

## **The complaint**

Mr N complains about the service he received from an agent of PrePay Technologies Ltd (PrePay) when he tried to get help.

For ease within this decision, I will refer to the agent's actions as those of PrePay.

## **What happened**

In late November 2023 Mr N wanted to contact PrePay for further information about a change of fees that was upcoming in relation to his account. However, after spending 20 minutes searching on the application (app), he was unable to find an option to contact it. The same day, Mr N emailed PrePay's support team to raise a complaint because he was unable to find the chat function. As a resolution to the complaint Mr N said he wanted contact options to be clearly laid out within the app, an apology and £40 compensation.

Three days later, PrePay contacted him and asked him to clarify the issue he was having but Mr N didn't respond. PrePay didn't raise a complaint.

In May 2024 Mr N contacted PrePay again asking for a complaint to be raised. He received a response outlining the steps he would need to take to access the chat feature for help within the app and was told he would need to contact the complaints team directly via email if he wished to raise a complaint. Mr N replied a few days later explaining he still couldn't access the chat feature after following the instructions given. At this stage he also raised a second complaint about the way PrePay had failed to acknowledge or record his complaint. PrePay then asked Mr N to clarify his complaint points. Mr N was also unhappy with this and raised a further complaint.

PrePay responded to Mr N's complaints in May 2024. It didn't uphold his complaint about the ability to access help within the app - PrePay could find no error and noted that many customers are able to access the chat function via the app with no difficulty. It also felt its request for Mr N to confirm his complaint points was reasonable. However, it did agree that it ought to have raised his complaint at his request. It also said it was regrettable that Mr N didn't receive guidance on access to the chat feature when he contacted it in November 2023. It said that 'in total, we have decided to offer you our most sincere apology to close this complaint.'

Mr N remained unhappy and brought his concerns to our Service. He said he still didn't know how he could access the chat feature via the app, and he provided screenshots to show this option wasn't available to him.

Our Investigator looked into things and didn't uphold the complaint. They were satisfied the facility was available via the app and noted Mr N had not followed the full process PrePay had outlined to him in its response in May 2024. In relation to Mr N's concerns about how PrePay had handled his complaint, they noted that the rules set out by the Financial Conduct Authority (FCA) explained our Service can only consider certain types of complaint and that complaint handling was not an activity that fell within our jurisdiction.

Mr N disagreed and so the complaint was passed to me to decide. After reviewing the evidence, I issued two provisional decisions. Both said I didn't intend to direct PrePay to do anything further, but my rationale altered based on new information provided by Mr N. Mr N had explained in response to the first provisional decision that the 'contact us' option only appeared on some of the FAQs not all, something which was not clear from the instructions he was given by PrePay in May 2024. And this evidence persuaded me that these instructions were not straightforward and that PrePay could have provided better service here. But I still felt the impact on Mr N was minimal such that I didn't think PrePay needed to do anything further.

Mr N didn't accept my provisional findings. He wanted PrePay to make further apologies. He felt PrePay hadn't apologised for providing inadequate support in its response to his initial email. And he felt PrePay should apologise for the inadequate instructions it later provided on accessing the in-app chat feature. He also said that the hassle and upset he'd experienced was having to hunt around for the chat option on multiple occasions due to the lack of support and unclear instructions. He felt that a small amount of monetary compensation was therefore appropriate.

PrePay didn't feel it should apologise. It felt Mr N was seeking compensation, noting he had demanded this when he first contacted it via email to complain in November 2023. It said that Mr N had successfully accessed the in-app chat function previously, so it didn't understand why he was unable to do so on the day in question. It noted that in his initial complaint email Mr N said: *'I have been through all the options and screens within the App and there is just no 'Chat with Support' option'*. However, the third option that appeared on his FAQ search included the chat option, and therefore he cannot have checked many available options.

I'm now in a position to issue a final decision on this 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'm aware Mr N is unhappy with the way PrePay handled the complaint he raised within his email. In particular, the delay in logging a formal complaint, its suggestion he was required to email a specific inbox and the request for him to clarify his complaint point.

As outlined by our Investigator, our Service operates under a set of rules published by the Financial Conduct Authority (FCA) and known as the Dispute Resolution (DISP) rules. Amongst other things, the DISP rules detail the activities our Service can consider. DISP 2.3.1R (R denotes it is a rule), lists the activities our Service can consider. And complaint handling is not an activity listed within these rules.

I appreciate Mr N feels our Service has considered a complaint about complaint handling previously. Whilst I make no comment on that specific complaint which has been decided separately, I think it might be helpful to explain that whilst complaint handling itself isn't an activity our Service can consider, where a complaint is brought to us that involves an activity we can consider, and there are customer service/complaint handling issues that are sufficiently interlinked, then we may be able to comment on this as part of our overall consideration of the listed activity. And that's because the activities at DISP 2.3.1R also include 'any ancillary activity, including advice, carried on by the firm in connection with' one of the other activities listed. In broad terms, for an activity to be considered an 'ancillary activity' there must either be a sufficiently close degree of connection between that activity and the underlying regulated activity; or be something that wouldn't have occurred but for the

regulated activity. The example given in the rules is 'advice'.

But in these particular circumstances, I am not persuaded this connection is sufficiently close such that I find these complaint handling activities to be ancillary. I accept there is a loose connection here because the complaint handling originates from Mr N's complaints about the support associated with his e-money account. But what Mr N is asking our Service to comment on is the individual errors in complaint handling, and whether PrePay complied with the DISP rules. I note that in his complaint email he didn't raise the original issue he was seeking support with either which I think is relevant when deciding if this activity is ancillary. Having carefully considered things, I don't think these complaint handling issues are necessarily linked to the use of, operation, administration or servicing of his e-money account. So, I won't be commenting on how PrePay handled his complaint.

But I can and have considered whether PrePay's response to Mr N's request for help to access the in-app chat function was reasonable. And this includes whether there was a delay in this response.

To access the chat function, PrePay customers must first navigate to the FAQs, and when certain FAQ pages are selected, the chat function then appears as an option on the bottom of that page.

Having reviewed the results that appeared for Mr N when he typed 'transaction fees' (the issue he was seeking assistance with) into the FAQs, I think the process for accessing the chat function wasn't straightforward. I agree with Mr N that the options that appeared didn't match the issue he was seeking help with. And the first two FAQ options that returned from his search didn't offer the chat function at the bottom of the page, so I can see why it may not have been particularly clear to Mr N how he could access the support he was seeking within the app. I acknowledge PrePay's position that Mr N had accessed the chat function before, but this doesn't persuade me that he was able to access the function on this occasion given the evidence he's provided.

I think PrePay missed an opportunity to provide Mr N with better support when he contacted it via email. Mr N was clear in the emails he sent in November 2023 that he was having difficulties finding the in-app chat function, so I don't think PrePay needed to ask him to clarify this further. And I think there was a missed opportunity at that point to provide Mr N with more support by outlining the steps he needed to take. This error is something PrePay acknowledged in its FRL.

I also agree with Mr N that the step-by-step instructions it later provided in May 2024 were not sufficiently clear either. They imply all FAQs offer the chat function at the bottom when this isn't the case. So, I think PrePay once again failed to provide Mr N with the support he needed to ensure he could access this contact method should he wish. And I think this was poor service.

I have thought about the impact of all of this on Mr N.

Mr N was able to find an alternative way to contact PrePay the same day he encountered the difficulties accessing the in-app chat. I appreciate this was not the way he wanted to be able to seek help, but when deciding if PrePay treated Mr N fairly, I do think it's important that it offered multiple ways for Mr N to contact it. Ultimately Mr N wasn't prevented from seeking help from PrePay. I am also aware that a response to an email takes longer than the in-app chat, but I'd also note that what Mr N wanted help with was fees and this isn't something he decided to raise with PrePay in the email he sent (or in the follow up emails sent in May 2024). So, I'm not persuaded that having to contact PrePay via email, rather than the chat, was the reason there was a delay in Mr N getting help with transaction fees.

So, I am not persuaded he was disadvantaged by the fact he couldn't use the in-app chat function.

I also observe that Mr N didn't respond to PrePay's request for clarification and didn't initiate any further contact for a further six months. The lack of action here suggests that his inability to access the in-app chat function during this time had minimal impact and/or indicates Mr N didn't take steps to mitigate this impact. I appreciate he'd raised a complaint, but I am satisfied that it's reasonable to have expected him to raise this again with the business in that time if he was being impacted. I say this also noting Mr N has raised financial complaints, including with PrePay, previously and so is familiar with the process.

I recognise the poor service has been frustrating for Mr N, and that it would have been better if PrePay had acknowledged this sooner and ensured it had been clearer in its communications. But I'm still not persuaded the level of impact here warrants compensation. Whilst it has been inconvenient for Mr N to have to search his app and to raise his access issues via emails (compared to him being able to effectively access the in-app chat from the start), I think it's important to highlight that using financial services won't always be hassle free. Based on the evidence I've seen, I don't think the impact here is beyond that which might reasonably be expected from the normal nuisances of day to day life and I don't think it warrants monetary compensation.

I'm aware Mr N would also like PrePay to make further apologies for its errors, but I'm not going to direct this within my decision. PrePay clearly has concerns over the motivation behind Mr N's complaint. Whilst I make no findings on this, as my role is to consider PrePay's actions not Mr N's, it is of relevance that PrePay would only make an apology here under obligation. So, any apology given would lack sentiment. Taking this into account, and my findings regarding the minimal impact on Mr N, I won't be directing PrePay to do anything further.

### **My final decision**

My final decision is that PrePay Technologies Ltd do not need to do anything further.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr N to accept or reject my decision before 16 June 2025.

Jade Cunningham  
**Ombudsman**