

## **The complaint**

X is complaining that Monzo Bank Ltd are requiring them to complete a verification procedure that they're unable to complete due to their disabilities.

## **What happened**

X has an account with Monzo and there are a number of reasonable adjustments in place for the way in which Monzo communicate with X.

X regularly corresponds with Monzo by sending them emails. After receiving emails from X, Monzo have replied to ask X to confirm their identity by sending Monzo a selfie photo with their face and their ID visible. They have asked for this on a number of occasions between January 2023 and May 2023.

In January and March 2023 Monzo's vulnerable customer team contacted X to offer assistance with reasonable adjustments to this selfie/ID process. X didn't engage with the vulnerable customer team. They've also previously said they feel harassed by the contact from Monzo's vulnerable customer team.

X complained to Monzo on 20 March 2023, and they issued their final response letter on 25 July 2023. In their final response Monzo explained that they couldn't bypass their selfie/ID security process when receiving X's emails, but would consider if they could make a reasonable adjustment to this process if X engaged with their vulnerable customer team to discuss what would work for them.

X has also raised other complaint points in their email correspondence with Monzo, which Monzo addressed in their final response letter and the investigator has commented on in their view. I will also address them here for completeness.

These are:

- one of Monzo's advisers was rude, unhelpful and obtuse in their email response of 9 March 2023; and
- on 25 May 2023 X said Monzo had taken a flex payment for a payment that had been refunded, and they also said Monzo had taken away their ability to chat through the app.

After X's complaint was referred to us, Monzo offered £50 for the delay in providing a full response to X. When the investigator looked into things they explained that they didn't think Monzo needed to do anything more in relation to the complaint points X had raised, but if X would like to accept Monzo's offer of £50, X should let them know.

X disagreed with the investigator's view, so their complaint has been passed to me for review and 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.

Having done so, I agree with the outcome reached by the investigator. I'll explain why.

I've taken the Equality Act 2010 into account here – given that it's relevant law – but I've ultimately decided this complaint based on what's fair and reasonable. If X wants a decision that Monzo have breached the Equality Act 2010, then they'd need to go to Court.

We have already considered complaints raised by X about the reasonable adjustments put in place by Monzo, the most recent being after Monzo's final response letter of 9 February 2023. During our investigation into this complaint, the investigator noted that Monzo's vulnerable customer team had reached out to X and the investigator encouraged X to engage with this team to see if further support could be offered.

The particular complaint point X has raised here concerns Monzo asking them to verify their identity for security reasons, in response to X's emails about payment disputes and in relation to data subject access requests (DSARs). Monzo have asked X for a selfie photo with their face and ID visible. But X says they're unable to hold things in their hands and take pictures; it's not physically possible for them.

Monzo have explained that they need to keep their customers' accounts secure. As emails are a less secure way of communicating than the in-app chat (where a customer's identity will already be verified) they have this procedure in place to make sure they're speaking to the right person. So, they do need to check X's identity when X emails them, and they can't bypass this procedure.

I don't think Monzo's position here is unreasonable. Monzo are required to have security measures in place to protect their customers' accounts and I agree with the investigator that it's for Monzo to make their own decisions about what policies and procedures they put in place to do this. If X continues to correspond with Monzo by email rather than within the app, they should expect that Monzo will need to check their identity.

I do understand that X has told Monzo they can't comply with the current procedure to do this. However, Monzo have told X they'd consider if they could make any reasonable adjustments to this identification process if X engaged with their vulnerable customer team which has contacted X about this. In order for Monzo to consider a reasonable adjustment to this process, they will need to explore with X if it's possible to make an adjustment which would work for both parties - which their vulnerable customer team can do. But I can't see that X has responded to them.

Monzo have already made a number of reasonable adjustments in the way they communicate with X and I have no reason to doubt that they will consider making an adjustment here too. As the investigator's explained, it's up to X if they engage with Monzo's vulnerable customer team to explore this. But at this time I don't think I could reasonably ask Monzo to do anything else.

In this complaint, X has raised this matter in the context of the DSARs and further emails they've sent to Monzo. However, I would add that the general issue of Monzo asking X to complete their email verification procedure is something an Ombudsman has already considered in a final decision issued in July 2022 – and they reached broadly the same conclusion as I have here. I want to make it clear that it's unlikely we'll be able to consider

any more complaints about Monzo using this email verification procedure, should X raise it again.

To turn to the other issues mentioned, I have the following comments.

I don't think the adviser who acknowledged X's correspondence on 9 March 2023 was rude, obtuse or unhelpful – they simply explained that X's correspondence had been received and would be reviewed by the relevant team.

X queried the position of a payment on 25 May 2023. Monzo asked for more information about which payment X was referring to and they didn't respond further, but they will review things further if X provides this. I think this is reasonable.

X has mentioned they've had difficulties with the app including the chat button disappearing - but Monzo haven't able to identify any systems issues, although they have mentioned they've recently changed the app so the chat function doesn't now appear on the main page. But I understand that in any case X has been using the app successfully since they reported the difficulties so I don't think Monzo need to do anything else at this time.

Monzo have now offered X £50 for the delay in responding to all the points of concern X had raised in their emails. X had already referred their complaint to our service at the time Monzo responded, so I don't think this impacted X by delaying our investigation. I think £50 is reasonable in these circumstances.

### **My final decision**

My final decision is that Monzo Bank Ltd should pay X £50.

Under the rules of the Financial Ombudsman Service, I'm required to ask X to accept or reject my decision before 13 March 2024.

Helen Sutcliffe  
**Ombudsman**