

The complaint

Mr T has complained that Revolut Ltd (“Revolut”) refused to change the name on his account as he’s unable to provide the documentation Revolut has asked for.

What happened

In October 2019 Mr T contacted Revolut asking it how he could change the name on his account. He explained that he’d changed his name via deed poll. Mr T provided a photo of the deed poll document as requested by Revolut via its in-app chat facility.

Following receipt of the picture of the deed poll, Revolut told Mr T that it was unable to change the name on his account using the document he’d provided. It explained that as the document wasn’t stamped it wasn’t considered an acceptable proof of identity. But it explained that Mr T could change his name using the document once it had been officially stamped, or he could provide a government-issued form of identification, such as a driving licence or passport.

Mr T also provided Revolut with a picture of his provisional driving licence. Revolut also said that this wasn’t an acceptable form of identification, as it could only accept a full driving licence. Mr T questioned Revolut’s decision as he explained that he’d been able to use his provisional driving licence as identification when he requested to update his email address. Revolut accepted it had made a mistake by accepting the provisional licence.

Mr T explained he couldn’t provide what Revolut had asked for in order to change his name. And he explained that other banks had accepted the deed poll document despite it not being stamped. He also referred to the Government’s website on name changes, specifically pointing out that this form of deed poll is recognised in law as an acceptable way for a person to change their name. As the situation wasn’t resolved Mr T made a complaint to Revolut, which Revolut didn’t uphold.

Following Mr T’s complaint to Revolut, he brought the complaint to this service. Our investigator considered everything but didn’t recommend that the complaint should be upheld. He thought it was reasonable for Revolut to have its own policies for which identification it does and doesn’t accept.

Mr T didn’t accept the investigator’s opinion, so the case has come to me to make a 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’m afraid I’m not upholding Mr T’s complaint. I’ll explain why.

All financial institutions in the United Kingdom are required to verify their customers’ identity – this is often referred to as Know Your Customer (KYC) checks. The Financial Conduct

Authority (FCA) sets the rules for how businesses need to verify their customers – but it doesn't provide a prescriptive list of acceptable documents that businesses can use. That's for each individual business to decide.

In this case, Revolut has explained that it can't accept Mr T's deed poll document as it's an "unenrolled" deed poll. An unrolled deed poll is a document created by an individual with the purpose of noting organisations that they deal with that they've changed their name. The UK Government website gives information on the wording that should be included in an unrolled deed poll and explains that it needs to be signed by two witnesses, but doesn't need to be officially stamped or signed by a public or professional body. I also note that the information from the Government also says:

"Some organisations may not accept a deed poll you've made yourself as proof of your new name. Ask the organisation you're dealing with (for example your bank) if they need an 'enrolled' deed poll instead."

The difference with an "enrolled" deed poll is that this is registered by the court, and consequently the individual's new name is placed on public record.

Mr T has explained that changing your name using either form of deed poll forms part of common law, and so Revolut should accept what he's provided. But I don't agree – as this isn't a legal matter. Whilst it may be true that the law says an individual can start using a new name based on an unrolled deed poll, that's not to say that the same document must be accepted by financial institutions as a proof of the individual's identity. Financial institutions need to follow strict rules set out by their regulator to assure themselves that they're dealing with properly identified individuals, to prevent themselves from the likes of financial crime and money laundering.

Revolut has also explained that whilst other companies may have accepted Mr T's unenrolled deed poll to change his name, Revolut has a slightly more robust procedure in place. It has explained that as an online and app-only financial institution it could be more susceptible to identity fraud; so it has enhanced measures in place to protect itself against these. And I don't think that's unreasonable. In fact, I'd be more surprised if a financial institution *did* accept Mr T's unrolled deed poll without any other form of identification or verification of it.

With this in mind, I've also gone on to consider whether Revolut adhered to its own standards of verification. Revolut has provided me with a copy of its internal guidance and this shows that Revolut accepts United Kingdom driving licences as a form of identification – but not provisional licences. Revolut also says that whilst it will accept unenrolled deed polls, these need to be stamped and signed by a Notary Public – a recognised legal professional with the power to verify documents. It's not for me to decide whether Revolut's policy on this is right or wrong, but it does satisfy me that Revolut followed its own guidance by not accepting Mr T's provisional licence or unenrolled deed poll which hadn't been stamped or signed.

Having reviewed the in-app chat histories between Mr T and Revolut, I note that Revolut also explained that Mr T could provide a passport or driving licence, instead of a stamped or enrolled deed poll. Mr T says that Revolut could be seen as discriminating against people who don't have any of those documents, as there's a cost involved.

Whilst I understand Mr T's point, this doesn't change my decision on the matter at hand. I agree that not everyone can have, or wants to have a passport or driving licence, but I don't think that affects what Revolut should require to verify a customer's identity. Revolut gave Mr T three different options as to what documentation he could provide. It's unfortunate that he

hasn't been able to provide any of those options, but I can't see a reason that they wouldn't be available to him, should he wish to use them. And having considered this, I think Revolut has acted fairly by giving Mr T various ways to verify his identity, albeit he says he's still unable to. I know Mr T has quoted the number of people in the United Kingdom that don't have a passport or driving licence, but I can only consider the facts of this individual case. And I don't find that relevant to the case, or discriminatory to Mr T in these circumstances.

Having considered everything, for the reasons I've explained, I don't uphold Mr T's complaint. So Revolut doesn't need to do anything to put things right.

My final decision

My final decision is that I don't uphold Mr T's complaint against Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr T to accept or reject my decision before 12 August 2021.

Sam Wade
Ombudsman