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20 August 2026

Final report by the Complaints Commissioner

Complaint number 202500174

The complaint

1. You initially submitted a complaint to the Office of the Complaints Commissioner ("**my Office**" or the "**OCC**") about the FCA on 1 May 2025. You referred the FCA's Decision Letter on your complaint dated 23 April 2024 (the "**2025 DL**"). I issued a Preliminary Report on 10 July 2025 (the "**2025 PR**"). I did not uphold certain elements of your complaint and I invited the FCA to provide additional information before I reached an outcome on the remaining elements of your complaint.

2. Since then, the FCA has:

   a. responded to my requests for information;

   b. spoken with you on 17 September 2025 to clarify its understanding of your complaint;

   c. issued a new Scoping Letter to you on 10 October 2025 to (i) set out its revised understanding of your complaint and (ii) give you an opportunity to correct its description of your allegations; and

   d. issued a new Decision Letter to you on 30 January 2026 (the "**2026 DL**"), setting out the FCA's findings in respect of its updated understanding of your complaint.

3. In a call with my Office on 17 February 2026, you referred the 2026 DL to me for investigation and set out where you believed that the FCA's findings were incorrect. Also, during the call:

    a. You provided several granular allegations about the failings of the FCA. While I have carefully considered the entirety of the submissions the parties have provided, my decision focuses on what I consider to be the central issues. The purpose of my decision isn't to comment on every point or question made, rather it's to set out my decisions on the central issues and reasons for reaching them.

    b. You described where you considered that the 2026 DL did not fully reflect the allegations you had put to the FCA on 17 September 2025. I have taken this into account, but I do not consider that the differences are material and I also note that you did not provide such feedback to the FCA in response to its Scoping Letter of 10 October 2025.

4. Therefore, I do not consider that I need to refer your complaint back to the FCA again to re-investigate and I do not think that it was unreasonable for the FCA to proceed to investigate its revised understanding of your complaint on the basis of the Scoping Letter and issue its findings in the 2026 DL.

5. In view of the above, I have summarised the main elements of your complaint in the remainder of this report.

Analysis

Element One: You submit that the FCA has not updated the DISP rules to bring them into line with the requirements of the EA 2010, resulting in the FOS misapplying the DISP rules. You want the FCA to update the DISP rules.

6. Your concern is that the FOS is not appropriately applying the provisions of the EA 2010. You have submitted that:

a. the FCA should ensure that the FOS complies with the EA 2010 by amending the relevant DISP rules (which are followed by the FOS) to reflect its requirements; and

b. the FCA has not updated the DISP rules to bring them into line with the EA 2010, despite the FCA updating other areas of the FCA Handbook to reflect the requirements of the EA 2010.

7. The FCA has determined that it is not required to investigate this part of your complaint to it because:

a. it concerns the content of the Handbook; and

b. the FCA's legislative function falls outside of the Complaints Scheme.

8. The FCA is correct that concerns about the content of the FCA Handbook or any part of it relates to the FCA's "legislative function" and is therefore outside the scope of the Complaints Scheme.

9. The FCA has also correctly explained that the EA 2010, which applies to the FOS in its capacity as a public body and service provider, is primary UK legislation and takes precedence over FCA rules (such as DISP), guidance and regulations. In other words, the EA 2010 applies directly to the FOS, regardless of whether it is expressly referenced in FCA's rules, and overrides the latter.

10. Additionally, the FCA has clarified (in response to my invitation) that, while it has a limited oversight role in relation to the FOS, it is not responsible for overseeing the FOS' compliance with the EA 2010.

11. The FCA's oversight function does not extend to giving the FOS or its Ombudsmen directions on handling particular complaints or the making of operational decisions, or its interpretation of DISP and other rules. Ultimately, only a court can decide if the FOS has breached EA 2010 and you would need to commence legal proceedings if you wished to obtain a determination on a point of law.

12. I appreciate that you consider that it is unsatisfactory that the FCA provides consumers with no mechanism to investigate complaints about the FCA Handbook (or, as is described in Element Three below, provide information as to how the FCA is treating consumers' feedback about the Handbook). However, the exclusions to the Complaints Scheme were introduced by Parliament and not by the FCA. In view of the above, I consider that the **FCA has acted reasonably by excluding** Element One from its investigation.

Element Two: You consider that it is unsatisfactory that the FCA does not have a standalone reasonable adjustments policy.

13. You have repeatedly submitted to my Office that:

    a. the Complaints Scheme directs complainants who require reasonable adjustments to visit the financial regulators' websites and look at their reasonable adjustments policy; and

    b. you therefore believe that the FCA is acting inconsistently with the Complaints Scheme because it does not have a standalone reasonable adjustments policy.

14. To clarify, the Complaints Scheme does not make any reference to regulators' websites setting out a standalone reasonable adjustments policy. Rather, the Complaints Scheme states that further information about reasonable adjustments which a complainant may be able to request can be found on regulators' websites. Specifically, para. 3.4 states:

    > "Please also let us know if you need any reasonable adjustments to be made to allow you to access the Scheme or to make your complaint. Examples include providing documents in larger print and communicating by telephone as well as in writing. There are further details on the respective Regulators' websites."

15. Please see paragraphs 18 - 20 below for a description of how the FCA's website provides information about making requests for reasonable adjustments.

16. You have also submitted that the FCA, as a public body, is obligated by section 149 of the EA 2010 to have a standalone reasonable adjustments policy. Questions of interpretation and alleged breaches of the EA 2010 are for a court or the Equality and Human Rights Commission (the "**EHRC**") [1] to advise on / decide. Accordingly, I make no finding on this specific complaint point. As a mere observation, I simply note that it does not appear to me, taking a literal interpretation, that section 149 itself specifies that public authorities must have a standalone policy (but I have not considered this more broadly).

17. It is only within my powers to investigate if the FCA has acted reasonably or not. To investigate this, in the 2025 PR, I invited the FCA to consider whether it should have dedicated reasonable adjustments policy or a hyperlink to one in the complaints section of its website.

18. In response, the FCA has explained to me that:

> "The FCA's website, including on the dedicated complaints page, has an accessibility statement at the bottom. Additionally within our complaints page, under the section "How to complain" we have our accessibility statement linked for consumers and firms to access. We therefore do not think it is necessary to publish a further reasonable adjustment policy on the dedicated complaints page."

19. I have accessed these FCA webpages and seen that:

    a. The FCA's website, on the bottom of the webpages, contains a hyperlink to its "Accessibility Statement" webpage.[2] I have seen that Accessibility

[1] The Equality Advisory and Support Service (the "**EASS**") is the relevant body to contact in the first instance. The EASS provides a free helpline (0808 800 0082) to assist and advise individuals on equality matters. This telephone number can also be used to make accessibility requests to the EASS.

[2] https://www.fca.org.uk/accessibility (last updated on 15/10/2025).

Statement webpage contains a hyperlink to the FCA's "Accessibility Service" webpage,[3] which:

i. sets out, "If you have specific needs to be able to communicate with us effectively, please tell us and we will do our best to meet them"; and

ii. provides a free telephone number (0800 111 6768) for this purpose.

b. The "Complain about us, the PRA or the Bank of England (the regulators)" webpage sets out:[4]

> "If you are unable to complain in writing, you can call the Complaints Team's voicemail service on 020 7066 9870. We'll aim to return your call within 2 working days of receiving it. Please note we cannot answer general enquiries on this line.
>
> If you want to contact us about something that is not a complaint about the FCA or the other regulators, you can contact our consumer helpline on 0800 111 6768 or visit our contact us page [https://www.fca.org.uk/contact].
>
> Please use one of these methods to contact us in the first instance even if your complaint is against the PRA or the Bank of England.
>
> We want to make sure you can make a complaint and communicate with us effectively. If you need information in a different format, such as an audio recording, large print, or spoken rather than written communication, please let us know when you raise your complaint or call the complaints voicemail service on 020 7066 9870 and we'll do our best to help."

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[3] https://www.fca.org.uk/accessibility-statement/accessibility-service (last updated on 26/09/2025.

[4] https://www.fca.org.uk/about/how-we-operate/complain-about-regulators (last updated on 26/09/2025)

20. While the FCA highlights its Accessibility Statement, I consider that the FCA's Accessibility Service policy is more relevant to this complaint point. I.e. the latter informs consumers that it will consider requests to adapt its service to accommodate accessibility requirements and sets out contact information to discuss such requests. Therefore, although the FCA does not have a standalone reasonable adjustments policy, I consider that the FCA has made available sufficient information about how consumers can request reasonable adjustments. Additionally, I do not agree with your recent submission that the FCA has only provided accessibility information in respect of its website. The Accessibility Service policy (with which I have previously provided you a large font hard copy) applies to the FCA's various services (such as how to request reasonable adjustments when submitting a complaint to the FCA) and not just to the FCA's website.

21. However, as you have set out, at the time you first tried to submit a complaint to the FCA, some of the FCA's webpages (e.g., the Freedom of Information webpage and Accessibility Service webpage) did not contain as much information about how to make accessibility requests as they currently do. Moreover, the FCA has confirmed to my Office that these webpages were updated to address your complaint to the FCA about the level of accessibility information these webpages contained.

22. In view of the above, my findings on Element Two are as follows:

    a. I **uphold** your complaint point that certain of the FCA's webpages previously did not contain as much accessibility information as might reasonably have been helpful for consumers with accessibility requirements at the time of your interaction with the FCA;

    b. I **do not** uphold your complaints that the FCA has acted inconsistently with the Complaints Scheme or unreasonably by deciding not to have a standalone reasonable adjustments policy. I consider that the FCA presently makes available sufficient information as to how consumers can request reasonable adjustments to access the FCA's services; and

c. I make **no finding** as to whether the FCA's decision not to have a standalone reasonable adjustments policy constitutes a breach of section 149 of the EA 2010.

Element Three: You submit that the FCA failed to make reasonable adjustments when you sought to speak to the internal team responsible for FCA Handbook drafting.

23. You have submitted that the FCA has failed to accommodate your request, as a reasonable adjustment, to speak directly with the FCA Handbook Team which drafts the FCA Handbook (which includes the DISP rules).

24. The FCA has confirmed to me that the Handbook Team is not a consumer-facing team. There is no two-way communication between consumers and this team. Rather, there is one-way communication (from consumers to the Handbook Team) to enable the Handbook Team to receive feedback from consumers, such as via the following methods:

    a. consumers can submit feedback indirectly by contacting the FCA Consumer Queries Team by telephone, email or online form and request reasonable adjustments when doing so;[5]

    b. consumers can submit feedback directly via the FCA Rule Feedback Tool (an online form); or

    c. consumers can submit feedback on the Handbook website and Handbook publications directly by sending an email to handbook.feedback@fca.org.uk. [6]

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[5] The relevant telephone numbers are: 0800 111 6768 (freephone), 0300 500 8082 (if dialling from the UK), +44 207 066 1000 (if dialling from abroad) or (18001) 0207 066 1000 (for Next Generation Text Relay). This information is set out on the 'Contact Us' webpages on the FCA's website and the FCA's Handbook website.

6 In contrast, consumers can contact the third party company which has built the FCA Handbook website to ask for technological help with the Handbook website by sending an email to fcahandbook@finreg-e.com.

25. For the avoidance of doubt, irrespective of what media the consumer has used to communicate to the Handbook Team, the Handbook Team will not share with a consumer how it intends to treat the feedback it has received.

26. While the FCA will consider reasonable adjustment requests as part of its Accessibility Service policy, it does not currently facilitate video or Teams calls between the Handbook Team and consumers as a reasonable adjustment (or otherwise).

27. In view of the above, I do not consider that the FCA has created a barrier for consumers with accessibility requirements which does not exist for consumers without accessibility requirements (or at all).

28. I understand from the FCA that it eventually took down your feedback via video call and then transcribed and input that feedback into the FCA's Handbook Feedback Tool for the Handbook Team's review. At your request, the FCA also shared this feedback with the team responsible for collating responses to the FCA's Consultation Paper CP26/9 'Modernising the Redress System'. The FCA also arranged for a video call between you and the FCA Redress Policy Team to take place in May 2026, whereby you provided comments on the questions asked in the Consultation Paper.

29. While I consider that the FCA acted reasonably by taking down your feedback in an accessible form and providing it to the Handbook Team, I note that this occurred a considerable time after you had put the FCA on notice of your complaint summarised at Element One (i.e. in March 2025, alternatively in September 2025 when your complaint was retaken). I consider that it would have been prudent for the FCA to take down the specifics of your feedback about the DISP rules (with a view to sharing it with the Handbook Team) much sooner than it did. It appears that the impetus for taking the steps that the FCA did was a call you had with the FCA on 17 November 2025 and not your original submission of a complaint or request for a reasonable adjustment.

30. Accordingly:

    a. I do not consider that the FCA acted unreasonably by denying your request to speak directly with the Handbook Team and I **do not uphold this part of Element Three**.

    b. However, I note in passing that I consider that the FCA was slow to take down your feedback in an accessible manner.

Element Four: You submit that the FCA mishandled your requests for reasonable adjustments when you made a complaint to the FCA's Complaints Team

31. You have submitted that it took the FCA approximately four months to provide you with an accessible way to take down your complaint. I understand that the issue you raised with the FCA in December 2024 was about the FOS's alleged failure to comply with the EA 2010 and that, on this basis, it was not classified as a complaint about the FCA for the Complaints Team to investigate. This is because the Complaints Scheme does not investigate complaints about the FOS.

32. On 20 February 2025, you informed the FCA that you wanted to reframe your complaint as being about the FCA, rather than FOS, and you submitted a reasonable adjustment request to provide your complaint by video or in person. At this point, your complaint was classified as a complaint about the FCA for the Complaints Team to investigate. The Complaints Team obtained new software so that it could speak with you via video and it did so within roughly a fortnight. I do not consider that this was unreasonable.

33. You have also recently submitted to my Office that the FCA only arranged a video call between you and its Complaints Team on 6 March 2025 because you visited the FCA's offices in person and refused to leave until a staff member spoke with you about your complaint. I have seen, from the FCA's records, that the Complaints Team had (i) already taken steps on 20 February 2025 to request video software for the purpose of complying with your reasonable adjustment request and (ii) taken further steps prior to 6 March 2025 to chase

this request internally. Accordingly, it does not appear that the Complaints Team only facilitated your reasonable adjustment request in response to you attending the FCA's offices.

34. You have submitted to my Office that the Complaints Team's recording of its video call with you on 6 March 2025 malfunctioned, the investigator's own notes from that call did not capture your detailed complaint, and the 2025 DL represented a significant misunderstanding/misdescription of your complaint to the FCA.

    Further to my recommendation in the 2025 PR, the Complaints Team then arranged a further video call with you (which took place on 17 September 2025) to recapture your complaint. You are dissatisfied with the time and steps required for your complaint to be understood and investigated by the Complaints Team.

35. In my 2025 PR, I noted that the FCA had not reviewed your allegation (made to my Office in May 2025) that it had significantly misunderstood/misdescribed your complaint and I invited the FCA to review this allegation and respond to my Office. I have since received and reviewed that information.

36. It is very unfortunate that the new video technology malfunctioned, but that was not in the FCA's control. I appreciate your frustration that the investigator's notes of the video call were not sufficient to act as a backup record of your complaint, but it is understandable that an individual may not be able to take a detailed note simultaneously to conducting a video meeting (particularly where that individual has no reason to believe that the video recording software will malfunction). The Complaints Team also sent you letters on 25 March and 2 April 2025 summarising its understanding of your complaint and asking you to inform the FCA if its summary was incorrect. I understand that the FCA did not receive any feedback from you about its formulation of your allegations and so proceeded to conduct its investigation on that basis.

In view of the above, while I entirely understand how frustrating this experience must have been for you, I do not agree that this reflects unreasonable conduct by the FCA.

37. You have also brought to my attention that the FCA's 2025 DL included webpage addresses and not did enclose print outs of those webpages. You consider that the FCA provided you with information in a non-accessible format and that this constitutes a breach of the EA 2010. I note that the author of the 2025 DL had offered to print out hard copies of these webpages and the FCA's 2026 DL (in response to complaint allegation eight) found that:

    a. the "web addresses are intended for your reference, and to demonstrate the investigator's point that the website contains adequate information for those seeking reasonable adjustments, in response to your initial complaint";

    b. it was sufficient that the Complaints Team had offered to print the webpages for you, but has recommended internally that "feedback is provided to ensure that in circumstances such as these, when we refer to websites in hard copy letters, we print the relevant information to further aid accessibility".

38. While it is not in my remit to determine whether or not this constitutes a breach of the EA 2010, I can set out whether I consider that the FCA did or not acted unreasonably. I am not persuaded that the FCA acted unreasonably by offering to print webpages instead of just providing hard copies.

    However, I note with the above-described recommendation of the Complaints Team investigator who drafted the 2026 DL which aims to be even more helpful than it already is.

39. On your call with my Office on 17 February 2026, you stated that you had previously asked the Complaints Team to provide in large font hard copies (i) the printable online complaints form and (ii) a copy of the Complaints Scheme. As this submission had not previously been made to the FCA, I invited the FCA to consider it. The FCA has confirmed to my Office that it has reviewed the

recorded communications between you and the Complaints Team and has not identified any record of a request for either document, including in large-print hard copy or otherwise.

40. Since you originally informed the FCA about accessibility issues with its website, the FCA has taken steps to improve accessibility as follows:

    a. during your early contact with the FCA, you informed it that you considered that FCA webpages did not make clear how a consumer could request reasonable adjustments (such as to submit a complaint or a freedom of information request in an accessible manner);

    b. the FCA subsequently amended those webpages to address your feedback and has since made clear how consumers can submit a complaint to the FCA in a manner other than in writing or by online form – see paragraph [19.b] for more information; and

    c. at the OCC's request (following your call with my Office on 17 February 2026), the FCA prepared a large font hard copy of the Complaints Scheme and provided it to the OCC in March 2026, which the OCC then sent to you.

41. I recognise that the FCA ultimately took a number of steps to address the issues you raised. These included providing an alternative means of communication, arranging a further video meeting after the failure of the initial recording, reviewing its handling of the complaint, and making changes to aspects of its accessibility information and practices. I also accept that some of the difficulties encountered arose from technical failures rather than any deliberate action by the FCA.

42. However, my role is not limited to considering whether the FCA eventually took corrective action. I must also consider whether you were able to access the FCA's complaints process effectively from the outset.

43. Having reviewed the evidence, I am satisfied that you experienced difficulty in obtaining adjustments which enabled you to participate effectively in the process. The complaint to the FCA was not initially captured in a manner that allowed it to be investigated properly, the failure of the first recorded meeting contributed to further delay and confusion, and considerable effort was required by you before your concerns were fully understood and addressed. While the FCA subsequently took reasonable steps to remedy these issues, those later actions do not wholly negate the difficulties experienced beforehand.

44. There is an important distinction between eventually addressing a problem once it has been identified and ensuring that its processes operate effectively from the outset. Where improvements are introduced as a result of a complainant's persistence, this may indicate that the original arrangements were not operating as effectively as they should have been.

45. I therefore find that, although the FCA acted constructively once the difficulties had been identified, there were shortcomings in the way your accessibility needs and complaint were initially handled. Your experience involved delay, inconvenience and frustration.

For that reason, I **uphold** Element Four to the extent it pertains to the FCA's initial handling of your accessibility requests and complaint, but not in respect of the steps the FCA took to address these points. In response to my Preliminary Report dated 10 June 2026 (the "**2026 PR**"), the FCA has informed my Office that it agrees with this decision and that it apologises to you to for the delay, inconvenience and frustration experienced. (I expect the FCA to apologise to you about this directly, if it has not already.)

The Complaints Team has also agreed to increase its offer of a compensatory payment from £50 to £100.

Element Five: You submit that the FCA mishandled your requests for reasonable adjustments when you submitted a FOIA request and a DSAR.

46. I **uphold** Element Five for the reasons set out below in paragraphs 47-50.

47. The FCA's Supervision Hub notified the FCA Complaints Team and the FCA's DSAR Team of your request for reasonable adjustments. However, the Supervision Hub failed to:

    a. notify the FCA's FOIA team of your request as a reasonable adjustment that any written correspondence use large font and contain a contact number; and

    b. update your profile on the FCA's system to include your reasonable adjustment request.

48. I understand that the FCA's policy requires that the Supervision Hub take both of these steps when alerted of a consumer's request for reasonable adjustments. As a result of this failure, the FOIA Team was not made aware of your request for reasonable adjustments and its interactions with you repeatedly failed to accommodate these requests on a number of occasions (such as by sending you correspondence printed in small font and which did not contact the FOIA Team's telephone number). I consider that the Supervision Hub's failure to implement this policy was unreasonable.

49. The FCA's DSAR Team informed you that it needed to verify your identity before it could provide you with the data you requested. You offered to bring your ID to the FCA's offices for this purpose and agreed with the DSAR Team that you would do this on 10 March 2025. When you attended the FCA's offices on that day, you were using a wheelchair. I have not seen reference to you alerting the FCA that you might be using a wheelchair when you attended the office, but I do not consider that you were obliged to.

50. Unfortunately, the FCA's EA 2010-compliant doors were not working and you have explained that you were unable to enter the FCA's offices through its revolving doors and present your identity documents. During later visits to the FCA in 2025, you observed that the EA 2010-compliant doors were still not working. I made enquiries of the FCA which has apologised for this and explained that there have been an ongoing issues with the EA 2010-compliant

doors, which is believed to be a design failure, and that the building landlord is in discussion with the door manufacturer to try to resolve the issue.

The FCA has also stated that its security and reception staff are fully aware of the ongoing issue with the door and remain available to assist anyone who requires support while the issue is being resolved. The FCA has confirmed that there is an alternative entry point into the building should this be required. Unfortunately it does not appear this was signposted sufficiently adequately at the time of your visit.

51. Separately, I have seen that the DSAR Team closed your DSAR case on 9 April 2025 on the basis that you had not attended the FCA's offices to provide your ID on 10 March 2025. The FCA's files provided to me do not reflect any attempt by the DSAR Team to contact you, on or after 10 March 2025, to:

    a. check why you had not attended and provided your identity documents;

    b. arrange another time or method to verify your identity documents; or

    c. inform you that it intended to close your DSAR case as a result.

52. While it is not within my remit to comment on or decide the extent to which the DSAR Team did or did not comply with its obligations under data protection legislation (that would fall under the remit of the Information Commissioner's Office), I made enquiries of the FCA to understand the FCA's position. The FCA has explained that it "receives a high volume of data protection rights requests, many of which require triage, identity verification and case processing. In a number of cases, requesters do not respond to identity verification requests or decide not to pursue their request further.

    Requiring the team to follow up in every case where identification has not been provided would divert resource from processing active requests and carrying out the FCA's statutory obligations". The FCA therefore has a policy not to follow up in cases where the requestor does not provide identification. It has explained however that "Where identification is received after a case has been closed, the FCA can open a new case and progress the request at that stage. Closure in those circumstances is therefore an administrative step and does not prevent the requester from pursuing their data protection rights request".

Element Six: You submit that the difficulties you experienced when requesting reasonable adjustments from the FCA indicates that the FCA has not fully implemented the reasonable adjustment measures which it informed the OCC (in 2021) and the Treasury Committee (in 2022) that it would.

53. The FCA has provided (i) a copy of the information it provided to the OCC and the Treasury Committee about the reasonable adjustment measures it intended to implement and (ii) a description of how it has since implemented those measures. On the basis that the FCA has implemented the specific measures it committed to implementing, I do **not uphold** Element Six.

54. For the avoidance of doubt, I have considered your representations in response to my preliminary finding on Element Six (set out in the 2026 PR). However, I do not agree that your summaries are correct of (i) the FCA's statements to the OCC and the Treasury Committee, (ii) the FCA's implementation of reasonable adjustment measures, nor (iii) the information set out in the Complaints Scheme.

55. I also note that the FCA has taken the following steps to implement the recommendations of the case investigator who handled your complaint (in an effort to minimise the likelihood of the FCA repeating the conduct you have complained about):

    a. The Supervision Hub employee who did not record your request for reasonable adjustments has received feedback to ensure that such adjustments are recorded on consumers' profiles on FCA systems. The FCA has also provided refresher training on logging reasonable adjustments to the Supervision Hub (i.e. to the whole department).

    b. The FCA has added guidance to its Complaints Manual about providing printed information about its Accessibility Service policy and Accessibility Statement, rather than referring only to the relevant webpages, in complaints about the accessibility of the FCA’s services from consumers who require hard-copy decision letters.

56. It also appears to me, from your complaint and some other reasonable adjustment request-related complaints against the FCA which I have recently seen, that the FCA can still make improvements to ensure more effective compliance by its staff with its Accessibility Service policy and the EA 2010 more broadly.

57. I have recently made recommendations that the FCA reviews its protocols for how it deals with consumers who (may be vulnerable and therefore) require reasonable adjustments and then updates me on the results of its review. The FCA has accepted this recommendation. I will continue to monitor how the FCA implements it.

58. You submit that the difficulties you experienced when requesting reasonable adjustments indicate that the FCA has not fully implemented the reasonable adjustment measures which it informed the OCC (in 2021) and the Treasury Committee (in 2022) that it would introduce.

59. The FCA has provided evidence of the measures it committed to implement and the steps it has subsequently taken to implement them. On the balance of probabilities, I am satisfied that the FCA has implemented those measures.

60. However, implementation of those measures does not mean that the FCA's arrangements are complete or that further improvements are unnecessary. The evidence before me, including the circumstances of your complaint and other reasonable adjustment-related complaints that I have recently considered, indicates that there remains scope for improvement in the consistent application of the FCA's Accessibility Service policy and its wider obligations under the EA 2010.

61. Accessibility and reasonable adjustment arrangements are not static and should continue to evolve in response to operational experience, feedback and identified shortcomings. In that context, I note the recommendations made by the FCA's case investigator.

62. I also note that the FCA has accepted recommendations to review its protocols for dealing with consumers who may require reasonable adjustments. I will continue to monitor the FCA's progress in this area.

63. Lastly, I note that you have informed me of more recent interactions you have had with the FCA, where you submit that the DSAR Team and the Complaints Team are still failing to comply with your requests for reasonable adjustments and therefore have not learned lessons from the present complaint. I understand that this newer complaint is being investigated by the FCA. As it has not (yet) been referred to me, I am not in a position to investigate or make recommendations in respect of it. However, as an observation, I consider that it would be prudent for the FCA to share this Final Report with the investigator assigned to your newer complaint.

Conclusion

64. Although I acknowledge the FCA has taken positive steps to implement measures with respect to reasonable adjustments, the evidence before me, including the circumstances of your complaint and other reasonable adjustment-related complaints that I have recently considered, indicates that there remains scope for improvement in the consistent application of the FCA's Accessibility Service policy. I have identified the following failings on the part of the FCA in its engagement with you:

<u>Accessibility and Reasonable Adjustments</u>

65. In my view, the FCA failed to (i) implement certain reasonable adjustments promptly after they were requested and (ii) maintain effective adjustments. For example, the Supervision Team failed to comply with the FCA’s policy to record internally and notify other relevant teams of your requests for reasonable adjustments. While this was corrected later on by notifying the Complaints Team and DSAR Team of your reasonable adjustment requests, the same was done not for the FOIA Team. As a result, your correspondence from the FOIA Team repeatedly did not satisfy your accessibility requests (such as to be

printed in large font and contain direct contact information). As another example, the FCA did not use its initiative when considering your reasonable adjustment request to provide feedback to the Handbook Team directly.

The FCA eventually offered to take down your feedback by video call and input it into the Handbook Feedback Tool, i.e. to accommodate your request in an indirect manner, but this occurred a considerable time after you first made a reasonable adjustment request

66. When you first contacted the FCA in relation to DISP rules, you found that the FCA's website (i) relied heavily on consumers contacting the FCA or making requests in written form and (ii) failed to provide clear information about how to request reasonable adjustments or access alternative methods of communication with FCA staff. However, in response to your feedback, the FCA acted promptly and reasonably to rectify this.

    In the context of a separate complaint from a different consumer, I recommended that the FCA reviews its protocols for how it deals with consumers who require reasonable adjustments. The FCA reported to me shortly after to explain the steps it has taken to do this.

Complaints Handling

67. Owing to a technological failure, your initial complaint was not captured in a complete and permanent form. You felt that the complaint points captured in the 2025 DL were so far removed from the complaint you had submitted that it became necessary for the FCA to retake your complaint again. Ultimately, the complaint investigation process has been significantly extended as a result of this. I do note, however, my understanding that the FCA did not receive feedback from you on its Scoping Letters dated 25 March and 2 April 2025. (The copies of the FCA's Scoping Letters I have seen were printed in large font, so I am not aware of these being provided in a form that did not comply with your reasonable adjustment requests.)

FOIA request and DSAR

68. The extent of the FCA's compliance with these requests under data protection legislation is excluded from the Complaints Scheme. However, I have expressed my view that - as a matter of general case handling - I do not consider that the FCA acted reasonably by closing your DSAR file without first taking any of the steps described in paragraphs [51.a - 51.c] above.

Recommendations and remedy

69. In the 2026 DL, the FCA has offered you an apology and compensatory payment of £50 in relation to the failures of the correspondence from the FOIA Team to comply with your request for reasonable adjustments (i.e. in respective of narrower findings than I have made in this preliminary report). In the 2026 PR, I invited the FCA to reconsider the level of compensatory payment offered to you in view of my preliminary findings. The FCA has agreed to revise its offer of compensation to you up to £100 and has issued a further apology, on the basis that it has accepted my finding summarised above. However, the FCA did not take into account my finding about Element 5, because it does not agree with that finding.

70. Since issuing the 2026 PR and conducting further investigation:

    a. I have changed my finding at Element Two to uphold part of it. Specifically, I now uphold your complaint point that certain of the FCA's webpages previously did not contain as much accessibility information as might reasonably have been helpful for consumers with accessibility requirements.

    b. Under Element Three, I have also found that the FCA was slow to take down your feedback for the Handbook Team in an accessible manner.

    Therefore, I recommend that the FCA considers these additional findings and applies its compensation metric at para. 6.17 of the Complaints Scheme.

The Complaints Commissioner

Complaints Commissioner

20 August 2026