

## **The complaint**

Mr W complains that Santander UK Plc requested identification during an ISA application and that he missed out on the 2022/2023 tax free savings allowance as a result.

## **What happened**

On 5 April 2023 Mr W applied online for an ISA with Santander. But when the process didn't complete and Mr W was sent an email requesting identification, he called Santander to discuss the situation. Another application was made and a new reference was provided. But to proceed with the application and finalise the account opening process, Santander said Mr W needed to supply identification. But due to 5 April 2023 being the final day in the financial year, Mr W explained he was unable to comply before the deadline. Mr W raised a complaint and said the requirement to provide identification was unreasonable given he was a longstanding customer with various accounts.

The ISA wasn't opened in time for the end of the existing financial year which meant Mr W lost out on his 2022/2023 tax free savings allowance. Mr W raised a complaint with Santander and it issued a final response on 14 April 2023. Santander accepted Mr W was an existing customer but said the request for identification when seeking to open the new ISA was correct and in line with its process. Santander didn't subsequently allow Mr W to make contributions for the previous tax year.

Mr W referred his complaint to the Financial Ombudsman Service and it was passed to an investigator. They weren't persuaded that Santander had made a mistake or acted unfairly when asking Mr W to supply identification before opening the ISA and didn't uphold his complaint. Mr W asked to appeal, so his complaint has been passed to me to make a 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.

I'm aware I've summarised the events surrounding this complaint in less detail than the parties involved. No discourtesy is intended by my approach which reflects the informal nature of this service. I want to assure all parties I've read and considered everything on file. I'm satisfied I don't need to comment on every point raised to fairly reach my decision. And if I don't comment on something, it's not because I haven't considered it. It's because I've focused on what I think are the key issues. My approach is in line with the rules we operate under. I'd like to assure Mr W in particular that I've read and considered everything he's said and submitted to this service in support of his complaint. I've also looked at all the evidence supplied by Santander, including listening to calls he had on 5 April 2023 and 6 April 2023.

I can understand Mr W's frustration that the account wasn't opened online or when he later called Santander on 5 April 2023. That was the final day of the financial year which meant Mr W needed to open and have access to the ISA in order to use his tax free savings allowance for 2022/2023. And Mr W has explained he's a longstanding customer with

various accounts at Santander that would've required him to submit identification previously. I appreciate that, from Mr W's perspective, the request for up to date identification felt unnecessary and over the top. But I have to be fair to both parties. And Santander, as a business, is free to decide how it operates – including when it needs to verify a customer's details.

Santander has forwarded a copy of its customer identification requirements document which has been shared with Mr W as well. It confirms that there are circumstances where Santander may request further documentation and identification from customers, even if they hold existing accounts. The document confirms that existing customers may be required to supply identification, like a passport or driver's licence, in order to proceed with an application.

Santander says it may require this information to ensure information it has about existing customers is up to date. And I haven't seen anything that shows Santander made a mistake or unreasonably asked Mr W to provide identification before it was willing to proceed. So whilst I accept Mr W was an existing customer, I'm satisfied Santander has explained why it needed identification and that it was unable to proceed without it. I'm very sorry to disappoint Mr W but I haven't found evidence that shows Santander made a mistake or treated him unfairly.

I've listened to the available calls and reviewed all the available evidence from Mr W's complaint. As I've noted above, I haven't found anything that shows Santander misled Mr W about the requirement to provide identification or that it made a mistake by requesting it. Ultimately, as Mr W wasn't able to provide the relevant identification before the deadline for the end of the financial year, his ISA wasn't opened in time. But I haven't been persuaded that Santander caused unreasonable delays or made mistakes in terms of the way it handled Mr W's application. I'm sorry to disappoint Mr W but as I'm satisfied Santander dealt with his ISA application and complaint fairly, I'm not telling it to do anything else.

### **My final decision**

My decision is that I don't uphold Mr W's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr W to accept or reject my decision before 16 May 2024.

Marco Manente  
**Ombudsman**