

The complaint

Ms C complains that National Westminster Bank Plc (NatWest) inconvenienced her and made her feel as if she had done something wrong when she applied for a current account.

What happened

Ms C said when she applied for a NatWest current account, she uploaded valid ID, but it was rejected because it 'didn't match my title'. Ms C said she uses Ms or Mrs interchangeably depending on whether she wants people to know her marital status. She said NatWest is using an outdated method of showing whether a woman is married or not to prove her identity, as her title should be irrelevant. Ms C complained to NatWest.

Ms C said she was inconvenienced during the application process because she is a woman. She said passports don't have titles, but she was forced to take more pictures of herself. Additionally she was called twice by NatWest about her complaint, even though it should be clearly recorded that she cannot talk on the phone due to sensory processing differences. She said this made her feel that her accessibility needs aren't important to her bank.

NatWest responded to Ms C's complaint to say it had followed the right process. It said that on her application of 21 March 2024 the title entered was 'Mrs' and the ID supplied was 'Ms' and so a request for additional documentation was in line with its regulatory 'Know Your Customer' requirements which it is required to follow.

NatWest said it located Ms C's pictures of herself and the reason it requested additional pictures was due to the background not being clear. It said a curtain appeared to cause interference in the background. NatWest said this was manually reviewed and the account opened on 21 March 2024. NatWest confirmed its awareness of Ms C's health condition, and said it has a specialist team that can help and support her banking needs.

Ms C wasn't happy and referred her complaint to us. Our investigator didn't recommend it be upheld. She thought it reasonable for NatWest to need an exact match to her title so as to be sure of her details, although she empathised with Ms C that she couldn't pick a preferred title in this instance. The investigator said NatWest's terms and conditions require a 'selfie' to confirm the passport and so NatWest hadn't made an error about this. She said Ms C prefers not to talk on the phone, but NatWest's agent made a human error in calling her.

Ms C wasn't satisfied with this response and requested an ombudsman review her complaint. Additionally, she complained that the investigator couldn't understand how she had been treated differently just because she is a woman, and so she is not the right person to investigate her complaint. She said she wanted somebody impartial to look at this matter.

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.

As an ombudsman I am impartial between consumer and business, as is our investigator who first looked at Ms C's complaint.

Ms C said she was inconvenienced and made to feel like she had done something wrong during the application for a NatWest current account. She said she was made to feel less

capable than other customers because she can't talk on the phone and NatWest should read its notes before making contact. She said NatWest need to change its checks to make titular 'discrepancies' irrelevant.

I was sorry to learn that what should have been a straightforward account application process turned into a difficult experience for Ms C. Part of my role is to determine whether what took place was unfair or unreasonable to Ms C and whether NatWest followed the proper process correctly.

I'm pleased to see Ms C's account was opened on 21 March 2024, the same day as her application. On the application, Ms C put 'Mrs', but the ID supplied had her title as 'Ms'. I can see that due to this mismatch the application wasn't approved straightaway. I can understand the frustration Ms C experienced at this block.

Ms C has said that by convention men don't reveal their marital status by use of their title, whereas women do. And I agree with Ms C and the investigator that her choice of title is entirely her own business. But NatWest's issue is with the variable use of Ms C's title in comparison to her ID documents, not her wish to decide about her use of title.

NatWest, in common with all financial services providers, have to follow strict rules around 'know your customer'. This is a mandatory process that involves evaluating the potential risks for illegal activity that the relationship with a customer poses to the business. Title isn't a requirement of these checks and can vary according to changes in marital status and qualification. Having said this, part of a person's identity is the title that they use and there is at least some potential that a business could misidentify someone if the title given on an application form is different to that on the ID documents. NatWest and other businesses are allowed to request this information.

Ms C also makes the point that title isn't shown on passports, which she then used to prove her identity. NatWest has explained that the issue with an applicant's title is that it uses an automated system and if the ID used shows a title this needs to match what is provided to the bank on the application. As a consequence, the details provided on a piece of ID need to match the title on the application. This means the issue faced by Ms C was one of inconsistency rather than discrimination. In the same way that anyone applying as Doctor, but having ID documents as Mr or Mrs would face.

I think NatWest has treated Ms C consistently with other customers in her circumstances and in line with how other financial services providers would have responded to her ID information.

Ms C says she had to provide a selfie which seemed unusual considering other known documents can be provided such as a passport. NatWest has explained that its checks compare the selfie to the applicant's passport or driver's licence picture.

I think NatWest has provided a reasonable explanation of why Ms C's initial photos were problematic. I'm pleased to see that when Ms C's first attempt failed, she was able to use her passport and pass the checks the same day. I'm sorry to see that Ms C felt like she had done something wrong during the application for a NatWest current account, but I'm pleased she was able to minimise the inconvenience.

I sympathise with Ms C for having been called by NatWest when she considered this to be an inaccessible way of communication for her circumstances. I've checked the information she provided NatWest about her needs and can see this has been added to its records. NatWest said its agent made an oversight in calling Ms C. I think that is what happened, but I hope NatWest's agents take more care to observe Ms C's communication needs in future.

My final decision

For the reasons I have given it is my final decision that the complaint is not upheld.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs C to accept or

reject my decision before 1 July 2024.

Andrew Fraser
Ombudsman