
The European Venues and Intermediaries Association [‘EVIA’] and the London Energy Brokers Association [‘LEBA’] thank the work that both the FCA and its members put into the contribution and the compilation of this [very first non-financial misconduct survey published today](#). It warmly welcomes an *evidence based* and a *data led* approach because it forms a basis for benchmarking whilst **supporting proportionality** according to each firm’s own metrics.

That the survey demonstrates an increase in reported incidents confirms that the **“Speak Up” culture** is non-negotiable across the industry. Association members intend to carry on work to build effective and standardised approaches in order to embed **governance frameworks** for those aspects of NFMC highlighted in the survey, including policies for **whistleblowing, inclusion and escalation**.

Firms fully support enhanced guidance and common parameters on both the role of **Regulatory References** and especially by confirming clear expectations on the **role of market monitoring**. EVIA would urge the FCA to establish a **regular periodic iteration** of this survey, perhaps triennial, along the lines of other multi-annual FCA surveys such as those concerning “Implementing Technology Change” and “Financial Lives” .