

## The complaint

Mr H complains that Monzo Bank Ltd has discriminated against his disability by failing to make reasonable adjustments and mishandling a refund to his account.

## What happened

A £32 refund went to Mr H's closed account, and he said Monzo failed to make adjustments as required by the Equality Act 2010. Mr H described his health conditions that make phone calls and selfies distressing. But despite this, said Monzo pressured him for a selfie with photo ID to verify his identity and then to repeat the process, which he found unbearable.

Mr H asked Monzo if he could verify his identity by documents via email, but they refused. He said he can make a phone call under pressure, but this doesn't mean it's an appropriate means of communication for him. Mr H said he called at Monzo's request to be told he could not verify his account over the phone or request the refund. Mr H complained to Monzo and said his experience caused him emotional and financial distress, and he closed his account.

Monzo said it has to carry out security checks to identify its customers and has measures to accommodate a range of disabilities and makes reasonable adjustments wherever possible. Monzo apologised to Mr H for not taking his information over the phone and not doing more for him and will improve its services. Monzo offered Mr H £50 as a goodwill payment.

Mr H wasn't happy with Monzo's response and referred his complaint to our service. He said Monzo had completely dismissed the issue of accessibility and disability discrimination and failed to honour his previous identification efforts. He said Monzo had refused to make reasonable adjustments despite knowing about and being explicitly informed of his disability and that excluded him from accessing his funds.

Our investigator didn't recommend the complaint be upheld. He said Monzo has to verify customers' identities to prevent fraud and as Mr H's photo was too blurry, it was reasonable to ask for another. He said Monzo wasn't aware Mr H had a disability as he didn't refer to this, only saying he was uncomfortable sending photos to people he didn't know. And so Monzo had no reason to think this was related to a disability or a need for additional support.

The investigator concluded Monzo hadn't failed to support Mr H. But said, Monzo accepted it incorrectly told Mr H it couldn't help by phone, when it could have. Although Monzo hasn't been able to locate a recording of this call, Monzo accepted its mistake and apologised, and offered £50 compensation. The investigator thought this was fair and reasonable.

Mr H disagreed with the investigator and requested an ombudsman review his complaint. He said he'd made repeated references to his disability in writing to Monzo, explaining his struggle with phone calls and photos of himself that required a reasonable adjustment.

Mr H said the Equality Act 2010 doesn't require him to declare or "prove" a disability to be treated fairly. He said if a customer expresses a need that is consistent with a disability, and a business has reason to suspect the person may be disabled, it has a legal obligation to make reasonable adjustments. He said Monzo's inflexible verification system isn't accessible

and its refusal to make adjustments reflects a systemic failure to accommodate disabled customers. He said, if needed, he is willing to pursue this through the courts.

## 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 was sorry to learn that Mr H has been caused avoidable emotional and financial harm by Monzo's verification requirements, and sorry that he felt the need to close his account.

I can see that as well as his own complaint Mr H would like to ensure Monzo changes the service and approach it adopts to customers with disability and access requirements.

I'd like to confirm this service isn't a regulatory body or a Court of Law and doesn't operate as such. Instead, we are an informal, impartial dispute resolution service. And while we do take relevant law and regulation into account when arriving at our decisions, our remit is focussed on determining whether we feel a fair or unfair outcome has occurred – from an impartial perspective, taking all factors and circumstances of a complaint into consideration.

Monzo requested a selfie from Mr H holding his photo ID, so that it could verify it was dealing with the account holder. Mr H understands that all financial institutions holding customer funds are required by the regulator, the Financial Conduct Authority, to put in place systems that reduce and interdict transactions that may be carried out for the benefit of fraudsters.

Monzo's verification process is standard for financial businesses without branches, but Mr H is unhappy because his mental and physical health conditions make the process humiliating and upsetting. Mr H said the fact this problem persisted over time further reinforces that Monzo's process is not accessible to customers with communication-related disabilities. It was unfortunate that Mr H's first photo wasn't readable by Monzo, and it requested him to repeat the process.

The other issue for financial businesses without branches is that they are generally only aware of a customer's disabilities if the customer tells them. I have looked carefully at the record of all Mr H's communications with Monzo, but I haven't seen anything to support his point that he made Monzo aware of his disabilities or requirements before his complaint.

Mr H makes the point that he isn't required to declare a disability and a business has to make reasonable adjustments if it has reason to suspect the person may be disabled. However, I think Mr H's communications were more concerned with the verification process.

I have seen many complaints from customers about banks' ID verification processes that are not related to a disability and are more to do with security of their data. Mr H's remark that he was uncomfortable sending photos to people he didn't know, is of that type as is a previous remark on Monzo's chat where he referred to the 'ridiculous amount of protections in place to stop fraudulent transactions'.

And so, I don't think such expressions are consistent with a disability, as Mr H has suggested. I'm not sure why Mr H didn't explain his disabilities to Monzo when he opened or closed his account, but it follows that I haven't found a reason, as a consequence of its interactions with Mr H, for Monzo to consider its legal obligation to make reasonable adjustments for him.

Mr H explained to Monzo that he wanted access to the funds credited to his closed account and asked for this to be dealt with over the phone. During the call, Monzo made a mistake in telling him that it couldn't be done that way. I can well understand Mr H's frustration in

discovering that his phone call was ineffective. I'm pleased that Monzo acknowledged and apologised to Mr H for this poor customer service and I hope that they see this complaint as an opportunity to review this part of their approach to ID verification by phone.

When we consider what would be fair and reasonable compensation in relation to a mistake by a business, we look at the impact on the consumer. Mr H has described the extreme distress he has been caused by his interaction with Monzo, and I was sorry to hear about what he has been through. However, I have to bear in mind the interactions I have described above and that the sum he was trying to gain access to was £32.

In conclusion, because I have found that Monzo was unaware of Mr H's disability at the time I don't agree that it ignored his accessibility and the emotional harm caused by an inflexible approach and I haven't found that its verification process to be discriminatory toward people with hidden disabilities. I agree with the investigator that Monzo's offer of £50 compensation is a fair and reasonable reflection of the difficulty and distress it caused Mr H.

I've taken the Equality Act 2010 into account when deciding this complaint, because it is relevant law. But our service is unable to make findings on whether or not the way a business has operated or the service it has provided constitutes discrimination under the Equality Act 2010. If Mr H wants a decision that Monzo has acted in a way that amounts to unlawful discrimination, then he would need to go to court, as he has suggested.

## My final decision

For the reasons I have given it is my final decision that the complaint is upheld. If Mr H accepts this decision I require Monzo Bank Ltd to pay him £50 compensation for the distress and inconvenience it has caused him.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 16 October 2025.

Andrew Fraser Ombudsman