

The complaint

Mr L complains about the way Bank of Scotland plc trading as Halifax handled a request to update his address on his credit card account.

What happened

I issued a provisional decision setting out what I thought about Mr L's complaint. I've copied the relevant parts of that provisional decision below – and they form part of this final decision.

“Mr L holds a credit card account with Halifax. In June 2024, he moved to a new address and wrote to each of his creditors to update his details – including Halifax. Halifax responded and asked Mr L to complete a change of address form. This was returned, but didn't contain enough information to meet Halifax's security requirements. Halifax told Mr L it didn't have the information it needed to update his address.

Mr L sent several further requests to Halifax between June 2024 and January 2025 – each of which were rejected. Mr L made a complaint, unhappy that Halifax had failed to update his details despite his requests. Halifax responded to the complaint in September 2024. It said the forms Mr L sent didn't contain enough information to meet its security requirements – and that he could update his address online, over the phone or in branch. It asked that any written requests include all of his details – including his date of birth – along with his signature. In December 2024, it responded to a further complaint saying that the forms he'd sent didn't include his date of birth or phone number – and that it couldn't update his address without that information due to its security processes.

Still unhappy, Mr L referred his complaint to this service. He said he had no access to a local branch and didn't wish to discuss his account over the phone or online – as he didn't have access to a reliable phone or internet connection. He didn't see how details like his date of birth were relevant to the process of updating his address, and said Halifax should already have all of this information so he shouldn't be required to provide it again.

One of our Investigators considered the complaint and upheld it. They said Halifax was entitled to put in place security measures when updating customer information – and was satisfied that the information provided by Mr L didn't meet its requirements. But they thought Halifax ought to have done more to explain to Mr L why his requests were being rejected. They also highlighted that Mr L had provided a form when submitting his complaint to this service, which contained the information Halifax needed. They recommended that Halifax reconsider Mr L's request based on the information it held and asked it to pay him £200 to recognise the distress and inconvenience caused.

Halifax didn't agree with the Investigator's conclusions. It said it responded to each of Mr L's requests with a letter clearly explaining the information he needed to provide. It said it gave Mr L several different methods to update his details, and that it was his choice to do so in writing. It asked that the complaint be referred to an Ombudsman for a final decision. So, it's been passed to me to decide.

Halifax has now agreed to update Mr L's details, and I understand this has now been completed. So, all that remains for me to decide is whether Halifax made an error or otherwise treated Mr L unfairly when processing his requests.

In this decision, I've only considered Mr L's concern that Halifax failed to update his address. I understand he's since raised a further complaint about a delay in sending him details about his account to allow him to settle and close it. I haven't considered that matter here. If Mr L would like this service to consider that complaint, he can ask us to do so separately.

What I've provisionally 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 can understand why Mr L was frustrated that Halifax didn't update his address when he asked it to. From his perspective, he'd informed Halifax of a change to his details and believed it held all the information it needed to update its records.

All lenders are required to put in place measures to protect their customers from fraud. If a lender receives a request to update a customer's contact details, it might need to ask for some additional information before it can process that request. This is to ensure the request is genuine and was made by the customer rather than someone else – and is intended to reduce the risk of fraud and keep customers' personal details secure. I can't interfere with the security processes Halifax puts in place or require it to change them. But I've considered whether it treated Mr L fairly – taking everything into account.

Halifax has shared details of the process it follows when it receives a request to update a customer's contact details. As part of this process, it asks customers for several pieces of information – including their date of birth and phone number – which needs to match the records it holds. So, I don't think Halifax made an error by requiring Mr L to provide this information when updating his address. I also don't find it unreasonable that Halifax – as part of its process - asked Mr L to complete a form confirming his details. I appreciate other organisations didn't ask Mr L to do this – but that doesn't mean Halifax did anything wrong by following its process.

I haven't seen copies of the information Mr L sent Halifax – but it's not in dispute that his letters and forms didn't include his date of birth and phone number. And Halifax's system notes suggest that the requests couldn't be processed because they were missing information. So, based on the information I've seen I don't think Halifax made an error by not updating Mr L's address at the time – as it hadn't received enough information to satisfy its security checks.

Having said this, I can understand why Mr L may have been confused by Halifax's initial communications. From Halifax's records, I can see Mr L sent at least seven requests in writing to update his address. On each occasion, Halifax responded with a letter rejecting the request. Halifax has provided an example of what these letters would have said, which states:

“Thank you for letting us know about your change of address. Before we can update our records, we need to confirm your identity to protect you from fraud. This is because we couldn't verify your signature on your previous instruction.

(...)

Complete and sign the Change of Address form enclosed. Return it to us using the address

at the top of the page. Please ensure you provide us with your date of birth and an up to date mobile number.”

Mr L completed and returned several copies of the form, but says he didn't include his date of birth or phone number as Halifax already held those details. The letter states it needs to confirm Mr L's identity to protect him from fraud – specifically because it couldn't verify his signature, rather than because it didn't receive enough information from him. It asks him to provide his date of birth and phone number but doesn't explain why it needed that information or the potential consequences of it not being provided. I can understand why Mr L may have thought there was no need to repeat details that Halifax already had. Taking into account the number of times Mr L attempted to update his information, I think it was reasonably clear that he didn't understand what was going wrong or why the information he was providing wasn't sufficient.

So, I think Halifax could have done more to explain to Mr L why the information he was providing wasn't enough. However, I'm not persuaded that things would have been different for Mr L even had it done so. Halifax's response to Mr L's complaint in September 2024 outlined that he needed to verify his details so it could ensure the request was genuine. The response sent in December 2024 is more specific, and states that Halifax cannot update Mr L's details unless he verifies himself by providing his date of birth or contact number.

I can see that Mr L sent some further requests to Halifax after it wrote to him in December – but still didn't include the information it needed to verify him. I think by that point, Halifax had done enough to make clear to Mr L what he needed to do and why it was important that it verify his details as part of its security measures. Taking this into account, I don't think it's likely that Mr L would have provided Halifax with the information it needed to verify him even if it had taken steps to explain things more clearly at an earlier point. While I appreciate Mr L may not agree that the information was relevant, I'm satisfied Halifax had done enough to explain to him why it was needed.

I'm glad to see that Halifax has now agreed to update Mr L's address using the details he provided to this service. While I think Halifax could have been clearer about what information it needed from Mr L when it received his initial requests, I'm not persuaded things would have been different for him even if it had. It follows that I don't think Mr L was significantly impacted by the way Halifax handled the situation, and I don't intend to require it to pay him compensation or do anything further.”

Responses to my provisional decision

Halifax said it accepted my provisional decision, and didn't have anything further to add. Mr L responded, and said he didn't have any further comments to make about the complaint. He reiterated his frustration about Halifax's security process, and said he's now settled his account in full.

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.

Neither party has provided any new points or information in response to my provisional decision, so I see no reason to depart from it.

I appreciate Mr L found the process of updating his address frustrating. But for the reasons I've explained I can't instruct Halifax to change that process, and I don't think it needs to do anything further here.

My final decision

My final decision is that I don't uphold Mr L's complaint about Bank of Scotland plc trading as Halifax.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr L to accept or reject my decision before 17 September 2025.

Stephen Billings
Ombudsman