

The complaint

Mrs A complained about the service provided by Bank of Scotland plc trading as Halifax after she had difficulties accessing a savings account. She's unhappy that Halifax refused to accept the identity documents (ID) she submitted, preventing her from reactivating and closing the account.

What happened

Mrs A wanted to give Halifax instructions about an account it holds. She lives abroad so she needed to send Halifax certified documents so it could verify her ID. She became frustrated when Halifax rejected her documents and required further certified evidence.

When Halifax responded to Mrs A's complaint it set out what was acceptable proof of ID and certification but recognised that it could've handled things better. Halifax paid Mrs A £100 compensation for the inconvenience this caused and offered to cover the additional cost of obtaining the required documentation again.

Our investigator thought that this was fair and that Halifax didn't need to do anything more.

Mrs A disagreed. She mainly said that she'd provided ample acceptable proof of ID and that Halifax should accept the documents and certification evidence she'd provided. So her complaint came 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.

I can understand why what's happened has been inconvenient for Mrs A. But having thought about everything, I've independently reached the same overall conclusions as our investigator. I'll explain my reasons.

I've approached this complaint in a way that reflects the informal complaint handling service we provide. I've summarised the background only briefly and I may not address every point that's been mentioned. But it doesn't mean I haven't considered the evidence and everything that's been said – it just means I haven't needed to specifically refer to everything in the same level of detail as Mrs A to reach a decision in this case.

The crux of Mrs A's complaint concerns Halifax's refusal to accept the ID evidence she's already supplied. Mrs A put things this way: *'...my documentation provides every element Halifax required, although arguably not in the precise form described.'*

I've thought carefully about whether Halifax should make some exception here for Mrs A as she's already incurred significant inconvenience and expense providing the documentation she's already supplied. But like all banks in the UK, Halifax must comply with legal and regulatory obligations designed to keep customers' (and the bank's) money safe. And I'd expect Halifax to have procedures in place to ensure safeguarding of customers' money.

This includes requiring strict compliance with identification requirements and Halifax has a process in place for this purpose. Mrs A has acknowledged that the paperwork she's provided so far doesn't precisely meet Halifax's criteria. She said there are only '*minimal deviations*' from Halifax's stated requirements in terms of what it needs to see and how documents should be certified. But I can't fairly say that Halifax has acted unfairly or unreasonably by rejecting the ID evidence when it wasn't certified in line with its requirements.

I don't think it's unreasonable for Halifax to ensure that Mrs A is who she says she is in order to safeguard the money in the account and its process for verifying ID is designed for this purpose. Halifax has provided Mrs A with information about what she needs to send to get account access. And I am satisfied that Mrs A is aware of Halifax's requirements as she's copied this information to me. It's up to Mrs A to comply exactly with the instructions that tell her what Halifax needs to see and how documents should be certified.

I don't think it's unreasonable if documents she supplied more than six months ago will need to be resubmitted as Halifax needs to see up to date information.

I'd still expect Halifax to treat Mrs A in a fair and reasonable way and it has admitted that some aspects of its service fell below standard. It's clear that there was confusion caused when Halifax decided it couldn't accept the documents Mrs A had provided. And I don't think it's always been made as clear as it could've been to Mrs A what she needed to do to complete verification.

I can appreciate how frustrating and challenging this experience has been for Mrs A and I've carefully considered the impact Halifax's poor service had on her. The £100 compensation already paid reflects the inconvenience and upset caused by the shortcomings in the way Halifax has dealt with Mrs A. It's in line with what I would have awarded had it not been paid. And as a goodwill gesture Halifax has offered to cover any additional costs that Mrs A incurs obtaining required ID evidence in the proper form. So I don't consider further compensation would be fair in these circumstances.

I appreciate that my decision will be disappointing for Mrs A but I hope that setting things out as I've done helps to explain how I've reached my conclusions.

My final decision

For these reasons, my final decision is that I don't uphold the complaint because 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 Mrs A to accept or reject my decision before 5 January 2026.

Susan Webb
Ombudsman