

The complaint

Mr S is unhappy with how The Co-operative Bank Plc (Co-op) is reporting his credit card to the credit reference agencies (CRAs).

What happened

On 19 March 2025 I issued my provisional decision to both parties, setting out the background to this matter and my provisional findings. The background and my provisional findings are copied below and form part of this final decision.

Background to this complaint

Shortly after Mr S took out a new credit card with Co-op in August 2023, he lost the card and reported this to Co-op on 5 October 2023. Co-op issued Mr S with a new card on 6 October 2023 which had a new card number.

Following this Mr S noted his credit file was now reporting the original card number as closed and the new card number showed as a new Co-op account entry on his credit file. Mr S complained to Co-op as he said this was misrepresenting his account given he had only one account with Co-op and he had not closed it.

Co-op confirmed there was only one credit agreement for Mr S and said they were reporting Mr S's account accurately.

Our Investigator considered Mr S's complaint and after initially finding in Mr S's favour, reviewed further submissions and concluded Mr S's complaint should not be upheld given the information on Mr S's credit file was not inaccurate and there was no requirement for Co-op to report in a particular way.

Mr S strongly disagreed. He said the information regarding his Co-op credit card was not accurate given it suggested he had opened more than one account with Co-op on the same day. He said this primarily because there were different account numbers and different opening balances. Mr S disputed Co-op's submissions that there was continuity in their reporting given the account number being used was changed. Mr S said Co-op's reporting would affect his creditworthiness and they were reporting differently to other organisations.

My provisional findings

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

I have taken into account any relevant law and regulations, regulators' rules, guidance and standards, codes of practice and (where appropriate) what is considered to have been good industry practice at the relevant time.

It may help if I also explain there is no scope for me to fine or punish a firm, or request that they change their processes or practices – those are considerations for the regulator, the

Financial Conduct Authority (FCA).

I've only included a summary of this matter above and will only comment on those points I consider relevant to reaching a fair and reasonable decision, but I assure the parties that I have reviewed all the evidence and submissions made available to me.

I've considered what, if any, requirements there are for how credit cards should be reported to the CRAs.

Data protection law doesn't require lenders to report to the CRAs, and so there is nothing here which extends to say how Co-op should report the account to the CRAs. The regulatory framework is also silent on how credit cards should be reported on a person's credit file.

But as a general principle, it is recognised within the industry (given their responsibilities for handling data) that information reported to the CRAs should be accurate, particularly given the information forms part of a person's overall financial standing which other organisations can (where appropriate) have access to.

As I've not found any requirement for Co-op to report the account in a particular way I've therefore reviewed the information Co-op is reporting.

I've reviewed Mr S's credit files with each of the three main credit file agencies and it's apparent that Co-op report differently to Mr S's other credit card providers. I say this as Mr S also lost his other credit cards at the same time as Co-op's card, but the other creditors have not closed and reported a new account entry to the CRAs as Co-op have done when replacement cards were issued.

Co-op have said if Mr S had been given a renewal card (after his existing card expired) then they would not have closed the credit file entry as the renewal card would have the same card number. However, as Mr S's credit card was lost Co-op have said that in order to prevent any misuse of the card, the card was closed and a replacement card issued with a new number. Co-op have said to stop reporting either the original card number or the new card number wouldn't be an accurate reflection of Mr S's account.

I note Co-op's point, but I also note this does appear to be different to other lenders' reporting given other card providers – including those apparently reporting using a card number as opposed to a separate account number - do not appear to have opened a new credit file entry for their replacement card.

Looking at Mr S's credit file reports I've not seen anything to suggest Mr S's Co-op account has been inaccurately reported in so far as no month for the account has been reported more than once. The start date of the account has remained the same. And while I note Mr S's comments about the starting balances being different on the different file entries, it is evident from the start date on the credit file entries and the months being reported, that the 'starting' balance for the second entry is not from the opening date of the account.

I take Mr S's point that the separate Co-op entries showing the same account opening date could suggest more than one account was opened that day, but I can see that the reporting months (with any of the CRAs) do not suggest the same, as they do not extend a payment history to the account opening date on each of the Co-op credit file entries that I have seen. There are also no additional hard searches to suggest a new account was opened when the credit card was replaced.

I acknowledge Mr S's frustrations with this, but there's not enough here for me to say Co-op have done something wrong or acted unfairly regarding the reporting of Mrs S's account at

this time. And for completeness, even if I were to have found Co-op had done something wrong, in the circumstances of this case I've not found anything to suggest Co-op's reporting has had a direct impact on Mr S.

Mr S said Co-op's actions had affected his ability to obtain credit and that it had caused the need for a guarantor to be requested following landlord checks. As our Investigator explained to Mr S, there are many variables that could prevent credit being approved or the landlord requiring a guarantor, and there was not enough in this case to say Co-op's reporting was the direct cause of either of these things. I note that Mr S now accepts that.

From the submissions I can see Mr S is aware that if he wishes he can place a Notice of Correction on his credit file to highlight to any organisation accessing his credit file that he has only ever held one credit agreement with Co-op. And I note Mr S is also aware that while many creditors use automated decision-making tools when considering lending applications, he is entitled to ask for any declined credit application to be manually reviewed.

I appreciate Mr S's annoyance with potentially having to take an extra step with any future credit application, but as already noted there are a number of variables a creditor will consider when deciding to lend to someone. To hold Co-op solely responsible, it would need to be determined that any declined credit was directly the result of how Co-op report the account following replacement credit cards to the CRAs.

Both parties have recently made me aware that Mr S unfortunately lost his Co-op card again, so Co-op have again closed Mr S's card number account and replaced it with the new one.

Closed accounts may or may not have an impact on someone's creditworthiness and it will depend on the wider circumstances at the time. Understandably Mr S's creditworthiness and financial standing is important to him. However, I am unable to make an award for something that may or may not happen in the future, so if Mr S finds himself in the position where Co-op's reporting has directly been the cause of a problem for him, he should first raise the issue with Co-op at that time.

Overall I have not seen enough in the circumstances of this case to say Co-op have done something wrong or acted unfairly at this time.

Responses to my provisional decision

On receipt of my provisional decision Mr S contacted our service and requested a deadline extension to provide further evidence to support his complaint. An extension was granted and extended once more after that; however, Mr S did not contact our service again and provided no further submissions or evidence for me to consider by the final deadline set out.

Co-op did not provide any further evidence or submissions for me either.

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.

Having done so, and in light of there being no further submissions or evidence from either party for me to consider, I have decided not to depart from the provisional findings I reached in my provisional decision.

That is, while I note Mr S's upset due to Co-op's style of reporting to the CRAs, for the reasons I've described above I have not found anything to persuade me Co-op have mis-

reported the history of Mr S's credit card or that they have acted unfairly towards Mr S at this time.

My final decision

I realise my findings will disappoint Mr S, but for the reasons set out above my final decision is that I do not uphold Mr S's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr S to accept or reject my decision before 20 May 2025.

Kristina Mathews
Ombudsman