

Culture review packages:

focus on non-financial misconduct

Build a culture that supports integrity, accountability and inclusion whilst meeting your regulatory obligations with our non-financial misconduct (NFM) and culture review packages.

There is growing political and regulatory pressure to adopt a zero-tolerance approach to non-financial misconduct (NFM), which includes behaviours such as bullying, sexual harassment and racism.

While culture is intangible, clear expectations can be set through leadership and a strong policy framework. This framework must define unacceptable behaviours, remain adaptable, and align with recent FCA rules and guidance changes.

Firms must ensure policies and procedures are in place to support reporting, investigation, and disciplinary action. Senior managers will be accountable for overseeing the framework, individual outcomes, and regulatory reporting.

Enquire now



Phase 1: Culture and conduct foundations

We assess whether your firm has the right framework in place to identify and handle allegations of bullying, harassment, discrimination and other forms of NFM. This phase combines a review of your internal processes, gathering insight into how culture is experienced day-to-day

What we deliver

- Gap analysis of policies and procedures relating to whistleblowing, speaking-up, internal investigations, disciplinarys and grievances to assess how NFM concerns are handled
- Review of SMCR responsibility for NFM incidents and NFM incident reporting
- Culture review through focus groups and employee interviews
- Next steps recommendations and actions

Phase 2: Framework strengthening

Building on Phase 1, we help you turn insight into action. This phase focuses on ensuring your internal processes, governance and policies fully support a zero-tolerance approach to NFM.

What we deliver

- Board update on Phase 1 recommendations and actions
- Updating policies on behaviour, culture and NFM
- Enhanced whistleblowing, grievance, internal investigations, speaking-up and disciplinary procedures
- Designing governance procedures for independent decision-making
- Enhanced staff training framework

Phase 3: Leadership and capability building

In this phase, we focus on developing the knowledge, behaviours and confidence your leaders and people managers need to foster a healthy culture and reduce the risk of NFM. All training and support can be tailored to your needs.

What we deliver

- 21st Century Manager training programme
- Specialist modules on Sexual Harassment in the Workplace, Inclusive Leadership and Gender Diversity
- One-to-one guidance for those with responsibility for dealing with NFM incidents
- Senior manager training on FCA expectations on NFM and liability