Complaints Commissioner

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29 December 2017

Dear Complainant's representative

Complaint against the Financial Conduct Authority

Our reference: FCA00286

1. Thank you for your email of 27 February 2017 and subsequent emails on behalf of the complainant. I undertook further enquiries of the FCA, and on 8 May 2017 I issued a preliminary decision on which both you and the FCA commented. I issued a second preliminary decision on 19 June 2017, and again both you and the FCA commented.

2. Having carefully considered all the comments, this is my final decision. I normally publish my complaints in an anonymised form – hence what follows has been anonymised.

The complaint

3. The complaint has a complex history.

4. The complainant complained to the FCA, and it described and investigated his complaint as follows:

> *You allege the FCA has improperly disclosed information to [bank X], including*
>
> *(1) Tipping off [bank X] into an investigation into central file falsification by sharing with [bank X] sensitive/confidential information you had provided to the FCA as a whistle-blower; and*
>
> *(2) Disclosing your identity as a whistle blower to [bank X]*

5. With regard to element 2 above, the complainant's main concern had been that a particular email in 2015 might have disclosed his identity as a whistle-blower to bank X.

6. The FCA undertook a detailed investigation which confirmed that the complainant's name had not been disclosed to bank X in 2015. However, it said that in the course of the investigation it had been discovered that the complainant's name had been given to bank X in 2013, and went on to explain why.

7. The complainant was not satisfied with the decision the FCA took on element 2 of the complaint above. In your subsequent correspondence with the FCA's Chief Executive, he wrote to you '*You asked whether [the complainant] is registered as a Whistle-blower. The complainant cannot be classified as blowing the whistle on something that did not happen'*. This statement gave you cause for concern, but you report that "Mr. Bailey refused to further elucidate on that statement or its intent in relation to [the complainant]'s allegations."

8. You referred the complaint (element 2 above) to me. In your email of 27 March 2017 you said:

The FCA as the prescribed person for whistle-blowers in financial services in the UK should never disclose the name of, nor allegations made, by any person that has approached them with either PIDA information or reportable concerns to the firm named in the disclosures.

9. You asked me to 'review the behaviour of the FCA in relation to [the complainant] as a Whistle-blower'.

10. I should make it clear that this decision letter focusses on the particular issues described above. In subsequent correspondence, you and the complainant have raised other issues which go beyond the scope of this investigation, and which I have not addressed here.

My investigation

11. There is voluminous documentary evidence supplied to me by the FCA, but for the purposes of dealing with the complaint I have concentrated upon the circumstances in which the complainant's name was disclosed by the FCA to bank X in 2013, and the explanations for the disclosure which the FCA has given.

12. On 8 May and 19 June 2017 I issued preliminary decisions to you and the FCA, with which the FCA strongly disagreed. For that reason, it is necessary for me to explain in some detail how my investigation has proceeded, and the differences of opinion between the FCA and me.

13. From the evidence available to me, what is not in dispute is that the FCA gave the complainant's name to bank X in 2013 (a fact which was disclosed to the complainant in the course of the FCA's investigation into his complaint about other matters). The complainant alleges that the FCA should not have done so as he has protection as a whistle-blower.

14. The FCA's position is that:

    a. The FCA did disclose the complainant's name to bank X in 2013, but

    b. The FCA's disclosure was necessary to answer the query the complainant's MP was pressing the FCA to answer, which was whether bank X had ever sought guidance about the complainant's whistleblowing (which the FCA understood had begun in 2005), and

    c. The FCA knew that the complainant's name had already been disclosed to bank X by the complainant's MP in August 2013, with the complainant's permission, in relation to the same underlying matters, and

    d. The complainant had supplied the FCA with copies of correspondence which showed that he had made his grievances known to a wide range of people both within and outside bank X, and

    e. The complainant had indicated to the bank that he might make his allegations known to the FCA, and

    f. Neither the complainant nor the bank had requested anonymity, and

    g. The FCA maintains it will try to protect the identity of anyone providing information who asks for anonymity whether or not they would be classed as a whistle-blower under PIDA. However, in the case of the complainant, the FCA did not consider at the time that he was seeking anonymity, given the facts above.

15. In summary, the FCA does not accept that the complainant was seeking anonymity as a whistle-blower (or more generally as someone reporting information), nor do they consider that the disclosure of his name was unreasonable.

My approach

16. The Complaints Scheme is not the forum to apply legal tests - that is a matter for the courts. I can, however, look at whether it was reasonable for the FCA to disclose the complainant's name to bank X in the circumstances. It is not my role to say what I would have decided had I been the regulator. In making this assessment, I have the benefit of access to all the regulator's records, including material which is confidential.

Two key issues

17. Having considered the complaint carefully, posed some supplementary questions to the FCA, and considered responses on behalf of the complainant and the FCA to two preliminary reports, this is my final analysis of the two main questions raised by the complaint, which are:

    (1) was it necessary for the regulator to reveal the complainant's identity to the bank in order to answer his query?

    (2) did the FCA adequately consider the issue of the complainant's confidentiality before doing so?

18. In answering these two questions, I have analysed the record of the sequence of events from 3 December 2013 – when the complainant first posed his question to the FCA – to 20 December 2013 – when the FCA disclosed the complainant's name to bank X and then addressed the complainant's question. In the annex to this report is a list of the key emails to which I refer. The FCA has stressed to me that that there were a large number of other emails: while that added to the complexity of the material which the FCA had to deal with at the time, it does not in my view affect the analysis of the two questions set out above.

(1) Was it necessary to reveal the complainant's identity?

19. To answer this question, it is necessary to look at the way in which the complainant's query was posed. The key part of the complainant's 3 December query to the FCA was as follows:

> *I would be grateful if you would check your records and let me know if [bank X] did ever seek guidance from yourselves as a result of my whistle blowing…[named individual in bank X] confirmed to me that [bank X] were seeking regulatory guidance this year, if you would confirm to me that was true I would appreciate it.*

20. The complainant's query was followed up on 19 December by an email from the office of his MP. That email included the following:

> *[The complainant] showed me an email exchange between yourself and him which asked a fairly straightforward question about whether [bank X] had sought guidance at any point in relation to his whistle-blowing….[The complainant]'s experiences over the last eight years have left him in an extremely vulnerable position….I would be very grateful if you could provide a more complete answer to [the complainant]'s question…..*

21. The FCA responded to the MP's office in the following terms in an email on 20 December 2013:

> *We have reviewed our records to see whether [bank X] has sought guidance from the FCA this year. I can confirm following a search of our data that we have not found any information to show that we received a request for guidance from bank X. Although, we note from your email that [bank X] were seeking regulatory guidance, it is possible, that may have been from a regulatory body other than ourselves.*

22. The FCA has repeatedly stated – in their original decision letter to the complainant and in response to my two preliminary reports - that it was "necessary" that they contact bank X in order to answer the complainant's query. The FCA argued that cross-checking the position with bank X was needed to ensure that the FCA's records were complete, particularly given the volume of correspondence with a variety of people within the regulator.

23. In its response to my first preliminary decision, the FCA argued that the complainant's request went further than advice sought by the bank from the FCA, and might encompass advice sought from other authorities, and for that reason only an approach to bank X could answer the query. It is clear from the record that the FCA did seek information from bank X about whether it had sought guidance from other sources, but it seems to me significant that the paragraph in the letter to the MP, quoted in paragraph 21 above, gives the impression that the FCA was only considering advice sought by the bank from the FCA. Furthermore, the complainant's request of 3 December 2013 to the FCA states clearly that he wanted to know "if [bank X] did ever seek guidance *from yourselves* [my emphasis] as a result of my whistleblowing".

24. In its response to my second preliminary decision, in which I set out the above argument, the FCA said:

> *A careful analysis of the relevant email correspondence shows that there were two limbs to [the complainant]'s enquiry. The second question (whether it was true that [bank X] had been seeking 'regulatory guidance') raised the possibility of [bank X] seeking guidance from other sources (as recognised by internal correspondence), as well as from the FCA. The FCA could not have answered that question without reference to [bank X], and without disclosing [the complainant]'s name.*

25. From the FCA's point of view, I can see that it might have been useful to discover whether bank X had been seeking regulatory guidance from other sources; but to use that as a justification for disclosing the complainant's name without his permission, on the grounds that it was "necessary", is unconvincing.

26. In my view, it is significant that, while the possibility that bank X might have sought guidance from another source was mentioned in the response to the MP's office, the FCA did not say that it was making further inquiries of the bank. If it was the case that the FCA felt unable to answer the MP's query fully without the information from the bank, and that the bank was therefore being asked for further information, it seems to me that it would have been natural to have stated that in the response. In its response to me, the FCA has speculated that, at the time the response was written, there may have been doubt about whether the query to bank X would have resulted in information which could be shared with the complainant, and that it "would have been unwise to inflate the expectations of [the complainant]". I do not find that argument persuasive.

27. The question of whether or not the disclosure of the complainant's name was strictly necessary is, however, secondary to the other element, which is whether the FCA adequately considered the question of the complainant's confidentiality before doing so.

(2) Did the FCA adequately consider the issue of the complainant's confidentiality before disclosing his name to bank X?

28. In its response to my first preliminary decision, the FCA wrote "The FCA did check that [the complainant] had not been registered as a whistleblower before writing to [bank X]….[The complainant]'s status had therefore been taken into account when the team decided to contact [bank X] about his concerns." However, in its second response, the FCA conceded that the person who disclosed the complainant's name to bank X did so before making an inquiry of the whistleblowing team (see further below).

29. The FCA has pointed out that the complainant sent it an email on 3 December 2013 with attachments containing emails sent to various parties including the Governor of the Bank of England, [complainant's MP], the Chair of the Treasury Committee, a peer, the Prime Minister, the Serious Fraud Office, and the Chancellor of the Exchequer containing allegations against bank X. Additionally, on 22 March 2013 the complainant had written to a number of people at bank X with allegations against bank X, urging all to share with trusted colleagues and loved ones the allegations/information against bank X.

30. The FCA argue that in the circumstances it was reasonable for the FCA supervisors to infer, following review of that material, that the complainant did not expect or desire anonymity. They have pointed out that the complainant, via his MP, had first approached the FCA in October 2013 with a request that the FCA undertake an investigation into a series of allegations going back to 2008. The FCA go further and say:

> - *The only reasonable inference from the significant evidence available to the FCA in December 2013 was that [the complainant] did not wish or need his anonymity to be protected. We are not aware of any evidence to support an inference to the contrary.*
> - *Email correspondence…clearly shows that prior to disclosure of [the complainant]'s name:*
>
> *i. the FCA Whistle-blowing team had conducted a search as to whether [the complainant] was recorded as a whistleblower;*
>
> *ii. the result was negative; and*
>
> *iii. this was communicated to the [bank X] Supervision team.*
>
> - *In all of the circumstances, it was reasonable for the FCA to disclose [the complainant]'s name to [bank X], and the evidence does not support any finding that inadequate consideration was given to the question of preserving [the complainant]'s anonymity in the FCA's communications with [bank X]….*
>
> *…we have seen no explanation of why he might have wished the FCA to protect his identity. We consider that these are probative matters that you should be satisfied on, before finalising your decision, given the absence of any other evidence on which to conclude that he desired anonymity (or that FCA staff should have inferred that desire).*

31. The FCA have also argued that subsequent correspondence, in 2014 and 2015, from the complainant to the FCA, specifically asked the FCA to contact bank X on his behalf, and that correspondence to the FCA was copied by the complainant to bank X.

32. I have examined the records further, in the light of the FCA's representations.

The sequence of events

33. The first point to emphasise is the sequence of events. The FCA is right to say that a search of the whistleblowing database was requested on 4 December 2013. At that stage, it is clear that the FCA was considering the complainant as a potential whistleblower, and the search was undertaken to see whether he had already approached the FCA, and also to establish whether to encourage him to use the whistleblowing procedures. In the FCA's words, "The purpose of searching the whistle-blower database on 4 December 2013 was to establish whether [the complainant] had approached the FSA in that capacity. Had he done so, that would have been taken into account in the FCA's consideration of his expectations around confidentiality."

34. On 5 December, it was confirmed to the head of the supervision team that the complainant was not on the whistleblowing database, though it is not clear how widely the result of this search was communicated within the FCA.

35. What is clear from the record, however, is that *after* the complainant's name was disclosed to bank X in an email timed 12.28 on 20 December, the member of staff who had made the disclosure sent an email timed 12.35 to the whistleblowing team asking whether the complainant had made a whistleblowing allegation. A further email timed 13.39 contains confirmation from the whistleblowing team that the complainant did not appear on the database. Later that afternoon, email exchanges demonstrate that at least some FCA staff considered that the complainant was a whistleblower, and this was cited as a reason for not sharing with bank X the draft reply to the MP's office, which was finally sent at 17.42.

36. The FCA has suggested that a possible explanation for this sequence of events is this:

> *…the [20 December] request [to the whistleblowing team] appears to have been precipitated by [the MP's office] correspondence of 19 December 2013, and a consequent direction from [an FCA staff member]:*
>
> > *'Can we answer the question about "whether [bank X] had sought guidance at any point in relation to [the complainant]'s whistleblowing"*
>
> *That is important, because it tends to suggest that the purpose of [the] request was to establish whether [bank X] had sought guidance from the FCA Whistleblowing team. Hence, we can distinguish the 20 December request from the 4 December request, which appears to have been intended to establish whether [the complainant] himself had approached the Whistleblowing team.*

In response to my second preliminary decision, the FCA has written:

> *Where a firm self-reports to the FCA a specific whistle-blowing allegation, or a whistleblowing allegation is received from another source that is not the original whistle-blower, FCA staff as a matter of practice contact the FCA's whistle-blowing function to establish whether the whistle-blower has separately reported the matter to the FCA, in which case any additional information may be relevant to the*

Whistleblowing team. Unless the whistle-blower has separately approached the whistle-blowing function, no formal record will be made. However, the whistleblowing team does retain all email correspondence received at the Whistleblowing Team email address.

We cannot provide contemporaneous evidence as to the reasons for the conduct of the second search on 20 December, beyond the language of the emails and documents, referred to above and below.

The email of 1235hrs on 20 December, requesting the second search, is drafted more broadly than the request of 4 December; and seeks confirmation as to whether the 'case has been referred to us', which we believe countenances the possibility of an allegation from the complainant having been notified to the FCA by [bank X], or indeed another party, such as his MP.

We accept that the language used in these emails is ambiguous; to some extent that is inevitable because an allegation made by an individual must continue to be described as being 'from' an individual, even where it may have been referred by another source.

We note that the email of 1235hrs on 20 December was followed up, at 1315hrs, with a further email; to the same individual in the Whistleblowing team who had conducted the 4 December search.

The follow up email of 1315hrs included reference to a prior discussion ('as just discussed here is the MP's letter we received on this case'). The MP's letter was dated 11 November 2013 and referred to a different allegation against bank X, made on 17 October 2013, than that which had inspired the search on 4 December.

All of these factors - the language, the discussion which followed the first email, and the follow up email which included the MP's letter - suggest that the intention was to commission a broader search than that initially undertaken on 4 December (whether in terms of the specific allegation referred, the source of the referral or records to be searched).

However, it doesn't seem controversial, from the emails of 20 December, that the staff member who commissioned the search did so, and sought a quick response, because of the stated purpose 'to respond to the MP today'. Hence our view that the second search must have been intended to enable as full an answer as possible to be provided to the MP's query…and so must have been directed at establishing whether bank X had sought regulatory guidance from the FCA.

That also seems consistent with the internal note, emailed at 1429hrs on the same day and prepared by the staff member who requested search, which included a section under the heading of 'Question on whether [bank X] has sought regulatory guidance from us on this case'. Within that same section, the author detailed all of the internal records searches that had previously been conducted, 'The Whistleblowing team has confirmed that they have not had anything from the individual – except for our correspondence this month asking them to check if they

have received anything from [the name of the complainant].'

37. While I understand this explanation, it seems to me to over-complicate a simple point. The 20 December inquiry to the whistleblowing team states quite clearly *"Please can you check the Whistleblowing database to see if we have received a whistleblowing allegation from a [complainant's name and address]. Ideally I would like to respond to the MP today and it would be helpful to know [if] this case has been referred to us under whistleblowing."* The request was therefore essentially the same as the request which had been made on 4 December – although I accept that it may have been motivated by a different purpose.

38. The only plausible explanation is that, at the time of writing, the FCA staff member did not know whether or not the complainant was an established whistleblower in respect of this particular matter; and it follows that the staff member did not know that when the complainant's name was disclosed to bank X.

The duty of care

39. The second point to consider relates to the duty of care. The principal argument advanced by the FCA is this:

> *…there is no evidence to suggest that, in December 2013, [the complainant] requested, wished or expected that his anonymity should be preserved by the FCA, or that the circumstances otherwise indicated that anonymity was appropriate. In fact, the evidence shows quite the opposite.*
>
> *We have not even seen confirmation of [the complainant]'s current position on the December 2013 events, and specifically whether he now suggests that he wished the FCA to protect his identity. It follows that we have seen no explanation of why he might have wished the FCA to protect his identity. We consider that these are probative matters that you should be satisfied on, before finalising your decision, given the absence of any other evidence on which to conclude that he desired anonymity (or that FCA staff should have inferred that desire).*

40. My task is not to establish what the complainant's wishes in 2013 were: it is to establish whether or not the FCA took sufficient care. The FCA is right to say that the complainant did not request anonymity; it is also right when it points out that the complainant had disclosed his name to a significant number of people in the context of his dispute with bank X, and had said to bank X that if he did not receive a satisfactory answer he would approach the FCA by a deadline which, by the time of these events, had already passed. Furthermore, in making his 3 December inquiry the complainant was seeking information about bank X, rather than disclosing information about the bank. I accept that all of those points might have tended towards the conclusion that this was not the case of a whistleblower who desired to have his anonymity protected.

41. However, there is an important distinction between the complainant's position as a whistle-blower *within bank X* and his position as a potential whistle-blower *to the FCA*. It is significant that, in an email of 4 December 2013, FCA staff said that they might wish to "encourage [the complainant] to use our whistleblowing procedures". It is also significant that a second check on the whistle-blower database was undertaken on 20th December 2013. There is the evidence (quoted above) that the FCA was actively considering whether the complainant should be treated as a whistleblower. And there is the fact that the complainant had been described as vulnerable by the MP's office. All of these points

suggest that the FCA should have been cautious about disclosing the complainant's name, whether or not he was classified as a whistleblower.

42. The complainant's actions might have understandably raised *a question* about whether he wished his anonymity to be protected by the FCA, but they were not a sound basis on which to reach a *conclusion* that he did not. The FCA has pointed to correspondence in 2014 and 2015 which suggests that the complainant was not seeking anonymity, but that is not really relevant: the question is, what did the FCA know about the complainant's wishes in December 2013?

43. Finally, I turn to Mr Bailey's comment to you on 14 February 2017: '*You asked whether [the complainant] is registered as a Whistle-blower. [The complainant] cannot be classified as blowing the whistle on something that did not happen'*. Mr Bailey did not respond further to your queries about his comment, and his office said that you should refer the matter to me. You have made the point that he could have responded to your queries since at that point you had not referred the matter to me. While that is correct, I do not think that it was unreasonable for Mr Bailey's office to suggest that, the FCA's investigation having concluded, the matter should be pursued with me.

44. In the course of my investigation, I have asked the FCA about Mr Bailey's comment, and the FCA have stated that Mr Bailey's comment, while "not as clear as it might be", relates to the allegation about the disclosure of the complainant's name to bank X in 2015, which [FCA staff member]'s investigation established 'did not happen'. It is unsatisfactory that Mr Bailey's comment was so unclear, although I do not think that it made any difference to the way in which the complaint was dealt with.

Conclusions

45. My conclusions are as follows:

    a. There is no evidence to show conclusively why in 2013 the FCA considered it necessary (as distinct from desirable) to disclose the complainant's name to bank X in order to answer the query which had been posed. While I can understand the desire to double-check the FCA's records against bank X's, and the wish to establish whether bank X had sought guidance from other sources, that is not the same as saying that it was *necessary*;

    b. There is evidence that the FCA were considering whether the complainant was a whistleblower at the time his name was disclosed – indeed, he was being described as a whistleblower in internal communications after his name was disclosed to bank X. The records show that his name was disclosed to bank X by a member of staff who *subsequently* made a check with the whistleblowing team;

    c. The FCA's argument that it was all right to disclose the complainant's name because his name had already been disclosed to bank X by his MP and because he had already written to a number of other people does not adequately take into account the distinction between the disclosure of certain matters to others within bank X and government, and the disclosure to bank X of the complainant's approach to the FCA;

    d. I have seen nothing to suggest that the decision to disclose the complainant's name to bank X in 2013 was motivated by anything other than a desire to provide a full answer to the MP's office, but that is not a justification for not

taking sufficient care to establish the complainant's wishes. Inferring that a complainant is not seeking anonymity is not sufficient;

e. The FCA's decision letter, and some of the subsequent correspondence, did not demonstrate a sufficient emphasis on the importance of considering the confidentiality of potential whistle-blowers (and others supplying information) very carefully before disclosing names. As I have explained above, I have found some of the FCA's arguments unconvincing: they have sought to justify the disclosure through inferring reasons when there is no contemporaneous record to confirm it.

46. In respect of the last point, in its recent representations to me the FCA has written:

> *We of course recognise, with hindsight and given the history of this matter, that it would have been preferable to obtain explicit confirmation from [the complainant's representative] that [his] name should be shared with [bank X] by the FCA…*
>
> *I should also make clear that, partly informed by this case, we have adopted a new step in our process to ensure that all whistle-blowers are now asked to explicitly state how they wish to be treated, and the protection they require. Their response is recorded as a standalone decision in our case management system and is then used to manage the case going forward. As we have always done, we are still providing information about the different ways in which they may wish to be treated and what that means for the information they provide.*

47. I welcome this statement. My comment to the FCA is that a statement of that kind in response to the original complaint might have helped this matter to be resolved much more quickly.

48. I now turn to your letter of 21 May 2017. In it, you outline the remedies you seek.

49. These include that members of the FCA staff step down from their roles, asking the FCA to investigate allegations made by the complainant against another member of staff, asking the FCA to instruct [bank X] to re-open the complainant's case, asking the FCA to compel a member of staff to sign an affidavit with respect to the allegations the complainant made against him, and asking the FCA or another appropriate party to compensate the complainant for damages to his mental health, and alleged incurred costs between "£5-£600,000" which may be connected to lost pension rights as a result of the complainant's transfer of his bank X pension to another provider.

50. These suggested remedies go beyond both the scope of this particular complaint, and the remit of the Complaints Scheme. I have investigated one particular point: the disclosure of the complainant's name to bank X in 2013. I have not investigated allegations against individual members of staff, and I cannot make any recommendations to the FCA to begin investigating them – that falls outside the scope of this Complaints Scheme. Nor have I investigated interactions between the FCA and the complainant, other than the events surrounding the disclosure of his name to bank X in 2013, and the handling of his complaint.

51. Whilst I appreciate the complainant has serious concerns about his treatment by bank X, those are concerns which cannot be dealt with under the Complaints Scheme. If the complainant feels that he has been disadvantaged financially in any way by bank X, the correct course of action would be to seek legal advice and instigate court proceedings against the bank. I have made criticisms in this report about the FCA's explanations of the

reasons for the disclosure which occurred in 2013, but that does not mean that the FCA is responsible for any subsequent actions of bank X. For that reason, I do not consider that a compensatory payment for loss would be justified.

52. I do, however, recommend that the FCA should apologise for its failure in the explanations it gave in response to the complainant's complaint to recognise the importance of establishing the wishes of whistleblowers and others supplying information in respect of confidentiality.

Yours sincerely

Antony Townsend
Complaints Commissioner

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Date	**Subject**
3 December 2013 Complainant emails FCA	Complainant asks FCA whether bank X sought guidance
4 December 2013 Internal FCA email to a number of staff including whistleblowing team	Identifies complainant's accusations as serious; asks whether he is registered on whistleblowing database
5 December Internal FCA email from whistleblowing to supervision staff	No record of earlier whistleblowing
19 December 2013 Email from MP's office to FCA	Asking for response to 4 December email on behalf of complainant, and identifying the complainant as vulnerable
20 December Email from FCA to bank X at **12.28**	Disclosing complainant's name and asking about guidance sought by bank
20 December 2013 Email from supervision to whistleblowing team at **12.35**	Asking whether complainant is on whistleblowing database
20 December 2013 Internal email from whistleblowing to supervision at **16.53**	Commenting on response to MP. Includes "as he is a whistleblower and has concerns with [bank X], we have reflected and decided we do not need to run this past [bank X] prior to sending."
20 December 2013 email from FCA to MP's office at **17.42**	Includes "I can confirm following a search of our data that we have not found any information to show we received a request for guidance from [bank X]. Although we note from your email that bank X were seeking regulatory guidance, it is possible, that may have been from another regulatory body other than ourselves."