

The complaint

Ms G complains that Revolut Ltd didn't do enough to prevent the loss she suffered when she fell victim to a scam.

What happened

The detailed background to this complaint is well known to both parties. So, I'll only provide an overview of some of the key events here. Ms G says in January 2024 she fell victim to a 'job scam' which resulted in her making a series of payments from her Revolut account. The payments took place across a few days and totalled just over £3,000, with the smallest individual payment being £47 and the largest £200.

When Ms G realised she'd likely been scammed, she got in touch with Revolut. She complained that Revolut had failed in its duty to protect her. She asked that it refund the money she has lost as a result of this scam plus 8% interest per annum for being without use of those funds. She also asked that it pay her a compensatory sum of £250 and indemnify her for any legal costs she may incur because of the scam. Ultimately, Revolut didn't uphold Ms G's complaint, and she referred the matter to us. Our Investigator didn't recommend that the complaint should be upheld. In summary he concluded Revolut couldn't have prevented Ms G's losses. Ms G asked that her case be reconsidered.

In response to the Investigators assessment, Ms G reiterated that she is a genuine victim, of what she considers to be a sophisticated scam. She was tricked and pressured into making the disputed payments. She wasn't in the right state of mind at the time and her mental health made her vulnerable, and an easy target. She detailed how falling victim to the scam has resulted in her experiencing significant emotional and psychological distress. Ms G didn't think Revolut went far enough in the warnings it provided at the time of processing the payments. She remained unhappy with Revolut's actions when she notified it that she'd fallen victim to a scam.

As Ms G disagreed the complaint was passed to me to decide. I issued a provisional decision, in which I said:

"I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

It's not in dispute that the payments were made by Ms G. I've taken on board her comments that she'd unknowingly sent money to a scammer, but this doesn't change the fact that under the Payment Services Regulations 2017 (PSRs) these payments are regarded as 'authorised' payments. The PSRs only require that payments are made with the consent of the payer and that they are correctly authenticated. And as Ms G followed Revolut's process for making payments (and she would've known they were leaving her account) they are considered authorised under the PSRs. So whilst I accept Ms G wouldn't have intended to pay a scammer, had she known that at the time, this doesn't change the fact that under the PSR's these were authorised payments. Therefore, she is presumed liable for the loss in the first instance.

That's not to say Ms G hasn't been the innocent victim of a scam. I accept that she has been. From what she's described, she has fallen victim to an 'authorised push payment' (APP) scam – specifically a 'job scam'. And whilst I have every sympathy for Ms G as a victim of a cruel and callous scam, there isn't an automatic right to a refund from Revolut in these circumstances. For me to fairly make an award in that regard, I'd need to be persuaded that there was a failure by Revolut which was causal to the losses that Ms G suffered. And here, I don't think there was. I'll explain why.

Ms G says had Revolut intervened in the payments, questioned her and informed her of the risk of a scam, then her losses would've been prevented. She also says that her personal circumstances and mental health during and after falling victim to a scam ought to be taken into consideration.

I've thought about what Ms G has said, but ultimately, I'm not persuaded that any level of intervention that could fairly have been expected by Revolut, would've made a difference or have prevented her from making the payments. I say this because there are marked similarities between this scam and another that Ms G was a victim of around two weeks earlier. And I've listened to a phone call that took place between Ms G and 'B', a bank involved in the transfer of funds which were ultimately lost to the first job scam, where Ms G was questioned, warned about the likelihood of opportunities relating to making money online being a scam, and told about the importance of carrying out independent research before sending any funds. Despite this Ms G proceeded with the payments. So I think she likely would've done the same even if Revolut had intervened, asked questions and provided warnings.

I appreciate Ms G says that both opportunities were distinct, one was to help hotels improve their rating by completing reviews and the other was to help merchants around the world increase product sales. However, having reviewed evidence in the form of communication between Ms G and the scammers, I can see that both scams bore similar hallmarks, including promises of unrealistic returns, requests for upfront payments, and the requirement to complete a set number of tasks before commission could be withdrawn. As the second scam followed a similar pattern to the first, with comparable red flags which Ms G had previously been warned about, it isn't unreasonable to conclude that Ms G ought to have been aware of the risks associated with such payments.

Further to this, I can also see from the WhatsApp chat conversation Ms G had relating to the first scam that she repeatedly said that she considers it to be a scam. Ms G reported it as such (which was prior to her engaging in the second scam), yet she continued to communicate with the scammer about how she can withdraw her funds, which appears to have been the catalyst for her sending further money and falling victim to the second job scam. Taking this altogether with what Ms G has shared about her tough personal circumstances and the difficulties she faced, I'm more persuaded that her need / desire to recover the money she'd already invested would've outweighed the impact of any proportionate warning that Revolut reasonably could've given. With the benefit of hindsight, it's natural for a victim to say, and believe, that they would've acted differently, but my role requires me to consider all the evidence available to me and aside from Ms G saying she would've acted differently none of the above supports the notion that she would've responded positively to warnings about potential scams from Revolut. So I'm not persuaded that anything that reasonably could've been expected of Revolut would've made a difference here.

I acknowledge that from what Ms G has described, her personal circumstances were challenging at the time. While I sympathise with Ms G's situation, I can't see that Revolut were aware of these at the times relevant to this complaint, or that this is something it ought to have ascertained. And I can't fairly use Ms G's personal situation as a reason to direct Revolut to do more when I don't think it's act, or omission can reasonably be said to be the cause of her loss.

I've also considered whether Revolut did everything I'd have expected it to in terms of the recovery of funds. There are industry standards around attempting recovery of funds where a scam is reported. Generally, businesses should attempt to recover payments immediately on being told of a scam. Having reviewed the chat history between Revolut and Ms G I can see there was some back and forth (on the same day) before Ms G's scam claim was eventually accepted, some of which, in my opinion, was avoidable and not entirely necessary. But I'm not persuaded that these delays have impacted what Revolut could've realistically recovered. I say this because the payments here were 'push-to-card' payments, meaning that Ms G transferred money directly to a bank card instead of a bank account. For payments made in this way there's no clear mechanism for a successful recall to take place, meaning there's no realistic prospect of a successful recovery.

I'm sorry to disappoint Ms G. I hope she can see that none of what I've said above is to downplay or diminish the fact that she has fallen victim to a cruel scam, which has had a significant, and lasting, impact on her. I have a great deal of sympathy for her and the position she finds herself in. And just because I haven't reached an outcome in Ms G's favour, doesn't mean I'm saying she is to blame for what has happened, it's just that I can't ask Revolut to refund her losses, as it wasn't the cause of them. And her personal circumstances / health conditions both during and after falling victim to a scam wouldn't solely form a basis upon which I could fairly and reasonably ask Revolut to refund her loss either.

My provisional decision

For the reasons outlined above, but subject to any further information I receive from either Ms G or Revolut Ltd, I'm not intending to uphold this complaint."

Revolut did not respond to my provisional decision. Ms G disagreed with the decision to not uphold her complaint. She says that her mental health, and belief at the time that the opportunity was genuine has been disregarded. She continues to feel like she is being blamed for falling victim to a scam. She refers to and asks for consideration to be given to the UK Payment Systems Regulator's mandatory reimbursement scheme for victims of APP fraud. Ms G maintains that Revolut are facilitators of organised criminal activity and know who took her money. She thinks Revolut could've recovered her losses but didn't. She thinks it's unfair that payment service providers (PSPs) such as Revolut aren't being held accountable; and believes not upholding her complaint sets a dangerous precedent, protecting PSPs, even when clear negligence (in her opinion) is evident. She also comments on needing information such as names and addresses of the people involved to be able to report the crime.

So now that both sides have had an opportunity to comment, I can go ahead with my 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.

New initiatives and mechanisms are regularly being introduced by the banking industry and regulators to try to tackle and prevent fraud. Ms G refers to one recent change, which has been made to the PSRs through which victims of APP fraud can, in limited circumstances, get back the money they've lost from the banks / PSP's involved. She asks for her case to be reconsidered taking this into account. However, these new rules aren't retrospective, they only came into force in October 2024, after Ms G's payments, so it wouldn't be a relevant consideration here. It also wouldn't be fair for me to apply today's standards and expectations in retrospect. A fair assessment of Revolut's actions requires me to evaluate these against what reasonably could've been expected of them at that time, which is what I have done here.

I'd like to assure Ms G that I've carefully considered what she has said about her mental health and belief about the genuineness of the scam. As I've stated in my provisional decision these factors in of themselves don't form a basis upon which I can fairly and reasonably ask Revolut to refund her loss. To reiterate, in these circumstances, there is no right to a refund from Revolut simply because Ms G has been the victim of a scam. To make a direction asking Revolut to provide a refund requires me to conclude that Revolut's act, or omission, was the cause of Ms G's loss, or that there was another fair and reasonable basis upon which I could ask it to do so. For the reasons (which includes consideration of Ms G's mental health and her belief at the time) that I've explained in my provisional decision I can't conclude that Revolut could've prevented Ms G's loss, nor do I consider there to be a fair and reasonable basis upon which I could ask it to do more. I recognise that fraud of this type can be deeply upsetting, and taking Ms G's personal circumstances into consideration I think this was always, once it had happened, going to be a distressing period for Ms G. But here I can't fairly hold Revolut responsible for the distress which has principally been caused by the fraud, and the actions of a third party – this being the scammer(s).

Ms G has commented on needing the name and address of the individuals involved to be able to report the crime. It's unclear whether this is something she has sought to obtain from Revolut, or even if this information would've been known to it, as these were push-to-card payments. Irrespective of this, Ms G wouldn't have needed any third-party data from Revolut to report the crime (something which I understand she has done). It would then be for the police to contact Revolut as part of its investigations (if it chooses to do so).

Given everything that has happened, and taking into consideration Ms G's personal circumstances, I can absolutely understand how upsetting it must be for her to feel that she's being blamed for falling victim to a scam. But I can only reiterate again that reaching the outcome that I can't ask Revolut to refund Ms G's loss, doesn't inadvertently mean that I'm saying she is to blame for what has happened here. Whilst I can see, from her perspective, why it may feel that way, I want to assure Ms G that isn't what I'm saying. I accept she is a victim here, but that alone does not form a basis upon which I can ask Revolut to refund her loss. And again, whilst I'm naturally sympathetic to Ms G having been a victim as she has, for the reasons I've set out above, there isn't a fair and reasonable basis upon which I can ask Revolut to do more to resolve this complaint.

Ms G is clearly unhappy with the outcome of my provisional decision. She continues to maintain that Revolut should refund her loss, and the decision to not uphold her complaint *"sets a dangerous precedent where banks are effectively shielded from accountability, even where clear negligence is evident"*. But Ms G hasn't put forward any other new evidence, comments or arguments for me to consider. So overall, nothing she has said in response to my provisional decision persuades me to deviate from the outcome I've reached and explained.

I appreciate Ms G's strength of feeling about what has happened here, and she is under no obligation to accept my final decision. If she doesn't accept my decision, it won't be legally binding, and she is free to pursue Revolut through other avenues, such as the courts, should she decide to do so. If this is something Ms G is considering, I'd recommend that she seeks independent legal advice.

My final decision

For the reasons outlined above, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms G to accept or reject my decision before 25 July 2025.

Sonal Matharu
Ombudsman