

The complaint

Mr H complains about how Clear Score Technology Limited is displaying information about his bank and his address.

What happened

Background

Clear Score isn't a credit reference agency ("CRA"). Instead, it provides what's known as credit information services (and some other regulated activities). Unlike a CRA, no financial businesses or other relevant third parties report data to Clear Score. Nor do other businesses use data held by Clear Score to assess an individual's creditworthiness. Instead, Clear Score offers (amongst other things) consumers the ability to see what is being reported by a CRA without paying any fee.

Mr H's complaint

Mr H signed up to use Clear Score's credit information services. He's explained that he's experiencing recurring problems with how Clear Score displays information. He's highlighted that the name of his bank is incorrect and that his address shows incorrectly.

In its final response, Clear Score explained that it is unable to amend information on Mr H's credit report because the data comes directly from a CRA. It explained that Mr H's bank needs to contact the CRA to amend the information for it to be updated within Clear Score's service. Clear Score had taken steps to try and fix the problem with how it displays Mr H's address, however that fix was not permanent. Clear Score acknowledged it had a bug in its system but pointed out it was not affecting Mr H's credit score, report, or creditworthiness.

Mr H referred the complaint to us. He said he should not need to continually contact Clear Score to correct his data and then have no guarantee that the changes made will be retained.

Our Investigator looked into the matter. He didn't think Clear Score had made any error in the way it displayed information about Mr H's bank. But he thought Clear Score had caused Mr H inconvenience in relation to the matter he's raised about how his address is shown. He pointed out that Mr H has needed to contact Clear Score on multiple occasions to let them know the fix hasn't worked and this issue remains. He recommended that Clear Score should pay £100 compensation to acknowledge this and to keep Mr H updated on a permanent fix.

Mr H didn't fully agree with everything our Investigator said. In summary, he said the data on his credit report needed to be accurate and it was not clear that an offer of compensation was going to cure the underlying problems. He pointed out that the data about his bank was still inaccurate and the fix to his address was not stable. He said it was unclear why Clear Score had not tried to correct the information about his bank once it was on notice of the inaccuracy, suggesting that it should have taken the matter up with the provider of the information feed. He said he can't know for certain if this incorrect data has impacted him

financially, but as long as the information remains incorrect, there remains a possibility that he could be disadvantaged. He asked us to consider whether Clear Score had broken data protection laws by failing to report accurate and up to date information on his file and failing to verify the accuracy of the information with his bank.

Clear Score didn't agree that it should pay compensation. It appreciated that Mr H was frustrated with the way his address appeared, but maintained it doesn't affect his credit score or his ability to benefit from Clear Score and its services. It said the reoccurrence of the issue was because it was technically complex to resolve. It explained it had already explored and tested multiple attempts to fix the issue, but each attempt requires configuring the address formats of all of Clear Score's users, which is a big undertaking.

As the parties could not reach an agreement, the complaint has been referred to me. For completeness, I should be clear that these findings only relate to Mr H's complaint about Clear Score's credit information service. The other concerns Mr H has raised about issues with Clear Score's account information services are being considered separately.

My further investigation

Whilst I've been investigating this complaint, I've been in touch with Mr H. I explained that if a permanent fix was disproportionate in time and expense to deploy compared to the number of end users that it will impact, it would be unlikely that I could fairly and reasonably endorse that Clear Score must do something within a set timescale.

Mr H has recently confirmed that his address is showing correctly at the moment. He's explained that he doesn't know what Clear Score has done to resolve the issue or if the fix will be stable because he's not received any further communication from them.

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.

In explaining my decision, I think it is helpful to clarify the role of this service. We are an informal resolution service and not a financial industry regulator. That's the Financial Conduct Authority. Also, complaints about the processing of personal data are dealt with by the Information Commissioner's Office (ICO). This means it's not the role of this service to instruct financial businesses what processes they should adopt, although we are able to look at the impact that any such process has on an individual.

Mr H has complained about two distinct issues he's encountered when using Clear Score's credit information service. For ease, I shall address each point in turn.

The name of Mr H's bank

Mr H has explained that Clear Score does not display the correct legal name for his bank. But this is not down to Clear Score. Clear Score's credit information service provides Mr H with financial data, but it is using data from other sources to do so and is not compiling that data itself. This means that Clear Score is only able to display what it receives.

I realise Mr H has found it very frustrating to try to get this information amended. I can see he's been in contact with Clear Score, the CRAs and his bank on numerous occasions to try and get the issue resolved and yet it remains outstanding. There's no question in my mind that Mr H has faced an ongoing challenge when disputing data given the number of different parties involved. But what Mr H wants, Clear Score can't do, and it has explained that to him.

As such, I don't find that the ongoing issue with the name of Mr H's bank is due to a mistake that Clear Score has made.

Mr H's address

Clear Score has explained it had a systems issue with the formatting of address data which impacted how Mr H's address appeared in its service.

Mr H was concerned that this could have an impact on him if he shares this information with third parties such as potential lenders at some point in the future. But lenders don't use Clear Score to view Mr H's credit report and so the address information Clear Score displays won't be used as part of any application Mr H may wish to make. A potential lender would go directly to the CRA of its choice. This means that any problems with Mr H's Clear Score report shouldn't impact any lending decisions.

Although I don't find that Clear Score's bug has impacted Mr H's ability to secure further credit, I do think the bug has led to additional concern and time spent on Mr H's part trying to get the problem resolved. Mr H first raised the problem in April 2022. He had to follow up in May 2022, with a further re-occurrence in June 2022. Mr H then raised the issue again in August 2022. Clear Score thought it had fixed the issue in September 2022, but Mr H had to contact Clear Score in October 2022 to say it had failed again. It's unclear exactly when Clear Score found a stable fix. It didn't continue communicating with Mr H about the issue because he'd referred his concerns to this service by that point.

Mr H explained to Clear Score how important it was to him that his personal and financial data is correct. Whilst I understand this was a systems issue and the impact of it is modest, I'm mindful that Mr H has experienced inconvenience when the initial fix failed, and he's been put to the trouble of having to follow the matter up with Clear Score when he thought it had been resolved. I don't think Clear Score's position that the issue wouldn't impact any applications Mr H might make fully takes into account that the bug has caused Mr H some inconvenience too. Against this backdrop, I don't think our Investigator's recommendation that Clear Score should pay Mr H £100 compensation was unfair or unreasonable. The situation has led to some frustration for Mr H and has required some reasonable effort on his part to sort out.

I am pleased to hear that Mr H's address is currently showing correctly in Clear Score's service. Should Mr H experience any further issues, he'll need to raise a fresh complaint, contacting Clear Score in the first instance.

My final decision

My final decision is that I uphold Mr H's complaint and direct Clear Score Technology Limited to pay him £100 compensation.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 2 January 2024.

Claire Marsh
Ombudsman