

The complaint

Mr A has complained that Billing Finance Limited loaded a fraud marker against him in respect of a car finance agreement application.

What happened

In January 2026 Mr A referred a complaint to the Financial Ombudsman. He said he'd recently contacted Billing Finance because he noticed it had loaded a fraud marker against him. The marker was loaded for application fraud because a bank statement submitted as part of an application was altered. The application was made in respect of a car finance agreement in 2023 via a regulated broker that I'll call "Z". Mr A said he remembered browsing for finance options but didn't apply for anything himself. He said he initially thought Z had done something wrong but later realised Z is a well-known business and didn't think it had submitted the altered bank statement. But he reiterated he didn't submit the evidence.

Mr A said the fraud marker was severely impacting him and he requested it was removed. He said he'd never submitted a fraudulent bank statement and wouldn't know how to. He said it could have been caused by something else like system or download errors.

Billing Finance had sent a final response letter in December 2025 saying it received the application via Z and that Mr A's identity was verified using biometric checks against his driving licence. It said as part of its underwriting process it requested proof of income and it was provided a bank statement. It said after reviewing the bank statement it confirmed with the bank that some personal details on it were correct, but the salary and balances were not. It said the alterations included exclusively the salary credit from the employment details Mr A provided. It didn't uphold the complaint.

One of our investigators looked into things but didn't make any recommendations. Mr A didn't agree. He said he'd been transparent and believe he'd been wronged. He requested the marker was removed again.

As things weren't resolved, the complaint has been passed 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.

I acknowledge I've summarised the complaint. I don't intend any discourtesy by this – it just reflects the informal nature of our service. I'm required to decide this complaint quickly and with minimum formality. But I've reviewed everything on file, and if I don't comment on something it's not because I haven't considered it. It's because I've concentrated on what I think are the key issues, which our powers allow me to do.

Mr A has acknowledged himself he was browsing for finance options and he sent some documents to a broker. The application received by Billing Finance was in Mr A's name, and it had his personal details included such as his email, date of birth, telephone number and

address. On balance, I think Mr A likely did make the application for finance and is therefore an eligible complainant. I don't know exactly what type of finance it would've been, but given the cash price of the vehicle, on balance I think the application was for a prospective regulated credit agreement. So I consider I can fairly decide this complaint.

In order for Billing Finance to have loaded a fraud marker it needed to operate within the terms of the National Fraud Database Handbook which sets out certain principles for use. It needed to have reasonable grounds to believe a fraud or financial crime had been committed or attempted, with clear, relevant and rigorous evidence. The conduct needed to meet the criteria for one of the case types, and Billing Finance needed to have rejected, withdrawn or terminated a product unless it had an obligation to provide it, or the subject had already received the full benefit. It also needed to retain its evidence.

It doesn't seem to be in dispute the statement provided to Billing Finance had been altered, and it declined the application. Mr A doesn't know how the statement was provided. But given personal details on the statement were correct, the employer was the same as the one declared on the application form, and the salary had been altered I can understand why Billing Finance thought it had reasonable grounds to record the marker. I think that was fair of it. I can also understand why it thought it was very unlikely the regulated broker, Z, the only other party involved, would have decided itself to alter the statements and the details on the application.

Overall, I don't find I can say Billing Finance acted unfairly. I think it had legitimate concerns about the information it received. It doesn't seem to be in dispute the statements weren't genuine. And I don't think Billing Finance received a viable explanation for how else they could have been provided, particularly given Mr A said he was browsing finance options, he'd sent information to a broker, and the details on the application Billing Finance received from a regulated broker matched his. So having considered everything carefully, I'm not going to direct it to take any 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 Mr A to accept or reject my decision before 15 May 2026.

Simon Wingfield

Ombudsman