

The complaint

Mr L complains Revolut Ltd recorded a marker against him on a fraud database and closed his account. He doesn't think it's treated him fairly.

What happened

Mr L held an account with Revolut. In April 2025, he received two payments from a third-party, through bank transfers. The funds came from someone who I shall refer to as 'H'. Mr L transferred most of the funds to another account in his name. However, both payments were reported to Revolut as being the result of a scam.

Revolut restricted the account and requested information to support why Mr L had received the payments and he was entitled to them. He said the payments were made on behalf of a friend by their uncle and he didn't personally know them. Revolut asked for some supporting evidence of the arrangement, such as, the chats. Mr L provided a screen shot of some voice notes. And said he didn't have anything else because a lot of exchanges happened over the phone verbally.

Revolut didn't find the explanation or screen shot satisfactory in explaining things and filed a misuse of facility marker at Cifas, as it believed he had been complicit in receiving fraudulent funds. It also closed the account. Mr L found out about the marker and complained that he'd not done anything to cause this.

He said, the funds were sent by a family friend in another country, he knew them well and they often communicated via WhatsApp through voice notes and calls. He explained his friend said he was experiencing issues processing a transaction from their side and asked if he could help them to receive the payments and forward the money on their behalf. Mr L said he hadn't appreciated that this was a misuse of the account. He provided a screenshot of some voice notes and said this demonstrated the legitimacy of the exchange.

Revolut reviewed the information and on completing its review, it didn't think it had made a mistake with the fraud marker and account closure. It also said that it wasn't able to offer Mr L an account. Dissatisfied, Mr L contacted us and said the marker was affecting him financially and personally. He also submitted there were two entries at Cifas.

One of our investigators reviewed the case. She acknowledged what Mr L had said but agreed with Revolut's analysis, that the information didn't show he'd been asked to receive a payment in the way that he'd described and that rather than assisting a friend, the available evidence showed he had benefitted from the funds. She also noted some inconsistencies in his testimony to the bank from April and July 2025 and said she was satisfied that the available evidence was enough to show Mr L had likely been complicit in receiving and benefitting from fraudulent funds.

Weighing everything, she concluded Revolut had met the bar for loading the fraud marker and there wasn't an error in closing the account either. She told Mr L that Revolut had deleted one of the entries, so there was only one now.

Mr L disagreed with the outcome on his complaint. He said he accepted he'd made a mistake in helping a friend and his evidence was limited, however, he was an innocent party. The amounts were small scale, and he'd only kept £20 of the £300. If there were inconsistencies in what he'd said, it was because he was responding under pressure but there was no intent to mislead. He believed the fraud marker was disproportionate and asked that it be removed.

When an agreement couldn't be reached the case was put forward 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.

The marker that Revolut has filed is intended to record that there's been a 'misuse of facility' – relating to using the account to receive fraudulent funds. To file such a marker, it's not required to prove beyond reasonable doubt that Mr L is guilty of a fraud or financial crime, but it must show that there are grounds for more than mere suspicion or concern. The relevant guidance says, there must be reasonable grounds to believe that an identified fraud or financial crime has been committed or attempted, and the evidence must be clear, relevant, and rigorous.

What this means in practice is that the business must first be able to show that fraudulent funds have entered Mr L's account, whether they are retained or pass through the account. Secondly, the business will need to have strong evidence to show that Mr L was deliberately dishonest in receiving the fraudulent payment and knew it was, or might be, an illegitimate payment. This can include allowing someone else to use their account to receive an illegitimate payment. But a marker should not be registered against someone who was unwitting; there should be enough evidence to show complicity.

To meet the standard of proof required to register a fraud marker; the business must carry out checks of sufficient depth and retain records of these. This should include giving the account holder the opportunity to explain the activity on their account to understand their level of knowledge and intention.

So, I need to decide whether I think Revolut has enough evidence to show fraudulent funds entered Mr L's account and he was complicit. And I'm satisfied that it has. I'll explain why by addressing what I consider are the salient points.

Revolut has provided evidence that it received a report, saying that funds which entered Mr L's account was because of a fraud. Looking at what was reported, I'm satisfied the bank had reasonable evidence of a fraud and needed to make enquiries to meet its regulatory obligations to investigate such matters.

Revolut asked Mr L to explain why he'd received the payment. The response it got back was that the money was for a friend. Revolut didn't find this satisfactory in light of other available evidence and decided to record the fraud marker. It also decided to retain it, after reviewing the case following Mr L's complaint and further information.

I've looked at the circumstances and I don't find Revolut's position unreasonable. The fraud report details are compelling, and Mr L hasn't been able to demonstrate that the information he has, shows another party's involvement in needing to send the funds to his Revolut account for the reasons he's given. The screen shot isn't date stamped either. In addition to this, the available evidence shows that he sent the money to himself, suggesting these funds were intended for him. His testimony has also changed about his friendship. Whilst I think Mr

L would've been concerned about Revolut asking him for information about the payments, there's no evidence of putting him under pressure that this would have influenced his responses.

My role is to look at what both sides have provided and consider the weight of the evidence. Here, although Mr L has attempted to explain things, I'm satisfied Revolut had enough information to support its actions that it believed Mr L had been complicit in receiving illegitimate funds, with the report it received, the account activity and the lack of any credible information from him. It follows that I don't find recording the marker and closing the account was unfair (there's provision for that in the account agreement).

Mr L held an account with Revolut that was the subject of a fraud report and with this in mind, I don't think there's anything wrong if as a commercial business it doesn't wish to offer him an account at this time.

All things considered, I won't be asking Revolut to do anything more. I'm sorry to give Mr L disappointing news but I must look at the evidence objectively and these are my conclusions.

My final decision

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr L to accept or reject my decision before 8 December 2025.

Sarita Taylor
Ombudsman