

The complaint

Mr A complains Revolut Ltd recorded a marker against him on a fraud database. He doesn't think it's treated him fairly.

What happened

Mr A held an account with Revolut and in April 2025 he received two payments from third parties, through a bank transfer. The funds were withdrawn by him straight away and remitted via a money transfer service, where they were sent overseas. However, the first incoming payment was reported as fraudulent to Revolut.

Revolut restricted the account and requested information to support why Mr A had received a payment in relation to the first fraud report and was entitled to the funds. In response, he said he didn't know the person that had sent them, they were a gift for a friend who had asked if they could be paid into his account.

Revolut requested some further information and Mr A sent in some screen shots of a conversation between him and his friend. Around this time, Revolut received a second fraud report about the other payment and after assessing things it didn't find what Mr A had said satisfactory. So, it decided to record a marker at Cifas, as it believed he had been complicit in receiving fraudulent funds. It also arranged to close the account.

Mr A found out about the marker and complained to Revolut that he'd not done anything to cause this. He said the funds came into his account because his friend overseas asked him for help. He told him that their friend abroad wanted to send him a gift, and since he didn't have a foreign currency account, he asked if the money could come through his. He said he'd only passed the money on, believing that he was helping and did so innocently.

Revolut reviewed the information but didn't think it had made a mistake in the steps it had taken. Dissatisfied, Mr A contacted us to challenge the decision. He said the fraud marker was affecting him both personally and financially and Revolut had refused to remove it, even after he'd told it that he'd not done anything wrong and given it information.

One of our investigators acknowledged what Mr A had said and provided but felt the bank had enough information to suggest he'd been complicit in receiving fraudulent funds. In particular, she didn't find Mr A's explanation persuasive that he had only received the funds because his friend didn't have a currency account. She couldn't see why Mr A's friend would need his help and couldn't have arranged for the money to have been sent direct to them. She also noted there were two payments had been the subject of fraud reports where Mr A had said it was only one payment that would be sent, and these had come from people with different names. Overall, the investigator concluded Revolut had enough information to show Mr A had been complicit in handling fraudulent funds, which justified it loading a fraud marker and closing the account.

Mr A disagreed with the outcome. He maintained he was an innocent party in what had happened and set out his analysis of why he thought the investigator had got things wrong. Amongst other things, he said it wasn't his fault that his friend had arranged to have money

sent to him and not to themselves. He submitted these were questions for others and not him and no one from the Police had contacted him. He added that the second payment was a complete surprise, which could be seen on the screen shots.

The investigator thought about everything but said it wasn't enough to change the outcome.

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.

I'm sorry to disappoint Mr A but I'm not upholding his complaint, and I'll explain why. 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 A 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 A's account, whether they are retained or pass through the account. Secondly, the business will need to have strong evidence to show that Mr A was deliberately dishonest in receiving the fraudulent payments and knew they were, or might be illegitimate payments. 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 A'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 reports, saying that funds which entered Mr A's account was because of a scam. Looking at what was reported, I'm satisfied Revolut had reasonable evidence of fraud and needed to make enquiries to meet its regulatory obligations to investigate such matters. Revolut contacted Mr A when it got the first fraud report and asked him to explain why he'd received the payment. So, I'm satisfied he was given a fair opportunity to defend himself and provide supporting evidence. There's also evidence that it sent a message about the second payment.

Mr A says that he believed the request he'd had was genuine and he understood he was simply helping a friend, and so, any concerns that the investigator has, should be directed towards the people that sent the funds, not him. But I don't agree. To get two fraud reports in quick succession presents deep concerns and the funds ultimately ended up in his account, which he then withdrew in minutes. Both reports are compelling and the difficulty is that Mr A's explanation wasn't persuasive to Revolut. I don't think that position was unreasonable in the circumstances.

The key points remain that there's still no credible reason why the funds couldn't have been sent to his friend direct, the other party could have used a money transfer service. There was also a second payment, which Mr A says he was surprised about and he refers to the screen shot in which he says "today?". But that alone isn't enough. If he genuinely wasn't expecting another payment, I'd have expected him to ask questions, particularly as the name on the second payment bore no correlation to the first. Yet none of this prompted any further questioning, suggesting Mr A had been expecting another payment and that's why he then dealt with it in the same way as the first. Beyond this, having had Revolut question him about the activity and close his account which are serious matters, Mr A has nothing from his friend about the consequences on him personally, and I think if he was unwitting, I'd expect to see this.

Mr A gave Revolut some screen shots, which it didn't deem satisfactory in refuting the allegations it had received, and I don't have an issue with the bank's stance on that. Ultimately, I must weigh all the available evidence, and having done so, I think Revolut collectively had robust information to support its actions, with the report it received, the account activity and the responses Mr A. The circumstances support Mr A has been complicit in receiving and disbursing fraudulent funds. And there is no requirement by Cifas for this to be reported to the Police.

It follows that I don't find Revolut's actions were unfair to record the marker, maintain it and close the account (there's provision for that in the account terms). All things considered, I won't be requiring any further action to be taken to resolve this complaint.

I'm sorry to give Mr A disappointing news but after considering everything, 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 A to accept or reject my decision before 14 January 2026.

Sarita Taylor
Ombudsman