

The complaint

Mrs B doesn't think Bank of Scotland plc trading as Halifax did enough to help and support her with her gambling addiction. She thinks it's systems and inaction led to her losing a significant sum of money and causing her unnecessary trouble and upset. She'd like the bank to reimburse her for what she spent.

What happened

I issued a provisional decision on this complaint, setting out why I didn't intend to uphold this complaint. I invited both parties to let me have any further comments before the deadline.

Below is a copy of my provisional decision.

Provisional decision

Mrs B held an account with Halifax and began using it in July 2024 to gamble. At the time, due to her deterioration and spending, she contacted Halifax for help, saying she'd spent £300 which she shouldn't have, and she was without money for food shopping. She enquired about some short-term borrowing. Halifax gave her information on gambling support and advice organisations and told her about the freeze function available in her banking app for card transactions, which when turned on, meant it wouldn't permit transactions to gambling merchants¹ and allowed her to put a limit on how much she spent.

Halifax declined Mrs B's request for borrowing.

Mrs B used the freeze function but said she'd realised the block amounts went back to zero if she changed the amount, which she didn't think had helped as she'd been able to reset the block. She complained about this, saying it hadn't done enough to support her and stop her spending. She said what she needed was for the bank to suspend her accounts so she couldn't make transactions.

Mrs B also submitted that she'd been vulnerable because of her addiction, and the bank should have had someone look at her situation and speak to her. She felt that if it had, this would have stopped her from gambling. She also raised concerns about the bank's unresponsiveness to some of the messages she'd sent using its secure messaging service and added that returned regular payments on her account should have also flagged that she needed help.

Later in January 2025, Mrs B opened another current account and spent similarly on that as well. She expressed concerns about the spending across both her accounts for gambling.

Halifax didn't think it had done anything wrong in relation to Mrs B's spending. It said it had signposted appropriate support to her when she'd contacted it in July and October 2024 and she had utilised the freeze function but turned that on and off, which was possible, but it didn't think it was responsible for this. It said that it had previously suggested some other

¹ Merchants that specifically identify as using the Merchant Category Code for gambling.

things. However, it accepted that there had been shortcomings in responding to messages and paid £150 to recognise the impact this had had on her.

Mrs B didn't think the bank's response was satisfactory and asked us to take a look. One of our investigators acknowledged what she said but didn't think Halifax needed to do more. He was satisfied that when Mrs B had contacted the bank in July and October, it had done enough to support her. He said that the freeze function was an extra layer there to help her think about and manage her spending, but it wasn't a complete stop if she was able to get around it. He thought that £150 for the poor service she'd had in the bank not responding was fair.

Mrs B didn't agree and asked for a decision. She believed she'd been let down by the bank after making it aware of her circumstances.

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.

I thank Mrs B for providing details about her difficulties with gambling – this can be a hard thing to share. She expected intervention from Halifax to stop this, so I have looked closely to see if the bank treated her fairly and reasonably.

I'm sorry to disappoint her, but I won't be upholding this complaint. I will explain why by addressing what I consider are the material points to support a fair and reasonable outcome.

- *I've looked at Mrs B's interaction with Halifax in July and October 2024 where she tells it about her gambling and that she needs help. In terms of her gambling, I'm satisfied Halifax did the right thing. It gave her the details of organisations specialising in providing support and made a note on its systems of her vulnerability. I understand she might have expected phone contact from a member of Halifax staff who understood her situation and could talk to her. However, in sign posting it was up to Mrs B to contact the organisations and speak to someone specifically trained to deal with her difficulties.*
- *While she might not have been keen to do this at the time, I don't think it was reasonable to expect the bank to provide this type of support instead, not when it had told her about the free organisations that could offer tailored advice and care to help with managing gambling.*
- *There are rules and industry practice around restrictions for fraud/scam payments, but there's a lot less guidance around what banks should be doing to prevent gambling spending. This is because gambling is a legal activity, and it doesn't always affect people negatively. Businesses can also commercially decide which blocks they have in place to allow customers to limit the way they spend their money.*
- *Halifax made Mrs B aware of the freeze feature in her banking app. I understand she'd realised that she could turn the block on and off, but this isn't a complete solution to gambling. It's only an extra layer designed to give the customer time to consider any impulsive decisions. I've looked at how the freeze feature works, and I'm satisfied it operated in line with how the business said it would.*
- *In her interaction with the bank in July, Mrs B said, "I'm asking for help. For u to loan me the money or put overdraft temp on while I sort myself out for the amount I've just spent. I'm doing other things as blocking gambling sites etc. If u reply with another*

contact so so I would like put complaint in". Looking at this, I think some of Mrs B's distress at the time stemmed from the bank not being able to give her borrowing. But it wasn't obliged to, not if she was having difficulty managing her spending.

- *I realise Mrs B expected a lot more from Halifax, especially because she had some of her payments returned, but having looked at all the circumstances, I'm not persuaded any further intervention would have made a difference to what happened. I say this because, she switched the block on and off multiple times and then opened another account. And if she hadn't opened another account with Halifax, I think she would have done so with another provider. I sympathise that this is all part of the addiction, and she's since sought support, but all things considered, I don't think the bank could have done more to prevent Mrs B's gambling. So, I won't be requiring it to do any more to resolve this dispute.*
- *Finally, I agree Halifax should have done better in responding to Mrs B's messages, but I think the £150 it has paid her is fair and is in line with what our service would award for the frustration and disappointment this caused.*

My provisional decision

My provisional decision is that I don't uphold this complaint.

Responses

Neither party provided anything further before the deadline.

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.

Given that neither party has presented anything more for me to consider, I see no reason to depart from my provisional conclusions. I now adopt my provisional decision as part of this final decision. Overall, I don't think Halifax could have done more to assist Mrs B that would have made a difference. So, I won't be asking the bank to do more.

Notes

I make a correction. I referred to the investigator as 'he', when I should have said 'she'

My final decision

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs B to accept or reject my decision before 26 February 2026.

Sarita Taylor
Ombudsman