

## **The complaint**

Ms C complains that FCE Bank Plc trading Ford Money (Ford Money) acted unfairly when it blocked her accounts and asked her to provide information. Ms C is also unhappy about how Ford Money communicated with her about the information it requested.

## **What happened**

The details of this complaint are well known to both parties, so I won't repeat them again here. Instead, I'll focus on giving my reason for my decision.

Ms C is represented by her father, Mr C.

## **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 would add too that our rules allow us to receive evidence in confidence. We may treat evidence from financial businesses as confidential for a number of reasons – for example, if it contains information about other customers, security information or commercially sensitive information. It's then for me to decide whether it's fair to rely on evidence that only one party has seen. It's not a one-sided rule; either party to a complaint can submit evidence in confidence if they wish to, and we'll then decide if it's fair to rely on it. Here, the information is sensitive and on balance I don't believe it should be disclosed. But it's also clearly material to the issue of whether Ford Money has treated Ms C fairly. So, I'm persuaded I should take it into account when deciding the outcome of the complaint.

I'm very aware that I've summarised the events in this complaint in far less detail than the parties and I've done so using my own words. No discourtesy is intended by me in taking this approach. Instead, I've focused on what I think are the key issues here. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts. If there's something I've not mentioned, it isn't because I've ignored it. I'm satisfied I don't need to comment on every individual argument to be able to reach what I think is the right outcome. But I want to assure Ms C that I have read all the submissions made on her behalf by Mr C.

I've decided to not uphold this complaint. I'll explain why:

- As has been explained by Ford Money and the investigator, the reason why Ford Money asked Ms C to provide information about her finances is because Ford Money are obliged to adhere to the regulator – the Financial Conduct Authority (FCA), Know Your Customer (KYC) responsibilities. Ford Money is entitled and obliged to carry out such checks to comply with its legal and regulatory obligations. This applies to both new and existing customers regardless of how many years a customer may have held an account with Ford Money.

- I appreciate that Ms C felt the information that Ford Money requested was intrusive and unnecessary. And due to Ms C's age she had to rely on Mr C to gather the paperwork Ford Money wanted, which was inconvenient. But the information Ford Money was asking Ms C to provide is fairly standard information that banks and other financial businesses are required to have in order to adhere to their KYC responsibilities. It's not in my remit to determine what questions Ford Money should ask its customers to ensure it adheres to these responsibilities. There's no fixed set of questions or period between each customer's update request, and they are usually done to reflect the changes in the economy, technology or tactics employed by criminals to commit financial crime.
- Ford Money is required to have up to date information about its account holders, including details of their source of wealth, in order to comply with its legal and regulatory obligations. So, whilst I can appreciate Ms C's point of view about the necessity of the information Ford Money requested, and the effort needed to pull the information together, particularly as some of the information related to a sale of a property years ago and old savings accounts belonging to her parents, I can't reasonably say that Ford Money was acting unfairly or unreasonably in asking Ms C for the information that it did.
- Ms C says Ford Money threatened to close her accounts if she didn't provide the information it had requested. She says this was stressful and upsetting. And Mr C had to spend time speaking to Ford Money to understand why it wanted the information. And on what basis was it able to ask Ms C for it. She says Ford Money kept asking for more information over several months. And led her to believe that she'd satisfied its requests and would be able to continue using her accounts. But that wasn't the case as Ford Money closed her accounts.
- Ford Money has provided evidence to show that it had repeatedly written to Ms C between October 2024 and March 2025 to request information about the source of wealth. I can also see that Ford Money told Ms C why it wanted the information. And when it became clear that Ms C hadn't provided enough information Ford Money then wrote to Ms C and explained the consequences, which was that Ms C's account could be closed. I don't find this unreasonable.
- I have reviewed the correspondence and listened to the phone calls between Ford Money and Mr C. Ms C says Ford Money weren't clear with her in what they wanted her to provide. I don't agree. Having looked at the exchanges, I'm satisfied that Ford Money explained what it wanted Ms C to provide – it wanted to know where the funds in Ms C's account had come from. Ford Money also explained why it needed her to provide the information. And why wasn't it happy with the information that Ms C provided. Having looked at the information Ms C provided I'm satisfied Ford Money's concerns were reasonable.
- Ms C says that Ford Money's review has taken too long. And they kept asking Ms C to provide more information, which was frustrating. I recognise the overall time this situation has taken. And I accept that Ms C's accounts have been under review for a long time. But I do not consider that it would be right for me to conclude it should not have taken more than any particular or specific timeframe. That's because the Ford Money was entitled to do what it did. I also think it's fair to say that Ford Money required Ms C to answer questions and provide information about the activity on her accounts and source of funds. I say this because firstly, Ford Money had reasonable grounds in which to ask for the information that it had requested from Ms C – to comply with its legal and regulatory obligations. And the information Mr C provided

on behalf of Ms C provided wasn't sufficient to satisfy these obligations.

- Following this review Ford Money decided to close Ms C's accounts. It wrote to her on 1 April 2025 to let her know it would be closing her accounts immediately. Ms C has said she doesn't understand why Ford Money no longer wants her as a customer and is upset that she hasn't been provided with a proper explanation about why her accounts were closed. She's said as a result she has lost out financially – specifically the interest she would have earned on the accounts. And she wants to be compensated.
- It's generally for banks and financial businesses to decide whether or not they want to provide, or to continue to provide, banking facilities to any particular customer. Unless there's a very good reason to do so, this service usually says that a bank or financial business must keep customers or require it to compensate a customer who has had their account closed.
- Ford Money relied on the terms and conditions when closing Ms C's accounts. I've reviewed the terms, and they explain that Ford Money can close an account for any reason by giving 60 days' notice. In certain circumstances, Ford Money can also close an account without notice, which is what has happened here.
- For Ford Money to act fairly here they needed to meet the criteria to apply their terms for immediate closure – and having looked at these terms and all the evidence that Ford Money has provided, including that Ms C failed to satisfy Ford Money's information request, I'm satisfied that Ford Money did. And that it was entitled to close Ms C's account as it's already done.
- Ms C has said she wants Ford Money to tell her why it closed her accounts. Whilst I acknowledge Ms C's pursuit to get absolute clarity, about why Ford Money ultimately decided to close her accounts, Ford Money does not have to be explicit in their reason, so, I find no error was made here.
- I appreciate Mr C wants to know more. He's asked for details of Ford Money's policies and decision making processes. But where Ford Money closes an account in these circumstances, it doesn't need to give reasons – and nor would it be appropriate for me to tell Ford Money to share its reasons with Ms C, much as Ms C would like to know.
- Ford Money has provided some further details of its decision-making process, which led to the closure of Ms C's accounts. I'm sorry but I can't share this information with Ms C due to its commercial sensitivity. But I've seen nothing to suggest Ford Money's decision around closing Ms C's accounts was unfair. On balance when considering Ford Money's wider regulatory responsibilities and all the information available to me, I find Ford Money had a legitimate basis for closing Ms C's accounts immediately.  
So, it would not be appropriate for me to ask Ford Money to pay Ms C compensation since I don't find Ford Money acted inappropriately when it closed her accounts. And I won't be asking Ford Money to reopen Ms C's accounts.

In summary, I'm sorry to disappoint Ms C. But Ford Money is allowed to make commercial decisions about how it meets its relevant obligations, so I can't reasonably question how it undertakes its reviews or challenge the information it says it needs to meet its legal and regulatory obligations. I think Ford Money's communication was reasonable and it treated Ms C fairly in taking action to discharge its regulatory obligations. I know Ms C will be

disappointed with the decision I've reached, but I hope it provides some clarity around why I won't be asking Ford Money to take any further action to resolve Ms C's complaint.

### **My final decision**

For the reasons I've explained, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms C to accept or reject my decision before 24 December 2025.

Sharon Kerrison  
**Ombudsman**