

## **The complaint**

I, a limited company, has complained HSBC UK Bank plc won't remove a fraud-related marker they've lodged in their name.

## **What happened**

Mr E is a director of I. In October 2024 Mr E, on behalf of I, applied for a business account with HSBC. In support of this application, he submitted identity documents as requested by HSBC. This included a utility bill showing Mr E's name and address.

HSBC checked this bill with the utility company who'd sent it to Mr E and discovered it had been altered. HSBC rejected I's application and lodged a fraud-related marker in both I's name and Mr E's.

Mr E was finding it increasingly difficult to run I's finances. Although he'd been able to open an account on I's behalf, he wasn't finding this to be as flexible or fully meeting I's needs.

Mr E contacted HSBC, but they wouldn't remove the marker as they believed Mr E had omitted information deliberately to mislead them when applying for an account for I with them.

Mr E brought I's complaint to the ombudsman service.

Our service explained to Mr E that we only had jurisdiction to consider I's complaint and Mr E confirmed that he was pursuing I's complaint.

Our investigator reviewed the evidence. She felt that HSBC had met the bar in showing that Mr E, on I's behalf, had knowingly attempted to commit a crime. She wouldn't ask HSBC to remove the CIFAS marker.

Mr E didn't agree with this outcome and explained why he'd initially altered the utility bill and now realised that he shouldn't have.

I's complaint has been referred to an ombudsman for decision.

I completed a provisional decision on 19 December 2025. I asked HSBC to remove the CIFAS marker in I's name.

Mr E on I's behalf, accepted this outcome. HBC didn't. They reiterated points they'd made before that as Mr E had changed his identity on his utility bill, then he must be seen as committing a financial fraud.

I now have all I need to complete my final 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've reached the same outcome as I did in my provisional decision. I'll explain why.

It is clear what the requirements are prior to lodging a marker. Specifically:

*"There must be reasonable grounds to believe that an identified fraud or financial crime has been committed or attempted.*

*The evidence must be clear, relevant and rigorous."*

HSBC must be able to provide clear evidence that an identified fraud was being committed and I was involved. I don't believe that what they've provided confirms this.

I've seen the evidence provided by HSBC. This confirms I made an application for a business account with HSBC in October 2024. In support Mr E provided a copy of a utility bill which showed his address, which is the one registered to I at Companies House.

On checking with the utility company, HSBC discovered Mr I had altered his name details. This evidence is not in dispute. HSBC rely upon this as their reason for lodging the CIFAS markers.

Mr E accepts he altered the utility bill and obviously now regrets doing this. His explanation for this is that due to his nationality (as has been confirmed by his passport), he has two surnames but tends to use just one as this tends to be simpler for all parties. I accept this explanation.

He, however, wanted to ensure that HSBC had the full information they needed about I, and his role as a director, when the account application was made. So he altered the utility bill.

I've been able to consider evidence which shows Mr E has now submitted his full name details to the utility company. This has resulted in his bills showing the identical information as HSBC considered when Mr E provided them with an altered bill.

There's not enough evidence to show that Mr E – on I's behalf – was trying to commit a crime. I can't see that Mr E was trying to hide his or I's financial history or commit any fraud.

I appreciate HSBC takes a different approach that any attempt to disguise Mr E's identity was in itself a fraud. I don't agree as I've seen nothing to confirm Mr E would have been achieving any financial gain or fraud.

### **Putting things right**

As required by the CIFAS rules, HSBC will need to remove the CIFAS marker they've lodged against I.

This isn't a complaint submitted by Mr E but it's worth noting that it would not be appropriate for HSBC to maintain the CIFAS marker in his name whilst I instruct them to remove the one in I's name.

### **My final decision**

For the reasons given, my final decision is to instruct HSBC UK Bank plc to remove the fraud marker from I's CIFAS record.

Under the rules of the Financial Ombudsman Service, I'm required to ask I to accept or reject my decision before 9 February 2026.

Sandra Quinn  
**Ombudsman**