

## **The complaint**

Miss H complains that Barclays Bank UK PLC trading as Barclaycard irresponsibly lent to her.

## **What happened**

Miss H was approved for a Barclaycard in March 2025, with a £11,900 credit limit. Miss H says that this was irresponsibly lent to her. Miss H made a complaint to Barclaycard, who did not uphold her complaint. They said taking everything into account, including her income, they were satisfied the credit limit they gave her was affordable. Miss H brought her complaint to our service.

Our investigator did not uphold Miss H's complaint. He said that Barclaycard's checks were proportionate, and they made a fair lending decision. Miss H asked for an ombudsman to review her complaint. She made a number of points. In summary, she said that at the point the Barclaycard was open she already had over £25,000 in active unsecured debt. She said her income was not guaranteed and it fluctuated.

Miss H said she had student loans which significantly reduced her income. Miss H said the disposable income relied on modelled disposable income than her real-world financial sustainability, and she believed further checks should have been completed by Barclaycard. She said another lender upheld her irresponsible lending complaint.

## **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.

Firstly, I'm aware that I've only summarised Miss H's complaint points. And I'm not going to respond to every single point made by her. No discourtesy is intended by this. It simply reflects the informal nature of our service as a free alternative to the courts. If there's something I haven't mentioned, it isn't because I've ignored it. I haven't. I'm satisfied I don't need to comment on every individual point to be able to reach what I think is a fair outcome.

I've considered what Miss H has said about another lender upholding her complaint for irresponsible lending. But our service judges each complaint on its own merits. So here, I'll be looking at what checks Barclaycard completed, and whether they made a fair lending decision.

Before agreeing to increase the credit available to Miss H, Barclaycard needed to make proportionate checks to determine whether the credit was affordable and sustainable for her. There's no prescribed list of checks a lender should make. But the kind of things I expect lenders to consider include - but are not limited to: the type and amount of credit, the borrower's income and credit history, the amount and frequency of repayments, as well as the consumer's personal circumstances. I've listed below what checks Barclaycard have done and whether I'm persuaded these checks were proportionate.

Miss H declared a gross annual income of £60,000, and that she was employed. Barclaycard calculated a net monthly income of £3,336. Although Miss H says that her income wasn't guaranteed, and it fluctuated, Barclaycard would not reasonably have grounds to know this when she said she was employed. But Barclaycard did make a further check with a CRA, who were able to validate Miss H's income, therefore another check (such as requesting Miss H's bank statements), would not have been proportionate here.

The CRA Barclaycard used showed that Miss H had active unsecured debt of £25,534, which was around 42.6% of her declared gross income - albeit I note the majority of this debt was from a hire purchase agreement (£15,625). The CRA reported no arrears in the last 12 months on any accounts for Miss H, and there were no defaulted accounts showing. Miss H was not showing as having opened any new credit agreements in the previous 12 months, so it didn't appear that she was hungry for credit at the time she applied for the Barclaycard.

Barclaycard also completed an affordability assessment. This included information from a CRA regarding Miss H's credit commitments, and modelling to estimate her other outgoings, and it is an industry standard way of assessing income. While Miss H has said they should have completed further checks to see her real-world outgoings (and her student loan repayments), the regulator does not require lenders to do this as part of every lending decision, as this would not be proportionate.

The results of the affordability assessment showed that Miss H should have enough disposable income in order to be able to make sustainable and affordable repayments for the Barclaycard.

In addition to this, if Miss H was transferring balances from other credit cards to refinance her debt, then this could save her interest and reduce her repayments (or she may wish to keep her repayments the same to reduce the time it took to fully repay her balance). It would not be foreseeable to Barclaycard that Miss H would re-use any credit she repaid off other credit cards as part of a balance transfer.

So in the absence of any adverse information on Miss H's credit file, and the results of the affordability assessment, I'm not persuaded that it would have been proportionate for Barclaycard to do any further checks here such as requesting Miss H's bank statements. I'm persuaded that Barclaycard's checks were proportionate, and they made a fair lending decision.

I've also considered whether the relationship might have been unfair under s.140A of the Consumer Credit Act 1974. However, for the reasons I've already given, I can't conclude that Barclaycard lent irresponsibly to Miss H or otherwise treated her unfairly in relation to this matter. I haven't seen anything to suggest that Section 140A would, given the facts of this complaint, lead to a different outcome here.

### **My final decision**

I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss H to accept or reject my decision before 15 April 2026.

Gregory Sloanes  
**Ombudsman**