

The complaint

Mr K complains Revolut Ltd won't refund him the money he lost as part of a work-tasks scam.

What happened

The circumstances surrounding this complaint are well known to both parties, so I've summarised what I consider are the key points.

Mr K says the scammer made contact with him through a popular messaging platform and told him about a job opportunity.

He says he was put through an interview process, also via a messaging platform, and was passed to a trainer to learn how to do the work. The work was to review applications, for which he would be paid a fee.

Mr K was told he would need to deposit small amounts to enable him to carry out some of the tasks, but he would be able to withdraw these, along with the fees he earned.

He didn't carry out any particular research on the company the scammer said he worked for, but assumed it was legitimate.

At first, Mr K was able to receive money for the work he was carrying out. He received four payments between 2 – 4 April 2024. But he realised it was a scam when he was contacted and asked to deposit significantly more money.

Mr K made a number of payments to the scammer, he also received some money into his account as part of this scam and he attempted some payments which were not completed. These are listed below.

| Transaction | Date and time | Amount | Outcome | Destination |
|-------------|---------------------|---------|--------------------------|------------------|
| 1 | 02/04/2024 15:33 | €55.00 | Payment received by Mr K | Incoming payment |
| 2 | 02/04/2024 15:33 | £46.37 | card payment completed | New payee 1 |
| 3 | 02/04/2024 17:11 | €124.54 | Payment received by Mr K | Incoming payment |
| 4 | 03/04/2024 14:34 | €101.00 | card payment completed | New Payee 2 |
| 5 | 03/04/2024 15:27 | €57.57 | Rejected by card scheme | |
| 6 | 03/04/2024 15:29 | €58.56 | Rejected by card scheme | |
| 7 | 03/04/2024 15:35 | €58.56 | Card payment completed | New payee 3 |
| 8 | 03/04/2024 16:36 | €100.00 | Payment received by Mr K | Incoming payment |

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|----|---------------------|-----------|--------------------------|------------------|
| 9 | 03/04/2024 16:40 | €153.00 | Payment received by Mr K | Incoming payment |
| 10 | 03/04/2024 16:43 | €50.00 | Payment received by Mr K | Incoming payment |
| 11 | 04/04/2024 10:48 | €101.00 | Push to card payment | New payee 4 |
| 12 | 04/04/2024 11:27 | €101.00 | Payment received | |
| 13 | 04/04/2024 12:04 | €135.00 | Rejected by card scheme | |
| 14 | 05/04/2024 11:32 | €93.48 | Push to card payment | New payee 5 |
| 15 | 05/04/2024 12:19 | €11.00 | Push to card payment | Payee 5 |
| 16 | 05/04/2024 13:34 | €150.03 | Push to card payment | Payee 3 |
| 17 | 05/04/2024 13:59 | €269.99 | Payment failed | |
| 18 | 05/04/2024 14:01 | €269.98 | Push to card payment | Payee 3 |
| 19 | 05/04/2024 19:37 | €2,211.41 | Payment failed | |
| 20 | 05/04/2024 19:56 | €2,212.37 | Push to card payment | New payee 6 |
| 21 | 05/04/2024 20:49 | €168.82 | Push to card payment | Payee 6 |

Revolut says Mr K was sent a general warning each time he added a new beneficiary. Revolut also says an attempted payment on 5 April 2024 (transaction 17) was held and triggered a warning. Mr K was sent a message asking him to enter the payment purpose, but instead Mr K cancelled the payment. Shortly afterwards, Mr K attempted to make a similar payment (transaction 18), which triggered a similar warning. Mr K responded and entered the payment purpose as “something else” and “as part of a job opportunity”. Revolut says this triggered further questioning about how he discovered the job opportunity, whether he had been asked to install software and whether he had been asked to complete a set of tasks for a fee. It says Mr K was shown warning pages that could not be skipped, which included warnings that said this was likely a job scam, but he confirmed he wanted to proceed, and the payment was released.

Mr K attempted another payment that same day, this time for €2,211.41 (transaction 19), but Revolut placed it on hold and sent a warning to Mr K. It asked him the payment purpose and he selected that he was investing in a company. He was asked whether he had been asked to install software, how he discovered the opportunity, whether he had researched the company and whether the transfer was being made to an account he controlled. Revolut then contacted him through live chat. The chat closed quickly, without Revolut having been able to discuss the transaction in a meaningful way and Revolut cancelled the transaction.

A transaction for a similar amount and to the same payee was attempted later that day (transaction 20), triggering the same warning and similar responses. Mr K was contacted by telephone and he told Revolut he was buying machinery for a new business he was planning to open. He said he had met the person he was paying. Revolut allowed the transaction to proceed following this call.

Mr K says he found the scammer persuasive, particularly because he received some payments at the beginning. When he was speaking to Revolut, he thought the person he was speaking to sounded suspicious because he could hear a dog barking in the background. Mr K says the scammer was telling him what to say and he was fully duped.

Our investigator said she considered Revolut acted proportionately when it intervened in the transactions and gave appropriate risk warnings. Even if she had thought further intervention was warranted, having listened to the call between Mr K and Revolut on 5 April 2024, she thought further intervention was unlikely to have made a difference. She said this because Mr K wasn't open and honest in his answers to Revolut's questions and appeared to have been taking instructions from the scammer about how to answer Revolut's questions. This prevented Revolut uncovering the scam and Mr K didn't act on Revolut's clear warnings. As the payments had been made to external cards, she said recovery wasn't possible.

Mr K didn't agree with our investigator's view of his complaint. He was invited to make further submissions, on multiple occasions, but he hasn't provided them, indicating he does not wish to deal with our investigator further.

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.

Mr K has indicated that he wants to make further submissions following the investigator's assessment. He has been asked to provide these, either in writing or to record his submissions. Mr K has not done so, asking to deal with someone other than the investigator. I'm satisfied Mr K has been given an opportunity to provide further submissions and that despite Mr K not providing them, I have sufficient information to fairly decide his complaint.

In broad terms, the starting position at law is that an Electronic Money Institution ("EMI") such as Revolut is expected to process payments and withdrawals that a customer authorises it to make, in accordance with the Payment Services Regulations (in this case the 2017 regulations) and the terms and conditions of the customer's account.

But, taking into account relevant law, regulators rules and guidance, relevant codes of practice and what I consider to have been good industry practice at the time, I consider it fair and reasonable in April 2024 that Revolut should:

- have been monitoring accounts and any payments made or received to counter various risks, including preventing fraud and scams;
- have had systems in place to look out for unusual transactions or other signs that might indicate that its customers were at risk of fraud (among other things). This is particularly so given the increase in sophisticated fraud and scams in recent years, which firms are generally more familiar with than the average customer;
- have acted to avoid causing foreseeable harm to customers, for example by maintaining adequate systems to detect and prevent scams and by ensuring all aspects of its products, including the contractual terms, enabled it to do so;
- in some circumstances, irrespective of the payment channel used, have taken additional steps, or made additional checks, or provided additional warnings, before processing a payment – (as in practice Revolut sometimes does including in relation to card payments);
- have been mindful of – among other things – common scam scenarios, how the fraudulent practices are evolving (including for example the common use of multi-stage fraud by scammers, including the use of payments to cryptocurrency accounts

as a step to defraud consumers) and the different risks these can present to consumers, when deciding whether to intervene.

Having considered everything, I'm not persuaded that Mr K's complaint should be upheld.

The transactions were relatively low in value and made to a number of payees. The account wasn't newly opened and had been in use for over two years. A variety of transactions had also been made in the past, in Euro and Sterling. Overall, I don't think the transactions were particularly suspicious or out of character. Despite that, there were a number of interventions by Revolut.

I consider a general "new payee" warning, was proportionate for those transactions where new payees were being set up – as mentioned, these were low value and not sufficiently out of character for me to conclude Revolut ought to have intervened further than it did.

Where Revolut did intervene further, on 5 April 2024, overall, I consider its interventions were reasonable. It says its internal systems flagged transactions 17-20 as possibly connected with fraud and so it paused the payments and sent Mr K warning messages asking about the payment purpose. It did this in relation to each of those four payments.

Mr K cancelled transaction 17, so no further action was taken in relation to it by Revolut, which appears reasonable in the circumstances.

For transaction 18, Revolut asked Mr K the payment purpose and asked further questions based on his responses. When Mr K answered that he was making the payment as part of a job opportunity, I would have expected Revolut to contact Mr K directly by in-app messaging, given the prevalence of work tasks scams at that time. Rather than sending Mr K warnings that it thought this was likely a scam but then releasing the payment, I don't think it should have released the payment. And I think it should have attempted to clarify its concerns with Mr K directly. Having said that, even if it had tried to do so, I'm not persuaded it's likely Mr K would have engaged openly and honestly with Revolut. I say that because when Mr K was messaged by Revolut later that day, the chat ended abruptly. When Mr K did engage directly with Revolut, in relation to transaction 20, he was not open and honest with Revolut, as I'll go on to explain. On that basis, I consider it's unlikely he would have engaged openly with Revolut or that the scam would have been uncovered if Revolut had intervened further during transaction 18.

Revolut paused transaction 19 and contacted Mr K, again asking him the payment purpose. Mr K's response prompted Revolut to make contact by live chat, but the live chat ended before Revolut could satisfy itself that the payment didn't pose a risk to Mr K and so the payment was cancelled. That was a reasonable response from Revolut in my view.

Mr K attempted a further payment, transaction 20, which again led Revolut to pause the payment and ultimately to make contact, this time by phone.

Mr K wasn't open and honest with Revolut about the purpose of the transaction and said he was buying equipment for a new business he was starting, and the payment was to someone he had met. That wasn't the case. I understand Mr K's point that he was fully duped by the scammer. Such scams can be complex and are designed to be convincing, for example by paying small amounts to the victim to make the scam appear legitimate, as happened here. I also note that he had some reservations about the caller from Revolut, which made him cautious about what Revolut was telling him.

However, while I'm satisfied Mr K has been the victim of a cruel scam, the steps Revolut took in this call and the questions it asked were reasonable. They were aimed at assessing

whether the transaction was a risk to Mr K. I consider it was reasonable for Revolut to release the transaction based on Mr K's answers. Revolut didn't know Mr K's answers were not accurate and they seemed to indicate this was a legitimate transaction for equipment Mr K wanted to buy, with the payment going to a person Mr K knew.

I do think the agent who called Mr K could have gone further and should have had the information about the failed interventions with Mr K in mind when he spoke to Mr K. He should have made enquiries not just about the payment that triggered the call, but the earlier unsuccessful payments too. But, I consider it likely Mr K would not have been open in his responses, as he appears to have been coached by the scammer.

I don't consider Revolut did all it could have done, in particular it should have intervened further in relation to transaction 18. But given Mr K's responses in relation to transaction 20, for the reasons given above, I don't consider it likely that further or better intervention by Revolut would have prevented Mr K's losses. It seems to me, and by his own admission, that Mr K was completely taken in by the scammers.

Recovery

Revolut says that as the payments were push-to-card transactions, essentially a payment from one card to another, recovery was not possible under the relevant card scheme rules and this appears to be the case. In any event, I consider it unlikely any attempts at recovery would have been successful, given how quickly money tends to be moved from one account to another in this type of fraud and that the fraud wasn't reported until two days after the final transaction.

My final decision

I do not uphold Mr K's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr K to accept or reject my decision before 11 June 2025.

Greg Barham
Ombudsman