

## **The complaint**

Mr A complains that he couldn't access his Starling Bank Limited application (app) or use his card which resulted in him having access to no money for food and accommodation.

## **What happened**

Mr A has a bank account with Starling, and due to his personal circumstances there was a restriction placed on his account to prevent it being used while he was unable to use the account. Mr A contacted Starling on 13 October 2023 as he wanted to access his funds and remove the restriction. Mr A says that Starling asked him to upload a video of himself so they could assist in removing the restrictions on the card, but Starling then said they were unable to verify Mr A's identity, so they couldn't remove the restrictions. As Mr A couldn't access his funds, due to his personal circumstances he didn't have money to eat and was left out in the cold. Starling removed the restriction the following day. Mr A made a complaint to Starling.

Starling partially upheld Mr A's complaint and paid him £200. They said as he was unable to record a video of himself when attempting to register his device with them, they were unable to allow him to access the account. Starling said that as an app based bank, they have this security measure in place in an effort to prevent unauthorised access to Mr A's account. Starling said that when Mr A spoke to them, no effort was made to allow him to transfer funds from his account, due to the lack of access to his card and the situation he found himself in. Mr A brought his complaint to our service.

Our investigator did not uphold Mr A's complaint. She said when Mr A rang Starling to access his funds, without access to an app, at no point was an account transfer offered. She said Starling could've offered further support to transfer his funds, as he was unable to access his card, especially given the difficult circumstances he was facing, as he needed access to his funds for accommodation and food. Our investigator said although video verification was necessary to access an account, Starling could've provided more support and provided an alternative solution to accessing his money, by allowing Mr A to transfer funds from his account.

Mr A asked for an ombudsman to review his complaint. He made a number of points. In summary, he said Starling lifted the restrictions without the video, he said he did take a video and removed a mask he was wearing for medical reasons. Mr A said he had to spend the whole night outside and he had nothing to eat. Mr A said he felt he was in danger, and he was in a dangerous place.

## **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.

Mr A has made a number of points to this service, and I've considered and read everything he's said and sent us, including what he's said about his personal situation at the time, and everything he's told us about his health. But, in line with this service's role as a quick and informal body I'll be focusing on the crux of his complaint in deciding what's fair and

reasonable here.

I'd like to explain to Mr A that it is not within this service's remit to tell a business how they should run their security procedures, such as what a video needs to contain, or how they decide to lift a restriction on an account. It would be the role of the regulator – the Financial Conduct Authority, who have the power to instruct Starling to make changes to their policies and procedures, if necessary.

I've listened to the calls that Mr A had with Starling on 13 October 2023. The call handler lifts the restriction on Mr A's card and tells him he can use the card whenever he liked. But Mr A was unable to get into the Starling app. The call handler talks Mr A through what he needed to do, and she tells Mr A that he needs to take a video as part of their security procedures. Mr A explains that he now wears a mask due to his medical condition, but he agrees to pull the mask down so they can see his face.

Mr A has another call that day as he couldn't access the app or use his card. The call handler confirms that his card is unblocked, but she could see he had a transaction declined. Mr A explains he's had a £20 contactless payment declined. He also explains that his camera is broke for the video. Mr A also tells the call handler he needs to find a hotel.

But neither of the call handlers offered Mr A further assistance that Starling have told us that they could have offered Mr A based on what he told them. I can see that the restrictions were removed on 14 October 2023, but this was a day after Mr A had tried to get the restrictions removed.

My understanding, based on the second call I listened to is that this issue was referred to Starling's technical team and they were looking at troubleshooting to resolve the issue (and that could be why Mr A says they lifted the restriction without the video). But the call handler was unable to explain when Mr A would have access to the app or the funds in his account.

As a result of what happened, Mr A has described what happened due to being without the money in his account and he was unable to pay for food or accommodation and he had to stay outside in a dangerous area. But if Starling had offered to transfer money to a different account for Mr A, then he would have been able to use another card to pay for food and his accommodation. So by Starling not assisting Mr A in his vulnerable state – which he had made them aware of his health conditions, and needing to find a hotel, then this caused Mr A added distress and inconvenience.

So I've considered what would be a fair outcome for this complaint. Starling paid Mr A £200 for what happened. Mr A called Starling on 13 October 2023 at 16:07pm and the restrictions were removed on 14 October 2023 at 12:17pm. So while the restrictions were on the account less than 24 hours after Mr A had asked them to be removed, he still had no access to food or the accommodation during this time. I must make Mr A aware that our awards are not designed to punish a business. But I'm persuaded that £200 is in line with our awards based on Mr A's individual circumstances of what happened in those 18 hours that the restrictions were on his account. So it follows I don't require Starling to do anything further.

### **My final decision**

I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr A to accept or reject my decision before 1 April 2024.

Gregory Sloanes  
**Ombudsman**