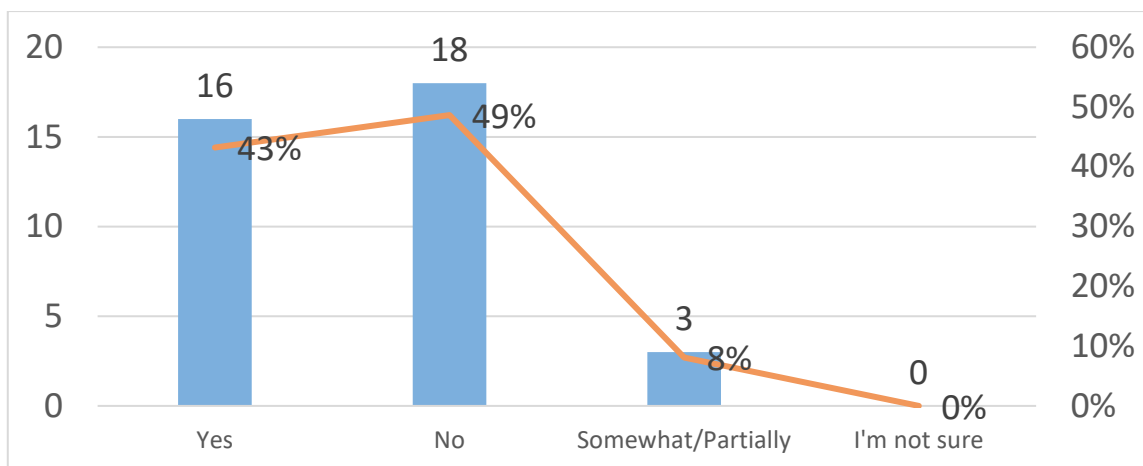
RICS response

44. Individual valuers who work outside of RICS-regulated firms will continue to have personal responsibility for their compliance with valuation standards and ethical conduct. Therefore, RICS assurance activities would continue to consider individual valuation practices.
45. If adopted, we would provide additional guidance about the necessary qualification requirements for Responsible Principals and VCOs to ensure they can fulfil their valuation compliance duties.

2.8 Can only RICS members be Responsible Principals?

46. As noted previously, a Responsible Principal is currently responsible for valuation compliance in valuation firms. Although there is discretion within the [Rules for the registration of firms](#) for RICS to accept someone who is not a member of RICS as the Responsible Principal, we do not consider that it is appropriate for a non-RICS member to be responsible for valuation compliance.
47. Given the responsibility includes assuring compliance with RICS' technical valuation standards, we propose that only RICS members should be able to accept responsibility for valuation compliance at RICS-regulated firms.

Question 7: Do you agree that only RICS member Responsible Principals should be able to assume responsibility for valuation compliance?



Summary of responses

48. We received mixed responses: more than 50% of respondents did not agree – or only partially agreed – that Responsible Principals and VCOs should only be an RICS member.
49. The respondents in favour of only RICS member Responsible Principals noted RICS members are held accountable for complying with RICS valuation standards. Also, to maintain a level of credibility with practitioners and the general public, RICS members understand the process of delivering valuation advice. Finally, RICS can enforce sanctions on its members for non-compliance, whereas non-members cannot be held to account.
50. The rest of the respondents noted that members as well as non-members should be able to adopt the role of the Responsible Principal (and VCO), based on their knowledge, expertise and role within the firm. However, it was noted that while individuals do not have

to provide valuations, they should have some direct interaction with/knowledge of valuations.

51. Several individuals noted adoption of the VCO role should be skills-based. Respondents added that professionals such as accountants have the necessary skill set to be able to supervise valuers and therefore should be able to take on the VCO role. Also, there are many non-RICS valuers and former valuers, or people from other disciplines within the valuation industry and wider real estate environment, who have the experience to take on the VCO remit. In addition, it was stated that relevant training should be provided to support individuals in the role.

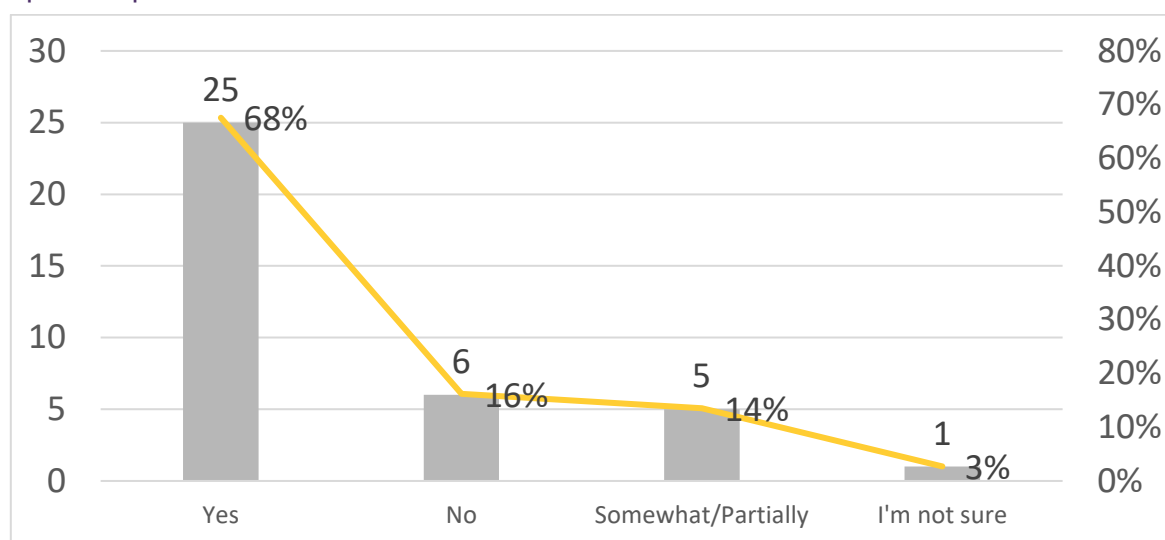
RICS response

52. In light of the comments received, we will consider whether it would be appropriate for non-RICS members to take on the duties of the Responsible Principal and VCO roles if this proposal is adopted. Furthermore, we would ensure we can support Responsible Principals and VCOs with sufficient training and assistance as necessary.

2.9 Option for firms to employ or contract with a consultant VCO

53. RICS considers that the rules should allow for a firm to employ or contract with an individual as a consultant specifically to carry out the duties associated with the VCO role, and that this individual could perform this role for several firms. We believe that enabling this option could provide a cost-effective way for firms whose valuation work warranted either additional expertise or expertise independent from fee-earning valuation work to benefit from an experienced compliance professional. This would increase the compliance competence available to firms, mitigate risk and provide a proportionate method for delivering assurance to the public in line with the Review.

Question 8: Do you agree that employing or contracting with a consultant VCO should be an option open to firms?



Summary of responses

54. More than two-thirds of the respondents agree that employing or contracting with a consultant VCO should be an option open to firms. Several respondents in favour of this option added it would be immensely helpful for small firms, as they may lack either the skill or time to address the VCO role properly. Therefore, using an external consultant would benefit their business and their clients.
55. Some respondents like this option but believe the consultant should be employed by RICS or the firm's auditors. They noted the consultants should also have a good knowledge of RICS standards and valuation process, including Red Book requirements.

56. Some respondents still consider this option to be too costly and an unnecessary additional financial burden, especially for small firms.
57. A response from the 'other' stakeholder category noted it should be a requirement for all firms producing Red Book valuations to have a VCO.
58. Respondents in the 'somewhat/partially' or 'I'm not sure' groups commented:
 - a. Risk and reward are an equal responsibility that should be managed accordingly.
 - b. The consultant VCO role could represent heightened risk around confidentiality breaches.
 - c. The VCO role could significantly impact both clients and valuers (increased associated costs and external reporting obligations) that could undermine profitability within the industry and could ultimately result in a reduced number of valuation firms (reduced options/availability of service providers).

RICS response

59. In principle, the 'consultant VCO' seems to be a viable option for many firms, in particular small firms. However, concerns around cost, confidentiality and expertise will be duly considered and we will ensure the qualification/eligibility requirements for the VCO role are appropriate and proportionate if this role is adopted.
60. We will also consider the risks as well as the benefits if we develop the VCO role to ensure it is implementable across all RICS-regulated valuation firms.

2.10 Other comments about the VCO role

Question 9: Please share any comments on the role description for a VCO.

Summary of responses

61. Sixteen respondents provided comments about the role description for a VCO.

62. The following are unique comments from respondents that have not been expressed so far:

- a. Clarification should be provided whether one VCO covers a firm or multiple VCOs are needed when a firm has multiple offices with several registered valuers in each office, as well as valuers in various countries.
- b. VCOs in other countries should be knowledgeable and capable of complying with local legislation.
- c. VCOs should be subject to ongoing CPD requirements specific to the role.
- d. If non-members are allowed to take on the role of the VCO, then they will need to stay up to date with valuation trends, developments and market issues, as well as understanding current valuation standards and processes.

RICS response

63. If we adopt the proposals, we will provide supplemental guidance about the number of VCOs needed when a firm has multiple offices and registered valuers are located across several countries. We would also take into consideration the size of the firm and type of valuation work undertaken by the firm.

64. We also agree that, if introduced, VCOs would need to stay current with legislation, valuation trends and standards as noted by the respondents. Furthermore, we would ensure RICS can support the VCOs (and Responsible Principals where they are also responsible for valuation compliance) with appropriate training and support.

2.11 Any other comments

Question 10: Do you have any other comments on the proposals?

Summary of responses

65. Twenty-two respondents provided additional comments about the proposals.

66. The following are unique comments from respondents that have not been expressed so far:

- a. In the event a consultant VCO fails in their duty and is sued, who is responsible for the professional indemnity insurance cover and premium payments? Does the duty and responsibility fall only on the shoulders of the VCO, or on the shoulders of the registered valuer who undertook the valuation, or both?
- b. Clarification is needed about how the size of the firm will dictate whether a dedicated VCO or a number of VCOs are needed – is this based on the number of valuers, type of valuations, number and quantum of value?
- c. Increased regulation is not by itself going to solve the problem. Several respondents noted increased CPD training, as well as including Recommendation 11 (post-qualification requirements and revalidation), should also accompany the added layer of regulation.
- d. While an individual respondent agreed with the need for an improved regulatory framework and rules, the individual added 'I do not see any evidence presented that substantiates the claim in section 22 of the consultation paper that the cost for this will need to be met through an additional regulatory fee'.

RICS response

67. We will collaborate with firms to consider the risks as well as the benefits before any implementation of the VCO role. Additionally, we would provide supplemental guidance about how many VCOs are needed, based on the size of firm (and how this is defined) and the type of valuation work undertaken by the firm.
68. We are also currently reviewing our CPD requirements as part of the work of the CPD Framework Steering Group. These requirements, although not yet finalised, may change from 2026. Additional information will be communicated to members following the CPD consultation.
69. Regarding the comment about the regulatory fee, consultation will take place on the matter. At present, if these proposals are adopted, we would expect the regulatory fees to be proportionate and borne by the firms undertaking the activities that are subject to this additional layer of regulation.

3 Path forward

70. As recommended by the Review, RICS will establish the [Valuation Assurance Committee \(VAC\)](#). This group will oversee the regulatory quality assurance framework for RICS Registered Valuers and RICS-regulated valuation firms undertaking valuation services, including:

- a. The registration of RICS Registered Valuers, VCOs, and RICS Regulated Firms that undertake valuation services on an approved list or lists.
- b. The CPD requirements, including possible revalidation, required of RICS Registered Valuers and VCOs to remain on the approved list(s).
- c. The monitoring, including audit arrangements, of RICS Registered Valuers, VCOs, and RICS Regulated Firms that undertake valuation services on the approved list(s), to provide assurance of their compliance with the requirements of the registration scheme.

We have appointed the Independent Chair of the Valuation Assurance Committee, and we are recruiting for the four valuer and four non-valuer members during August 2024. Applicants need to submit their complete application by 17:00 (BST) on Thursday 22 August 2024. Please refer to the following links for information:

- [Apply here for valuer membership of the VAC.](#)
- [Apply here for non-valuer/independent membership of the VAC.](#)

We expect the VAC will be in place by the end of 2024.

4 Key matters to be addressed

71. Based on responses to the consultation and the existing regulatory landscape, we will work with the VAC (once established), firm representatives and other key stakeholders to determine the final proposals to be put to the Standards and Regulation Board and to address key matters if the proposals are adopted, including the following. Please note this is not an exhaustive list.

- a. General implementation:
 - i. How to ensure seamless and proportionate implementation of the VCO role across all sizes of valuation firms, including firms with internal audit or risk management groups, and ensure in particular that an additional disproportionate burden is not placed on small businesses/practices.
 - ii. Further clarify and explain the eligibility criteria for becoming an RICS-regulated firm or Regulated Practice Division, including to support consideration of an RICS firm valuation scheme.
- b. Scope:
 - i. Determine initial markets for implementation (UK-only, select markets or markets where the VR scheme is employed) and the number of VCOs needed when a firm has multiple offices in a country and offices in several countries based on its size and type of valuation work undertaken.
 - ii. Conclude on valuation purpose(s) and asset classes – either real estate for investment purposes only, or all valuation purposes and asset classes.
- c. Define roles:
 - i. Determine who would ultimately oversee ethical behaviour at a firm – VCO, Responsible Principal, or firm compliance officer.
 - ii. Define and differentiate the two roles where a firm has both a VCO and a Responsible Principal.
- d. Qualification requirements:
 - i. Determine the necessary qualifications and experience for the VCO and/or Responsible Principal to perform the responsibilities of their role on an ongoing basis.
 - ii. Determine whether non-RICS members can take on the duties of the Responsible Principal and/or VCO.

- e. Policy changes:
 - i. The need to communicate changes to the Valuer Registration scheme and firm regulation due to the implementation of the VCO role.
 - ii. Establish regulatory fees.
- f. Risks:
 - i. Evaluate legal issues around client confidentiality.
 - ii. Address non-compliance and liability issues.
- g. Other:
 - i. Establish appropriate CPD training and support for VCOs and Responsible Principals.
 - ii. Ensure key stakeholders are aware of and understand any proposed changes to the RICS regulatory regime regarding valuation practice, and ensure non-compliance is being appropriately addressed.

5 Conclusion

72. RICS is grateful for the invaluable contributions of our members, stakeholders and subject matter experts who took the time to provide comments through [iConsult](#) (our interactive platform), by email and in person. We are pleased with the level of engagement the consultation received.
73. Due to the volume of feedback received, it has not been possible to summarise every comment in this document, but we wish to emphasise that each individual comment was fully considered.
74. We recognise and understand both the positive comments received and the concerns raised in respect of the VCO role. Therefore, we will be collaborating with our members and stakeholders in the world regions to further develop any proposals to implement the VCO role across valuation firms and practices.
75. We are committed to considering the feedback received in deciding how our regulatory policy can ensure that valuation services are delivered appropriately, objectively and to the highest standards, thereby upholding public confidence.

Delivering confidence

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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