

Incidents of non-financial misconduct (NFM) across Wholesale Banking, Wholesale Brokers, Wholesale Insurers & Wholesale Insurance Intermediaries portfolios

Questions marked with a "*" are compulsory.

1) * Respondent full name

[Text box]

2) * Respondent email address

Will be used to contact if the FCA has any questions about your submission to this survey.

[Text box]

3) * Are you providing a consolidated response to this survey (only applicable if you have received this survey request for multiple entities within the same parent group)?

[Y/N]

3.1) * Name of firm

[Text box]

3.2) * FRN

If you responded 'Yes' to (Q3), please list the FRNs of all the entities that make up your consolidated response (in the format: 123456, 123456, etc.)

[Text box]

4) * Employee numbers

	Employee statistics:
Number of employees within your firm	
Number of Senior Management Function (SMF) holders within your firm	
Number of employees within Certification Function roles within your firm	

5) * Which sector is your firm in?

[Wholesale Banks / Wholesale Brokers / Lloyd's Managing Agents and London Market (Re) Insurers (inc. P&I Clubs) / Lloyd's and London Market Intermediaries (inc. Managing General Agents)]

Survey Instructions

In this survey, we are requesting high-level statistics for all NFM related incidents at your firm. These should include incidents that have already been reported to the FCA using the relevant channels and regulatory reports (e.g., SUP15.11, REP008, Form C & D via the Connect system) **and** any other incidents of NFM at your firm that you have not already reported to the FCA for various reasons (e.g., the incidents didn't meet the FCA's reporting threshold).

We do not expect firms to reassess historical files against regulatory reporting requirements.

Please report the number of incidents aggregated across each **calendar year**, not reporting year or financial year. Please also populate incidents based on the year in which they had occurred, not the year in which the subsequent case and/or disciplinary proceedings concluded. We also ask that the incidents reported relate to [conduct rule staff](#) only and should **not** include ancillary staff employed by the firm that are not subject to the conduct rules.

We are requesting data that includes incidents that took place at the office, working from home, working offsite, and social situations related to work ('in the workplace' for the purposes of Q24). This can include incidents that happened in any work-related capacity and may include events that have been organised through work, including staff social events, off-site training and conferences, client entertainment or sponsored events ('unrelated to the workplace' for the purposes of Q25). It would not include private events organised by members of staff among themselves with no other connection to work.

You are also required to provide this information split by incidents that were attributed to **non-SMF** and **SMF holders**. The text above each question will indicate the year the information is being requested for and whether it should be populated for SMF holders or non-SMF holders.

For questions **(6) - (11)**, please ensure you populate each type of NFM correctly, relating to the detection method(s) (across the vertical axis) that apply to each case.

We request that you disclose all the ways each NFM related incident was identified. For example, if for a given case an incident was raised using both whistleblowing and general surveillance, we would expect you to indicate so in both fields.

For situations where multiple types of NFM are present in a course of behaviour by the same individual that was the subject of the complaint, please identify what you consider to be the predominant behaviour and populate the table once only.

If you are providing a nil return for any of the matrix tables (Q6 - 23), simply leave the table blank.

6) * How were these incidents of NFM detected (SMF holders)? – 2023

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal						

processes for escalation						
Surveillance (Market surveillance tools)						
Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

6.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

6.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

7) * How were these incidents of NFM detected (non-SMF)? – 2023

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal processes for escalation						
Surveillance (Market surveillance tools)						
Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

7.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

7.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

8) * How were these incidents of NFM detected (**SMF Holders**)? – 2022

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal processes for escalation						
Surveillance (Market surveillance tools)						
Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

8.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

8.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

9) * How were these incidents of NFM detected (**non-SMF**)? – 2022

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal processes for escalation						
Surveillance (Market surveillance tools)						

Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

9.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

9.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

10) * How were these incidents of NFM detected (SMF Holders)? – 2021

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal processes for escalation						
Surveillance (Market surveillance tools)						
Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

10.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

10.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

11) * How were these incidents of NFM detected (non-SMF)? – 2021

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Whistleblowing (formal process)						
Grievance or other similar formal processes for escalation						
Surveillance (Market surveillance tools)						
Conflicts of Interest Disclosures						
Other						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

11.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

11.2) Other detection methods

If you populated the 'Other' detection methods field, please specify the types of detection methods that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

The following section asks for data about the outcomes or disciplinary actions taken by the firm, in relation to incidents of NFM. Contrary to your responses to questions **(6) - (11)** where we requested you disclose all the detection methods that applied to individual cases, for questions **(12) - (17)** where multiple types of disciplinary actions apply, please only use the most recent or final disciplinary action for each case. For example, if following an incident of NFM the subject of the complaint received a verbal warning but was subsequently dismissed as part of the investigation, only populate the dismissal within the table for that incident. This will prevent double counting of incidents.

12) * Non-financial misconduct outcome statistics (SMF holders) – 2023

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						
Written warning						
Verbal warning						

Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						
Awaiting decision (Investigation still in flight)						
Other (D&I training, coaching etc.)						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

12.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

12.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

13) * Non-financial misconduct outcome statistics (non-SMF) – 2023

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						
Written warning						
Verbal warning						
Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						
Awaiting decision (Investigation still in flight)						

Other (D&I training, coaching etc.)						
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* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

13.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

13.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

14) * Non-financial misconduct outcome statistics (SMF Holders) – 2022

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						
Written warning						
Verbal warning						
Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						
Awaiting decision (Investigation still in flight)						
Other (D&I training, coaching etc.)						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

14.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

14.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

15) * Non-financial misconduct outcome statistics (non-SMF) – 2022

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						
Written warning						
Verbal warning						
Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						
Awaiting decision (Investigation still in flight)						
Other (D&I training, coaching etc.)						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

15.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

15.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

16) * Non-financial misconduct outcome statistics (SMF Holders) – 2021

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						

Written warning						
Verbal warning						
Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						
Awaiting decision (Investigation still in flight)						
Other (D&I training, coaching etc.)						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

16.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

16.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

17) * Non-financial misconduct outcome statistics (non-SMF) – 2021

	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Dismissal						
Written warning						
Verbal warning						
Complaint upheld – No action taken						
Complaint not upheld						
*** Investigation unable to conclude						
Complaint not investigated						

Awaiting decision (Investigation still in flight)						
Other (D&I training, coaching etc.)						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** Which may include the subject of the complaint leaving the firm (by their own choice).

17.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

17.2) Other outcomes

If you populated the 'Other' outcomes field, please specify the types of disciplinary actions/outcomes that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

For questions **(18) - (23)** we request that you disclose all the further outcomes that were associated with each incident. For example, if for a given case the individual in question signed both a settlement agreement and a confidentiality agreement, we would expect you to indicate so in both fields. Questions **(18) - (23)** will also require you to disclose the further outcomes faced by both the subject of the complaint and the complainant - Each table will clearly highlight this to avoid confusion.

18) * Further outcomes (SMF holders) – 2023

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						

Complainant	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
***** Confidentiality agreement signed						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.

**** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.

***** Vested is variable pay that has already been paid to the employee.

***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

18.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

19) * Further outcomes (non-SMF) – 2023

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						
Complainant	* Sexual harassment (as outlined in the	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct

	Equality Act 2010)					
Employment Tribunal claims						
Settlement Agreement signed						
***** Confidentiality agreement signed						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.

**** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.

***** Vested is variable pay that has already been paid to the employee.

***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

19.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

20) * Further outcomes (SMF holders) – 2022

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						
Complainant	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						

Settlement Agreement signed						
***** Confidentiality agreement signed						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.

**** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.

***** Vested is variable pay that has already been paid to the employee.

***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

20.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

21) * Further outcomes (non-SMF) – 2022

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						
Complainant	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						

***** Confidentiality agreement signed						
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* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.

**** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.

***** Vested is variable pay that has already been paid to the employee.

***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

21.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

22) * Further outcomes (SMF holders) – 2021

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						
Complainant	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
***** Confidentiality agreement signed						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).
 ** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).
 *** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.
 **** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.
 ***** Vested is variable pay that has already been paid to the employee.
 ***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

22.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

23) * Further outcomes (non-SMF) – 2021

Subject of the complaint	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
*** Remuneration adjusted – fixed pay						
**** Remuneration adjusted – malus in year adjustments (unvested variable pay)						
***** Remuneration adjusted – clawback (vested pay)						
Complainant	* Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
Employment Tribunal claims						
Settlement Agreement signed						
***** Confidentiality agreement signed						

* Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).
 ** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

*** This includes salary, role-based allowances, non-discretionary pensions, other benefits and other elements of fixed remuneration.

**** Unvested refers to the agreed variable pay that hasn't been paid to the employee but will be in line with the payment schedule.

***** Vested is variable pay that has already been paid to the employee.

***** Confidentiality agreement, or confidentiality clause within settlement agreements, whereby the complainant agrees not to disclose the allegations they have made in respect to NFM (noting that non-disclosure could not include a protected disclosure or a disclosure to the regulator. Please contact us separately if agreements have been made that attempt to include these).

23.1) Other non-financial misconduct

If you populated the 'Other non-financial misconduct' field, please specify the types of incidents that you've categorised in this submission with any additional comments. Do not include any identifiable information, such as employee names in your response.

[Text box]

24) * How many times has your firm amended an individual's Fit and Proper (FIT) assessment for NFM-related incidents that took place in the *workplace?

	** Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	*** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
2023						
2022						
2021						

* Including the office, working from home, working offsite and other situations related to working.

** Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

*** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

25) * How many times has your firm amended an individual's Fit and Proper (FIT) assessment for NFM-related incidents that are unrelated to the *workplace?

	** Sexual harassment (as outlined in the Equality Act 2010)	Bullying and harassment	*** Discrimination	Possession or use of illegal drugs	Violence or intimidation	Other non-financial misconduct
2023						
2022						
2021						

* Including the office, working from home, working offsite and other situations related to working.

** Which may include allegations of sexual assault (as outlined in the Sexual Offences Act 2003).

*** This may include but isn't limited to discrimination against protected characteristics (as outlined in the Equality Act 2010).

Regulatory references, Management Information (MI) and Appointed Representatives (ARs)

26) * Regulatory references

	2023	2022	2021
* How many individuals who had incidents of NFM on their regulatory reference has your firm hired?			

How many regulatory references containing incidents of NFM has your firm provided?			
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* You can respond with a '0' to indicate that either your firm has chosen to hire no individuals with NFM on their regulatory references by policy, or equally that they have not received any references containing NFM disclosures.

26.1) * Would your firm include NFM in a regulatory reference?

[Y/N]

26.2) * Would your firm update a regulatory reference following a NFM incident?

[Y/N]

27) * Does your firm have a formal governance structure or committee that decides on the outcomes and disciplinary actions for those involved in NFM cases?

[Y/N]

28) * Does the board or a board level committee receive any management information (MI) around NFM?

[Y/N]

28) If yes, please confirm the board/committee title and briefly outline the MI received.

[Text box]

29) * Are you a principal firm?

[Y/N]

29.1) If yes, do you monitor the conduct of individuals in your Appointed Representatives and / or collect information from your Appointed Representatives on non-financial misconduct of individuals in the Appointed Representative?

[Y/N]

29.2) If yes, how many cases of non-financial misconduct were reported to you by your Appointed Representatives, or did you identify at your Appointed Representatives, for the following calendar years?

	2023	2022	2021
Number of NFM incidents at ARs			

Policies and Procedures

30) * Does your firm have a documented Diversity & Inclusion (D&I) Strategy?

[Y/N]

31) * Does your firm have a current remuneration policy in force (in 2024)?

[Y/N]

31.1) If yes, what year was this policy first introduced?

[Dropdown (2024-2000, before 2000)]

31.2) If yes to **(31)**, how frequently is this policy reviewed?
[At least yearly / At least every two years / More than two years]

32) * Does your firm have a current disciplinary policy in force (in 2024)?
[Y/N]

32.1) If yes, what year was this policy first introduced?
[Dropdown (2024-2000, before 2000)]

32.2) If yes to **(32)**, how frequently is this policy reviewed?
[At least yearly / At least every two years / More than two years]

33) * Does your firm have a current whistleblowing policy in force (in 2024)?
[Y/N]

33.1) If yes, what year was this policy first introduced?
[Dropdown (2024-2000, before 2000)]

33.2) If yes to **(33)**, how frequently is this policy reviewed?
[At least yearly / At least every two years / More than two years]

Training

34) * Do all staff receive whistleblowing training?
[Y/N]

End of Questions