

The complaint

Ms S complains that she's having problems with Bank of Scotland plc trading as Halifax's new cards as they're no longer embossed.

What happened

Ms S has several accounts of her own with Halifax and she also helps two of her son's manage their accounts. That means Ms S has several Halifax cards in her wallet which she used to be able to distinguish from one another – despite being visually impaired – because the numbers on the cards were embossed. The embossing allowed Ms S to check the last four digits of the card meaning she could work out which card she had in her hand.

Ms S says Halifax changed the design of its cards in 2022 and started issuing cards without any embossing. Ms S says the change meant she could no longer work out which card she had in her hand because she started receiving cards that were no longer embossed. They're all the same colour too. So, she spoke to her local branch and then to Halifax's accessibility department. She says neither of them were able to help her, so she complained to Halifax.

Halifax looked into Ms S's complaint and said that as physically embossed numbers are no longer needed for a card to function it, along with the majority of the banking industry, had moved over to printed cards. Halifax said it had, however, spoken to its disability support team and that Ms S could purchase different coloured stickers or braille labelling from RNIB to help her distinguish between her cards. Halifax said that it didn't believe this would cause problems using ATM machines. Alternatively, Halifax said that Ms S could download an app to her mobile phone that could read out text and numbers for her. Ms S was unhappy with Halifax's response and complained to our service.

Following our involvement, Halifax said that it's now aware that a lot of visually impaired customers had relied on embossed numbers to help them identify cards and that it was, therefore, looking into alternative designs for its card including adding tactile dots. That's despite the fact that embossed numbers weren't originally designed as an accessibility feature. Halifax said it was speaking to RNIB about its plans. Our investigator didn't think Halifax had thoughts about the impact of its changes on Ms S. So, they recommended £200 in compensation for the distress it had caused. In addition, they recommended that Halifax issue differently coloured cards to Ms S so that she could differentiate between them.

Halifax agreed to the compensation our investigator had recommended but said that it couldn't issue differently coloured cards. As this was the main adjustment Ms S had asked for, our investigator said they'd refer her complaint to an ombudsman for a decision. Ms S's complaint was, as a result, passed to me.

What I've decided – and why

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

Last month I issued a provisional decision. In that decision I said the following:

"I accept that debit and credit cards used to be embossed so that an imprint of them could be taken when they were used to pay for goods and services. Advances in technology means that's no longer necessary. So, I can understand why businesses like Halifax looked into new designs for their cards. I also accept that many businesses took this as an opportunity to make their cards more accessible. For example, by increasing the font size on their cards and using colour schemes that allowed for greater contrasts.

Halifax says it spoke to RNIB when it was considering new designs. I haven't necessarily seen evidence of that, but I can see that following the introduction of printed cards Halifax has said that it now understands that some customers use the embossing to help them identify their cards. So, Halifax appears to accept that it needs to do more for Ms S.

I can see that Halifax made a number of suggestions to Ms S – one such suggestion was to use stickers to help her differentiate between the various cards she has. Halifax said to our investigator that it hadn't had any issues with stickers causing ATM card retention but was doing some testing. In its response to this provisional decision, I'd like Halifax to tell me what that testing has concluded. Halifax also said that it was looking to add tactile dots to its cards in the future, and again I'd like Halifax to update me on this. In the meantime, I've spoken to Ms S and it's clear that practical suggestions that a staff member made when she recently visited a branch have helped to an extent. That member of staff suggested, for example, marking the signature strip on the back of each card in a way that helps Ms S differentiate between the various cards she has. It is, however, clear, based on the conversation I had with her, that Ms S still gets confused between the various cards she has. So, I do still think Halifax can and should do more here. In coming to that conclusion I've taken, amongst other things, the Equality Act 2010 into account as I'm satisfied that its relevant law.

Ms S told me, when I spoke to her, that she has a mobile phone which she's able to use to shop online – provided the card details have been saved into the relevant website or app – and she's also able to use Halifax's mobile app. She's able to unlock her mobile phone using her fingerprint. I accept that being able to log onto Halifax's mobile app means Ms S can check her card details. I also accept that the app allows Ms S to manage her accounts and those she helps with. Ms S has told me that. But it doesn't help her when she's trying to work out which card she has in her hand. Ms S has told me that she tries to put the cards back in the right place after she takes them out of her wallet and that she has strategies to help with this too. But these don't always work.

In short, I'm satisfied that Halifax's printed cards have caused, and continue to cause, Ms S problems when it comes to managing her accounts and those she helps with. I do think Halifax could and should have done more. Ms S has confirmed bright coloured stickers, as long as they don't interfere with ATM use, would work as a solution. In the meantime, I'm satisfied that the changes caused Ms S significant distress and inconvenience for which an award of £500 would be appropriate. So, that's the award I'm minded to make."

Both parties were invited to reply to my provisional decision, and both parties did. Ms S was broadly speaking happy with what I'd said. Halifax updated me on steps it had taken to make its cards more accessible for customers with visual impairments. Those steps include the fact that they now issue credit cards with a notch carved out at the bottom, debit cards with three embossed tactile dots next to the chip and cashpoint cards with six embossed tactile dots next to the chip. In addition, branches are now able to order tactile sticky dots – where a customer need is identified – to be stuck on the bottom-right corner of the front of the card so

as not to impact the use of the card. Halifax also gave me a number Ms S could call to arrange the right option for her. In addition, Halifax agreed to pay the compensation I had said I was minded to award.

Putting things right

Having spoken to Ms S, and having agreed to pass on the information Halifax has sent to me, she was happy with my provisional decision. I'm, therefore, going to issue a final decision along the lines of my provisional decision as I consider that to be a fair resolution to this complaint.

My final decision

My final decision is that I'm upholding this complaint and requiring Bank of Scotland plc trading as Halifax to pay Ms S £500 in compensation for the significant distress and inconvenience it has caused. In the meantime, Bank of Scotland plc trading as Halifax has introduced additional options to help Ms S differentiate between her cards details of which I've passed onto Ms S.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms S to accept or reject my decision before 5 January 2024.

Nicolas Atkinson
Ombudsman