

The complaint

Mr A complains about Revolut Ltd and the service they provided when they carried out CCD checks on his account.

What happened

Mr A held an account with Revolut which received payments from clients. Around October 2020, Revolut asked Mr A to provide three months invoices as part of a CCD check. Mr A messaged Revolut to explain invoices he sends to his clients are confidential, due to the nature of his work. So, he asked if there was different information he'd be able to send instead.

But Mr A encountered difficulties when trying to discuss this with Revolut. And he provided a tax return which Revolut said they couldn't see, and Mr A was worried this confidential information had been lost. As Mr A couldn't provide the invoices Revolut requested, Revolut decided to close Mr A's account. But because of this, Mr A was unable to access his transaction history, which he needed to complete his yearly tax return. Mr A submitted a Subject Access Request (SAR) to obtain this, but Revolut didn't respond. Mr A was unhappy about this, so he raised a complaint.

Mr A wasn't happy with the level of service he received when he spoke to Revolut throughout the CCD check process. And he was unhappy that they had failed to reply to his SAR, which he explained had made it difficult to complete his tax return. So, he wanted to be compensated for the upset and inconvenience that had caused him.

Revolut didn't uphold the complaint initially. And Mr A remained unhappy with this so brought his complaint to our service. But while the complaint was with our service, Revolut accepted their service had fallen below the level they'd expect. And they accepted they had failed to respond to Mr A's SAR in a reasonable amount of time. So, they offered to pay Mr A £150 compensation and issue a response to his SAR to resolve the complaint. Our investigator put this offer to Mr A but received no response, so they continued with their investigation.

Initially, our investigator thought the offer put forward by Revolut was fair and in line with what they would've directed. But Mr A responded explaining how the failure to access his transaction history had impacted his ability to complete his tax return. Our investigator considered this and thought the compensation amount should be increased to £250 to recognise this.

Revolut accepted this after discussion with our investigator. And they confirmed that Mr A's SAR response had been issued to Mr A's working e-mail address on 18 March 2022. But Mr A remained unhappy as he didn't think the £250 offered was enough. As Mr A didn't agree, the complaint has been passed to me for a decision.

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, I'm upholding the complaint for broadly the same reasons as the investigator. I've focused my comments on what I think is relevant. If I haven't commented on any specific point, it's because I don't believe it's affected what I think is the right outcome.

I'm aware it's not in dispute that Revolut have acted unfairly. Revolut have accepted the service they provided during their chat conversation with Mr A fell below the standards they'd expect. And they have accepted they failed to respond to Mr A's SAR request. So, as this isn't in dispute, I don't intend to discuss this further.

In this situation, the main dispute centres around the actions Revolut should take to put things right. So, I've thought about this in more detail below.

I'm aware Mr A also raised concerns about the tax return he sent to Revolut, and the safety of this document. While I recognise within the chat Revolut said they couldn't see this, Revolut have since confirmed it was received by e-mail. So, I'm satisfied that Mr A's tax return, and the information within it, was secure. Because of this, I haven't considered this complaint point when considering what actions Revolut should take below.

Putting things right

When considering what I think Revolut should do to put things right, any direction or award I make is intended to place Mr A back in the position he would've been, had Revolut acted fairly in the first instance.

Had Revolut acted fairly, they would've responded to Mr A's SAR in a reasonable period of time, which would've provided him with his statements and transaction history that allowed him to complete his tax return in full. So, I think Mr A should be provided with a response with this SAR. I note Revolut has confirmed this was sent to Mr A on 18 March 2022 and Mr A hasn't raised any objections to this.

And had Revolut acted fairly, I think they would've engaged with Mr A during the CCD process in a more reasonable way. While I can't say for sure whether Mr A would've been able to provide the information they required due to the issue of confidentiality, I think Mr A would've been able to reach a conclusion to the process in a shorter period of time, with less frustration and inconvenience.

I can see throughout the chat Mr A asks questions that aren't acknowledged or responded to. And on several occasions, there were significant delays in responding to any messages sent by Mr A. I think this would've been both frustrating and upsetting for Mr A, and I think he should be compensated for this.

I also think it's reasonable for me to assume that Mr A was inconvenienced by his inability to access his statements and transaction history. Mr A has explained he needed this information for tax purposes and without this, he was unable to complete his tax return in full. I think this would've been worrying for Mr A, and he should also be compensated for this. But I don't think this compensation should consider any fines Mr A thought he may be subjected to as our service is only able to compensate customers for actual financial losses, not prospective.

I recognise Mr A has also commented on the issue customers will be caused when Revolut closes an account as statements become unavailable, unlike most other bank accounts. And he thinks Revolut should be fined for this. But this isn't something our service is able to

consider, as this issue relates to Revolut's business process and only the industry regulator is able to comment on or change this. So, I've been unable to consider this as part of the compensation amount I think Revolut should pay.

And I've also thought about Revolut's point that Mr A was able to access his bank statements when the account was limited before it was closed. And I don't dispute this was the case. But crucially, this was only for a period of eight days. And Mr A had already submitted his SAR by this point, so I don't think Mr A would've thought to do this. Nor would I have expected him to do so.

Our investigator recommended that Revolut pay Mr A £250 to recognise and compensate for the impact I've discussed above. And I think this award is a fair one and in line with what I would've directed, had it not already been recommended. I think it fairly takes into consideration the frustration, upset and inconvenience Mr A was caused while also taking into account Mr A was able to withdraw the funds from the account and, from what I've seen, he incurred no further financial losses. So, I think Revolut should pay Mr A £250.

My final decision

For the reasons outlined above, I uphold Mr A's complaint about Revolut and I direct them to take the following action:

- Pay Mr A £250 to recognise the upset and inconvenience he's been caused. And;
- Ensure Mr A has received a full response to his SAR.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr A to accept or reject my decision before 3 May 2022.

Josh Haskey
Ombudsman