

25 January 2024

Dear Simon Youel,

Thank you for your email of Friday 12th January 2024.

In preparation for my role as Financial Regulators Complaints Commissioner (FRCC), I made various changes to my arrangements to take proper account of conflicts and the perception of conflicts. I did this in discussion with HM Treasury who appointed me.

I am no longer a partner at Hogan Lovells “(HL)”, as you suggest in your e mail. I have stepped down both as a partner and also from my various positions on “industry lobby groups”.

I now have a new role at Hogan Lovells as a part time consultant focussing on HL’s work for the UK Government and related entities. For the last few years most of my work has been for the public sector and this has now been formalised. By way of example, I advised HM Treasury on the compensation arrangements for those who lost money in relation to London Capital and Finance Ltd. I will not take any part in work for regulated firms. No amount of my remuneration from HL is attributable to income from regulated firms.

As regards policies at the Office of the Complaints Commissioner (OCC) to deal with conflicts, there is an explicit requirement that the OCC publishes a register of interests. I have made enquiries and the OCC does in fact have a register of interests, which I have signed and which is now published on our website here: [OCC-Register-of-Interests.pdf \(frccommissioner.org.uk\)](http://frccommissioner.org.uk/OCC-Register-of-Interests.pdf)

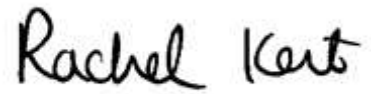
I also attach a link to my profile <https://frccommissioner.org.uk/profile/>

In the unlikely event that any conflict of interest arises, there is a mechanism in place under the Complaints Scheme whereby HM Treasury can appoint an alternate to deal with affected complaints (this mechanism was invoked in 2021 by my predecessor when she identified a conflict of interest- an alternate was appointed who dealt with the affected cases: More details can be found here <https://frccommissioner.org.uk/alternative-investigator-final-reports/>)

I note that in so far as I am currently aware, there have been no complaints in connection with any clients of HL. Complaints have come mostly from consumers and small businesses. In fact, the scheme, as you know, is open to anyone affected by the decisions of regulators. This includes consumers and regulated firms and going forward I may well find myself receiving complaints against the regulators from both categories of complainant.

The OCC and I take the matter of conflicts of interest seriously and I am confident that there are mechanisms in place to deal with conflicts of interest should they arise.

Yours sincerely,

A handwritten signature in black ink that reads "Rachel Kent". The script is cursive and fluid, with the first letters of "Rachel" and "Kent" being capitalized and prominent.

Rachel Kent
Complaints Commissioner