

## **The complaint**

Mr G complains about the verification process Monzo Bank Ltd asked him to complete in order to discuss a card dispute.

## **What happened**

Mr G had a current account with Monzo. In December 2021 Mr G raised a card dispute with Monzo in relation to a purchase he'd made. While the issue was ongoing, Mr G switched his bank account to another business and his Monzo account was closed. That meant Mr G lost access to the Monzo banking app it generally uses to contact customers.

On 31 March 2022 Monzo emailed Mr G and advised it had an update in relation to his dispute and asked him to respond with a selfie and a photo of his identification.

Mr G went on to raise a complaint and asked Monzo to forward the refund to him without delay. Monzo sent Mr G a final response and said it was unable to discuss account specific information without successfully verifying his identity. And Monzo said this was a step it had to take following closure of his current account. Monzo said it was willing to provide more detail if Mr G responded with the required selfie and identification.

An investigator at this service looked at Mr G's complaint. They didn't think Monzo had acted unfairly by asking Mr G to verify his identity to discuss his account and the dispute. The investigator also said Monzo had forwarded Mr G's refund to his new bank. Mr G didn't agree with the investigator and said Monzo had acted outside of the General data Protection Regulation (GDPR). Mr G also said he hadn't received the refund into his new bank account.

## **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 understand Mr G's view is that the request for a selfie and identification to correspond by email is unnecessary and disproportionate. Mr G's also told us he thinks the request goes against GDPR obligations on Monzo. I've looked at the link Mr G's noted in the complaint form. The link takes the viewer to the Information Commissioner's Office's guidance for businesses when responding to a Subject Access Request. But I'm aware of guidance the ICO issues in terms of when it's appropriate for businesses to request identification.

As Mr G said in his response to the investigator, businesses shouldn't apply a blanket policy when dealing with customers. I think it's reasonable to say Mr G's case is somewhat unusual as the dispute was raised while his account was open. But by the time the dispute was resolved and a refund agreed, Mr G's Monzo account was closed and his banking arrangements had been switched to a new business. Monzo's pointed out it would normally correspond with a customer via its banking app without requiring further identification or action. As Mr G no longer had access to the app (because the account had been closed) it had to correspond via email.

Monzo's told us that in order to correspond via email in relation to a closed account it first had to complete a verification process. And that required Mr G to send a selfie and picture of his identification. I appreciate it's Mr G's view that this was unreasonable, but I haven't been persuaded that's the case. In my view Monzo was seeking to discuss a reasonably long standing dispute in relation to an account that was closed. I'm satisfied there were reasonable grounds to request further information from Mr G and haven't been persuaded Monzo acted unfairly.

Mr G told our investigator that he hasn't received the dispute refund in his new bank account. Monzo's sent us systems information that shows it ultimately agreed to refund half the disputed transaction amount (£175) to Mr G's account with his new provider. The information available shows the funds were transferred to Mr G on 21 March 2022. There's nothing to show the funds were later returned to Monzo by Mr G's new bank. But if Mr G can't find a credit from Monzo for £175 on or shortly after that date he can provide a copy of his statement to our investigator. They can then go back to Monzo to trace the funds.

Monzo's confirmed it was seeking to discuss the outcome of the dispute with Mr G when it asked him to provide the above information. Monzo's also explained no further action is required from Mr G as the disputed funds were returned to him.

I'm sorry to disappoint Mr G but as I'm satisfied Monzo dealt with his complaint fairly I'm not telling it to do anything else.

### **My final decision**

My decision is that I don't uphold Mr G's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr G to accept or reject my decision before 3 January 2023.

Marco Manente  
**Ombudsman**