

## **The complaint**

Mr D, is unhappy that National Savings and Investments (NS&I) require him to enter a one-time passcode (OTP) which they send by text message when he wants to log into his account online.

## **What happened**

In July 2022, NS&I introduced changes to the way customers log into NS&I accounts online. These included that customers needed to enter an OTP when logging into their account, which NS&I send via text message. Mr D works on an approximately month-long rotation in a setting where there is no mobile phone signal, meaning that he can't receive the OTPs NS&I send him during the times he is on rotation at work. Mr D wasn't happy about this and wanted NS&I to send him OTPs via email. So, he raised a complaint.

NS&I responded to Mr D and explained that they don't consider email to be a secure method of communication such that it would be appropriate to send account log-in OTPs by that channel. NS&I also explained that Mr D could receive the OTPs via an automated call to a landline telephone number, and that he could access his account either by calling NS&I directly or by posted form. Mr D wasn't satisfied with NS&I's response, so he referred his complaint to this service.

One of our investigators looked at this complaint. But they didn't feel NS&I had acted unfairly in how they'd managed the situation and so didn't uphold the complaint. Mr D remained dissatisfied, so the matter was escalated to an ombudsman for a final 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.

Having done so, I'd like to begin by confirming that this service isn't a regulatory body or a Court of Law and doesn't operate as such. Instead, this service is an informal, impartial dispute resolution service. And while we do take relevant law and regulation into account when arriving at our decisions, our remit is focussed on determining whether we feel a fair or unfair outcome has occurred – from an impartial perspective, after taking all the factors and circumstances of a complaint into consideration.

This means it isn't within the remit of this service to instruct a business as to how it should operate. And this in turn means that it isn't within my remit here to instruct NS&I to change their processes to allow Mr D to receive OTPs via email, as he would like.

NS&I have explained that they introduced the need for customers to input an OTP when logging into their account online in order to comply with the Strong Customer Authentication rules that were laid out in the Payment Services Directive in 2017. NS&I have confirmed that OTPs can be received either by text message or by an automated call to a landline number. And NS&I have also explained that they don't send OTPs by email because they don't have the infrastructure in place to do so and because they don't consider emails to be a

sufficiently secure method of communication to send OTPs by.

As explained, it isn't within my remit to instruct NS&I to change their processes here. And, from a fairness perspective, I don't consider the position of NS&I – as I've described it above – to be either unreasonable or unfair.

Mr D has explained that he can receive emails while working. And I'm aware that many platforms and environments in the remote setting where Mr D works have telephones, of some kind, from which calls to UK numbers can be made. And so, if this is the case, then it seems possible to me that Mr D can access his NS&I account by calling them by telephone.

However, if this isn't possible for Mr D, then it may simply be the case that the communication restrictions he's subject to because of the remoteness of his work means that he isn't able to access his NS&I account directly while at work. This would be unfortunate, but I don't feel that it's unfair. And ultimately, this is because it isn't NS&I's fault that Mr D works in a place where he can't receive text messages or automated calls, and where he doesn't have access to telephone.

All of which means that I won't be upholding this complaint or instructing NS&I to take any further or alternative action here. This is because I feel that NS&I requiring an OTP is fair, and because I feel that they provide a reasonable variety of different means for their customers to either receive such OTPs or to access their account via a different channel. And I also don't feel it's unfair that NS&I don't send OTPs by email as Mr D would like.

I realise this won't be the outcome Mr D was wanting. But I hope he'll understand, given what I've explained, why I've made the final decision that I have.

### **My final decision**

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr D to accept or reject my decision before 28 February 2024.

Paul Cooper  
**Ombudsman**