



## The complaint

Mr R is unhappy about the service he has received from HSBC UK Bank Plc ("HSBC") in relation to the options provided by it to verify his identity with HSBC and access his dormant accounts with it. In particular, he doesn't believe HSBC has made reasonable adjustments to support him in providing the documentation needed to verify him.

## What happened

Mr R has limited mobility and is housebound. Mr R holds two dormant accounts where the most recent transactions on them were over four years ago. HSBC has been writing to Mr R about these accounts since December 2018 but had not received a response.

Mr R now wishes HSBC to lift the dormant markers on the accounts but in order to do so – as per HSBC's letters – it needs Mr R to verify his identity by providing certain identity documentation to it.

Due to Mr R's personal circumstances, he is unable to attend branch and wants HSBC staff to make a personal visit to his home address to witness the required documentation. But HSBC refused this request instead offering Mr R alternatives to its standard process of asking a customer to visit a branch as follows:

1. Posting the required documentation or certified copies to it;
2. With written authority from Mr R, someone can visit a branch on his behalf bringing the requested documentation for verification; or more recently,
3. HSBC has said Mr R can upload his identification documentation online via a link and once the documentation is accepted Mr R can call HSBC and complete security and the block will be removed.

Mr R had concerns about sending documents through the post and so he reluctantly asked his wife to visit a local branch of HSBC with the required letter of authority from him and the requested ID including his driving licence and a recent utility bill. Unfortunately, on attendance at a branch HSBC the branch manager who was aware of Mr R's circumstances - but not aware Mrs R was attending branch that day - wasn't able to meet with her at the time and the branch staff didn't accept Mr R's authority for his wife to act and so could not accept the ID presented.

Mr R was very unhappy with this and wants an apology from HSBC and significant compensation of £2,000 for the distress and inconvenience this has caused.

HSBC have acknowledged the distress and upset this event caused and to put things right have offered to pay Mr R £150 compensation as well as provide a settlement communication which would include an apology. Furthermore, HSBC have provided Mr R with its branch managers personal work email address so that Mr R can contact them directly to arrange an agreed appointment time for his wife to visit the branch again with the appropriate authority and documentation in order to update his records and have the dormancy marker removed allowing access to his accounts once again.

Mr R is dissatisfied with this as he doesn't want to send his documents through the post and given the difficulties faced last time his wife visited HSBC's branch, he and his wife don't want her to make a further visit to branch and believe the only reasonable solution is for HSBC to provide a home visit to verify his identity.

One of our investigators looked into Mr R's concerns but thought that the options HSBC had provided him for having his documentation witnessed and accepted by HSBC were reasonable and that HSBC's settlement communication and offer of £150 compensation for the distress and inconvenience caused by the branch visit was fair for the impact caused.

Mr R disagreed and has asked for an ombudsman's decision on the matter.

### **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 hope that Mr R won't take it as a discourtesy that I've condensed his complaint in the way that I have. Ours is an informal dispute resolution service, and I've concentrated on what I consider to be the crux of the complaint. Our rules allow me to do that. And the crux of Mr R's complaint is regarding the service he received from HSBC when it required him to verify his ID in order to lift the dormancy marker from his accounts.

It might be helpful for me to say here that as we are not the regulator, I cannot make HSBC change its systems or processes – such as the how it provides its banking services or the technology it uses. These are commercial decisions and not something for me to get involved with. Nor does this service supervise, regulate or discipline the businesses we cover. And my role isn't to punish or penalise businesses for their performance or behaviour – that's the role of the regulator, in this case the Financial Conduct Authority (FCA).

And while I do take relevant law and regulation into account when arriving at a decision, my remit is focused on whether I feel a fair and reasonable outcome has occurred.

But that said while I wouldn't tell a HSBC how it needs to run its business, or what procedures or policies it needs to have in place, where a customer has a disability or vulnerability that reasonably prevents them from using or accessing a service provided by a business, I would expect it to make reasonable adjustments where it can to facilitate its customers being able to achieve their objective – in this case providing the information and documentation HSBC needs in order to have the dormancy marker lifted from Mr R's accounts.

So what I need to consider is given Mr R's circumstances, whether HSBC did enough to cater to his needs to help him provide the documentation it requested.

And having considered everything, I think it did. I accept Mr R is housebound and not able to travel to branch to provide the required documentation and wishes HSBC to have a staff member visit him at his home instead. But just because HSBC is unable to facilitate this request it doesn't automatically mean that it has failed to make a reasonable adjustment for him.

HSBC listened to and noted his concerns and found what I think is a number of reasonable alternatives – as outlined in the background above - for the provision of the required documents.

I appreciate Mr R has concerns about sending documentation in the post and is reluctant to have Mrs R attend branch again on his behalf considering the difficulties she faced the first time. But HSBC has now provided the option of uploading the documents on to a link followed by a phone call – which doesn't require post or branch attendance.

And if Mr and Mrs R wished to provide the documentation via a branch visit, HSBC have provided the branch managers email address to arrange an appointment with Mrs R to circumvent the issues had on the last visit.

Both of these options – on top of the postal option - I consider are reasonable to cater to Mr R's personal circumstances and don't require him to leave his home.

I accept that HSBC hasn't done everything right and that Mr and Mrs R were distressed and inconvenienced following Mrs R's failed visit to a branch of HSBC – despite having the authority and documentation requested - which was no doubt compounded by the fact they didn't wish to use this option to begin with.

But as a resolution to this HSBC have offered a written settlement resolution including an apology and compensation of £150 which I think this is reasonable. I understand Mr R feels this compensatory award is too low, but I haven't seen that Mr R has suffered any financial loss due to HSBC's actions and as it was Mrs R who I think was impacted more by the unsuccessful visit to branch, I feel the compensation is fair. I say this as when considering compensatory awards we can only consider the impact the event had on the account holder – Mr R – and not Mrs R personally as she is not the eligible complainant.

I appreciate this will come as a disappointment and that Mrs R has undoubtedly been caused both distress and inconvenience at a time when all she was trying to do was assist her husband but as she isn't the account holder and merely acting as a representative of Mr R I'm unable to consider compensation for the impact this has had on her personally.

So it follows that I think the options HSBC have given to Mr R for providing the documentation it needs to verify his identity are reasonable and the offer HSBC has made to settle Mr R's complaint is fair.

**My final decision**

For the reasons I've explained I think what HSBC UK Bank Plc have offered to settle Mr R's complaint is fair and I direct it pay Mr R £150 compensation and issue a settlement communication as outlined above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr R to accept or reject my decision before 4 June 2025.

Caroline Davies  
**Ombudsman**