

The complaint

Mr T complains that Barclays Bank Plc has failed to make reasonable adjustments for him regarding his Smart Investor account.

What happened

Mr T raised a complaint with Barclays in May 2025 as he was dissatisfied with support provided by it and felt it hadn't provided reasonable adjustments for his undisclosed disability. Mr T referred his complaint to this service for an independent review as he was unhappy with Barclays' response.

One of our investigators considered the complaint but didn't uphold it. In summary, they said:

- They had taken the Equality Act 2010 into account during their investigation but ultimately arrived at their conclusion based on what's fair and reasonable.
- They were satisfied that Barclays had remained open to discussing reasonable adjustments to make accessing his statements easier, but he had declined the alternative options offered.
- They were not persuaded that Barclays was at fault for not having agreed an adjustment suitable for his needs.
- The only method Mr T had proposed was to send his statements by an insecure method, but owing to the risk presented by this, they said it wouldn't be reasonable for them to recommend that Barclays do this.

Mr T didn't accept the investigator's findings. In summary, he said:

- He accepts that Barclays' decision to refuse to send him insecure emails containing statements but said this was not the complaint point he wanted resolving.
- He requested Barclays make a reasonable adjustment by providing his passcode in an accessible format to allow him to view his account online. This was the complaint point in dispute.
- He disagreed that he'd only offered the solution to send his statements by an insecure method and instead said he'd asked Barclays to provide him with a passcode by phone after verification.
- He says Barclays has unfairly rejected this as viable option.
- He's taken the decision to close his account with Barclays; however, he still needs online access to view historic documents.

In response to Mr T's comments, the investigator spoke to Barclays in order to try and arrange an alternative way for him to receive his passcode. Barclays explained it wouldn't be possible to send the passcode to Mr T's local branch and that this can only be sent to his home address.

Barclays said that if Mr T is comfortable discussing what adjustments it can make for him, the passcode could be issued in braille or large print. However, it said he would need to give it permission to add a marker to his account to note the adjustments required.

This was put to Mr T but the investigator felt that these adjustments weren't useful for him as their understanding was that his undisclosed disability was not in relation to sight.

The investigator considered Mr T's further comments and explained the following:

- Barclays has confirmed its process is only to issue online passcodes by post and they are unable to provide this to Mr T in a different way for example verbally over the phone.
- Various options exist for print in different formats, but Mr T has declined all postal communication.
- Whilst Mr T feels Barclays has failed to consider making a reasonable adjustment to accommodate his disability, they hadn't seen any evidence that Mr T has made Barclays aware of his disability or what reasonable adjustments are required.
- Appropriate reasonable adjustments need to be tailored for a person's unique circumstances, which requires Mr T's input.
- Because he hasn't demonstrated a willingness to explore what reasonable adjustments can be put in place, they didn't think Barclays were at fault.
- It is vital that Mr T's online passcode remains securely confidential to him and as he has declined to receive this by post and has confirmed that his telephone contact details weren't up to date and didn't wish to update them, they didn't think Barclays had acted unfairly by not providing an alternative way of sending him this.

As Mr T remains unhappy with the support offered, the complaint has been passed 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.

Having done so, I agree with the investigator's finding for broadly the same reasons. I will explain why, but first I need to clarify for Mr T that this service is unable to make findings on whether something constitutes discrimination as per the Equality Act 2010. This is because we are an informal, free alternative to the Courts and only a court of law can make a legal finding based on the definitions set out within the act.

Despite the above, I can consider whether Barclays has acted in a fair and reasonable manner. In order to do that I will take a number of things, including the Equality Act 2010, into consideration.

The first thing I have considered is Barclays policy when it comes to issuing new passcodes. It has explained to our service that its policy is to send this by post to the registered address on its file. I understand that this policy is in place to ensure the security of its investor's details. Therefore, I can't conclude that Barclays has acted unfairly by requesting Mr T receive the passcode by post.

However, I have gone on to consider the fact Mr T has explained that he doesn't want to receive the passcode by post because of his undisclosed disability, and as such, reasonable adjustments should have been made by Barclays.

The Equality Act 2010 says that businesses have a duty to make reasonable adjustments for customers who are placed at a substantial disadvantage due to their disability. However, in law, Barclays is only required to make adjustments which are reasonable, and ones that

don't fundamentally alter the nature of its service. That's relevant law and I've taken it into account when reaching my decision.

I can see that Barclays and our service has asked Mr T the reasons why he doesn't want to receive the passcode by post. However, Mr T has been reluctant to provide this information as he feels it isn't relevant. But in order for Barclays, and in turn our service, to consider if reasonable adjustments could or should have been made, I think it is reasonable to enquire about the reasons that prevent/prevented Mr T from receiving the passcode by post.

So, as Mr T hasn't provided our service or Barclays with any information regarding his disability, or the adjustments he needs to ensure he is not substantially disadvantaged, I can't fairly conclude that Barclays has treated him unfairly.

I note that Barclays has offered to send Mr T the statements he requires online access for by secure message but call notes provided by Barclays suggest Mr T was not willing to set this up. So I'm satisfied Barclays has made reasonable attempts to assist Mr T with accessing the information he requires.

I appreciate Mr T will be disappointed with my findings and that it should be sufficient to say his disability requires this adjustment. But in order for reasonable adjustments to be made, it's reasonable for Barclays to have an understanding of the barriers Mr T faces and the reasons why it is required to depart from its usual course of business. So, with that in mind I won't be asking Barclays to do anything further.

My final decision

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr T to accept or reject my decision before 28 April 2026.

Ben Waites
Ombudsman