

The complaint

Mr B complains that Barclays Bank UK PLC allowed him to make multiple gambling transactions to an unlicensed gambling operator and failed to identify and protect him as a vulnerable person with an addiction.

What happened

The detailed background to this complaint is well known to both parties. So, I'll only provide a brief overview of some of the key events here.

Mr B has a gambling addiction and between December 2022 and June 2025 he lost £50,306.49 to an overseas gambling company (Company E) after paying them £113,713.85 through his Barclays bank account for 869 gambling transactions and receiving winnings of £63,407.36. Mr B explains the devastating impact of this financial loss on his life and family.

Mr B complained to Barclays, seeking a full refund together with interest and compensation, as he believes they should've noticed a classic pattern of high-risk compulsive gambling behaviour and intervened to help him.

Mr B states that if Barclays had alerted him to a gambling blocking facility (that exists on his banking app) he would've enabled it immediately. Also, he points out that he gambled additional money on other sites, and he now knows that Company E isn't authorised by the UK gambling regulator.

Barclays rejected his claim and their response included the following comments:

- They didn't make any error in allowing the transactions that he confirms he authorised and took part in.
- They don't validate merchants on their trading practices, and they can't enforce any regulatory requirements.
- They have no grounds to dispute the transactions with them.
- It was Mr B's responsibility to ensure he was satisfied with the merchant and their trading practices, before engaging with them.

Mr B was dissatisfied and brought his complaint to our service. However, our investigator's view was that Barclays weren't responsible for his perceived loss as Mr B hadn't made them aware of his gambling problem or taken steps to get help or limit the amount he was spending.

But Mr B remains dissatisfied and his points when asking for an Ombudsman to review the complaint included:

- Barclays didn't take proportionate steps to identify and support a potentially vulnerable customer.
- The FCA's vulnerability approach exists because many vulnerable customers do not or cannot self-disclose and there should've been objective monitoring, proportionate intervention for clear indicators, proactive contact, welfare checks and signposting to tools (gambling block) or a short cooling-off period for gambling transactions.

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, although I'm very sorry to hear about Mr B's gambling addiction and the difficulties and distress it has caused him, I've reached the same outcome as our investigator, for broadly the same reasons.

Although I've read and considered everything Mr B has said, I won't be responding to every point individually. If I don't comment on any specific point, it's not because I've not considered it but because I don't think I need to comment on it in order to reach the right outcome.

In deciding what's fair and reasonable in all the circumstances of the complaint, I'm required to take into account relevant law and regulations; regulators' rules, guidance and standards; codes of practice; and where appropriate, what I consider to be good industry practice at the time.

In broad terms, the starting position in law is that a bank is expected to process payments and withdrawals that a customer authorises, in accordance with the Payment Service Regulations and the terms and conditions of their customer's account. However, where the customer made the payment as the consequence of the acts of a fraudster, it may sometimes be fair and reasonable for the bank to reimburse them, even where they authorised the payment.

Having considered all the information on file, including Mr B's payments and winnings, and researched Company E, even though they appear not to adhere to UK regulatory standards, I think it more likely than not that they are a genuine gambling company.

As I'm satisfied Company E is a genuine provider of gambling services and Mr B authorised and then received the services he paid for, and that there are no chargeback rights (as they don't apply to gambling activity) or fraud / scam refund rights under the APP Scam Reimbursement Rules or the Contingent Reimbursement Model (CRM) Code, I considered Barclays' monitoring responsibilities under the Payment Services Regulations 2017 (PSR) and Consumer Duty (which came out in July 2023) to monitor his account in order to protect him from financial harm and offer support if they are vulnerable.

Regarding the monitoring of gambling transactions, it is important to note that:

- It isn't illegal for customers to gamble.
- Gambling is a legitimate activity and it's not the role of the banks to take a view about legitimate transactions.
- The validity of a gambling licence or where Company E can legally operate isn't for Barclays to determine.
- A bank's role is to act on customers' payment instructions and customers should be free to spend their money as they wish.
- Banks are though required to identify and support customers who are in financial difficulty and look out for signs of vulnerability.
- Barclays shared a record of the vulnerabilities Mr B shared with them but these aren't relevant to this complaint as they aren't about gambling or financial hardship. And Mr

B has explained his reluctance to discuss his gambling vulnerability with them.

I would however expect Barclays to have support mechanisms in place for gambling where it should've reasonably become aware there might be a problem.

I considered whether Mr B's account activity should've been enough to alert Barclays that something might've been wrong and that it needed to step in. Although the statements do show large amounts of gambling activity, I'm not persuaded that this on its own was enough to indicate a problem and that Barclays made an error by not stepping in and offering support.

Mr B's statements show that he didn't require a bank loan or any overdraft and, with his regular winnings and credits, he consistently had sufficient money each week to fund his gambling activity. In addition, there were no obvious indicators of financial difficulty like unpaid direct debits or an unauthorised overdraft to cause Barclays to think he might be in financial difficulty and for them to take a closer look at his account activity.

So, although Barclays did have information on Mr B's gambling activity, that had become established, I don't think it could be reasonably concluded that this on its own points to Mr B having difficulties and a gambling spend that was out of control and that Barclays failed to put in place a proportionate intervention.

I noted that Mr B is able to use the internet and Barclays have a website with a dedicated gambling help and support page which includes card restrictions, freezing payments, blocking gambling websites and a self-help toolkit. I appreciate Mr B was worried about speaking to Barclays, in case they closed his account, but if he'd viewed this publicly available information that can easily be found he would've:

- Found out about Barclays' blocking facility and, as he would control this, he would've been able to use this whenever he wanted.
- Been signposted to independent support services who could've helped him and would've likely known about the blocking service.

Regarding independent support services, although Mr B has explained his reluctance to speak to Barclays and I recognise how difficult an addiction is to break, although he says he would've used the block service, I can't see an explanation on any efforts he made to seek out help with his gambling addiction or check Barclays app or website support and help pages.

In summary, although I recognise Mr B processed a high number of gambling transactions and appreciate his reasons for not wanting to talk to Barclays, I don't think it would be fair or reasonable to have expected them to have had a reason to intervene. Barclays would've thought the gambling activity was within his means and, although it appears he struggled to ask for support (due to shame and anxiety), I think this was clearly advertised and available.

So, having considered the above and all the information on file, I'm sorry to disappoint Mr B but I'm not upholding his complaint against Barclays.

My final decision

For the reasons mentioned above, my final decision is not to uphold this complaint Barclays Bank UK Plc.

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

Paul Douglas
Ombudsman