

## **The complaint**

Mr P complains about the service he received from Bank of Scotland plc trading as Halifax ("Halifax"). In particular he is unhappy in the way staff questioned him regarding a payment he wished to make and that Halifax haven't provided him with a reason as to why it temporarily couldn't send him paper statements.

## **What happened**

On 4 January 2024 Mr P attended a branch of Halifax to pay a large tax bill of around £33,000. The payment triggered an extra security check and so Mr P had to answer some questions about the payment before Halifax could process it.

Mr P says he's had to make this type of payment a few times and every time he feels like he's being interrogated. He says he had a letter confirming the payment that needed to be paid and that this type of questioning is unnecessary and was unhappy Halifax staff also questioned him about a large payment coming into his account.

Mr P complained to Halifax about this, that it was closing all its branches and the service he'd received on a call with it when he queried why his statements were being changed to paperless.

Halifax didn't agree that its fraud procedures were excessive and says with the large transfer Mr P wanted to make from his account its processes require it to ask a combination of questions that differ from its usual verification processes.

Halifax explained it wasn't closing all its branches and that its decision to close certain branches was based on the information it has on the local area and when making decisions to close a branch it does look at the impact this would have on all customers including those that may need more support.

Halifax did agree that Mr P had been given incorrect information on a call with it regarding the issuing of paper bank statements and compensated him £40 for this.

Mr P was dissatisfied with this and brought his complaint to this service. Mr P wants an apology and an explanation as to why it took the decisions it did and compensation for the distress and inconvenience suffered.

One of our investigators looked into Mr P's concerns but didn't think Halifax had treated Mr P unfairly when carrying out its fraud checks as it has a duty of care to safeguard its customers money and given the value of the transaction it was within its rights to ask additional questions it deemed necessary. Furthermore, as Mr P was once again receiving paper statements and Halifax had compensated Mr P £40 for the misinformation, they didn't think there was anything more Halifax needed to do.

Mr P disagreed. He wants to know the reason why Halifax were having difficulties issuing paper bank statements and some assurances that Halifax are adhering to the Financial Conduct Authority (FCA) guidelines. Furthermore, Mr P wants compensation for what he

believes amounted to an interrogation when he was questioned in branch about the payment he wished to make. He doesn't understand why it questioned the payment going out but not the money coming into his 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.

My role is to look at problems that Mr P has experienced and see if Halifax has made a mistake or done something wrong. If it has, we seek to put - if possible - him back in the position he would've been in if the mistakes hadn't happened. And we may award compensation that we think is fair and reasonable.

It might be helpful for me to say here that, I don't have the power to tell Halifax how it needs to run its business and I can't make Halifax change its systems or processes – such as how or when fraud prevention checks are deemed necessary regarding funds coming into or going out of an account, how it issues its bank statements or when to open or close a branch. These are commercial decisions and not something for me to get involved with. Nor can I say what procedures Halifax needs to have in place to meet its regulatory obligations. We offer an informal dispute resolution service and we have no regulatory or disciplinary role.

That said I don't think it was unreasonable for it to have systems in place – in this case carrying out checks on outgoing payments that meet certain criteria for fraud prevention - to ensure the transactions are legitimate and it meets its regulatory requirements. As I'm sure Mr P understands this is needed not only to protect businesses against criminal activity, but also their customers. I appreciate Mr P doesn't understand why the money coming into his account wasn't questioned when it first came in, but as I have stated above, it's not for me to say what systems or processes Halifax needs to have in place to meet any regulatory requirements. And I don't know what type of transaction will trigger a security check – indeed, if this information was released it could assist criminals in circumventing its security processes.

All I can decide is whether Halifax treated Mr P fairly when carrying out the checks it deemed necessary and I think in this case - given the not insignificant amount of the payment Mr P wished to make - it did. Mr P doesn't think this sort of blanket policy of questioning all large payment is necessary especially as he has made these payments before. I accept this is an inconvenience for Mr P but I don't think it would be fair or practical to expect Halifax staff to go through Mr P's statements to see what has happened before or be expected to remember this. So I don't think it is unreasonable that it follows the same procedure for payments that trigger these checks – this also ensures that it is treating all its customers equally.

I also don't think Halifax did anything wrong when it questioned the receipt of £39,000 into Mr P's account. Again, it is a large sum of money coming in and they wanted to understand where the funds came from. And from what I understand – although legitimate – Halifax's staff member wasn't familiar with this type of transaction and so I don't think it unreasonable that they asked further questions surrounding this.

I appreciate Mr P has been both distressed and inconvenienced by this, but the actions Halifax took is in-line with its regulatory obligations and ultimately, it took this action to protect Mr P's interests, so I don't think Halifax have acted unreasonably or treated Mr P unfairly here.

Finally, I understand Mr P wants Halifax to give him a reason as to why he temporarily couldn't receive paper bank statements. Our investigator has already provided all the information we have been given on this. I appreciate this is most unsatisfactory for Mr P, but we are unable to do more than that. Mr P believes it is a move by Halifax to get everyone to do all their banking online, and that may well be the case, but ultimately whatever its reasons are – providing Mr P is reasonably able to access information on his account – however Halifax chooses to provide this information is a commercial decision it is entitled to take.

And as Halifax has already compensated Mr P £40 for the misinformation provided regarding this and Mr P has told this service he isn't looking for an uplift on this and is again receiving paper statements, I don't think there is anything more Halifax needs to do.

### **My final decision**

For the reasons I've explained, I've decided not to uphold Mr P's complaint against Bank of Scotland plc.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr P to accept or reject my decision before 15 August 2024.

Caroline Davies  
**Ombudsman**