

## **The complaint**

Mr P holds a Lasting Power of Attorney (LPA) over Mrs P's affairs. On behalf of Mrs P, Mr P complains that he is restricted making certain transactions on her account with TSB Bank plc (TSB) as he lives abroad and has encountered issues with receiving the One Time Password (OTP) required to do this.

## **What happened**

Mr P who lives abroad is acting under an LPA – registered with TSB since October 2023 – for Mrs P (his mother) who lives in the UK. To assist with her financial affairs Mr P says he's set up direct debits to pay most of his mother's household bills and when registering the LPA with TSB he was assured by branch staff that he would be able to pay one off bills and make purchases for his mother despite living abroad and not having a UK mobile phone number.

Mr P registered for online banking to assist him with this but due to living abroad has encountered issues with receiving the OTP required to authorise transactions. As a workaround TSB entered Mr P's non-UK mobile number on its system as a business number but unfortunately when trying to use Mrs P's debit card for an online transaction this did not work so Mr P raised a complaint.

TSB responded to this on 27 November 2024. TSB explained that Mr P had been misinformed by staff and to use the mobile banking app as this didn't need an OTP and apologised and offered to pay Mr P £100 compensation to a nominated account. Mr P once again tried the workaround provided, but the app suggested he still needed an OTP.

Mr P raised a further complaint about this with TSB in April 2025. TSB advised that Mrs P's account has a non-UK mobile number registered against it and that it isn't currently able to send SMS messages to non-UK contact numbers for card payments online or for logging into its mobile app and that Mr P would need to update Mrs P's contact details with a UK registered number to allow a OTP to be sent to login to the mobile app.

Mr P was dissatisfied with this and so brought the complaint to this service. Mr P says he wasn't made aware that living abroad could cause any potential problems when trying to manage his mother's account. Mr P says his mother doesn't possess a mobile phone or understand the internet and he is unable to look after his mother's affairs as the LPA allows him to do. Mr P says that he is having to pay costs out of his own funds which makes managing both his own and his mother's affairs more difficult.

TSB say its main method of sending the OTP is by SMS message to a UK mobile phone or landline but that it does have the option of registering a device as a trusted device and that once registered an OTP is only required every 90 days – but Mr P needs a UK mobile number to receive this as the OTP can only be sent by SMS as they expire.

TSB explained there are difficulties in sending and accessing OTPs with international mobile numbers due to the reliability of different network providers and their different protocols. It says that its digital banking terms make it clear that these services are designed for use in the UK so you might not be able to use them and will need to use an alternative channel to

do their banking or transact on an account. Furthermore, TSB say this is why it is made clear in its Terms and Conditions that they don't offer banking facilities to customers who are resident outside of the UK.

One of our investigators looked into all of this and although they acknowledged TSB's terms and conditions don't offer banking services to customers outside the UK they thought as Mrs P is resident in the UK it wasn't reasonable for Mr P to assume that managing her account would be an issue for him because he lives abroad and thought TSB should've made Mr P aware of this when registering the LPA and advising it of his residence.

They accepted it wasn't this services role to ask TSB to change its processes or procedures to accommodate sending OTPs to foreign numbers but thought the impact the overall situation has had on Mrs P warranted compensation. They didn't think TSB had done enough to try and assist Mr P to fulfil his requirements under the LPA in providing a suitable workaround for him to receive an OTP and it was possible that due to TSB's system limitations that Mrs P would have to move her banking elsewhere which would be very daunting for her.

They noted that this service can only award compensation for the impact events had had on the customer – in this case Mrs P - and so they thought TSB should compensate Mrs P £250 for the distress and inconvenience the matter has caused.

TSB disagreed and has asked for an ombudsman's decision. It says it is made clear by the online terms that customers would not be able to use internet banking abroad and that its staff wouldn't assume that an attorney is going to use online banking. TSB says that Mr P can contact it by telephone from abroad to service the account and that he doesn't need online access for this and doesn't agree any redress is appropriate.

I issued my provisional decision on 20 November 2025. In my provisional decision, I explained why I was proposing to uphold this complaint. I invited both parties to let me have any further submissions before I reached a final decision and neither have added any new information that I think changes my provisional 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.

In my provisional decision I said that:

*"I hope that Mr P won't take it as a discourtesy that I've condensed this complaint in the way that I have I have considered all his submissions carefully but ours is an informal dispute resolution service and so I've concentrated on what I consider to be the crux of the complaint - our rules allow me to do that. And the crux of this complaint is that TSB's inability to send OTPs to non-UK mobiles has restricted Mr P's ability to use his mother's account as needed causing much cost and inconvenience to him.*

*Firstly, I must be clear that I can't look at the impact TSB's actions have had on Mr P personally. As our investigator has already explained, this is because I can only look at how TSB's actions have affected the account holder - Ms P – as she is the eligible complainant.*

*So although even if I accept that Mr P has been inconvenienced and distressed by TSB's actions I can't look at compensating him personally for this if I found that TSB had done something wrong or treated him unfairly.*

*It might help if I explain here, I don't have the power to tell TSB how it needs to run its business and I can't make TSB change its systems or processes – such as the security processes it has in place when one accesses their account or when making payments out of an account and how or by what means TSB chooses to authenticate a payment and the communications surrounding this. These are commercial decisions and not something for me to get involved with.*

*Nor can I say what procedures TSB needs to have in place to meet its regulatory obligations. We offer an informal dispute resolution service and have no regulatory or disciplinary role.*

*That said, while I'm not looking at TSB's systems and processes per se, it won't have acted fairly and reasonably towards Mrs P if it wasn't giving Mr P reasonable access to information and banking services to her accounts with it.*

*Mr P has explained that while he is able to set up direct debits to pay his mother's regular bills, at times he needs to make purchases or pay one off bills on her behalf and hasn't been able to do this due to TSB's inability to send OTPs to international phone numbers. Instead, if Mr P wishes to make a one-off purchase that requires an OTP, he has to either conduct Mrs P's banking through telephone banking or attend a branch or pay it himself at his cost and inconvenience.*

*I accept that this isn't how Mr P wants to assist his mother in managing her financial affairs and how frustrating and inconvenient this must be especially when he is been placed in this position through no choice of his own and is merely trying to assist his mother. But that doesn't mean it automatically follows that TSB in not being able to send OTP by SMS to international numbers has done something wrong or is treating its customers unfairly.*

*Ultimately, TSB are within its right to decide how and what services it provides and when, and its digital banking terms do stipulate that these services are designed for use in the UK and customers might not be able to use them and will need to use an alternative channel to conduct their banking or transact on an account.*

*I appreciate Mr P doesn't understand why TSB can't send OTPs to an international number. But TSB have explained the difficulties it has with sending OTPs to international numbers and that it is working with its provider to get its service number provisioned so it can send SMS abroad. But as this currently isn't possible, I don't think it would be fair to penalise TSB for something outside of its control.*

*My understanding is that Mr P can meet his mother's banking needs using the telephone and internet – albeit not in the way he'd like - and is still able to access the information he needs to manage and transact on her account on her behalf.*

*So I can't say that TSB have done anything wrong or treated Mrs P unfairly in this regard.*

*But that is not to say TSB has done everything right. Throughout this process Mr P has been misinformed, been provided with solutions that haven't worked and it has taken far too long for him to receive a clear answer.*

*I appreciate this will come as a disappointment for Mr P as he has undoubtedly been caused both distress and inconvenience at a time when all he was trying to do was a selfless act in looking after his mother's affairs. But as I've explained already as Mr P isn't the account holder and is merely acting as a representative of Mrs P, I'm unable to consider compensation for the impact this has had on him personally.*

*I'm also mindful of the fact that as a resolution to these issues Mr P and Mrs P could*

*consider moving banking providers which would no doubt be distressing and an upheaval for Mrs P given she's banked with TSB for many years. I also appreciate that Mr P says had known he about the issues he wouldn't have gone through this process or registering the LPA and having a debit card issued.*

*But when considering compensation, I can only look at the actual distress and inconvenience suffered and the impact had. Not what could've happened or what might happen in the future. And whether Mr P was told or not when registering his mother's LPA of the potential issues in receiving OTPs abroad, he'd still need to register the LPA to deal with her affairs. And Mr P still wouldn't be able to receive OTPs to his non-UK number.*

*But I do think some compensation is warranted here as I accept Mrs P has suffered some inconvenience when Mr P hasn't been able to purchase products and pay bills or transfer money when requested and Mr P has had to find his own solutions to the issue which has no doubt also caused Mrs P some distress seeing the trouble he has had to go to.*

*So taking everything into consideration I currently think this complaint should be upheld and that TSB should compensate Mrs P £150 for the poor customer service and support received regarding this matter."*

As neither party has provided any further evidence or arguments for consideration, I see no reason to depart from the conclusions set out in my provisional decision. It follows that I uphold this complaint.

### **My final decision**

For the reasons I've explained, I uphold Mrs P's complaint against TSB Bank plc and direct it pay her £150 compensation for any distress and inconvenience caused.

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

Caroline Davies  
**Ombudsman**