

## **The complaint**

X complains that NATIONAL WESTMINSTER BANK PUBLIC LIMITED COMPANY ("NatWest") won't allow them to change their middle name without a Deed Poll despite other financial institutions allowing this.

## **What happened**

X switched their account to NatWest in October 2024. X wished to change their middle name from what was shown on the driving licence submitted when opening their account.

NatWest informed X that in order to do this it required a deed poll as per the advice on its website. X complained about this to NatWest.

NatWest didn't uphold X's complaint it explained that it as per its policy it requires a Registered Deed Poll for a change of name as that is the document that confirms the name has been changed legally.

X was dissatisfied with NatWest's final answer and so brought their complaint to this service.

One of our investigators looked into all of X's concerns but didn't think that NatWest had acted unreasonably or treated X unfairly. They didn't think that NatWest were unreasonable in asking for X for a Registered Deed Poll or Statutory Declaration to change his middle name as this is in-line with government guidance and its policy which apply to all its customers.

X disagrees. They say other financial institutions have made the change without the deed poll and that government guidance does not say banks need this information for middle names and thinks that updated passports and a driving license should be enough. X says that asking for this information is a breach of General Data Protection Regulation (GDPR) and their privacy and has asked for an ombudsman's decision.

## **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 X won't take it as a discourtesy that I've condensed and described this complaint in the way that I have, but 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 X's complaint is about NatWest's requirement that they evidence their middle name change by Registered Deed Poll.

And having considered everything carefully I'm in agreement with our investigator and I'm not sure there is anything much more of use I can add.

It might be helpful for me to say here that, as we are not the regulator, I cannot make NatWest change its policies or processes – such as what identity documentation it needs to

verify its customers or to make changes to its customers names. Nor is it my role to say what documentation NatWest are allowed legally to request or how it processes the personal data it receives on customers, that is the role of the regulator in this case the Financial Conduct Authority or the Information Commissioner's Office. We offer an informal dispute resolution service and we have no regulatory or disciplinary role.

Rather my role is to look at the problems X has experienced and see if NatWest has done anything wrong or treated them unfairly. If it has, I would seek – if possible - to put X back in the position they would've been in if the mistakes hadn't happened. And I may award compensation that I think is fair and reasonable.

X is unhappy that they aren't able to change their middle name with NatWest without providing a Registered Deed Poll. X feels that NatWest's requirements are unreasonable especially considering other institutions were able to make the change without this and feels their updated passport and driving license should be enough.

Although I wouldn't tell a bank or building society how it should run its business or what identification requirements it should have in place, I don't think NatWest have treated X unfairly or were unreasonable in its request for a Registered Deed Poll.

NatWest have KYC obligations it has to meet and part of this is being able to verify its customers identity. There is no prescribed format for KYC and it is entirely up to NatWest what policies it sets to satisfy its regulatory obligations.

I've seen NatWest's internal policy guidance on making name changes and it does stipulate that a registered deed poll or statutory declaration would be required. And as I haven't seen anything to suggest the same policy hasn't been applied to all its customers, I can't say NatWest has done anything wrong here or treated X unfairly.

And as government guidance confirms a deed poll is the legal document that proves a change of name and includes changes to:

"... any part of your name, add or remove names and hyphens, or change spelling."

I'm satisfied middle names are included in this and that NatWest's policy on this is in-line with government guidance and not unreasonable.

I accept this is an inconvenience and how frustrated X was about this and that other banks or building societies might do things differently. But NatWest is entitled to set its own policies about this and isn't obliged to follow what other institutions do.

I appreciate X believes that by de facto the provision of an updated passport and/or driving license should be enough. But I don't think it would be fair to expect NatWest to rely on the processes or policies of third-party institutions checking X's middle name was changed by registered deed poll.

And so it follows that I don't think that NatWest has done anything wrong or treated X unfairly when it insisted they evidence their name change by deed poll and I don't uphold this complaint.

### **My final decision**

For the reasons I've explained, I do not uphold X's complaint against NATIONAL WESTMINSTER BANK PUBLIC LIMITED COMPANY.

Under the rules of the Financial Ombudsman Service, I'm required to ask X to accept or reject my decision before 10 July 2025.

Caroline Davies  
**Ombudsman**