

## The complaint

Miss E complained when Bank of Scotland plc trading as Halifax sent statements and other correspondence addressed to her at home after she'd told Halifax repeatedly that her postal arrangements were insecure and she wanted to continue using one of its branches as her correspondence address. She was also unhappy about the way Halifax had handled her complaint.

To put things right, Miss E requested Halifax to continue to send all her correspondence to the branch address, explain to her why things had needed to change and pay her more compensation for the distress and inconvenience caused by the bank's actions.

## What happened

Miss E complained when Halifax stopped sending her statements to a branch for her to collect and instead sent these to her home address. Miss E says sending statements to her home address isn't secure as her post sometimes goes to the wrong address and has on occasion been found in the street.

Halifax didn't uphold her complaint. It was sympathetic but explained that it couldn't any longer send her statements to a branch address. Halifax suggested some alternative solutions and made her a goodwill payment to cover the cost of arranging a PO box where she could receive all her mail safely. Halifax also paid her £75 in acknowledgment of its shortcomings in explaining why it couldn't use the branch address for her correspondence.

Miss E didn't feel this resolved her complaint and so one of our investigators looked into what happened. The investigator didn't uphold Miss E's complaint. They were satisfied that Halifax had treated Miss E in a fair and reasonable way overall, having explained why it couldn't do as she wanted, paid compensation for distress and inconvenience and put Miss E in funds to enable her to set up an alternative that would ensure her mail was held securely for her.

Miss E disagreed, mainly saying that she should have been told when Halifax changed its policy and that her main complaint wasn't the policy change but the fact that the arrangement had never worked reliably over the years and she'd spent many hours in branches trying to sort this out. She also said she was unhappy that neither Halifax nor we had handled her complaint in the way she'd requested or expected.

As the complaint hasn't been resolved, it has been passed to me for a final 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've carried out an independent review and having done so, I've reached the same conclusion as our investigator and for broadly the same reasons. I'll explain my approach and how I've reached my decision.

I've briefly summarised and expressed in my own words what seem to me to be Miss E's main concerns and my focus is on what I think are the key issues here. Our rules allow me to do this and this approach simply reflects the informal nature of our service as a free alternative to the courts.

As I understand things, Miss E's main complaint to Halifax was that she needs her mail to be 'blocked' and says she's entitled to this. So I'll deal with this first.

I've taken into account that Miss E has particular reasons to be concerned about bank statements being sent to her home address. And I'm sorry to learn that even when she had arrangements in place with Halifax for it to send her statements to a branch where she could collect them, she still had to spend a lot of time over the years speaking to branch staff about this trying to sort things out. But in order to uphold this complaint, I would have to find that Halifax did something wrong or that it treated Miss E in a way that wasn't fair and reasonable overall. So that's how I've approached my decision.

In September 2024, Halifax made some policy changes and this caused it to change Miss E's correspondence address to her home address. This meant that in October and November 2024, her statements were sent to her home address, prompting Miss E to complain.

The relevant part of Halifax's policy in relation to using a branch as a safe correspondence address says that where a customer doesn't have a safe address, the branch may be used as a delivery address 'only when the customer needs to order a new card and/or PIN'. And it goes on to say that following collection of the new card/PIN, the branch address must be removed as the customer's correspondence address.

Halifax doesn't have a policy that would enable customers to simply choose to use a branch address for correspondence purposes. And, whilst I appreciate that Miss E feels differently about this, I haven't seen enough to persuade me that she's entitled to require Halifax to put this arrangement in place for her. The fact that Halifax has previously arranged for her to collect statements in branch isn't a good enough reason for me to uphold this complaint or tell Halifax that it must continue the arrangement.

I am satisfied that bank policy means Halifax doesn't have any process in place that would allow Miss E to opt for her correspondence address being a Halifax branch. So I can't fairly say that Halifax made an error or did something wrong when it used Miss E's home address to send her statements and other information as that was in line with bank policy.

How businesses choose to operate and their internal processes come under the oversight of the regulator - the Financial Conduct Authority (FCA). So it's not up to me to tell Halifax it should have a different process for customers who want to be able to have their account information sent to a branch for them to collect

But I've thought carefully about whether Halifax acted fairly and reasonably here – and I think it did.

My starting point is that I don't think that Miss E's preferred solution here is feasible so I can understand why Halifax has come up with other potential solutions. I say this because Halifax has to meet legal requirements and regulatory obligations that mean it must provide account information and statements to customers – but Halifax can't satisfy this requirement by sending these to a branch for collection because it will only keep paperwork (including post awaiting collection) for 30 days. So it can't guarantee that it will safely reach the customer in time which puts Halifax at risk of not meeting its legal and regulatory obligations.

And whilst I appreciate that Miss E doesn't have her own phone, mobile or internet banking are options that work for a lot of bank customers. These could potentially be options for Miss E. So I am satisfied that she could choose to look at other ways of banking if her priority here is to avoid the risk of paper statements going astray.

Halifax also mentioned that if the branch is affected by closure, this wouldn't be a long-term solution for Miss E in any event. Whilst I appreciate that the branch where she'd like her statements to be sent is still operational, I think it's fair to say that banks are increasingly limiting their opening times and/or moving away from having staffed branches. So I think this would be a concern if it was the only way Miss E could get access to her account information.

Other concerns she's raised during the course of correspondence relate to complaint handling. I'm sorry if our process has been unclear. There's nothing I can usefully add to what our investigator has explained about how we work save to assure Miss E that our two-stage process means her complaint has been independently considered twice before I've made my final decision.

And whilst Miss E expected a reply from Halifax's Chief Executive Officer, to whom she addressed her concerns, I don't think it was unreasonable that Halifax instead arranged for her complaint to be dealt with by the team responsible for complaint handling. Halifax is required to operate a complaint handling process for this purpose so I'd expect complaints like Miss E's to be dealt with this way.

Halifax acknowledged however that it should have made it clearer to Miss E previously that allowing her to have statements sent to a branch for collection as an exception to its general practice of sending account information to a customer's home address was never going to be a long-term solution. And for this shortcoming in service on its part, Halifax paid Miss E £75.

And as a goodwill gesture, Halifax paid Miss E £353.40 to cover the first year's cost of a Royal Mail PO Box, where all her post could be delivered and held for her to collect. This will give Miss E a further twelve months to think about and set up some alternative ongoing arrangement if she remains concerned about post delivered to her home.

Halifax has already suggested that Miss E could take up the issues she's having with her post with Royal Mail and I would encourage her to do that if she hasn't already. Royal Mail has legal obligations regarding postal delivery and it may be able to suggest things that could help Miss E.

Possibly she could look into having a more secure system set up where she lives so that her personal post goes into a post box that only she can access. Or perhaps she has a trusted family member or friend who would agree to her using their address for correspondence purposes. We expect consumers to take reasonable steps themselves to limit the impact of things going wrong so I hope these suggestions are useful.

Ultimately, if receiving post securely is problematic for Miss E, the onus rests with her to make the necessary arrangements to address the issue and she can't reasonably expect .

Looked at overall, I am satisfied that Halifax has done enough to put things right for Miss E in her particular circumstances and paid fair compensation for its admitted poor service. The fact that Halifax paid compensation direct to Miss E's account without first discussing her complaint with her simply means that she had the benefit of that money in her account straightaway. It hasn't made any difference to my decision on whether the amount was fair or not – I wouldn't have awarded more than £75 to reflect Halifax's admitted poor service

even if this hadn't already been paid by Halifax. And I haven't identified any other poor service that would warrant a compensation award.

During our investigation, Miss E has mentioned some additional complaint issues. But I can't address those further issues within this decision. I have to restrict myself to the points raised with Halifax in December 2024 which were responded to in Halifax's letters of 30 January and 17 February 2024. That's because the rules I'm bound by say that Halifax must have had the opportunity to address any issues itself and issue a final response before we can consider them.

If Miss E feels she has further cause for complaint (that goes beyond the scope of the complaint she brought to us), then she should first tell Halifax what her concerns are, so it has an opportunity to respond. If she still feels unhappy after that, she may be able to bring a new complaint to this service. We can't award redress for any complaint where the financial business hasn't first been given a chance to put things right.

I appreciate that Miss E would like answers to questions she has raised. But whilst I may not have addressed every single point raised or question asked, I am not required to do that. It doesn't mean I haven't taken into account all the considerations I need to keep in mind – it just means I haven't needed to specifically refer to everything Miss E has mentioned in order to reach what I consider to be a fair decision.

I hope that setting things out as I've done helps explain how I've reached my conclusions and even though this isn't the outcome Miss E hoped for, she will at least feel that the Financial Ombudsman Service has fully considered her complaint.

## My final decision

My final decision is that I don't uphold this complaint as I am satisfied that Bank of Scotland plc trading as Halifax has already done enough to put things right.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss E to accept or reject my decision before 1 December 2025.

Susan Webb Ombudsman