

## **The complaint**

Ms H complains about delays and difficulties amending her address and telephone number with Bank of Scotland plc trading as Halifax.

## **What happened**

In August 2019 Ms H opened a bank account with Halifax online. Halifax has explained that its systems were able to verify Ms H's details and identity electronically so it didn't need to request documents from her. Halifax has also explained it didn't obtain a copy of Ms H's signature during the application process. The last transaction on Ms H's account was a deposit of £20,000 which left the balance at £39,000. Halifax says Ms H wasn't registered for online or telephone banking so access to her account was limited.

Ms H has explained she moved abroad during the pandemic. In July 2020 Ms H contacted Halifax to update her address and phone number with a view to transferring her funds to another account with a different bank. But Halifax says it was unable to verify Ms H's information over the phone. Halifax's contact notes say that Ms H gave a foreign phone number during the call but its systems held a UK number for her.

Halifax says it wrote to Ms H at the address she provided during her call on 7 July 2020 to confirm she would need to send it certified identification by way of a driver's licence or passport and a utility bill dated within the last three months. Halifax has explained that as Ms H wasn't registered for online or telephone banking her options for accessing the account were limited. And because Ms H's signature wasn't on file, it couldn't amend her address following a written instruction to do so either.

Ms H has told us she tried to address the issue again with Halifax in the months that followed. Halifax says it has no record of Ms H contacting it again until 2023.

In February 2023 Ms H contacted Halifax and went on to raise a complaint about difficulties updating her details to gain access to her account. Halifax issued its final response on 14 April 2023 but didn't agree it had made any mistakes. Halifax said Ms H's account had insufficient transactions to allow it to verify her, on a risk basis, by asking questions about its history. Halifax explained that as Ms H isn't registered for telephone banking she was unable to access her online banking by receiving a One Time Passcode by text message. But Halifax added that as Ms H's phone number had changed since opening the account, it couldn't forward a text message to one that wasn't recorded on its systems.

Halifax's final response went on to say that it couldn't post a One Time Passcode to Ms H as she'd moved from the previous address recorded. And Halifax added it didn't have Ms H's signature on file and accepted she couldn't visit a branch to amend her details, as customers in the UK would. An email address was given to provide instructions on how to amend Ms H's address along with the documents required. Halifax explained that once the information was on file it could update Ms H's telephone number and she could be registered for telephone banking meaning she could then access online banking to access and close her account. Halifax didn't uphold Ms H's complaint.

An investigator at this service reviewed Ms H's complaint. They didn't find any evidence of mistakes by Halifax and didn't ask it to do anything else. Ms H asked to appeal and said that in 2020 her UK address had a redirect in place. Ms H added her UK phone number was still active until July 2021 and that she had no calls in July or October 2020 from Halifax. Ms H said that in July 2020 she'd called Halifax from the number registered on her account. Ms H said she'd given Halifax information about her account and details it could've used to verify her identity and details. Ms H explained that as a result of delays in releasing the funds from her Halifax account she'd suffered a foreign exchange loss due to movements in the currency markets. As Ms H asked to appeal, her complaint has been passed to me to make a decision.

### **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.

I'm aware I've summarised the events surrounding this complaint in less detail than the parties involved. No discourtesy is intended by my approach which reflects the informal nature of this service. I want to assure all parties I've read and considered everything on file. I'm satisfied I don't need to comment on every point raised to fairly reach my decision. And if I don't comment on something, it's not because I haven't considered it. It's because I've focused on what I think are the key issues. My approach is in line with the rules we operate under.

I can understand why Ms H is frustrated at what feel like unwarranted delays in accessing her account with Halifax and the funds it holds. Ms H contacted Halifax as far back as July 2020 to amend her details, but at the time of submitting her complaint to us, they hadn't been changed and access to the account hadn't been restored. But I have to be fair to both sides and I think Halifax has made reasonable points in its final response to Ms H and submissions to this service.

Halifax has explained that Ms H's account only has a very limited transaction history when she moved abroad and stopped using it. Normally, Halifax would be able to ask questions based on the account history to help verify a customer but that wasn't an option in Ms H's case. I'm satisfied that's reasonable. Further, Ms H wasn't registered for telephone banking which meant she couldn't access online banking either. Given Ms H's location, this would've been the most straightforward option. So I've looked at whether an error was made.

In response to the investigator, Ms H explained she'd contacted Halifax in July 2020 from the registered number on the account. But Halifax's contact notes specifically show it asked Ms H to confirm her phone number and recorded her response which wasn't the UK number it had recorded. So I'm satisfied Ms H didn't give her UK number when she contacted Halifax in July 2020.

Whilst Halifax didn't update Ms H's address in July 2020 during her call, it did write to her at the address she gave that day with confirmation of how to move forward and what documents to supply. It's not clear whether this letter was received by Ms H, but I'm satisfied it was sent by Halifax as claimed. Whilst it didn't offer to immediately amend Ms H's details so she could gain access, Halifax did provide clear guidance.

I also note Ms H has told us she contacted Halifax again in October 2020 but there's nothing on its contact logs to reflect that. Halifax has also provided an audit trail to show who accessed Ms H's account during this period. I'd have expected to see a notation showing

someone at Halifax had looked into Ms H's account around that time, but there's nothing to show Ms H contacted it at that time or that her account was reviewed by its staff.

The information I've seen shows that Halifax responded to Ms H in July 2020 with confirmation of what she needed to provide to register her new number and gain access to her account. Ms H complained and Halifax's final response dated 14 April 2023 gave a further explanation of the documents required, how to submit them and why they're being requested. I appreciate complying will put Ms H to some inconvenience, but I'm satisfied that's offset by Halifax's obligation to protect customer accounts and ensure it's fully verified her details. I can see the street name on the final response is slightly wrong, but Ms H has provided a copy of the letter so I'm satisfied she received it. I'm sorry to disappoint Ms H but I haven't been persuaded that Halifax's requests are unclear or misleading. And I haven't seen evidence that supports Halifax made a mistake in this case.

Ms H has asked for exchange rate differences to reflect movements in the markets. But as I haven't found evidence of delays or mistakes by Halifax, I'm not able to award compensation for the losses Ms H has told us about.

I'm very sorry to disappoint Ms H but as I'm satisfied Halifax has followed the correct process and dealt with her complaint fairly, I'm not telling it to do anything else. If Ms H hasn't already supplied the relevant information to Halifax to gain access to her account, details of what's required and how to forward it are set out in Halifax's final response.

### **My final decision**

My decision is that I don't uphold Ms H's complaint. Under the rules of the Financial Ombudsman Service, I'm required to ask Ms H to accept or reject my decision before 29 November 2023.

Marco Manente  
**Ombudsman**