

## **The complaint**

Miss A complains that Santander didn't make reasonable adjustments for her when it introduced its new app. And she complains about issues that arose in the course of making complaints.

## **What happened**

Miss A complained to Santander in May 2024, having received notice that a new app would be replacing the old one. She has explained that she is autistic and has a condition meaning that she can't look at screens for too long as it gives her headaches and eye strain. She felt that Santander should make adjustments for her and allow her to keep using the old app. She further said that when she contacted Santander, it repeatedly downgraded her complaints. She requested that the response to the complaint be sent by e-mail or post but was informed that it would be sent via the online chat.

Santander explained that the app would contain all the original functionalities but offer an easier platform for banking needs. And Miss A could continue to use the online service. It apologised for the complaints being downgraded and confirmed that she would receive answers to her complaints and copies of the chat transcripts by post. The complaints adviser said that more could have been done in the way of assisting Miss A during her chat service by providing further support and assistance with her information request. It paid her £150 compensation.

On referral to the Financial Ombudsman Service, our Investigator asked Miss A to set out what her problems were with using the new app. She explained that she couldn't comply with Santander's new requirements for proving ID as she can't follow the instructions on the app for doing this.

Our Investigator said she thought Santander had handled Miss A's complaint fairly, and noted that it had paid compensation in respect of her concerns with the service provided.

Miss A disagreed, and the matter has been passed to me for an Ombudsman's consideration.

## **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.

The Financial Ombudsman Service is set up to resolve complaints with minimum formality. I mean no discourtesy to Miss A but I should advise her that although I've considered everything she's said, I'm not required to cover every point of complaint. Our rules allow me to take this approach.

Miss A complains that Santander's actions discriminated against her in that it she says it has failed to make reasonable adjustments for her under the Equality Act 2010 (the Act). I can't

make a finding on whether discrimination as per the Act has occurred - that's a matter for the courts. I'll consider whether Miss A has been treated fairly and reasonably.

I should also advise Miss A that I can't look at the latest issue she has described to us in that she can't get on to the app or access her online account. She will have to raise this with Santander.

#### *use of the app*

Miss A has demanded that Santander allows her to keep using the old app. I'm satisfied that Santander gave Miss A full and adequate notice of the new app. She didn't raise the issue of photo ID until our Investigator asked her. So I think she was given the opportunity to clarify any particular issues. Santander has said that the new app has all the same functionality as the old app, but is in its view easier to use. And I bear in mind that in designing the app Santander will have taken into account, so far as is practicable, any issues people might have in using it. As I've noted above, our Investigator asked Miss A to set out why she had problems with the new app. She has described the requirements for proving ID, which include take a photo of herself.

Santander has explained that the ID verification procedure is not necessary for Miss A to use the new app. It'll only apply in cases where it has to approve more riskier transactions. Since I can't ask Santander to remove a requirement to prove ID that would have to take place using the new app, I don't think it's reasonable to expect it to allow Miss A to go back to using the old app. I understand that she feels she can't follow the instructions, but all I can say is that if she carries out a transaction which needs approval she'll have to approach Santander if necessary via the chat to see how it could help. For the actual use of the app, I understand that she has been able to continue to use her account for direct debits, faster payments, and card payments. So I don't think there has been any financial detriment to her.

#### *contact by e-mail*

I understand that Miss A asked for a response to her complaints to be by e-mail or post. She was told by the online chat advisers that this would have to be done on the chat. I understand she does not want to be contacted by telephone and that she doesn't want to spend too much screen time, although this does limit the ways that she could be helped. But I do understand that the advisers didn't offer her the option of sending her reply by post. Once it reached the complaint adviser they provided that option to her. I won't go into all the interactions she had with various chat advisers, I do accept that she had issues with the way they dealt with her.

#### *downgrading complaints*

Miss A has complained that when she made complaints they were downgraded to "dissatisfactions" rather than formal complaints. Santander did apologise for this. I think the difference between a dissatisfaction and a formal complaint is that she wouldn't have been informed of her right to refer the matter to the Ombudsman. She didn't cease to have that right.

So overall I think that Santander has acted fairly and reasonably in respect of Miss A's complaints about using the new app. To the extent that there were problems with the service and information provided by the online chat, I think that Santander paid her reasonable compensation.

**My final decision**

I don't uphold the complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss P to accept or reject my decision before 2 May 2025.

Ray Lawley  
**Ombudsman**