

## **The complaint**

Mr H has complained that HSBC UK Bank Plc (“HSBC”) failed to identify, intervene, and provide support in response to clear and escalating signs of gambling-related spending on his account.

Mr H says that this particularly became a problem between 21 May 2025 and 03 June 2025.

## **What happened**

After Mr H raised his complaint, HSBC issued its final response to the complaint on 9 October 2025 and didn’t uphold the complaint.

In summary, HSBC said that it offers a range of support options, including a gambling block, for its customers if they find that they have a gambling problem. But HSBC said the consumer would need to inform HSBC about their circumstances, for such help or support to be offered. HSBC said that support may sometimes be proactively offered to customers, but only if there is sufficient evidence that a consumer is suffering from financial difficulties. HSBC said there was not enough evidence of financial difficulties in Mr H’s case, to have prompted such an intervention.

After Mr H referred his complaint to this service, one of our investigators assessed the complaint and they didn’t uphold the complaint either.

As Mr H didn’t accept the investigator’s conclusions, the matter was referred for an ombudsman’s decision.

## **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 considered everything, I don’t uphold this complaint. I will explain why.

Mr H has complained that HSBC didn’t intervene when he made many payments from his personal account to gambling companies over a period of time, and particularly between 21 May 2025 and 3 June 2025. Mr H says that HSBC should’ve intervened or offered him support. However, the starting position here is that a Payment Service Provider such as HSBC, is expected to process payments and withdrawals that a customer authorises it to make. This is in accordance with the Payment Services Regulations and the terms and conditions of the customer’s account.

HSBC has explained that it has a number of tools and support available if customers reach out for help or support with problem gambling. HSBC said it would generally offer such support if the customer said that they have a gambling problem or asks HSBC for support. But in this case, unfortunately I can’t see that Mr H did that.

Although Mr H didn't tell HSBC about his problem gambling and didn't ask for support, banks do however, need to have systems in place to identify whether their customers are having problems managing their spending. It is important to note that bank accounts are not, generally speaking, manually reviewed or manually monitored. So, for HSBC to have become aware that Mr H might be having a problem, this would usually only occur if it had been alerted to unusual spending on the account by its anti-fraud systems, or if it identified that the consumer was experiencing ongoing financial difficulties.

In the absence of Mr H telling HSBC about his problem gambling, this could be identified in one of the following ways:

- The transactions themselves being identified as possibly fraudulent.
- Having financial problems, e.g. if the account is frequently overdrawn or over the limit.
- Unusual and/or out of character account activity.

Looking at Mr H's statements, I can see that the account was typically managed with a high frequency of payments regularly being made into and out of the account. It was not uncommon for there to have been a number of payments being made in a single day.

The account in question doesn't seem to be Mr H's main current account, as I can see a number of transfers into and out of the account from another account in Mr H's name. And I can see that winnings from Mr H's gambling were also paid into (and out of) the account too. So given that the account seems to have largely been used for gambling purposes, then I can't reasonably say that the gambling transactions (especially in the period of time specified by Mr H) were particularly unusual or out of character for how Mr H had operated the account before.

I have considered whether HSBC should've intervened due to concerns about fraud or scams. But Mr H had made many payments to gambling companies from the account, without raising any concerns with HSBC about fraud or scams. So, based on the history of the account, overall there seemed to be little reason for HSBC to suspect that any of the payments being made from the account were unusual or linked to fraud or scams.

There was however, a particularly high frequency of payments being made out of the account to a gambling company on 19 May 2025 and then on 27 May 2025. Due to the excessive amount spent on those specific days across multiple transactions, arguably this should've prompted HSBC to intervene, to check that they were not linked to fraud or scams. But even if HSBC had intervened on those particular days, given Mr H's compulsion to gamble, I don't find it likely that he would've said anything to HSBC that would've caused it to block the payments. After all, although there was a large amount of transactions made on those specific days, they were to a gambling company that Mr H had already used before.

Looking at statements covering a large part of 2025, it does appear that Mr H was able to manage the account well. He regularly credited money into the account to cover his expenditure, so that it remained in credit balance – sometimes with a balance in the thousands of pounds. And Mr H was regularly transferring money to and from the account.

I appreciate that Mr H running the account well may not have been an accurate reflection of his actual financial position. For example, I acknowledge that he may well have had to borrow money from other sources to maintain such high levels of gambling and to have kept the account in a credit balance. But from HSBC's perspective of how he operated the account in question, there was little to indicate that Mr H was experiencing financial difficulties due to his gambling, particularly between 21 May 2025 and 03 June 2025.

The first time it seems that there was any sign of potential financial difficulties was on 6 June 2025. On this day the account had gone overdrawn and Direct Debits started to be returned unpaid (because the account was overdrawn). But Mr H had stopped using the account to gamble by then – with the last payment to a gambling company having been made on 4 June 2025. So even if I were to conclude that HSBC should've done more and contacted Mr H on 6 June 2025 to see if he needed support, I can't say that Mr H had suffered a loss due to HSBC not intervening at that point, as he'd already stopped using the account to gamble.

So, taking everything into account, I don't think that HSBC can fairly or reasonably be held responsible for the gambling losses that Mr H incurred.

I'm sorry to hear about the impact Mr H's gambling problem has had on him. But I hope he understands the reasons why I have not been able to uphold his complaint in the given circumstances.

### **My final decision**

Because of the reasons given above, I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 21 May 2026.

Thomas White  
**Ombudsman**