

24 February 2026

**Final report by the Complaints Commissioner****Complaint numbers 202500495 and 202400133***The complaint*

1. On 3 October 2025, you submitted a complaint to my office about the FCA, which I set out below:
2. **Element One:** The FCA was asked by the NCA to review information it had received in 2021 concerning alleged signature forgery. This information included allegations you had previously provided to the FCA in 2010 regarding wrongdoing by Bank X (“**2010 information**”). However, the FCA decided not to include this information in its review sample, notwithstanding your allegation that the NCA had informed both the Chair of the All-Party Parliamentary Group on Fair Banking and the Group itself that it would be investigating document manipulation and tampering.

**Outcome: Not upheld.** The FCA had previously reviewed your allegations in 2010, and I consider that it acted reasonably in deciding not to review them again, particularly given its conclusion that they did not relate to signature forgery. The FCA is not aware of the NCA having informed the All-Party Parliamentary Group on Fair Banking that it would be investigating document manipulation or tampering. I provide further reasons below.

3. **Element Two:** In 2018, you obtained information from Bank X through a DSAR concerning how it had managed your accounts that were previously the subject of your 2010 information. You then asked a specialist consultant in bank treasury to review this material, and they have written to me expressing an opinion that alleges fraud and/or other wrongdoing by Bank X in relation to these accounts, copying both you and your MP. You and the consultant have

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also provided information relating to the accounts, including snapshots of court judgments and possibly bank ledger records. You believe that you are not the only individual affected in this way and would like me to urge the FCA to open an investigation into Bank X with regards to this matter, with a view to establishing whether other Bank X clients were affected in the same way as you were.

**Outcome: Not investigated.**

4. This matter was not raised as part of the complaint considered by the FCA in its Decision Letter dated 31 July 2025. Although you have said that you have raised these issues previously with the FCA, they would need to be submitted formally under the Complaint Scheme, to which both the FCA and I are subject. Under the Scheme, it is standard practice for the FCA to consider matters in the first instance.
5. For that reason, in the Preliminary Report I suggested that you refer this issue back to the FCA for its consideration. You have now done so, and the FCA has agreed to review the information. You will receive a decision from the FCA, which you may refer to me for review if you remain dissatisfied with the outcome.
6. For the record, I have not reviewed the material you have provided nor considered the merits of this element of the complaint. My comments relate to process only. I note your statement that you may previously have raised these issues with the FCA. For the reasons given above I have not investigated this element of complaint.

*Background*

7. In 2010 you provided information to the FSA (the FCA's predecessor) on Bank X, alleging that between 1998 and 2008 it engaged in either malpractice or fraud against your accounts. I addressed how the FCA dealt with this information in my Final Report of November 2024 ([202400133-Issued-08-November-2024.-Published-05-December-2024.pdf](#)). It is not my intention to repeat the report here, but I note that the FSA did review your allegations although there is no record remaining of how it handled them.

8. My Final Report acknowledged that you were unhappy with how the FCA had handled the 2010 information you provided as part of its 2021 review at the request of the NCA (see details below). As the FCA had not reviewed this complaint, it invited you to refer it back, which you did. You are unhappy with the answer and have referred the complaint to me.
9. Turning to events in 2021, the NCA received information from the Bank Signature Forgery Campaign Group (“**BSFCG**”) as part of its investigation into alleged serious organised crime relating to bank signature forgery. This information included the 2010 information you had previously provided to the FSA.
10. The FCA assisted the NCA with its investigation. This included reviewing information which the NCA passed to it. The FCA assessed the information which the NCA provided it as part of the investigation but concluded that your information did not relate to signature forgery. Therefore, the FCA decided that it would not review this information in the context of the 2021 NCA review (however, I note that the FCA had already reviewed this information when it received it from you in 2010).
11. You were not happy that the FCA did not include your 2010 information in its 2021 review connected with the NCA investigation. You complained to the FCA about this in July 2025. The FCA issued a decision letter on your complaint dated 31 July 2025 and did not uphold your complaint, on the basis that it had previously reviewed your allegations in 2010 and they did not relate to signature forgery, which was the theme of the NCA review. The FCA later confirmed it was not aware of the NCA having informed the All-Party Parliamentary Group on Fair Banking that it would be investigating document manipulation or tampering.
12. On 3 October 2025 you complained to my office

### *Analysis*

*Element One: The FCA was asked by the NCA to review information it had received in 2021 concerning alleged signature forgery. This information included allegations you had previously provided to the FCA in 2010 regarding wrongdoing by Bank X (“2010 information”). However, the FCA decided not to include this information in its*

*review sample, notwithstanding your allegation that the NCA had informed both the Chair of the All-Party Parliamentary Group on Fair Banking and the Group itself that it would be investigating document manipulation and tampering.*

13. My November 2024 Final Report noted that the FCA had reviewed the material on alleged regulatory misconduct within Bank X which you provided in 2010 at the time. The FCA noted that there was evidence that it had assessed the material, but given the passage of time, the FCA could not explain precisely how it dealt with the material. It would not be proportionate to ask the FCA to reassess the material.
14. My November 2024 Final Report also recommended that you refer any questions about the FCA's decisions on your 2010 allegations, which it had received from the NCA in 2021, to the FCA.
15. The FCA stated in its 31 July 2025 Decision Letter that the material on alleged regulatory misconduct within Bank X which you provided in 2010 was included in the information it was asked to assess by the NCA. The FCA explained to you that this material did not concern signature fraud but instead related to regulatory misconduct within the debt recovery centre of Bank X and false accounting. The FCA told you it had made an assessment that the 2010 information was not directly relevant to the 2021 NCA investigation so did not review it in 2021.
16. The FCA also confirmed to you that it had received this material on alleged regulatory misconduct within Bank X from you in 2010 and had assessed it in 2010.
17. You have stated that *"the co-chair of the All Parliamentary Group on Fair Banking and the APPG itself was told by the Director General of the NCA that document tampering and manipulation would be investigated as it formed the most serious element of the campaigns allegations."*
18. However, you have subsequently provided a copy of a letter sent by the FCA to your MP on 9 December 2025, in which the FCA confirmed it was not aware of being told the above.
19. I find the FCA's decision not to re-review the information you supplied in 2010 to be reasonable. The FCA had already considered that information at the time it

was provided and has explained that it did not consider it relevant to the scope of the NCA's 2021 request. In those circumstances, it was entitled to conclude that a further review was unnecessary. That decision falls within the FCA's regulatory discretion.

20. For the above reasons I do not uphold Element One of your complaint.

*Decision*

21. I have not upheld Element One of your complaint and I have not investigated Element Two of your complaint.

*The Complaints Commissioner*

Complaints Commissioner

24 February 2026