

## The complaint

Mr P complains about Bank of Scotland plc trading as Halifax. Mr P has a dormant account with Halifax which he wants to access. Mr P is unhappy about the identification documents (ID) Halifax have requested to reactivate the account. Mr P wants Halifax to reactivate the account without asking for ID he doesn't have.

## What happened

In 2023 Mr P's Halifax account was marked as dormant after three years of inactivity. In 2025 Mr P tried to reactivate his account. He called Halifax then went into branch, but he was unable to meet Halifax's ID requirements. This was followed by more calls with Halifax about its ID requirements.

Halifax initially advised Mr P to go to a branch with some ID to reactivate his account. Mr P did this but was told by the branch the ID he'd brought didn't meet the requirements. Halifax said Mr P's driving license didn't have his photo on it and his passport is out of date so it couldn't accept these forms of ID. The branch advised Mr P to apply for a new passport or a photocard license.

Mr P was unhappy with this and said he doesn't need a new passport or driving license so he didn't think he should have to get either solely for the purpose of reactivating his account. Mr P called Halifax again to discuss it further. Halifax discussed various options with Mr P including getting a letter of introduction from his GP or reactivating the account through Halifax's mobile banking app. And Halifax said it would cover the cost of getting a GP letter up to £25.

Mr P said he shouldn't have to get a letter from his GP, and he wouldn't be able to get the bank app on his current mobile phone.

Halifax maintained its position on what ID it could accept, and Mr P raised a complaint.

In its final response Halifax said it appreciates Mr P would need to reach out to other organisations to obtain the required ID and it's Mr P's choice if he decides not to do this. Halifax said it's unable to reactivate Mr P's account until he meets the ID requirements.

So, Halifax said the account will remain inactive until the ID process is completed. Or until there have been no transactions for 15 years at which point Halifax may close the account and transfer the money to the unclaimed assets fund.

However, Halifax said the service Mr P received fell short of its usual standards and awarded £60 compensation to address any inconvenience Mr P had experienced. Though Halifax didn't explain what service aspects had fallen short at that time.

Mr P didn't accept this outcome and brought his complaint to this service.

Our investigator didn't uphold the complaint. He said it wasn't unreasonable for Halifax to request Mr P arrange a letter of introduction from his GP or that he apply for a new passport

or photocard license. He said the compensation is fair in the circumstances and it's up to Halifax what ID it deems acceptable.

Mr P didn't accept this and raised several points in response to our investigator's findings.

Mr P reiterated he didn't need a photocard license or a new passport. Mr P said he had a letter addressed to his mother about reactivating her dormant account. This was a separate account to Mr P's account. However, Mr P said the letter to his mother didn't include the Letter of Introduction option on its list of acceptable ID.

Mr P also pointed out a letter from his GP wouldn't have a photo on it. So, he questioned why it's any different from other documents that don't contain photos of him such as his birth certificate or a bank statement.

Mr P referenced Halifax's website page where it discusses ID. He said it doesn't mention getting a letter from a GP, and it doesn't say your passport has to be current. Mr P said the webpage also states you can use your existing card to verify your identity. Mr P tried to do this with his Halifax credit card but was told it can't be accepted.

Our investigator maintained his original findings and sent Mr P Halifax's internal list of ID requirements which includes a letter of introduction.

Mr P replied and questioned why there are two lists of acceptable ID. And he questioned why he couldn't use his credit card to verify his identity. He said Halifax isn't following its own process and is changing the rules.

Mr P then referenced recent telephone calls with Halifax where he asked about acceptable ID to reactivate his account and said he was told various conflicting things by Halifax across several calls. He also said he had asked his GP about a letter of introduction, and they told him they don't do that sort of thing.

Mr P also questioned why his account was made dormant at all and he said he wasn't informed it would be made dormant in 2023. He said it shouldn't have been made dormant until 15 years of inactivity in line with the Dormant Bank and Building Society Accounts Act 2008 (DBBSA Act).

Our investigator said he wouldn't comment on the account being made dormant as that hadn't been raised to Halifax. And he suggested Mr P could discuss getting a letter with the reception or manager at the GP surgery or consider changing his paper license to a photocard license.

Mr P said he had raised to Halifax about his account having been made dormant without notice. And he said the DBBSA Act was fundamental to his complaint and so should have been considered as part of his original complaint.

Our investigator went back to Halifax to ask for various information and evidence to respond to Mr P. This included receiving a copy of the 2023 dormancy letter and querying why a credit card wasn't an acceptable form of ID. Following this our investigator maintained his original findings.

Mr P remained dissatisfied, so his complaint has been passed to me, an ombudsman, 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.

As an informal dispute resolution service, we are tasked with reaching a fair and reasonable conclusion with the minimum of formality. In doing so, it is not necessary for me to respond to every point made, but to consider the circumstances of the complaint as a whole.

Having done so, I've reached the same overall conclusion as the investigator. I know Mr P will be disappointed as I can see how strongly he feels about what happened, so I'll explain my findings.

Halifax has extensive obligations under the Proceeds of Crime Act 2002, Money Laundering Regulations and related legislation. It is required to have systems and processes in place to comply with the regulations. These include customer identification and due diligence measures. These obligations cover the entire period of a relationship with a customer.

Halifax says its process for reactivating dormant accounts involves verifying the customer's identity, in line with these measures. That's what I would expect. And I think it's reasonable that Halifax has asked Mr P to provide appropriate ID before it will reactivate his account.

The regulations which Halifax must comply with aren't prescriptive as to exactly how businesses should carry out customer identification checks. So, businesses have some discretion and it's up to individual organisations to decide upon its own procedures for verifying identities when completing actions such as reactivating dormant accounts.

I do understand Mr P's concerns with being asked for ID he doesn't currently have. And I can understand his frustration with this and that it will be inconvenient to source a new form of ID. And I appreciate Mr P says he doesn't need a passport or a new photocard license. But I think it's fair to say acquiring either of those IDs would be sufficient to reactivate his account. And I think it's fair to consider reactivating his dormant account would be a legitimate and practical reason to update either of those IDs.

So, I don't think it's unreasonable for Halifax to request to see a photocard license or a current passport as part of its acceptable forms of ID. And I think it's reasonable to consider an expired passport is not an acceptable or valid form of ID. So, I think Halifax acted fairly in saying it couldn't accept an expired passport.

I also think it's fair to say, on the balance of probabilities, that Mr P would be able to get one of those forms of ID or one of the other forms of ID Halifax would accept. So, I don't think Halifax needs to make an exception in this case and I'm not aware of a reason why Mr P wouldn't be able to get at least one of those forms of ID.

There are other forms of ID Halifax will accept such as an HMRC Tax Notification document or a Letter of Introduction from an individual such as a GP. And typically, on the balance of probabilities, I think it's fair to say those documents are reasonably obtainable.

I'm aware of what Mr P has said about not being able to provide a letter of introduction after speaking with his GP. However, this matter took place after the final response and our service can only consider what happened, what Halifax did and what has been complained about leading up to a final response - alongside the outcome reached in the final response. And in that timeframe, I don't think Halifax acted unreasonably in relation to its ID requirements or the outcome it reached in the final response.

I also think the investigator's suggestion to discuss getting a GP letter with the surgery's reception, or its practice manager is reasonable in the circumstances.

The HMRC Tax Notification option wasn't particularly discussed by Mr P and Halifax. But I think it's likely fair to say that's also a reasonable option. HMRC Tax Notification letters can be requested over the phone or online via the GOV.UK website. A person might not be able to get an HMRC Tax Notification letter if they're on benefits or a state pension. But I understand Mr P isn't on either of these, and if he were, benefits or state pension documents are also accepted as valid forms of ID by Halifax.

Ultimately, I don't think Halifax have acted unreasonably with the forms of ID it's requested. And I think it has offered a reasonable range of options for Mr P to confirm his identity.

I understand Mr P's concerns and questions around why he can't use his birth certificate, a bank statement or his credit card to verify his identity.

Though I can understand Mr P's frustration around this given a letter of introduction doesn't contain a photo of Mr P for example, I don't think Halifax have acted unfairly or unreasonably.

Halifax has said when an account goes dormant the account holder becomes a new customer when trying to reactivate an old account. Halifax said this means it needs to see one of the specific forms of ID noted on its proof of identity lists, and Mr P wouldn't be able to use his credit card to complete the process. And Halifax doesn't accept birth certificates or bank statements as proof of identity.

Halifax has outlined its process for reactivating dormant accounts and has detailed the forms of ID it will accept. It's not the role of this service to tell businesses how to implement regulations or customer identity checks or to direct them to change its procedures. Our role is to decide what's fair and reasonable in all the circumstances.

I find that Halifax has a policy in place, which it followed here. I think its approach is reasonable and it has applied it fairly. So, if Mr P wishes to reactivate his account, he will need to provide an ID which suits Halifax's requirements.

There has been a lot of correspondence around there being two lists of acceptable ID. There was a list on the dormancy letters, and a list Halifax held internally which our investigator sent to Mr P.

The fact there are two lists hasn't been complained about to Halifax as part of this complaint. So, I won't address it further other than to say I think it's reasonable that if customers can't provide anything that's on the list in the letter, they would contact Halifax who at that point could advise of the further possible options, as happened in this case. And I don't think there's something substantially wrong with this.

Mr P said Halifax isn't following its own procedures and is changing the rules. I understand Mr P has said this primarily in relation to what it says on Halifax's website on the '*Proving your identity*' webpage. I've looked at this webpage, and it says:

*"We need you to prove your identity if you are a new customer opening a new account with us. Existing customers may also need to prove their identity when opening additional accounts."*

Halifax has said Mr P is being treated as a new customer. But I think it's fair to say he is not a new customer for the purpose of opening a new account or an additional account. And is

instead trying to reactivate an old account. And I don't think the webpage is directed at customers trying to reactivate dormant accounts.

From what I can see the webpage is directed at customers who are applying for new current accounts and for other online applications or applications made in branch. And I think it's reasonable to say Mr P is not providing an application for a new account.

The webpage also says Halifax "*reserve the right to obtain additional identification and address verification documents if required.*"

Ultimately, I'm not persuaded that Halifax have done something wrong or acted unreasonably in relation to the ID it's requesting and what it says on its website.

Mr P said he didn't receive the dormancy letter from Halifax in 2023. Mr P said without evidence of recorded delivery it can't be proved he received the letter. I understand Mr P's position here. However, our service's approach is that if a business can provide a copy of the letter it sent, we will accept that as suitable proof that it was issued by the business.

I've seen a copy of the letter Halifax said it sent in 2023. It's got the correct address for Mr P and I've no reason to believe it wasn't issued by Halifax at that time. That doesn't mean I think Mr P necessarily received the letter, for example something could have happened when it was being posted by a third party. But our service wouldn't hold Halifax responsible for potential third party postal issues.

So, I've not seen any evidence to show Halifax didn't write to Mr P to inform him the account would be made dormant if he didn't get in touch in 2023.

Mr P has raised the DBBSA Act and said his account shouldn't have been made dormant until 15 years of inactivity has passed. I don't agree that this complaint point is fundamental to Mr P's original complaint. Mr P's original complaint is about Halifax's ID requirements. It is not about whether the account should have been made dormant at all. And I can't see that this was raised as part of the complaint prior to the final response. And so, I won't be able to directly address the merits of it here.

What I can do is explain things around the DBBSA Act and how it applies. I've also included a link [here](#) to Halifax's website which explains the purpose of the DBBSA Act.

The DBBSA Act is legislation that was enacted to enable money held in dormant accounts to be transferred to a central reclaim fund. Money held in dormant accounts can only be transferred to the reclaim fund after the account has been dormant for 15 years. However, this doesn't mean an account can only be made dormant after 15 years.

There isn't a set timescale that a bank has to follow when it makes an account dormant – and the timescale for doing this can vary across banks. Typically, accounts don't generally become dormant for at least 12 months after the last transaction activity. And many accounts won't be made dormant until after three years of inactivity as in Mr P's case.

Mr P can still complain to Halifax about this, I haven't made a finding on it here, but I hope the information I've provided is useful in explaining things around dormant accounts.

Mr P raised several new points after Halifax's final response and after our investigator's view. These points primarily relate to phone calls Mr P says he had with Halifax about its ID requirements. As I've mentioned above, I'm only able to consider what has been complained about in the events leading up to the final response and the outcome in the final response.

For any new concerns, complaint points or issues Mr P will first need to refer those to Halifax for them to consider.

In conclusion, I think Halifax have acted fairly in the circumstances of this complaint and I think the range of options it has offered Mr P to confirm his identity are reasonable. And I'm not aware of any reason that would prevent Mr P from obtaining at least one of the valid forms of ID Halifax have requested.

Halifax offered £25 towards a letter of introduction from his GP, and I think this was a fair offer and Mr P may still wish to take Halifax up on it. Halifax also awarded Mr P £60 in compensation. Halifax said this was to address service issues with the advice given over the phone prior to Mr P going into a branch, and then the advice given by the branch.

Halifax said based on Mr P's testimony around what he was advised it thinks it could have provided more support and information around its ID requirements earlier on. And this might have saved Mr P a trip to the branch when he didn't have the required ID.

Overall, I think this is reasonable compensation to address the inconvenience caused to Mr P by the poor service provided by Halifax in the circumstances of this complaint.

### **My final decision**

I don't uphold this complaint.

I make no further award against Bank of Scotland plc trading as Halifax.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr P to accept or reject my decision before 7 January 2026.

Gordon Candlish  
**Ombudsman**