



Affordability Assessment

Systemize Affordability Analysis

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Case Information

RD-2026-0190 | Richard Davies

Summary of the lending transaction and key dates for reference.

CASE ID

RD-2026-0190

APPLICANT

Richard Davies

STRONG CASE

Credit File Indicators

Analysis of adverse credit indicators found on applicant's credit file

- **Active CCJ**

Court judgment against applicant is active and unresolved. Strong indicator of inability to meet financial obligations.

- **Multiple CCJs**

Multiple court judgments show pattern of legal debt enforcement. Demonstrates persistent inability to manage credit responsibly.

- **Active default**

Current unsettled default on credit account. Applicant is actively failing to meet payment obligations.

- **Debt collection account**

Account has been passed to debt collection agency (Lowell, Cabot, PRA). Indicates serious payment failure and debt enforcement action.

- **AP marker**

Payment arrangement marker shows applicant negotiated reduced payments. Indicates financial stress and inability to meet original obligations.

- **Arrears in last 6 months**

Recent missed payments within 6 months. Shows ongoing payment difficulties and deteriorating financial position.

- **Credit utilisation >80%**

Applicant using over 80% of available credit. Indicates over-reliance on credit and limited financial buffer.

- **Rapid borrowing acceleration**

Multiple new credit applications in short period. Suggests applicant seeking additional credit to manage existing debt.

- **Repeat lending**

Multiple agreements with same lender or refinancing/top-ups. Pattern suggests lender not reassessing affordability despite worsening profile.

In-Scope: Potential Claims

Lenders that can be pursued for irresponsible lending

- **Vanquis Bank** [Credit Card](#)

Lending after CCJs / defaults visible on credit file

Sub-prime lender specializing in high-risk credit. Advanced credit despite multiple active court judgments and recent defaults on credit file. FCA rules require affordability assessment before lending - CCJs should have triggered decline or enhanced affordability checks.

- **Capital One (Europe)** [Credit Card](#)

Lending during adverse credit period

Extended credit during period of active defaults and payment difficulties. Credit file shows clear signs of financial distress - failed to conduct adequate affordability assessment or ignored adverse credit indicators present at point of lending decision.

- **NewDay Ltd (Aqua)** [Credit Card](#)

Sub-prime lending into deteriorating profile

Specialist sub-prime lender. Approved credit limit despite visible deterioration in applicant's financial position. Multiple CCJs and active defaults on file - lending decision appears to have ignored or underweighted clear affordability concerns.

- **JAJA Finance** [Credit Card](#)

CRA red flags ignored at point of lending

High-risk credit provider. Advanced credit despite clear red flags visible on credit file (CCJs, defaults, debt collection). Failed to conduct adequate affordability assessment or deliberately ignored adverse credit indicators.

- **Zable** [Credit Card](#)

High-risk profile at time of lending

Sub-prime lender. Approved credit to applicant with high-risk profile including multiple CCJs and active defaults. Lending decision not supported by adequate affordability assessment evidence.

- **Indigo Michael Ltd** [Credit Card](#)

Defaults and CCJs visible on credit file

Specialist lender. Extended credit despite applicant's visible payment difficulties and court judgments. Lending decision appears to have failed to properly assess affordability given clear evidence of financial distress.

Out-of-Scope: Not Defendants

Entities that cannot be pursued for irresponsible lending

- Lowell Portfolio I Ltd Debt Purchaser

Not original lender

Debt purchaser/collector. Did not originate the credit and therefore cannot be pursued for irresponsible lending. Only the original lender can be held responsible for affordability assessment failures.

- Monzo Bank

No lending decision

Current account provider. Not a regulated consumer credit lender for these purposes. Account facility does not constitute lending decision subject to FCA affordability rules.

- NatWest Bank

No lending decision

Current account provider. Banking services (current account, overdraft facility) are not regulated consumer credit lending for irresponsible lending purposes.

- EE Telecoms

Not regulated consumer credit

Telecommunications provider. Mobile phone contracts are not regulated consumer credit for FCA affordability assessment purposes.

- BT Telecoms

Not regulated consumer credit

Telecommunications provider. Broadband/phone contracts are not regulated consumer credit for FCA affordability assessment purposes.

- Sky Mobile Telecoms

Not regulated consumer credit

Telecommunications provider. Mobile phone contracts are not regulated consumer credit for FCA affordability assessment purposes.