

The complaint

Mrs T complains that TransUnion International UK Limited (TransUnion) failed to add her electoral registration within a timely manner following receipt of supporting evidence.

What happened

I issued my provisional decision to both parties on 19 March 2024, which set out the background and my provisional findings on this complaint. My provisional decision said:

Mrs T opened a dispute with TransUnion on 14 August 2023, as her electoral registration wasn't showing on her credit report. She provided an email from her local authority that confirmed her registration. TransUnion acknowledged Mrs T's dispute and informed her it would investigate it and update her within 28 days.

TransUnion requested an email or letter from Mrs T's local authority that confirms the registration dates. Mrs T responded confirming she'd already provided this evidence and provided the same email again.

TransUnion responded to Mrs T's dispute on 11 September 2023, saying it was unable to update her electoral registration data based on the information provided. It asked again for an email or a letter from the local authority that confirms the registration dates. As it hadn't received this evidence, the dispute was closed.

On 13 September 2023, Mrs T sent TransUnion a letter from her local authority that confirmed the registration date as 3 April 2023. She raised a formal complaint about TransUnion's lack of response to her previous emails and the delay it had caused. She also said her local authority had told her that it notified TransUnion of her electoral registration in April 2023, so TransUnion should justify why it wasn't updated at that time.

TransUnion didn't uphold Mrs T's complaint and said it's the data providers responsibility to ensure accurate and up to date information is provided. Within its final response, TransUnion confirmed it had raised the matter with its Data Services team to have the electoral status updated.

Unhappy with TransUnion's response, Mrs T referred her complaint to this service. Our Investigator reviewed matters and concluded that TransUnion was not responsible for the information not being displayed as Mrs T's local authority hadn't reported her electoral registration to it. The Investigator thought TransUnion had acted fairly by adding Mrs T's electoral registration on receipt of supporting evidence.

Mrs T didn't accept our Investigator's findings. She said the evidence TransUnion relied on to update her electoral registration was the same as what she provided back in August, so TransUnion should've been able to update this data then.

As no agreement has been reached, the matter has been passed to me to decide.

What I've provisionally 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.

In considering what is fair and reasonable, I've taken into account the relevant industry rules and guidance, and what would be considered as good industry practice.

The information held by Credit Reference Agencies (CRAs) is provided to them from sources such as financial businesses, local authorities and utility companies, who are the owners of the data. TransUnion is only able to display the information it is provided with by the data owners, so isn't responsible for inaccurate or incomplete entries based on what is or isn't provided.

Mrs T said her local authority notified TransUnion of her registration in April 2023, but I've not seen any evidence to support this. TransUnion has searched its database and found no record of notification of Mrs T's electoral registration, on dates either side of April 2023. So, based on the information that is available to me, on balance, it seems more likely than not this wasn't received by TransUnion.

However, CRAs are expected to take reasonable measures to ensure the information that is reported via their credit files is accurate. So, I'd expect TransUnion to have updated its records on receipt of adequate supporting evidence of Mrs T's electoral registration.

The evidence Mrs T provided to TransUnion in support of her dispute was an email from the Senior Electoral Registration Officer at her local authority which said:

"I can confirm that you are on the register and an acknowledgment was posted out on the 14 March, which would be the date your application was completed."

TransUnion promptly responded to Mrs T explaining that it required confirmation from her local authority of the registration date to be able to update its records. I'm satisfied this was a reasonable request, as it's important the registration data is accurately reported. And the evidence Mrs T had provided didn't confirm the actual registration date, it only confirmed she was on the register, and the date her application was completed and acknowledgment of this was posted.

As the required evidence wasn't received, TransUnion closed Mrs T's dispute. Mrs T then raised a second dispute and provided TransUnion with a letter from Mrs T's local authority that did confirm the registration date of 3 April 2023. This evidence was received by TransUnion on 13 September 2023, and Mrs T's electoral registration was updated just under three weeks later. Considering this required referral to TransUnion's Data Services Team, and relevant checks before completion, I'm satisfied this was completed within a reasonable timeframe. It was also within the 28-day timeframe TransUnion advise consumers to expect a response to each new dispute.

So, for the reasons I've explained above, I don't think TransUnion were at fault for Mrs T's electoral registration not being reported prior to Mrs T raising a dispute. And I'm satisfied TransUnion advised Mrs T what it needed to update its records and resolved the matter within a reasonable timeframe once the required information had been received.

However, the level of service TransUnion provided did fall short of satisfactory at times throughout its handling of Mrs T's dispute. Following TransUnion's request for information, Mrs T sent two emails to TransUnion that weren't acknowledged or responded to for over three weeks. TransUnion didn't help Mrs T understand why the evidence she'd provided

wasn't adequate, and simply continued to send her the same generic information requests that she clearly thought she'd already provided. TransUnion also asked for the same information again, days after it had already received what it needed from Mrs T.

I'm satisfied these issues combined would've caused Mrs T unnecessary inconvenience and frustration. So, I think TransUnion should pay Mrs T £100 compensation in recognition of this. I'm satisfied this fairly reflects the level of distress and inconvenience caused to Mrs T and falls within our award ranges for situations like this.

My provisional decision

For the reasons set out above, I intend to uphold Mrs T's complaint and require TransUnion International UK Limited to pay Mrs T £100 compensation.

Responses to my provisional decision

Both TransUnion and Mrs T confirmed their acceptance of my provisional decision and offered no further comments or submissions.

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.

As there are no further submissions for me to consider in relation to this matter, I see no reason to alter the conclusions reached in my provisional decision as set out above.

Putting things right

TransUnion should pay Mrs T £100 compensation.

My final decision

For the reasons set out above, my final decision is I uphold Mrs T's complaint about TransUnion International UK Limited. I now require it to put things right as described above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs T to accept or reject my decision before 18 April 2024.

Nicola Bastin
Ombudsman