

## **The complaint**

Mrs A complains Bank of Scotland plc, trading as Halifax (Halifax) did not make it clear that when she cancelled her lost credit card she would no longer be able to see her transactions online. Mrs A says this caused her much distress.

## **What happened**

Mrs A lost her card on 15 December 2023 while abroad visiting family. On Saturday 16 December 2023 Mrs A went online to report the card as lost.

On 18 December 2023 Mrs A used Halifax's online chat to let them know she was unable to see her card account and transactions online. Mrs A explained to Halifax this was causing her stress and anxiety as she wanted to ensure her card hadn't been used by anyone else. In the course of the chat Halifax's virtual assistant told Mrs A her card account would reappear within two days of the new card being sent to her, and if she needed her card details in the meantime she could find them in the app.

This didn't resolve Mrs A's concerns that someone may have used her card and the virtual assistant placed Mrs A in a queue to speak to someone. However, due to high demand no one was available and the virtual assistant explained Mrs A could call Halifax through the app if it was urgent.

Mrs A didn't call through the app and instead completed an online complaint form. Mrs A expressed her concerns that Halifax had not made clear to her that she would lose access to her account after she reported her card as lost.

Halifax reviewed the complaint and said they had followed their process and offered Mrs A ways to contact them so they could help her - so Halifax concluded they had not done anything wrong.

Mrs A raised her complaint with Halifax again in January 2024 and Halifax responded similarly, noting that Mrs A had access to her account.

Our Investigator reviewed Mrs A's concerns and concluded the complaint should not be upheld. The Investigator found that while the process of reporting a lost card did not explain access to a card's transaction history would be suspended (to allow for a new card to be issued), Halifax had answered Mrs A's question about access to the transactions and she was given a means to contact Halifax to make any further enquiries. The Investigator concluded there was not enough to say Mrs A would have done anything differently (as she still would have reported the card as lost) or that Halifax had done anything substantially wrong.

Mrs A disagreed as she said a simple warning message that she would temporarily not have access to her account should be part of the online messaging. Mrs A also said she was abroad and connectivity was poor for her at that time and she was disappointed Halifax had not called her to better investigate her concerns once she raised them. Mrs A referenced her concern that not sharing such information (suspending access to the account) was not in

keeping with Consumer Duty's expectations to provide information to customers in a timely manner.

### **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 have taken into account any relevant law and regulations, regulators' rules, guidance and standards (including Consumer Duty), codes of practice and (where appropriate) what is considered to have been good industry practice at the relevant time.

Mrs A complains Halifax did not tell her during the process of reporting her card as lost that she would not be able to access her account online or via the app (so she could check for unauthorised transactions).

Before I set out my findings I think it helpful to explain that it is not for me to say how Halifax should design their systems, controls or processes – that is a decision for them to make. It is also not for me to fine or punish a firm. All these things are considerations for the regulator, the Financial Conduct Authority (FCA). My role here is to look at the individual circumstances of the complaint to reach a fair and reasonable resolution.

I've first considered whether Halifax adhered to their own process.

Halifax's website explains to customers they should receive a replacement card in five working days. Mrs A reported her card as lost, it was immediately cancelled and a new card generated the same day. As the events in question happened at the weekend, the card was not issued until the next working day (Monday 18 December 2023) and during that time, as per Halifax's process to allow for generating a new card number, access to the card account and the card's transaction history was temporarily removed. Mrs A could access the new card number though if she needed those details sooner.

Halifax have explained Mrs A would have regained access to the account within two days of the new card being sent. Neither party have been able to confirm exactly when Mrs A regained access to seeing her card transactions - Halifax were not able to provide this information from their systems and Mrs A did not provide a specific date to this service either. However, Mrs A told this service that had Halifax made their process clear to her she would not have had '*three days / nights of worry*'. So on balance I think Mrs A was not long without access to her account and there is nothing to persuade me that she did not regain access to her account within Halifax's expected timeframe.

Taking the above into account, I have no reason to believe things did not happen as they should have done in accordance with Halifax's processes at that time. But I've also gone on to consider what information Mrs A had available to her and when, and whether she was treated fairly by Halifax during the course of these events.

I can see Mrs A told us if it had been made clear to her that she wouldn't be able to access her account due to the process of requesting a replacement card, she would not have had cause to complain.

Halifax accept that the information about not having access to the account online for a short period is not shared with customers and I note Halifax have taken Mrs A's comments away to consider as part of their ongoing review of their processes, which I think is a reasonable thing for them to do.

I have noted Mrs A's reference to the Consumer Duty in the context of Halifax's responsibility to provide timely information.

The Duty references that customers should have the information they need at the right time to make an informed decision. As noted above, Halifax set their processes which I can't involve myself in and they have said they have taken Mrs A's comments away to consider. While there is not enough here for me to say Halifax have done something wrong, even if they had made an error I don't think this would have changed things. I say this because even if Mrs A had known, during the course of reporting her card as lost, that she would temporarily not have been able to access her account or see her transaction history, I think she still would have reported her card as lost.

In short, I don't think Mrs A would have done anything differently. Regardless of whether information about temporarily removing access to the account was provided, I think it's reasonable to say Mrs A's priority at that time would have been to ensure she had cancelled her card. Halifax's systems show that once notified by Mrs A the card was cancelled immediately and a new card ordered.

I recognise that much of what has likely driven Mrs A's concerns here is that she could not see whether unauthorised transactions had been made on her account, but Mrs A didn't then contact Halifax until two days after she reported the card as lost. I can't find that Halifax did anything wrong in those two days as they would not have known of Mrs A's worries about potential unauthorised transactions on her account.

Halifax have explained Mrs A would have had confirmation that her card was cancelled and a new one ordered, so I think it reasonable to say this would have been of some reassurance to Mrs A after she reported the card as lost. And having reviewed the submissions I think Halifax provided the primary information Mrs A was seeking when she contacted them on 18 December 2023.

Mrs A used the online chat to query with Halifax why she couldn't access her account and explained not being able to access it was causing her to worry. The virtual assistant was able to tell Mrs A, within two minutes, that she would be able to access her account within two days of the new card being sent to her. I think this likely offered some reassurance that the account had not been removed from Mrs A's sight due to any sort of fraudulent activity, rather it was part of Halifax's process for issuing a replacement card. I therefore think Mrs A's query about why she could not see her account online was promptly answered.

As noted above, Mrs A's submissions are that she would not have complained if she had been in receipt of this information sooner, however, Mrs A was still unhappy after she had been given this information because she raised her complaint after receiving it.

From the online chat I can see Mrs A also said she wanted to ensure no unauthorised transactions had taken place on her account. Mrs A confirmed to the virtual assistant they had not been able to resolve her query, so the virtual assistant asked Mrs A if she would like to speak to a colleague – to which she said ‘yes’. However, almost immediately after saying someone would be in touch the virtual assistant explained Halifax could not help through messaging that day (due to a high customer demand at that time) and if it was urgent Mrs A could follow the steps outlined to speak to someone. Perhaps using the word ‘speak’ was not helpful in this online chat exchange, given the queue was to ‘chat’ with someone directly. But I think it reasonable to say any potential confusion here would have been very short-lived given Halifax’s redirection to Mrs A to call through the app if it was urgent.

Halifax have said Mrs A could have been helped by frontline colleagues either via the online chat or telephony team. It appears the online chat support was particularly busy that day and Mrs A didn’t call the telephony team, but rather raised her complaint online.

I recognise Mrs A was naturally worried someone had used her card to make unauthorised transactions – I think it’s fair to say this would be a natural concern in such circumstances. But Mrs A had successfully cancelled the card (to prevent any unauthorised transactions) and ordered a replacement which would have been confirmed to her; she was told via the virtual assistant why she couldn’t access her account and was given guidance on how to call Halifax with any further queries or concerns. I also think it’s more likely than not Mrs A regained access to her account within a few days, and it does not appear Mrs A has experienced any financial loss because of these events – if she had, Mrs A would have been able to dispute any transactions she had not authorised herself as a separate matter.

I understand Mrs A has said her connectivity was poor as she was abroad, but I think it would be unreasonable for me to hold Halifax responsible for that. In the circumstances I think it’s fair to say Mrs A was aware of how to contact Halifax.

I’ve noted Mrs A’s concerns about how Halifax handled her complaint, but complaint handling does not fall within the jurisdiction of this service so I am prevented from considering Mrs A’s points in that regard.

I realise my findings will come as a disappointment to Mrs A, but overall I have not seen enough to persuade me Halifax have done anything wrong in this particular case or treated Mrs A unfairly in the circumstances.

### **My final decision**

For the reasons above, my final decision is that Mrs A’s complaint is not upheld.

Under the rules of the Financial Ombudsman Service, I’m required to ask Mrs A to accept or reject my decision before 20 May 2025.

Kristina Mathews  
**Ombudsman**