

## The complaint

Mr A complains about the service provided by Bank of Scotland plc (BoS) when it stopped an overseas bank transaction and blocked his account. Mr A is seeking an unblocking of his account and wants to transfer his funds to another bank account.

## What happened

Mr A requested BoS transfer funds to an overseas account. BoS asked Mr A for verification information and when this was not forthcoming BoS said he should attend a branch of the bank to verify himself and his transaction.

BoS told Mr A that when it spoke on the phone about the block, it was concerned it wasn't him and had concerns about his attempts to log in to his account. BoS said that to ensure that it isn't removing blocks for third parties, it needs to see Mr A face-to-face to make sure that the transaction is genuine.

Mr A said he couldn't attend as he was staying abroad. He sent BoS a copy of his passport, but this had expired. BoS blocked Mr A's account and said this would remain in place until he was able to verify himself. Mr A complained to BoS about the blocks on his account and the suspension of his online banking. He said this had happened several times before without reason. In order to put things right Mr A wanted the bank to remove the blocks.

BoS didn't uphold Mr A's complaint. It noted he was unable to attend for verification as he was overseas and his passport had expired. And noted the information he had sent in, but said it couldn't remove the block as he needed to attend a branch with valid identification. BoS said it does this because it takes keeping customers' money safe very seriously.

Mr A wasn't satisfied with this response to his complaint and referred it to our service. He said BoS's actions are politically motivated and said he had been forced into residing in a foreign country, describing himself as a '*hostage of arbitrary detention*'. He shared correspondence about his situation and about a dispute with a foreign embassy.

Our investigator didn't recommend the complaint be upheld. She said we can't ask a bank to change its systems or procedures concerning verification. She did not agree that the account blocks were politically motivated and said the information Mr A has sent us about this has no bearing on his complaint. She said Mr A needed to send BoS documents that are in date.

The investigator said BoS's records show it blocked the account due to concerns about Mr A's numerous changes to devices, PIN and security codes. She said in its letter to Mr A, BoS explained that during a call it didn't think it was speaking to Mr A. And so, she thought it was reasonable for BoS to require a meeting to make sure that the transactions are genuine.

Mr A disagreed with the investigator saying his allegations should be taken by the head, not the tail because his account had been frozen at times since 2022 without reason. He said if he made a mistake once or twice with a wrong PIN or to login to his account from different phones due to losing his phone or using two different phones, he shouldn't be punished.

Mr A said BoS is wrong to say he can still use his debit card and make cash withdrawals because it has frozen his debit card and refused to send him a new card abroad and blocked his online banking. Mr A requested an ombudsman review his 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.

Mr A complained that BoS caused problems by declining his transactions and blocking his account. I am sorry to see the inconvenience and frustration caused to Mr A by having his account blocked.

BoS and Mr A disagree about whether he is still able to use his debit card to make cash withdrawals. I have seen Mr A's account statements and these show that he is still using his debit card to make payments. Mr A has since indicated that the problem now is that his card is damaged. Mr A should contact BoS directly to obtain a replacement bank card.

BoS has explained to Mr A in its letter of 26 April 2024, that it requires a face-to-face meeting in branch to remove the blocks on his account. I have looked at the regulations and the interactions between the parties to see if BoS has treated Mr A fairly in its requirements.

Firstly, I can see no evidence that the blocks on Mr A's account have been placed because of political motivation. From its phone contact with Mr A, BoS was of the view that it wasn't him it was speaking to. BoS also found numerous changes to his logging in codes and the devices he was using over a short period of time and felt this provided justification for requiring face-to-face verification.

I note Mr A's explanation about mistakes in logging in and various devices used to access his account. He said of BoS's actions, *'they shouldn't had concerns about numerous device changes and PIN and security code.'* But I think that BoS has acted within the regulations it is required to follow in knowing who it is dealing with and verifying the transactions that have been instructed. Otherwise, BoS could have found that it removed the blocks for the benefit of third parties.

All financial institutions holding customer funds are required by their regulator, the Financial Conduct Authority, to put in place systems that reduce and interdict transactions that may be carried out for the benefit of fraudsters. From what I have seen, BoS has followed these rules in requiring Mr A to verify himself in branch as he has failed its security checks.

Mr A told BoS he is abroad and wouldn't be able to verify his identity in branch. He subsequently sent BoS expired passports to verify his identity, but BoS has correctly told him that it needs to see in-date documents. The other correspondence Mr A has sent us is not in any way relevant to his complaint about BoS.

I agree with the investigator that from the information we have been provided it does not appear that BoS has made an error in its dealings with Mr A about the checks it needs to make. As I have explained, verification checks on a customer's identity are a requirement of banks and therefore a normal practice within the banking industry to prevent fraud and scams. So long as it acts within the rules, the methodology a bank follows in making these checks is a matter for it to decide upon. We would not stipulate how this should be done.

I think it is fair for BoS to maintain its position concerning Mr A's verification as he has yet to meet its requirements. BoS has said that as soon as Mr A is able to visit a branch of BoS with his photo identification and debit card, its branch staff will be happy to assist him in meeting its verification requirement. I hope Mr A can do this soon.

## **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 Mr A to accept or

reject my decision before 10 March 2025.

Andrew Fraser  
**Ombudsman**