

The complaint

Miss L complains that PROPEL HOLDINGS (UK) LIMITED, trading as Quid Market, lent to her irresponsibly. She's also unhappy with how it dealt with her complaint, and some subsequent communication.

What happened

Miss L was provided one short-term loan by Quid Market, for £400, in September 2020. Her repayments were around £130, to be paid monthly, over a six-month term.

In 2022, Miss L raised a complaint with Quid Market about irresponsible lending. Quid Market, in response, seems to have agreed to remove the loan from her credit file and, as I understand it, Miss L accepted that offer. Despite investigating her complaint and reaching an agreement with Miss L, it doesn't appear that Quid Market ever issued a final response at that time.

Some years later, in 2025, Miss L contacted Quid Market again. This time, Quid Market did issue a final response; it said, in summary, that it thought it had provided Miss L's loan responsibly. Miss L was unhappy with Quid Market's response – specifically, that it hadn't commented on some wider circumstances which had a profound effect on her. She said she contacted Quid Market again, via phone, and was treated without empathy; Miss L said a welfare check – involving the Police – was used, in her view, as a threat.

Miss L contacted our Service and asked us to review what had happened. An Investigator here did so, but they didn't recommend Miss L's complaint be upheld. They said, in short:

- Quid Market had completed proportionate checks in the circumstances before agreeing to lend to Miss L.
- The results of those checks hadn't indicated any significant cause for concern.
- On that basis, the loan wasn't irresponsibly provided to Miss L.
- Complaint handling, in and of itself, isn't a regulated activity that our Service can consider. Even so, there was very little information available to review; Quid Market couldn't provide any call recordings, and there was no way of knowing exactly what had been discussed.
- In terms of a welfare check, it wasn't for our Service to tell a business what its policies or procedures should be in such situations. Internal safeguarding policies were instead something for the business to determine.

Miss L disagreed. She maintained her view that the loan had been irresponsibly provided; she also said that Quid Market's behaviour and treatment of her should be further investigated. Miss L added that Quid Market should be able to provide call recordings, as part of wider regulatory obligations.

As no agreement has been reached, Miss L's complaint has been passed to me to decide.

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.

At the outset, I think it important for me to say that I'm left without doubt over just how strongly Miss L feels about what's happened here. I'm truly sorry to read of what she's been through. There's no question she is, and has been, in a difficult situation – both personally and financially. Before I cover anything else, I'd certainly encourage Miss L to reach out to organisations which can provide support and advice; our Service will be happy to pass on contact details of such groups, should Miss L like them.

I'll address the key aspects of Miss L's complaint individually – just to ensure clarity – and I should also explain that I've focussed on what I deem to be the crux of the matter. That's because our role is to be an informal service; I don't intend any discourtesy in my concise approach, it's simply to align with that purpose.

Was the loan provided to Miss L irresponsibly?

Fundamentally, Quid Market needed to make sure that it didn't lend irresponsibly. In practice, what this means is that it needed to carry out proportionate checks to be able to understand whether Miss L could make her payments in a sustainable manner before agreeing to lend. If the checks Quid Market carried out *weren't* sufficient, then I'll need to consider what reasonable and proportionate checks are likely to have shown.

Our website sets out what we typically think about when deciding whether a lender's checks were proportionate. Generally, we think it's reasonable for a lender's checks to be less thorough – in terms of how much information it gathers and what it does to verify that information – in the early stages of a lending relationship. That said, we might think it needed to do more if, for example, a borrower's income was low; or if the information the lender had – such as a significantly impaired credit history – suggested it needed to know more about a prospective borrower's ability to repay.

Here, for Miss L, Quid Market approved her application after it had gathered details of Miss L's income – which it verified using a third-party report – and used statistical data to help determine her day-to-day expenses. It also reviewed Credit Reference Agency ("CRA") data to build a view of Ms H's existing credit commitments and how she was managing them.

The results of those checks painted a broadly stable picture of Miss L's finances at the time. Recorded CRA data suggested her existing commitments were up to date; Miss L's verified income against her declared outgoings (which were adjusted, using statistical estimations) showed she'd have enough disposable income to meet the repayments, and no County Court Judgments or Individual Voluntary Arrangements were recorded either. Miss L did have two defaults recorded against her, but both were from 12 months prior to this lending decision and, as such, reasonably deemed historic. Overall then, Quid Market's checks suggested Miss L was generally managing things well at the time she applied for this loan.

I know Miss L's opinion is such that Quid Market ought to have carried out significantly more detailed checks into her finances before agreeing to lend. The fact is, though, that there are no fixed checks a business must complete when reviewing an application for credit. There isn't any requirement on a lender to review specific things such as bank statements, for example. So, I can't fairly say that Quid Market was wrong to not run those sorts of checks here; there was no regulatory requirement to do that, and I don't think the results of the checks it did run ought to have prompted it to go further. Instead, Quid Market was entitled to

rely upon the information available at the time; and that data suggested things were being managed well.

All of that means Quid Market would've never uncovered the true position of Miss L's finances. It simply wouldn't have known that her situation was much worse than it appeared – and that isn't a failing, for the reasons I've explained. That will, of course, significantly disappoint Miss L; I'm in no doubt her true financial circumstances were just as she's described, and that she was struggling. Even so, it's only fair and reasonable for me to uphold a complaint in circumstances where I can conclude a business did something wrong. Here, I don't think Quid Market could have known – or ought to have known – that the loan was, or would become, unaffordable at the time of lending. So, for the reasons I've already given, I can't fairly conclude that Quid Market acted irresponsibly or otherwise treated Miss L unfairly. I haven't seen anything to suggest that Section 140A or anything else would, given the facts of this complaint, lead to a different outcome.

Quid Market's handling of Miss L's circumstances and complaint

This is of great importance to Miss L, and I can surely understand why, so I want to reassure her that I have read everything she's said and provided. Some of what she's described is deeply personal, so I've not set out the specific detail here, and I do certainly hope that things have improved for her.

Our Investigator explained that complaint handling, in and of itself, isn't a regulated activity. They're not wrong about that, it isn't, and as a standalone complaint point it's not something I'd be able to comment on here. That said, we *can* consider aspects like complaint handling if brought ancillary to a regulated activity. I think that applies in this scenario; in providing Miss L a loan Quid Market was carrying on a regulated activity, and its subsequent handling of her complaint about that loan is ancillary to that regulated activity. So, broadly, I think I can review this aspect of Miss L's overall complaint.

That as may be, the fact is there's very little information or evidence available around this point. From Quid Market, I don't have call recordings and there are only nominal, sparsely detailed, contact notes to review; on the other hand, Miss L has provided her testimony about what happened. So, I must be clear that where evidence is limited, as it certainly is here, I need to reach any findings "on balance" – considering the available evidence and the wider circumstances.

From what I can see, when Miss L raised her complaint initially, in 2022, the only thing mentioned was irresponsible lending. There's no indication of any other aspects being brought to Quid Market's attention. So, it wouldn't be surprising if any investigation focussed on that alone. That said, I've no reason at all to doubt what Miss L says about phone calls with Quid Market – in 2022 or 2025, during which she explained her wider circumstances – nor about how the contact with its agents over the phone made her feel. I'm sorry to hear that the calls made her feel the way she's described. I have to keep in mind, though, that my role here is to step back from the emotion; essentially, I must remain impartial and look at things holistically.

As I've said, I don't at all doubt Miss L felt just as she's said she did; but in the absence of call recordings or transcripts, for example, there's nothing *objective* to substantiate allegations here. Without that, I'm simply unable to ascertain the context or tone of any conversations Miss L had with Quid Market. So, while I certainly don't mean to downplay what Miss L has told us, and I hope she understands that I'm not diminishing what she's said, based on the little information that's available I don't think I can reasonably determine – or say it's more likely than not – that Quid Market acted unfairly.

I know Miss L was particularly aggrieved at Quid Market saying it would organise a welfare check involving the Police. Again, context here is important – but in any event, as our Investigator explained, it isn't for this Service to tell a business how to operate; that includes policies around customer safeguarding. Quid Market is legitimately able to determine those procedures for itself.

Miss L has pointed out that Quid Market *should* have recordings of the calls she made to it, but we're not the appropriate body to review whether it has, or hasn't, complied with legislation around data and retaining information. I'd suggest Miss L contact The Information Commissioner's Office ("ICO") if she wishes to pursue this aspect.

Overall

In closing, I'll say again that I'm in no doubt this matter has, clearly, impacted Miss L greatly. I know this won't be the answer she wants to receive and that she'll find it disappointing; I'm sorry for that, but it's for the reasons I've explained that I don't think Quid Market lent to her irresponsibly – nor can I conclude that it otherwise treated her fairly. It follows that I don't uphold this complaint, and I don't require Quid Market to take any further action.

My final decision

My final decision is that I don't uphold Miss L's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss L to accept or reject my decision before 1 January 2026.

Simon Louth
Ombudsman