

## **The complaint**

Miss S complains Revolut Ltd wrongly applied a Credit Industry Fraud Avoidance System ('CIFAS'- the UK's fraud alert service) marker against her name.

## **What happened**

The detailed background to this complaint is well known to both parties. So, I'll only provide a brief overview of some of the key events here.

Miss S held an account with Revolut. On 12 September 2025 Revolut received a fraud report regarding an incoming payment of £500. At this point the account was restricted so Revolut could review the account and the report. On 15 September 2025 Revolut issued a notice to close letter and it also loaded a CIFAS marker against Miss S for 'misuse of facility'.

Miss S raised a formal complaint about the handling of her account. Revolut issued an initial response to the complaint on 30 October 2025 explaining it had acted appropriately in applying the marker and the necessary CIFAS principles had been adhered to. It also provided Miss S with a further opportunity to show her entitlement to the funds.

Unhappy with the response received, Miss S referred her complaint to this service. In the submissions made to this service, Miss S explained her difficult personal circumstances and the circumstances surrounding the transfer in from her boyfriend. An Investigator reviewed Miss S's comments and gathered the necessary evidence. The Investigator found the CIFAS marker was fairly applied by Revolut. It asked reasonable questions of Miss S and without further evidence to support her version of events it wouldn't be appropriate for Revolut to remove the marker.

Miss S disagreed with the Investigator's review, and provided further submissions, but these didn't change the Investigator's opinion. Miss S didn't accept the Investigator's findings and maintained she had been treated unfairly. As no agreement could be reached the complaint was referred to me – an ombudsman – for a 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.

I appreciate Miss S was disappointed by the Investigator's opinion. I'd like to reassure Miss S that I've considered the whole file and what's she's said. But I'll concentrate my comments on what I think is relevant. If I don't mention any specific point, it's not because I failed to take it on board and think about it, but because I don't think I need to comment on it to reach what I think is a fair and reasonable outcome. No discourtesy is intended by me in taking this approach. Our rules allow me to take this approach. It simply reflects the informal nature of our service as a free alternative to the courts.

Firstly, I am sorry to see Miss S has had cause for complaint. I don't underestimate the worry and anguish this situation has caused, and also the stress of dealing with the complaint

about it. I appreciate her sharing details about her challenging personal circumstances, and she has my sympathy. Having looked at the complaint fully, my review of the evidence has led me to the same overall conclusions as the Investigator previously set out and for much the same reasons. I will explain why.

As a UK financial business, Revolut is strictly regulated and must take certain actions in order to meet its legal and regulatory obligations. It's also required to carry out ongoing monitoring of an existing business relationship. This includes establishing the purpose and intended nature of transactions as well as the origin of funds, and there may be penalties if they don't. That sometimes means Revolut needs to restrict, or in some cases go as far as closing, customers' accounts. In Miss S's case I can see the account was closed, but Miss S's main concern is the application of the CIFAS marker, so my decision will focus on this.

As part of its regulatory duties, businesses will use databases to share information. CIFAS is a fraud prevention agency, which has a large database on which information is recorded to protect financial businesses and their customers against fraud. When a bank is a member of CIFAS, it can record a marker against a customer when that customer has used their account fraudulently. This type of marker will stay on a customer's record for a specific period, depending on the customer's age and will usually make it difficult for that customer to take out new financial products. CIFAS forms an important part of the financial services regulatory framework and is intended to assist in the detection and prevention of financial crime.

In order to file such a marker, Revolut is not required to prove beyond reasonable doubt that Miss S is guilty of a fraud or financial crime, but it must show that there are grounds are more than mere suspicion or concern. CIFAS 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 such that the member could confidently report the conduct of the subject to the police.

What this means is that Revolut will need strong evidence to show that Miss S has used the account to receive fraudulent funds. A CIFAS marker shouldn't be registered against a customer who has acted unwittingly – there must be evidence of a deliberate fraudulent action. The application of a CIFAS marker can have serious consequences for an individual, so this service expects business to carry out a thorough review of the available evidence.

My role is to establish if Revolut has sufficiently demonstrated it has met the burden of proof set out by CIFAS to load the marker against Miss S. Revolut has provided this service with details of the investigation it carried out following the fraud report it received. This included a detailed review of Miss S's account activity. It also provided Miss S with an opportunity to provide her version of events and further evidence. At this stage Miss S provided details of her relationship with the individual who sent her the funds – Miss S explained this was her partner at the time and he gave her the money as a gift. Revolut asked Miss S for supporting evidence – such as messages between her and her boyfriend regarding the gift, with specific details regarding the payment. Miss S says she was unable to provide this as she changed phones at this time and messages weren't saved or transferred over. Miss S also said messages sent on a social media platform were also inaccessible.

Revolut weighed up this evidence, against the details of the fraud claim made, and found the requisite bar had been met for applying the marker. I think Revolut acted reasonably in loading the marker against Miss S based on the evidence it held.

When Miss S raised her complaint with this service, I can see the Investigator asked Miss S for further details regarding the funds and account activity. In particular Miss S was asked about the transactions following the transfer in - £250 was transferred to another account in Miss S's name and £250 was withdrawn in cash. Miss S says her boyfriend – who had just gifted her the money needed £250 and withdrew this as he had access to her PIN and card. Miss S also says she transferred £250 to another account as she couldn't access her Revolut account. Miss S has also mentioned there being a delay in the funds being accessible in her account, but the statements and account activity show the money coming in and it being used immediately. Miss S also refers to using the funds for everyday shopping and expenses, but this isn't supported by the evidence on her statements. I can also see Miss S says she acquired a new phone around this time, but the technical evidence provided by Revolut doesn't support this as a new device isn't registered against Miss S's account.

I've thought carefully about whether the application of the marker is fair in light of these additional submissions. There are a number of inconsistencies, and I don't find Miss S's version of events to be plausible. I understand Miss S says any inconsistencies are due to her difficult personal circumstances, and I am mindful of these factors. Miss S says Revolut has failed to consider these as mitigating factors and disregarding them is unfair. I appreciate Miss S's openness about the challenges she has faced. Miss S was in a vulnerable position, and I would expect Revolut to support her in the appropriate manner based on what Miss S disclosed to it. However, I don't think this support extends to Revolut setting aside its regulatory and legal duties and not recording a CIFAS against Miss S.

Ultimately, Revolut is under a duty to accurately record information about all its customers, and it must do so in an objective manner. Further, the test set out by CIFAS doesn't ask businesses to make judgements on each individual customer. Instead, the test sets out clear requirements that enable businesses such as Revolut to make evidence and fact-based decisions. I therefore find Revolut's actions to be fair in the circumstances.

I can see Miss S has provided details about the impact the CIFAS marker has had on her finances, work life and personal situation. The loading of a CIFAS marker can have serious consequences, and I am sorry to learn of the impact Revolut's decision has had on her at what is already a challenging time. Having reviewed Miss S's comments and the supporting evidence I don't find these allay the concerns regarding fraud and clearly show Miss S is entitled to the funds that entered her account. This means I agree that the evidence available equates to more than mere suspicion or concern of fraudulent activity. I therefore find that the marker was loaded fairly.

I appreciate Miss S will be disappointed with my decision, but I am satisfied Revolut acted reasonably in taking this action to discharge its regulatory obligations. I hope my decision provides some clarity around why I won't be asking Revolut to take any further action.

### **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 Miss S to accept or reject my decision before 26 February 2026.

Chandni Green  
**Ombudsman**