

## The complaint

Mr H complained about Monzo Bank Ltd's requirement for him to provide a selfie video as part of its identification (ID) verification process. He has refused to complete this step, which has resulted in him being unable to regain full access to his account.

## What happened

Monzo didn't uphold his complaint and said this was the ID verification process he had to follow and it was a necessary and proportionate step to ensure the security of his account.

When Mr H escalated his complaint to our service, our investigator thought Monzo had acted in line with the account terms and treated Mr H fairly.

Mr H didn't agree with our investigator and requested an ombudsman review. So his 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've carried out an independent review and having done so, I've reached the same conclusion as our investigator. I'll explain my reasons.

Mr H has mentioned concerns about Monzo being in breach of '*...multiple UK and international legislation*'. He's said its insistence on him providing biometric information for the purpose of verifying ID is unlawful and so it amounts to an unfair contractual term. And that blocking access to his money violates international human rights laws and breaches the requirements of the General Data Protection Regulation (GDPR). So I think it's helpful for me to clarify the role of the Financial Ombudsman Service.

We're an informal service and our role is to decide what's fair and reasonable in all the circumstances of a complaint. Despite what Mr H says, it's not my role to legally determine whether or not there's been unlawful conduct like breaches of contract or human rights legislation in the same way that a court or tribunal would. It's not what I'm required to do. Neither is it for me to specifically determine whether or not Monzo's terms and conditions breach the Unfair Contract Terms Act – which is outside the scope of our service and beyond my role as an ombudsman. And the Information Commissioner's Office (ICO) is the proper forum to address Mr H's concerns regarding data protection and privacy aspects of his complaint. Here's a link to the ICO website: <https://ico.org.uk/>.

But I can consider the way Mr H was treated by Monzo. Mr H was entitled to expect that Monzo would act towards him in a fair and reasonable way. So this is the focus of my decision.

It's part of my role to identify what I think is the key issue here and the crux of this matter seems to me to be Mr H's deeply held objection to sending Monzo a selfie video. He put things this way: '... *Monzo refused to provide an alternative and more secure means of ID verification... Monzo insisted I provide the requested data in order to regain control of my account and property with reckless disregard or wilful malice for the law, my security or the damages and potential risks associated with such a request.*'

Based on the evidence I've seen and from listening to call recordings, I'm satisfied that:

- Although the reason why Monzo blocked Mr H's account access in the first place isn't agreed (Monzo said the wrong PIN was entered three times while Mr H said he entered it correctly) this makes no difference to the outcome of his complaint. I say this because it's not in dispute that shortly afterwards Mr H asked Monzo to block his account fearing that he might've been hacked. So he would in any event have had to complete ID verification to regain access to his account.
- To comply with legal and regulatory obligations Monzo is required to have processes in place to keep customers' money safe and prevent fraudulent transactions.
- Monzo's process is to ask customers to verify themselves with a selfie video that it can compare against the ID and video that customers, including Mr H, had to submit on signing up to bank with Monzo.
- It's up to Monzo to decide how it meets its legal and regulatory obligations. How businesses design and implement measures to do this falls under the oversight of the Financial Conduct Authority (FCA), so it's not for me to tell Monzo how to run its verification systems.
- I appreciate that Mr H offered to present himself with ID at a Post Office. But I don't consider it unreasonable that Monzo said this wasn't good enough. Monzo doesn't have any arrangement set up to have ID certified by third-party. And as Monzo is a digital-only bank with no physical presence, I think it's reasonable that its customers should expect to deal with things exclusively via the app or online.
- Mr H told us that Monzo had lifted the PIN block so he can use the app and purchase things in store – although other restrictions remain in place until he provides a selfie video.
- I understand that, as far as Mr H is concerned, he's not required by law to provide biometric information and he doesn't trust the security of information held on servers and isn't happy sending biometric information over digital platforms. But whilst I respect his point of view, as this is the only way Monzo can verify ID and it's following its correct process and can't do this any other way, I can't say it is treating Mr H unfairly or unreasonably.
- To sum up, Monzo's request for a selfie video is part of its standard security process to verify identity and protect customers' accounts. Monzo has no physical premises where it offers its banking services, so it doesn't offer in-person alternatives, and I've seen no evidence that it acted unfairly or outside its terms. It has enabled some account functionality to assist Mr H. While I understand Mr H's concerns about sharing biometric information, Monzo followed its correct process and can't reasonably verify his identity in any other way. So, like our investigator, I agree that this isn't a complaint we can uphold as Monzo hasn't ultimately acted in a way that's unfair.

If I have not referred to everything mentioned during the course of the correspondence, that's because I have nothing useful to add to what the investigator has said already. I have concentrated on what I consider to be the main points that affect the outcome of this complaint. I appreciate that my decision will be disappointing for Mr H 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'm not upholding this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 6 January 2026.

Susan Webb  
**Ombudsman**