

## **The complaint**

Ms H complains that Zopa Bank Limited failed to make reasonable adjustments to enable her to successfully verify her identity and as a consequence her application has been unfairly declined.

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

Having done so, I agree with the conclusions reached by the Investigator and have decided not to uphold it for the following reasons:

- Ms H has complained that Zopa has failed in its duty to make reasonable adjustments under the Equality Act 2010. I've taken the Equality Act 2010 into account when deciding this complaint – given that it's relevant law – but I've ultimately decided this complaint based on what's fair and reasonable. If Ms H wants a decision about whether Zopa has breached the Equality Act 2010, then she'd need to go to Court.
- It's also not our Service's role to regulate businesses, this would be for the Financial Conduct Authority (FCA). So, it's not my role to decide whether a business's policies are appropriate or should be changed. My role is to reach a finding on whether Zopa has treated Ms H fairly or whether it has made any errors.
- As a regulated financial business, Zopa is required by law to understand who its customers are and carry out appropriate due diligence to verify the information it is provided. The 2017 Money Laundering Regulations (as amended) place obligations on Zopa from the point of initial application onwards which include a requirement to verify its customers' identities. So, I think it was reasonable that Zopa requested identification from Ms H.
- I have then thought about the way in which Zopa requested this information be provided and whether this fairly took into account Ms H's circumstances. Having done so, I also think this was reasonable – I'll explain why.
- Ms H has explained she has dyspraxia and this impacts her coordination and dexterity. As such she was unable to take a photograph of her passport that met Zopa's automated application system's requirements. Ms H has also said that her phone is too small to take a clear photograph of a passport. And that due to her disability she holds no other forms of identification.
- Ms H also said that her relative, who is not disabled, assisted her in taking one of the two photographs that were submitted but this was also not acceptable to Zopa's automated system. She said she also tried on a larger phone and still couldn't take a clear photo. I also note that at some stage Ms H tried to submit a copy of her

identification document (ID) to Zopa via email but I understand this wasn't accepted either.

- Zopa has explained it's a digital bank and so, whilst it acknowledges digital submissions are more difficult for Ms H, it has said it isn't able to offer her the option of attending a branch to submit this ID in person. It also doesn't accept ID via post.
- Given the fact that the product Ms H was applying for was a digital account, I don't think it's unfair that Zopa asked for this information to be submitted digitally initially as per its standard process. I say this noting that its standard process also allowed Ms H 10 days to submit a photograph of her ID, which I'm satisfied was sufficient time for her to seek support if necessary to take a clear photograph or get in contact with Zopa about any difficulties.
- I haven't seen evidence that Ms H notified Zopa that she was struggling with the process due to her disability or asked for any advice or support. And I also note there was support available to Ms H to take this photograph as she got the help of a relative.
- I appreciate Zopa wouldn't allow Ms H to email her ID rather than using the established online application process, but any images she submitted via email could also have been submitted via the standard application process. And so in these circumstances, I don't think it was unreasonable that Zopa asked Ms H to provide this evidence via the standard channel.
- I acknowledge neither Ms H's photo ID submission, or the one taken by her relative, were accepted. But I am satisfied that it is possible for someone without Ms H's disability to take a clear image on a phone of an ID as big as a passport – I think her relative was simply unsuccessful in doing so on this occasion. Which means I also don't think the type of ID Ms H had prevented her from being able to provide the evidence Zopa was asking for. I am also not persuaded that the size of the mobile phone is a relevant consideration here – I say this noting Ms H said using a larger phone didn't resolve the problem.
- I think Zopa's process allowed sufficient time for Ms H to get support if required and it appears there were options available to Ms H to help her provide the evidence Zopa was requesting. Which means I don't think Zopa acted unreasonably in requesting this evidence from Ms H in this format or in declining the application when a suitable image wasn't provided.

### **My final decision**

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms H to accept or reject my decision before 13 March 2026.

Jade Cunningham  
**Ombudsman**