

The complaint

Mr M complains that Bank of Scotland plc trading as Halifax didn't accept photocopy documents to re-activate his dormant account. Mr M said Bank of Scotland plc trading as Halifax was aware it was difficult for him to attend a branch.

What happened

Mr M tried to switch his Halifax bank account to another bank, but this was rejected as the Halifax account was dormant. When Mr M called Halifax to reactivate the account, he was told that he would need to go into branch and provide identification and verification documents. Two months later, Mr M wrote to Halifax, enclosed photocopy documents, and told Halifax he was unable to attend a local branch because of a long-term disability. Halifax responded by letter and told Mr M that he could send original documents by post to verify his identity and his address. Mr M didn't receive this letter and complained to Halifax.

Halifax provided a final response to Mr M's complaint and apologised for the delay in responding. Halifax told Mr M that the copy documents he sent previously would have been confidentially destroyed, but any original documents he wanted to send would be returned directly to him. Halifax explained that it didn't communicate with customers by email when verifying personal information due to potential security risks.

Mr M brought the complaint to the Financial Ombudsman Service and one of our Investigators looked into things. The Investigator thought that Halifax hadn't done anything significantly wrong. Mr M asked that an Ombudsman decides the complaint.

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 M will be disappointed, but for very much the same reasons as our Investigator, I've decided that Halifax hasn't done anything significantly wrong. I will now explain why.

Mr M called Halifax in early March 2023 when he found out his account had been marked as dormant. There's no dispute Mr M hadn't used the account for at least five years. In the telephone calls Mr M told Halifax he wanted to reactivate the account. Halifax told Mr M he would need to take identification and address verification documents into a branch to do this. I've listened to these calls. I do understand that Mr M feels Halifax should have been aware he had long-term disability that prevented him getting into a branch, but Halifax says it's checked its records and there are no notes about Mr M's disability. The account had been dormant for at least five years, and I think it would have been helpful if Halifax had confirmed with Mr M if there was anything that prevented him from getting into a branch when speaking with him in March - but equally Mr M didn't raise any concerns in these calls. Because of this I've decided that it would be unfair for me to decide Halifax did something wrong at this stage.

Mr M sent copy documents to Halifax in May and explained he had a long-term disability which prevented him from going into a branch. Halifax says this is the first time it became aware Mr M had a disability that prevented him from going into a branch. Halifax wrote back to Mr M on 21 June to explain it could not accept photocopy documents but said it could accept original documents sent by post and provided an address for these to be sent to. The same letter provided a telephone number for Mr M to call if he had any questions. This was a reasonable response to Mr M at the time. It reflects that Halifax had taken on board Mr M had issues getting into a branch and had provided him with a reasonable alternative to reactivating his account.

Unfortunately, it seems more likely than not Mr M didn't receive this letter. I've seen a copy of the letter and it's correctly addressed, and it was more likely than not Halifax posted it. Of course, I can't say that Mr M received this letter, but the letter provided Mr M with a reasonable alternative to attending a branch with the documents. I note there is a suggestion that Halifax could have emailed Mr M, but Halifax responded to Mr M by letter as he wrote to Halifax. Regardless of this, I don't think it was unreasonable that Halifax wrote to Mr M as part of its process to reactivate an account in view of the security risks when sending emails.

Mr M has explained that some of the documents Halifax requires are only available on-line; for example, utility provider bills. However, the letter Halifax sent Mr M in May, and its final response letter, provided details of other documents that would be suitable, such as a HMRC tax notification letter and a benefit or pension letter. Mr M has said that a benefit letter could be provided but said Halifax didn't tell him what would happen to any original documents he sent. However, in its final response to the complaint Halifax explained, *"Any copy documents sent to us for verification purposes, that aren't used, would be confidentially disposed by the bank. Any hard copies of these documents would be returned directly to a customer."* I acknowledge Halifax could have made this clearer earlier than it did, but it did provide Mr M with specific contact details if he had any questions in its letter of 21 June – although Mr M says he didn't receive this. Mr M had contacted Halifax previously and I think it would have been reasonable for him to do so again if he had any concerns about what would happen to original documents he was required to send to Halifax.

Complaint handling isn't a regulated activity. So, although Mr M is disappointed Halifax took more than eight weeks to respond to his complaint, this isn't something I can consider in my final decision.

My final decision

For the reasons detailed above, I've decided that Bank of Scotland plc trading as Halifax hasn't done anything significantly wrong and I won't be asking it to do anything else.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr M to accept or reject my decision before 1 May 2024.

Paul Lawton
Ombudsman