

## **The complaint**

Mr C complains that Starling Bank Limited failed to protect him as a vulnerable customer when it was clear from his account activity that he was in serious financial and emotional difficulty due to gambling.

## **What happened**

Mr C says that between January and December 2022, and again between January and December 2024, he was struggling with severe gambling addiction, unmanageable debts, and mental health problems. He further says his Starling account showed obvious signs of crisis. He was depositing thousands of pounds to gambling sites almost daily, while also making regular payments to debt charities and high-cost lenders. He believes that Starling should have identified this as it was clear from his account that he was borrowing to fund his gambling problem.

Mr C was registered with G, a self-exclusion scheme for people with online gambling problems, from February 2019 to April 2024. Then again from October 2025. He also used Starling's gambling block which he says he turned on and off from time to time.

In October 2025 he contacted a Claims Management Company (CMC) who presented a claim to Starling on his behalf. They asserted that he had paid out over £93,000 gambling and claimed a refund of those losses. This was based on what they said was Starling's "constructive knowledge" of his gambling activity and its failure to take any action.

Starling said that it would not be reimbursing Mr C's gambling losses. It explained that it wouldn't have been made aware of Mr C's vulnerability. And there were no signs of financial distress that Starling could have acted on. Additionally it said that Mr C intended to make the transactions and there was no guarantee that any further signposting by its team would have dissuaded or stopped Mr C from making the payments. It offered to discuss the matter further with Mr C and/ or if he wanted to know more about the support and services it could offer, to get in touch.

Mr C felt that Starling's response felt cold, dismissive, and purely procedural. He said it didn't acknowledge the clear signs of vulnerability that were visible on his account for a long time. And that it didn't recognise the part he believed the bank had played in allowing his situation to get worse

On referral to the Financial Ombudsman Service, our Investigator didn't think that Starling was responsible for Mr C's gambling losses as no triggers were there that could have given it cause to communicate with Mr C or to review his account activity.

Mr C didn't agree - he said that he turned the block on and off repeatedly and each time had to speak to someone at Starling. At no time did it stop this or seemingly do anything to intervene or provide support.

The matter has been referred to me for an Ombudsman's consideration. .

## 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.

I do recognise that a gambling addiction is very difficult to get through and talk about. I appreciate that Mr C having gone through such a difficult time, has taken steps to get help to prevent further gambling.

If there is gambling on a customer's account it doesn't automatically mean that they are vulnerable or compulsively spending. It could be an indication of vulnerability, but it wouldn't be suitable for Starling to assume that a customer needs additional support just because gambling transactions are being made. But as Mr C didn't tell Starling about any problems he may have had in this respect until October 2025, it couldn't act on them until then.

Banks do need to have systems in place to identify whether its customers are having problems managing their spending. It is however important to note that bank accounts are not manually reviewed. So, in order for Starling to know that its customer might be having a problem it would need to be alerted to identify unusual spending on the account. In the absence of Mr C telling Starling this could be:

- The transactions themselves being identified as possibly fraudulent.
- Having financial problems e.g. if the account is frequently overdrawn or over the limit. Or he had applied for loans or credit from Starling.
- Unusual and/ or out of character account activity.

I've noted that Mr C didn't apply for an overdraft, credit or a personal loan from Starling. If he had, it might have reviewed the account. And as far as I can see there was no indication that the gambling transactions themselves were in any way fraudulent – most appear to be with recognised betting companies or casinos. If any payments needed to be authorised by Mr C, he would have done it without having to make personal contact.

As for account activity, I've reviewed this for 2022 and 2024, the period Mr C is complaining about. And I've looked at what were obvious gambling transactions. If Mr C was transferring money out to gamble elsewhere, this wasn't obvious on the statements. I do note that Mr C declared a high income to Starling in 2022 and 2024, and that the account appeared to be well-managed and didn't go overdrawn.

There were periods during which Mr C spent a lot on gambling. But equally there were months when he didn't appear to gamble at all. Starling would have been unaware that he was registered with G. And the activity doesn't in my view stand out as being out of character or something Starling should have been prompted to investigate.

As an example, the CMC raised the account activity in June 2024 when Mr C spent over £12,000 on gambling. However his winnings that month were more than that, so it would in my view have been an indication of somebody coping with gambling. I've noted that Mr C's registration with G expired in April 2024 and wasn't renewed until October 2025.

Further the extensive betting activity which the CMC says continued for weeks after that simply doesn't show on the statements for Mr C's account. I've noted that there were extensive transfers out to other accounts and to a savings and investment service, but there's very little clearly identifiable gambling for the rest of 2024.

Mr C has told us that he turned the gambling block off and on repeatedly and each time had to speak to someone. He believes this would have triggered Starling to look at his account. We have asked Starling about this – its records don't show any telephone contact, and the log shows the only change in the block was in June 2024, when this was turned off via the app by Mr C. And even if that was done via telephone contact, as I've said, the account for June 2024 doesn't show any net gambling losses.

I note Mr C's point about Starling's response to his complaint. As our Investigator has said, complaint handling in itself isn't a regulated activity. I would however note that the response was given to the CMC and the case had been presented as a legal claim. I've considered from the point of view of customer support what Starling did once it became aware of Mr C's gambling addiction. It offered for Mr C to contact it if he wanted to learn about the support and services it can offer. As far as I'm aware he hasn't taken up that offer. I appreciate that he may be getting help elsewhere. Nevertheless the support from Starling was in my view offered appropriately and is there if he needs it.

Overall I'm not persuaded that Starling would have been aware of Mr C's vulnerabilities until October 2025 when it was contacted by the CMC. I won't make any award for gambling losses or compensation, as I think Starling took appropriate steps once it was made aware.

### **My final decision**

For the reasons set out above, I don't uphold the complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr C to accept or reject my decision before 11 March 2026.

Ray Lawley  
**Ombudsman**