

## **The complaint**

Miss L is unhappy that PayPal UK Ltd ('PayPal') refused to update her name on her account unless she provided photo identification in her new name.

## **What happened**

From the information available, Miss L tried to change her name on her PayPal account on 10 November 2024. She tried to do so online via their website, but was getting an error message.

She contacted PayPal the next day (11 November 2024) and they then explained via an online chat message instructions for how the matter could be resolved and the change completed and what was required to do so.

Miss L was still having difficulty in changing her name online and thought this was due to her being on a debt management plan, so she posted some supporting documentation to PayPal on 19 November 2024 and asked for her name on her account to be updated. The documents she provided included her statutory declaration of her change of name and a copy of her passport in her previous name. At the same time, she also made a complaint about not being able to update her name. In particular, that PayPal wouldn't do so without her providing government-issued photographic identification in her new name.

Paypal issued their final response letter to that complaint on 26 November 2024. In that response, they apologised for the difficulties Miss L had been having but explained that they weren't upholding the complaint because she ultimately hadn't provided the relevant supporting documentation for the name change that they required. They also confirmed the fact that Miss L was on a debt management plan didn't affect this.

They gave instructions for how the relevant documentation could be provided via Miss L's online account but also provided an alternative link for her to use in case she was still having issues doing so via her account.

Miss L remained unhappy with this response and so referred the complaint to the Financial Ombudsman Service the next day.

While our Service was looking into the matter, PayPal issued a further final response letter dated 6 December 2024. In this letter, they explained that while they still felt they had followed their name change policy correctly, they had made an exception on this occasion and updated Miss L's name on her account based on the other documentation she'd already provided.

Miss L remained unhappy and one of our Service's Investigators looked into the complaint. Having looked into it, they rejected the complaint on its merits.

They concluded, in summary, that PayPal had followed their policy for a name change, which applied equally to every customer, and so they couldn't see any error had been made.

Miss L did not agree and ultimately requested that the matter be referred to an Ombudsman for a final decision to be made – which is why it has now been passed to me.

## **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 want to make it clear that my role as an Ombudsman is not to address every single point that has been made to date. Instead, it is to decide what is fair and reasonable in the circumstances of this complaint. If I haven't commented on, or referred to, something that either party has said, this doesn't mean I haven't considered it. Rather, that I've focused here on addressing what I consider to be the key issues in deciding this complaint and explaining the reasons for reaching my decision.

Having considered everything, I agree with the outcome reached by the Investigator, and for broadly the same reasons. I'll set out my findings below.

As part of that, I think it's firstly helpful to reflect on the role of our Service.

Our Service is an impartial and independent dispute resolution service, which is a free alternative to the courts. We do not regulate the financial services industry, that is the role of the Financial Conduct Authority (FCA). It's not therefore our role to make the rules for businesses or to review their conduct or policies on a wider level, nor can we mandate that a business should change a certain policy. We are also not a court so cannot make a finding as to whether a business has acted unlawfully.

But, what I can look at, is whether, in the individual circumstances of this complaint, PayPal made an error i.e. did not follow their process correctly and whether they acted unfairly or unreasonably. And, if so, how that should be put right.

I've focused here on the crux of the complaint which is regarding PayPal's policy for changing a customer's name. I acknowledge that Miss L has identified some initial difficulties in trying to update her name online, which PayPal hasn't disputed. But, PayPal have apologised for this, which I think is reasonable in the circumstances. And, from the information available, this didn't ultimately make a difference to what happened here as Miss L didn't at any stage provide PayPal with the relevant photographic ID they had explained they required as per their policy.

As mentioned above, PayPal have also now made an exception to their policy and updated Miss L's name on her account.

So, as I've said, the crux of the complaint is the issue of PayPal's name change policy – the fairness of this and whether it was followed correctly.

I've reviewed PayPal's internal policy for a name change and I can see that unless it's a small change (such as correcting a small typing error), supporting documentation is generally required.

Customers are asked to provide a copy of valid photographic identification, showing the customer's new name (and examples are given such as a driving licence or passport). And, a copy of the court-issued document showing the name change (and examples are given such as a deed poll or marriage certificate).

Customers are then asked to upload the relevant documentation, after which the name on the account would be updated.

The policy is clear that it is photographic identification in a customer's new name which is required, and this is ultimately what PayPal explained to Miss L. From the comments she's provided, Miss L doesn't dispute that this is what the policy requires and therefore I can't see that PayPal made an error here in requesting it.

Miss L's issue, ultimately, is that she doesn't feel the policy should ask for photographic identification in a customer's new name. And, because it requires this, the policy is unfair.

I acknowledge Miss L's comments here, but having reviewed PayPal's policy, the same requirement applies to all customers equally so I can't see that it's discriminatory or unfair towards a particular group. It also lists a range of documents a customer can provide, so I can't see that it's unduly restrictive.

I appreciate Miss L wasn't happy with this, but ultimately, it's not unreasonable for a business to require evidence to support a name change and for them to decide what evidence they will accept according to the level of risk they are comfortable with. This therefore generally varies from business to business.

So, I don't ultimately agree that PayPal have acted unfairly or unreasonably here and so I'm not asking them to do anything further. I appreciate this will likely come as a disappointment to Miss L as I acknowledge the strength of feeling she has on this issue, but I hope I've explained everything clearly.

### **My final decision**

For the reasons I've explained above, I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss L to accept or reject my decision before 29 May 2025.

Fiona Mallinson  
**Ombudsman**