

The complaint

Ms B complains that HSBC UK Bank Plc unfairly registered a 'SIRA' marker in her name following a mortgage application she made to it with her partner.

What happened

Ms B and her partner made a joint mortgage application to HSBC in September 2023 via a mortgage broker. They submitted various evidential documents to HSBC in support of their application. However, HSBC registered a 'SIRA' marker in Ms B's name and Ms B and Mr H cancelled their application. SIRA is a fraud prevention database used for information sharing across the industry, and the HSBC marker said that there were inconsistencies in the application. Ms B has since been unable to access financial products including mortgages.

Ms B made a data subject access request (DSAR) to HSBC but says HSBC's response revealed nothing about its reasons for registering the marker or the investigation it undertook before doing so. Ms B complained to HSBC in January 2025, but HSBC didn't respond with a final response letter and referral rights to this Service.

Ms B approached this Service via a professional representative in June 2025. We contacted HSBC and it wrote to Ms B on 5 September 2025 with its final response. It didn't uphold Ms B's complaint because, it says, it acted in accordance with its current policies and procedures.

Dissatisfied with HSBC's response, Ms B asked us to consider her complaint. Having considered all the evidence available, our investigator thought that HSBC's reporting of its concerns to SIRA was reasonable and the level of the marker it applied was appropriate.

Ms B didn't agree, so her complaint was passed to me for a decision. As I wanted to expand on what our investigator said about this complaint, I wrote to both parties with a provisional decision, giving them the opportunity to make further submissions. Neither party has responded with additional submissions about the merits of Ms B's complaint.

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 my provisional decision is said:

"Ms B has asked this Service – as an impartial body – to decide whether HSBC registered an entry on the SIRA database fairly and reasonably. And, if we decide HSBC did not, to instruct HSBC to remove or change the marker based on what we consider is appropriate.

So, to decide Ms B's complaint I've thought about whether, from the evidence available, HSBC acted fairly and reasonably when it added the marker it did to the SIRA database about Ms B. In deciding that, I've considered whether HSBC had

reasonable grounds for suspicion about the application. I'll also consider whether, even if the marker was justified at the time, there's further evidence now available which means it ought fairly to be removed now.

HSBC says the level of marker it recorded is 'inconsistency.' That level of marker is visible to other banks, is recorded for three years and is generally used where a bank has identified a discrepancy in the information provided and hasn't been able to find an innocent explanation.

For HSBC to be satisfied that an 'inconsistency' marker should be recorded with SIRA, I'd expect that the inconsistencies or reasons for concern were clear from the evidence; that it had carried out an investigation to the extent that the subsequent evidence it found supported its initial concerns; and that, where appropriate, it gave the consumer the opportunity to provide further information.

HSBC has provided us with all the documentation provided to it by Ms B's broker to support her application and has set out specifically where it had cause for concern. It's also explained the investigation it carried out and how the findings of that investigation supported its concerns. HSBC has also provided its system notes including, as part of those notes, its underwriter's notes and its correspondence with Ms B's broker.

Having carefully considered the evidence HSBC has provided, I am satisfied that its concerns based on the broker's application submission and supporting documents were reasonable. And I am satisfied that those concerns and HSBC's investigation to support those concerns was at the level I'd expect for it to record the 'inconsistency' marker.

HSBC's concerns centred on Ms B's stated income, particularly as the level of income stated by Ms B was required for her and her partner to achieve the level of borrowing they wanted. HSBC found that the circumstances of Ms B's recently and substantially increased salary and inconsistencies in both the explanation of that and the supporting documentation were all reasons for concern. Having considered Ms B's application and supporting documentation, I think HSBC's interpretation was reasonable and that it added the appropriate marker to the SIRA database.

Ms B has expressed concern that she was not given the opportunity to respond to HSBC's concerns before it recorded the marker. However, I have seen from HSBC's internal notes that it requested information and evidence that had the potential to allay its concerns. That request was via a portal on 22 September 2023.

In the days that followed, the notes show the broker did respond with some information, HSBC responded asking for more, and the broker responded again. The notes show that the case was returned to the underwriter on 26 August 2023, but the evidence provided did not satisfy his concerns about inconsistency. On 27 August 2023 Ms B's broker called HSBC to cancel the application as she'd opted to apply to another lender. The broker's withdrawal of the mortgage application, when asked to evidence the income stated, didn't provide HSBC with anything further to allay its concerns.

I'm persuaded, based on the evidence I've seen, that HSBC did give Ms B's broker opportunities to provide answers and evidence that could have allayed the concerns of its underwriter. But I haven't seen that the evidence the broker provided was such that it should have allayed the underwriter's concerns. And I haven't seen that anything Ms B has provided as part of her complaint would do so. I say that because

the evidence provided showed that Ms B's income and employment were not consistent in the time after the HSBC application was withdrawn. And I noted further inconsistency with Ms B's explanation of her pay increase that preceded her application and the evidence provided to support that.

Overall, I don't think HSBC acted unfairly or unreasonably in recording the marker it did with SIRA. And the evidence that I've seen doesn't persuade me that HSBC should remove or change that marker now."

As neither party has made any further submissions relating to the merits of this complaint, I see no reason to change my findings, as outlined in my provisional decision.

My final decision

My final decision is I don't uphold Ms B's complaint about HSBC UK Bank Plc

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms B to accept or reject my decision before 20 March 2026.

Gavin Cook
Ombudsman