

The complaint

Miss O complains about Monzo Bank Ltd requiring her to email a selfie picture for identification purposes, which she has refused to do, resulting in her being unable to access her account.

What happened

In May 2025, Miss O had difficulty accessing her account via Monzo Bank's mobile banking app. Her email address was unrecognised and she couldn't log-in to her account.

When she contacted Monzo Bank for assistance, it tried to help but was unable to see what would've prevented Miss O successfully using the app. And in order to continue looking into the problem, Monzo Bank asked her to verify herself with a selfie photo.

Miss O was unhappy about sending her image in an email and declined. She referred her complaint to our service when she wasn't able to resolve the matter with Monzo Bank.

One of our investigators looked into Miss O's complaint and said that they didn't think Monzo Bank had done anything wrong and wasn't being unfair or unreasonable. Miss O didn't agree with our investigator and asked for her complaint to be referred to an ombudsman for a decision.

So her complaint was passed to me to decide.

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.

Having done so, I've independently reached broadly the same conclusions as our investigator. I'll explain my reasons.

I'm sorry that Miss O feels our investigator hasn't addressed any of the issues she has with Monzo Bank or found out why she can't access Monzo Bank's app, and she's unhappy that the investigator didn't speak to her first before forming a view. But this simply reflects the fact that we provide an informal complaints handling service as a free alternative to the courts. And we wouldn't expect to carry out a forensic investigation into a technical issue that's gone wrong.

The investigator's role, and mine, is to consider the evidence presented by Miss O and the business and reach what we each think is an independent, fair, and reasonable decision based on the facts of the case. It's part of my role to identify what I think is the key issue here and the crux of this matter seems to me to be Miss O's deeply held objection to sending Monzo Bank a selfie via email. So I've made this the main focus of my decision.

Based on the evidence I've seen and from listening to call recordings, I'm satisfied that:

- Monzo Bank made reasonable efforts to help Miss O when she first reported the issue with accessing its banking app. When initial troubleshooting didn't resolve the problem, a specialist tried unsuccessfully to speak to Miss O. The call back was made within a reasonable time frame, so this isn't a reason for me to uphold her complaint.
- Following on from this, I am satisfied that Monzo Bank wasn't acting unfairly or unreasonably after this when it asked Miss O to take a selfie and send this via email as further verification of her identity. She's said: *'...I will not be verifying the account again because there is no reason to do so. There is no evidence of fraud or false documentation and therefore, I want my money in the account to be refunded and the account closed.'*
- I appreciate she only felt comfortable sending a selfie via the app – but that wasn't an option for her because she hadn't been able to get into the app. And I wouldn't reasonably expect Monzo Bank to look further into the issues she was having trying to use the app as it wasn't able to discuss her account until she satisfied its security.
- Monzo Bank's process is to ask customers to verify themselves with a selfie holding some identification or a piece of paper showing the day's date and to email this. Miss O said she had concerns about Monzo Bank's email security. We asked Monzo Bank if it could offer any alternative, such as an email drop box or some form of password protection, but it has confirmed that it has no other email security function set up other than its normal process of requesting a valid selfie for a customer to confirm their identity over email.
- Taking all this into account, I don't think it's unfair for the bank to expect to resolve issues arising online and electronically. Miss O is dealing with a digital bank, and she hasn't said she can't meet this requirement. Monzo Bank told us it considers its email security process to be secure and a reasonable alternative to verify a customer's identity where they are unable to contact the bank via its app's encrypted chat function.
- And the other options Miss O suggested for establishing her security credentials weren't viable alternatives because Monzo Bank doesn't have any branches so it can't arrange face-to-face meetings, and it said it can't use a video call for ID purposes. It explained that it uses a selfie to match with the video Miss O would have sent previously when she opened the account, and this is how it verifies ID and ensures it is speaking to the account holder.
- I understand that, as far as Miss O is concerned, she's not required by law to provide biometric information and she doesn't trust email security. But whilst I appreciate her point of view, as this is the only way Monzo Bank can verify it is speaking to the account holder when communicating over email, and it's following its correct process and can't do this any other way, I can't say it is treating Miss O unfairly or unreasonably. Monzo Bank explained all this to Miss O. I understand she hasn't alerted Monzo Bank to any wider vulnerability or accessibility needs which would mean that its well-being team could look into making exceptions to its normal processes. And she hasn't provided us with any compelling information as to why she might have any particular reason for thinking an email to Monzo Bank is especially risky. So, like our investigator, I agree that this isn't a complaint we can uphold as Monzo Bank hasn't ultimately acted in a way that's unfair.
- I appreciate that Miss O has said her priority now is to close her Monzo Bank account

and move her money elsewhere and we broached this with Monzo Bank as a possible resolution. It told us that in principle it would be happy to do that, but as the account is overdrawn, Miss O would first need to arrange a repayment plan with Monzo Bank for the outstanding balance.

- In case it's helpful to know, I would just mention here that another possibility for Miss O might be to consider an account switch. Having an overdraft isn't necessarily a bar to switching accounts. Her new bank might be willing to provide the option for her to pay off her overdraft subject to its normal lending criteria – or she could make separate arrangements to repay her Monzo Bank overdraft.

If I have not referred to everything mentioned during the course of the correspondence, that's because I have nothing useful to add to what the investigator has said already and I've concentrated on what seem to me to be the core issues I need to address when deciding if Monzo Bank has treated Miss O fairly and reasonably.

I'm mindful that some of Miss O's current concerns go beyond the scope of her original complaint to Monzo Bank. I can only consider a complaint after Monzo Bank has had a chance to resolve it. But perhaps it might be helpful if I mention that one of the things that seems to be causing confusion here is to do with Monzo Bank blocking Miss O's account access.

Miss O has said: *'...The bank is yet to explain or provide evidence of anyone attempting to access my account as at the time a restriction was placed on my account.'* She's said this happened before she tried to log on with another device – which also alerted Monzo's security system and wants Monzo: *'...to provide evidence of anyone attempting to access the account at the time it was restricted and any evidence of suspicious transactions or fraud...and why the account was restricted at the time it was restricted and why another verification process was needed if it was carried out prior to opening the account excluding the fact that I did not attempt logging in on another device at the time of restriction or 42 days later.'*

Miss O's account wasn't blocked when she first became aware she couldn't access her account via the app. She could still use her debit card for payments and withdrawals at that time. But when she tried using a new device to access the account the following month, Monzo Bank flagged this activity and at that point restricted her account access until Miss O completed identity verification.

I wouldn't expect Monzo Bank to share with us or Miss O confidential information about how its systems work as this would risk undermining the effectiveness of those systems. And how businesses choose to operate, and their internal processes come under the oversight of the Financial Conduct Authority ('FCA'). It's not up to us to tell Monzo Bank how it should design its systems.

Given that banks have an obligation to take steps to keep customers' accounts safe and prevent fraudulent transactions, it's understandable that Monzo Bank restricted the account to protect the money in it when it knew Miss O couldn't use the app. And it's reasonable that Monzo Bank wants to double-check things with Miss O before allowing any account activity. But to do that, it needs her to complete its ID check in line with its email verification process so it can be sure it is speaking to the account holder.

Monzo Bank said its troubleshooting team did very recently attempt another call to her to try and explain things again with a view to resolving her complaint, but Miss O didn't answer or return the call. So as things stand, the onus rests with her to complete Monzo Bank's required security to enable it to be satisfied it can safely action her instructions.

I hope that setting things out as I've done helps explain how I've reached my conclusions.

My final decision

My final decision is that I'm not upholding this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss O to accept or reject my decision before 18 November 2025.

Susan Webb
Ombudsman