

The complaint

Mr O complains that Revolut Ltd unfairly loaded a marker about him at Cifas, the national fraud database and closed his account.

What happened

The background to this complaint is well known to both parties and so I'll only refer to some key events here.

Mr O had an account with Revolut which he opened in 2021.

In May 2023, Mr O received three payments into his account, totalling £1,700 from an individual I will refer to as D. Mr O immediately transferred just over £1,200 to two other accounts in his name and withdrew £250 in cash. The following day Mr O transferred just over £220 to accounts in his name.

Following this Revolut were notified by another bank that one of their customer's had been a victim of a scam and that the payments were fraudulent. So, Revolut decided to close Mr O's account with 60 days' notice and applied a fraud marker with Cifas.

Mr O contacted Revolut in January 2024 and complained. Revolut asked him to explain why he'd received the money from D. In response, Mr O told Revolut he'd received the money as a favour for a friend. Revolut asked him to provide evidence to support his explanation but Mr O didn't provide anything.

Mr O contacted Revolut again in November 2025, after he was declined for a mortgage, and had contacted Cifas seeking removal of the marker. Revolut reviewed its decision but maintained its position and said it wasn't willing to remove the marker.

Mr O remained unhappy, so he brought his complaint to our service where one of our investigators looked into it. The investigator asked Mr O to provide more information about what had happened. In response, Mr O said he never knew the money was fraudulent and thought he was just helping his friend, who I will refer to as K, by allowing them to send money to his account. To support his explanation, he provided a screenshot of a conversation he'd had with K in 2022.

Our Investigator reviewed everything but thought Revolut had fairly applied the Cifas marker. And that Mr O had benefitted from the fraudulent funds. The investigator also thought Revolut had acted reasonably by closing Mr O's account.

Mr O didn't accept the investigator's findings. In short, he said:

- The three payments from D, were unexpected credits and were paid into his Revolut account from people he did not know. These funds were arranged by a friend who asked him for a favour.

- At K's instruction, he withdrew or transferred the money to K, and he kept none of the money for himself.
- He now understands these funds were likely fraudulent in origin, and his account was unwittingly used – but he had no knowledge or intent to facilitate fraud.
- He has known K for several years and trusted him. Much of their communication at time was in person or via phone/temporary messaging (which auto-deletes messages), so he unfortunately has limited written evidence of his conversations with K.
- He has a dated screenshot from 22 June 2022 in which he told K this would be the “last favour” he would do for him. This shows that even before the May 2023 payments, he was uncomfortable and intended to stop helping K – further indicating he was not knowingly complicit in any scheme.
- He filed an official police report detailing how his account had been misused by K. He took this step to demonstrate his good faith and willingness to involve law enforcement to get to the truth.
- The stress from being labelled with a fraud marker has been severe and ongoing. He has suffered acute anxiety and even medical issues like significant hair loss since discovering the marker.
- This marker has derailed a right-to-buy mortgage application for his family home.

The Investigator considered what Mr O said but their position remained the same – that being it would be unfair for the Cifas marker to be removed. The investigator added:

- The activity on Mr O's account didn't support his explanation – that he hadn't benefitted from the funds.

Mr O remained unhappy. In summary he said:

- His health has been severely impacted by the marker.
- He thought he was just helping someone who was stuck. And he had no idea the money was fraudulent. Nothing felt suspicious to him at the time. And just because he moved money to his accounts doesn't mean he knew the funds were fraudulent.

As no agreement could be reached the matter has come to me to decide.

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 recorded against Mr O is intended to record that there's been a 'misuse of facility' – in this case using an account to receive fraudulent funds. In order to file such a marker, Revolut isn't required to prove beyond reasonable doubt that Mr O is guilty of a financial crime, but they must show there are grounds for more than mere suspicion of concern. CIFAS guidelines say:

- 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 in practice is that the bank must first be able to show that fraudulent funds have entered Mr O's account, whether they are retained or pass through the account.

Secondly, the bank will need to have strong evidence to show that Mr O was deliberately dishonest in receiving the fraudulent payment and knew it was or might be an illegitimate payment. This can include Mr O allowing someone else to use his account in order to receive an illegitimate payment.

A marker should not be registered against someone who was unwitting, there should be enough evidence to show deliberate complicity. There's also a requirement that Revolut should be giving the account holder an opportunity to explain what was going on.

Here Mr O received funds into his account that were confirmed by another third-party bank to have originated from fraud. The bank reported that their customer had fallen victim to an investment scam.

Revolut didn't question Mr O at the time and only asked him about the activity on his account when Mr O contacted them in 2024 and 2025. Revolut asked Mr O to send them evidence of where the funds had come from and why he'd received the money from D. In response Mr O told Revolut he'd agreed to receive the money for a friend.

Whilst I'm satisfied Revolut did eventually provide Mr O with an opportunity to explain why he'd received the money from D, I think it should have explored things more at the time. With this in mind, I can see the investigator asked Mr O to provide any information he had about why he'd received the money from D and what he did with it.

In response, Mr O provided a screen shot of a conversation he says he had with K in 2022. He told us he was helping out a friend, and he didn't know the money was fraudulent.

Based on Mr O's response, I think if Revolut had asked Mr O about the payments at the time it's likely that he would have provided the same information to them.

So, I need to consider whether based on all the information including the evidence Mr O has submitted to us, whether Revolut had sufficient evidence to meet the standard of proof and load a marker for misuse of facility with Cifas. Having looked at all the information provided, I'm satisfied they did, and I say this because:

- I've seen the evidence from Revolut that confirms they were notified by another bank that the money Mr O received from D, originated from fraud.
- It's difficult to assess what's the genuine story because until recently Mr O hasn't provided any evidence to back up how he came to receive fraudulent money into his account.
- In order to look at the issue, I've looked at Mr O's account statements. Mr O told us that he received the money from D on behalf of K, who'd given his account details to D. Mr O also said that K then instructed him what to do with the funds. In that case I wouldn't expect him to have profited from the money he was moving around. The statements show at the time the funds were reported as fraudulent Mr O moved just over £1,200 into other accounts in his name and withdrew £250 cash.
- On 14 May 2023, Mr O transferred more of the funds to accounts in his name.
- Mr O said he was told by K what to do with the money, which may or may not be the

truth. But using his own card to take out cash and send money to his other accounts after receiving the funds is difficult to argue it was for someone else or as a result of being directed to do so by K. Why would K be happy Mr O was spending the funds on himself?

- Mr O hasn't provided any evidence apart from a screenshot which he says relates to a conversation in 2022 with K to support his story, but there's no real evidence of his connection or involvement with the individual K who he says he was helping so, it's difficult to take it into consideration, and give what Mr O has said much weight.
- I've also got no way of verifying the authenticity of the screenshot. I've kept in mind that this screenshot is from 2022 – more than a year before Mr O received the money from D. I've not been provided with any evidence to show what led up to Mr O receiving the funds – for example any communications between him and Mr K. If Mr O was an unwitting beneficiary of fraudulent funds as he has suggested I would expect him to be able to provide such evidence. But he hasn't done so.
- Even if I accept the screenshot Mr O has provided were related to Mr O being manipulated into allowing his account to be used for fraud I can't reasonably conclude that, at the time Mr O believed what he was being asked to do was legitimate.
- Mr O has said that he does not know the third party, D, who paid the funds into his account. However, his account statement would have shown who the payer was, and he would have known the money had not come from Mr K. And it is quite clear that Mr O immediately moved the majority of money to another account in his name. This activity suggests to me that Mr O was potentially involved in money laundering. And benefitted from the fraudulent funds paid into his Revolut account.
- It appears Mr O only contacted Revolut once he realised a Cifas marker had been loaded against his name, which was months later. I find this odd. Especially as Revolut closed Mr O's account.
- I've looked at the information provided by Revolut and the evidence Mr O has provided. Mr O's story has been consistent but missing crucial parts that would make his story credible. Unfortunately, he isn't able to produce sufficient evidence to show that he wasn't aware that the money coming into his account was fraudulent.
- He also hasn't provided sufficient evidence regarding the destination of the money he received. I must conclude that he was complicit.

I do sympathise with Mr O's circumstances and the impact the marker is having on his day-to-day life. But I must also look at the evidence objectively and decide whether Revolut acted fairly at the time it decided to load the marker. Even if Mr O did not know the exact details I think Mr O must have known that his account was being used for fraudulent activity and that he benefitted from fraudulent funds.

Overall, I am not persuaded by Mr O's story, and I am satisfied Revolut met the requirements of Cifas to lodge the marker. I've not found anything that would suggest it's appropriate to ask them to remove it prior to the relevant removal date.

Did Revolut close Mr O's account fairly

Revolut decided it no longer wanted to offer Mr O account facilities. As the investigator has already explained, it's generally for financial institutions to decide whether or not they want to

provide, or to continue to provide, banking facilities to any particular customer. As long as they reach their decisions about that in a legitimate manner, this service won't usually intervene. But before Revolut closes an account, they must do so in a way which is fair and complies with the terms and conditions of the account. I've looked at the terms and conditions, and they state that Revolut could close Mr O's account by giving at least two months' notice. I've seen the email Revolut sent to Mr O giving him the full notice period, so I'm satisfied Revolut has complied with this part.

I've next gone on to consider whether Revolut's reason for closing the account was fair. In doing so, I appreciate that Revolut are entitled to set their own policies and part of that will form their risk criteria. It is not in my remit to say what policies or risk appetite Revolut should have in place. On balance when considering all the relevant considerations and information available to me, I find Revolut had legitimate basis for closing Mr O's account and did so fairly and in line with the terms and conditions of the account.

My final decision

For the reasons I've explained, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr O to accept or reject my decision before 13 May 2026.

Sharon Kerrison
Ombudsman