

The complaint

Mr M is unhappy at the decision Bank of Scotland plc trading as Halifax ("Halifax") took to turn off paper statements. In particular, he is unhappy that he has to manually turn paper statements back on once they have been switched off.

What happened

In late August 2025 Halifax sent out a mailing to customers who were registered for online banking advising them that they'd like to change and move their statements from post to paper-free in October. The benefits of this would be that customer's statements would always be available, accessible and secure. The letter explained that they can opt out of this change by using the opt out link being sent by email or calling Halifax's IVR automated line.

Although Mr M uses internet banking regularly Mr M prefers to receive paper statements and so in September, he called Halifax's telephone banking team to raise his concerns about the switch to digital-only statements. Mr M requested he keep his paper statements and not to turn them off, but the agent Mr M spoke to couldn't do this in advance due to Halifax's systems and explained it must be actioned by Mr M himself. Mr M was told to call Halifax in November using its IVR automated line informing Halifax that he wanted to keep his paper statements.

Mr M complained that he had to personally take action to opt back in for paper statements after they went digital rather than allowing him to prevent the change from happening at all. Mr M thinks this is unacceptable and wants to be compensated for the distress and inconvenience.

Halifax didn't agree it had made an error and explained changing statements to paperless was part of a bank-wide initiative to encourage secure environmentally friendly digital banking and that this move was free and more secure for customers. Furthermore, customers had the option to opt out and keep paper statements using the opt out link being sent by email or you could call its automated service on 0345 129 9758 by 22 November 2025.

Halifax accepted it didn't send its final response letter in the timescales it had agreed and was issued a day later than expected and so compensated Mr M £40.

Mr M was dissatisfied with this and so brought his complaint to this service.

One of our investigators looked into Mr M's concerns and explained Halifax were entitled to make its own decisions about how it operates and that this isn't something this service would get involved in. They didn't think Halifax were unreasonable to ask customers to opt out of the paperless change and as Mr M hadn't suffered financially didn't agree any compensation was warranted.

They accepted Mr M wasn't sent Halifax's final complaint letter as expected but explained as this aspect of Mr M's complaint related to complaint handling this service was unable to investigate this as complaint handling is not a regulated activity. Nevertheless, they thought the £40 compensation awarded was fair.

Mr M disagreed. Mr M says the staff he spoke to knew nothing about how to keep statements on and thinks it unfair that customers were expected to remember to contact Halifax to have statements switched on. Mr M has asked for an ombudsman's 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.

My role is to look at the problems Mr M has experienced and see if Halifax has done anything wrong or treated him unfairly. If it has, I would seek – if possible - to put Mr M back in the position he would've been in if the mistakes hadn't happened. And I may award compensation that I think is fair and reasonable.

In this case Mr M is unhappy about Halifax's decision to move to paperless statements and that he has to manually opt out of this following the change.

It might be helpful for me to say here that as we are not the regulator, I cannot make Halifax change its systems or processes – such as how it issues its customers bank statements or how it implements a change to its services. These are commercial decisions and not something for me to get involved with. My role rather is to see whether Halifax have treated Mr M fairly.

That said, while I'm not looking at Halifax's systems and processes per se, it won't have acted fairly and reasonably towards Mr M if it wasn't giving him reasonable access to information on his accounts with it.

And in this case, I can't say Halifax isn't doing this. Mr M is still able to receive paper bank statements – albeit I accept he does need to opt out of digital. And as he is a regular user of on-line banking, Mr M now has the option of receiving his statements digitally which as outlined above comes with many benefits.

I appreciate that Mr M is unhappy he has to manually opt out requiring some action on his behalf which may be inconvenient for him. But my understanding is this can be done quickly over the phone or via an opt out link sent by email. Not every inconvenience experienced warrants compensation and I don't think it's unreasonable to expect one to carry out small tasks such as these as ultimately it is for the benefit of both Halifax and its customers as it will make viewing one's statements more secure, accessible and convenient. And as I can see that the option to opt out was explained to Mr M in advance in Halifax's letter, I don't think it has treated Mr M unfairly.

Finally, I understand Mr M is also unhappy about Halifax not sending out his final response when it said it would. But as complaint handling isn't a regulated activity, I can't look at this aspect of Mr M's complaint. In any case, I can see that the letter was sent within a day of

what was expected and that Halifax have compensated Mr M £40 for this already which I think is fair.

And so it follows, for the reasons I've explained, I've decided not to uphold Mr M's complaint.

My final decision

My decision is not to uphold Mr M's complaint against Bank of Scotland plc.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr M to accept or reject my decision before 19 January 2026.

Caroline Davies
Ombudsman