

## **The complaint**

Mr W complains Santander UK Plc (Santander) failed to adequately action Subject Access Requests (SARs) that he raised. Mr W's also unhappy Santander failed to investigate his concerns properly.

## **What happened**

In February 2025, following the transfer of his loan between Santander and a debt collection company (DCC), Mr W raised a SAR. He initially raised his request with the DCC, who passed it on to Santander on his behalf.

Santander responded to the SAR in March 2025, providing Mr W with all records held in relation to his loan account. This totalled around 200 pages of information.

Mr W contacted Santander, unhappy with the volume of documents he'd been sent. He said he was entitled to request specific documents, in the format of his choice and that he only required documents specifically relating to the transfer of his loan both too, and back from, the DCC.

Santander explained how Mr W could navigate the original documents he'd been sent and informed him which sections of the pack would contain the information he might require, but they also agreed Mr W was entitled to specific information and said they'd request this to be sent out.

Mr W says he later received a further response from Santander, this time containing only three pages of information – but that he knew from the original package of documents he received that there should be more, around 25 to 30 pages worth, of relevant documents.

Dissatisfied, Mr W raised a number of complaints with Santander, each time unhappy with the responses he'd previously received. He said Santander had neither acknowledged why he was originally sent 200 plus pages of information or why he then received only three.

Mr W also said Santander should have a record of the documents they'd sent, that he felt they were making the SAR as difficult as possible, and he let them know he was unhappy their final response letter to his initial complaint incorrectly said they had spoken to him prior to him accepting a resolution to close the complaint.

Having looked into his concerns, Santander didn't uphold Mr W's complaints. They said it wasn't their intention to make his life difficult but that they had provided everything in relation to the product requested. Santander did acknowledge the incorrect template had been used when responding to Mr W's initial complaint. They apologised for any confusion caused and confirmed their system had been rectified to show Mr W had not agreed to resolve the complaint.

But Santander said their SAR department had since emailed Mr W the specific documents he'd requested and confirmed as they were not aware of any further documents relating to the SAR request, no further documents would be sent.

As Santander said their decision regarding Mr W's complaints remained unchanged, he referred his concerns to our service.

One of our investigators looked into things but he didn't think Santander needed to do anything to put things right. He said while the information Santander initially provided may not have been specifically what Mr W would have liked, because they'd provided documents relating to the loan in full in the first instance, he didn't think they'd acted unreasonably by subsequently only providing limited pages.

Mr W said he was disappointed by our Investigators outcome saying he had a right to request specific documents to be sent to him in a format of his choosing. Mr W was also unhappy because he didn't think our Investigators response addressed all of his concerns.

Our Investigator followed up to say, from what he could see, Santander responded to Mr W's initial SAR within the timeframe allowed. He said he thought because Santander completed the original request, he didn't think they needed to re-action this and whilst he understood why Mr W didn't then find being provided with three pages very helpful, ultimately he'd already been provided with the information and Santander had also provided support in helping him locate the documents he required within the larger package.

Mr W remained unhappy, saying our Investigator was suggesting Santander could tell him they would do something, in this case provide him with specific information, then not do so, despite it being within his rights. He also said our Investigator was suggesting Santander can refuse to properly investigate complaints or not investigate them at all.

Mr W said he did not dispute Santander did technically comply with the initial SAR, but his issue remained with how they acted after he then made a perfectly reasonable and legal request to obtain the specific documents he required in a format of his choice.

As our Investigator's opinion remained unchanged and a resolution could not be reached, this complaint has been 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, while I know it will come as a disappointment to Mr W, I'm not upholding this complaint. I'll explain why.

But first, I'm aware I've summarised this complaint in far less detail than has been provided, and I've done so using my own words. No discourtesy is intended by this. Instead, I've concentrated on the points I think form the crux of this complaint and what I think are the key issues here. Our rules allow me to do this.

This reflects the nature of our service as an informal alternative to the courts. If there's something I've not mentioned, it isn't because I've ignored it. I haven't. I'm satisfied I don't need to comment on every detail to be able to reach what I think is the right outcome reasonable in the circumstances of this complaint.

I'm satisfied there are three points which make up the crux of this complaint. It's these points I've focused on in my decision and for ease I'll address them in turn below.

### Initial SAR

In February 2025, Santander received a SAR on Mr W's behalf from the DCC his loan had previously been transferred to. The instruction told Santander Mr W had requested 'copies all records regarding the account'.

Santander went on to provide Mr W everything they held in relation to his loan account. As this is in line with the request they received, I can't say Santander did anything wrong here.

### Follow-up SAR

Unhappy with the volume of documentation provided in the initial SAR, Mr W asked for specific information relating only to the transfer of his loan between Santander and the DCC.

Mr W was told this information would be requested and he went on to receive a small number of documents relating to the transfer.

I understand Mr W feels strongly that Santander must provide him the specific documents he is requesting in a format of his choice. He's unhappy as he doesn't believe the documents, he was subsequently sent, cover all the transfer specific information Santander holds, saying having briefly looked through the initial SAR, he believes there to be around 25 to 30 pages of information he considers relevant and which should be provided.

But the Information Commissioner's Office (ICO) sets out that a business should perform a reasonable search for the requested information, which they should then go on to provide in an accessible, concise and intelligible format. I'm satisfied that's been done here.

Santander have confirmed their SAR team have sent Mr W the documents they consider relevant and that no further documents are due to be sent.

It may be possible Mr W considers the specifics of his request to be wider reaching than Santander do here. I can't be sure. But what I can be sure of, is that Mr W has received all the information held relating to his loan account in full within the response to his initial SAR.

I think from Mr W's comments, it's clear he has looked through the initial SAR information at least in some respect. I also think should Santander have gone on to, or if they did go on to, provide some more information, Mr W would more likely than not want to satisfy himself that there were no further documents he considered to be missing.

So, I think here, the actions Santander have taken are reasonable. As I've already explained, I'm satisfied they complied with the SAR they initially received, that request being to provide Mr W copies of all records regarding the account he held.

Santander then took steps to complete the follow up SAR when Mr W told them he was unhappy, and they have since provided the documents they consider relevant. Should Mr W consider further documents to be relevant, he has been provided these within the initial SAR and has them in his possession. I won't be asking Santander to do anything further here.

### General service

Its clear Mr W is frustrated and unhappy with the service he's received throughout the

course of raising his concerns. He's expressed his dissatisfaction in detail and I'm sorry to hear his concerns.

I think it's important to say here that as I've already explained, I am satisfied Santander have acted fairly and reasonably by responding to the SAR's as they are required to do so. Mr W was initially told his specific secondary request would be dealt with and while I understand he remains unhappy with the response he received, he was sent what documents Santander considered to be relevant.

Santander also looked to explain to Mr W within which sections of their response to his initial SAR, he was likely to find any further information he might be looking to locate.

I understand Mr W doesn't feel he should have to look through the full package of documents himself. He mentioned to the advisor he spoke to that the index wasn't user friendly and questioned if she could be certain the sections she'd highlighted were the only ones that contained relevant information.

But I think this points back to what I previously explained, this being that I think even if some further documents had or were to be provided, Mr W would more likely than not want to reassure himself there was nothing further he considered to be of interest to the specific information he required. And I think the guidance Santander gave him regarding how to easier navigate the full package of documents would go some way to helping him to do this.

In summary, I think Santander, while they maybe could have been clearer at times, ultimately responded to Mr W's SAR requests and to his subsequent complaints.

It's clear he's unhappy with their responses in relation to both, but I think short of them sending him further documents, which for the reasons I've explained I don't think it's reasonable for them to do here, they couldn't have fairly done anything further to resolve his concerns for him so I'm not upholding this complaint.

### **My final decision**

For the reasons I've explained above, my decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr W to accept or reject my decision before 13 November 2025.

Sean Pyke-Milne  
**Ombudsman**