

## **The complaint**

Mr K complains about the service received from Al Rayan Bank PLC (“Al Rayan”) regarding the access to and transfer of his ISA with it to another provider.

## **What happened**

Mr K holds an ISA with Al Rayan. Al Rayan wrote to Mr K in February 2020 advising that as there had been no activity on the account for three years the ISA would become dormant (resulting in his account and digital banking being blocked) unless Mr K took preventative action. But as Al Rayan had no response to this Mr K’s account became dormant on 5 March 2020.

Mr K wished to transfer his ISA to another provider but when trying to give notice to do this Mr K was told he’d previously failed security checks and that there was a security marker on his account. Al Rayan needed to verify Mr K’s before it can reactivate his account and give Mr K access to his account and action the transfer of his ISA. To do this Al Rayan needs Mr K to answer security questions and provide certain identity documents. Mr K was unhappy with this and so raised a complaint with Al Rayan.

Mr K lives too far away from Al Rayan’s closest branch and so wasn’t able to visit a branch to provide the information Al Rayan required. But as Mr K had provided a letter with updated security answers via the post Al Rayan made an exception to its usual processes and said Mr K could email the requested information via his registered email address.

Mr K emailed his proof of identity documents and they were received by Al Rayan on 2 June 2024. But as the certifier of Mr K’s document – a doctor - didn’t meet its criteria of who it could accept as a certifier Al Rayan couldn’t accept this document as proof of ID.

Al Rayan emailed Mr K on 11 June 2024 advising him of the information he needed to provide which included:

- Full name
- Full Address
- Date of birth
- Town of birth
- Mother’s maiden name
- Contact information (phone number(s), email)
- School Name

Mr K was also asked to provide a valid proof of ID original, or certified and provided a guide on certification.

Al Rayan didn't uphold Mr K's complaint as it says the correct processes had been followed and Mr K had been advised on a number of occasions how he must update his security and reactivate his account before it could process any requests.

Mr K was unhappy with this and so brought his complaint to this service. As a resolution to his complaint Mr K would like Al Rayan to release his money and pay compensation for the distress caused to him.

One of our investigators looked into Mr K's concerns but didn't think Al Rayan had made a mistake or treated Mr K unfairly as it had tried to accommodate Mr K's needs by making an exception to its normal processes and allowing Mr K to send the requested information by email.

As Mr K doesn't have access to email from his home to assist Mr K in understanding what Al Rayan's needed from him our investigator asked it send Mr K this by post which it did by letter dated 4 July and enclosed a guidance booklet on who it can accept to certify Mr K's identity documents. Our investigator also provided Mr K with the details of a post office near to where he lives who could help with certifying and sending his documents to Al Rayan.

Mr K remained dissatisfied as he says the post office advised him he couldn't use this service and so he paid for an accountant to certify his passport and forwarded this to Al Rayan but hasn't had a response. Mr K has asked for an ombudsman's decision on the 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.

And having considered everything I'm in agreement with our investigator that Al Rayan haven't done anything wrong or treated Mr K unfairly and I don't think there is anything much more of use that I can add.

It might be helpful for me to say here that, as we are not the regulator, I cannot make the bank change its systems or processes – such as how and when it needs to verify a customer's identity. We offer an informal dispute resolution service and we have no regulatory or disciplinary role.

Rather our role is to look at the problems Mr K has experienced and see if Al Rayan has done anything wrong or treated him unfairly. If it has, I would seek – if possible - to put Mr K back in the position he would've been in if the mistakes hadn't happened. And I may award compensation that I think is fair and reasonable.

That said I don't think it unreasonable that Al Rayan ask that Mr K provide updated security details and to provide proof of his ID when Mr K failed security, as I'd expect Al Rayan to have these types of procedures in place to ensure the safeguarding of its customers money.

I accept that this was inconvenient for K due to the difficulties he faced in attending a branch of Al Rayan in person but Al Rayan made an exception to its processes and allowed Mr K to supply the information requested by post or email which I think is reasonable.

Unfortunately, the certified copy of Mr K's passport that Mr K emailed Al Rayan was certified by a doctor and didn't meet Al Rayan's certification criteria and so it needed Mr K to either provide it with his original passport – which understandably Mr K didn't want to post – or have it recertified.

I don't think this is unreasonable as I'm sure Mr K understands, Al Rayan have to ensure that Mr K is who he says he is in order to safeguard his money and so it can't accept anyone's ID certification. I can see that Al Rayan had provided a guide about certification in its email of 11 June and as Mr K couldn't easily access his emails Al Rayan sent this by post on 4 July confirming again what was needed to verify his identity which I think is fair.

I can see that Mr K had his passport recertified on 11 July 2024 which he says he sent to Al Rayan. This service emailed a copy of this to Al Rayan but unfortunately it says it never received this. So to move matters forward Al Rayan has confirmed again what it needs from Mr K to give him access to his funds which is:

- A signed written request to update Mr K's security details and remove dormancy
- Proof of identity original or certified

And answers to the questions as outlined in the background above.

I accept this must be very frustrating for Mr K when he believes he has done all he's asked at his own expense and inconvenience. But I can't fairly say Al Rayan is at fault because it didn't receive Mr K's documents or that it's unfair of it to insist on receiving the information requested before it will allow Mr K to access to his money with it – as ultimately this is to ensure its customers funds are protected.

So it follows that I don't uphold Mr K's complaint.

### **My final decision**

For the reasons I've explained I've decided not to uphold Mr K's complaint against Al Rayan Bank PLC.

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

Caroline Davies  
**Ombudsman**