

The complaint

Mrs D complains that Revolut Ltd won't refund her the money she lost in a work tasks scam.

Mrs D is being represented by a professional representative, but for ease of reading I'll just refer to her.

What happened

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

Mrs D says she was actively looking for work and was contacted over a popular messaging platform by a person claiming to be from a recruitment company. The recruiter told Mrs D about a job with a company that involved rating apps to boost the company's ranking and visibility.

Mrs D was interested in the job opportunity. She says she saw positive reviews online and thought it was a legitimate company. She was told that she would have to deposit small amounts of money to her online work account, on occasion, but she would be able to withdraw it together with the commission she earned for completing her work tasks.

An account was opened with Revolut on 17 October 2023 and Mrs D gave the account opening purpose as: overseas transfers, stocks, rewards, cashback, transfers and cryptocurrency.

Mrs D made the following payments from her Revolut account to several individual payees:

Transaction	Date	Amount	Payment type
1	18/10/2023	£22.15	Push to card payment
2	18/10/2023	£71.50	Push to card payment
3	19/10/2023	£157.09	Push to card payment
4	19/10/2023	£539.75	Push to card payment
5	21/10/2023	£1,739.10	Push to card payment
6	21/10/2023	£1,739.10	Push to card payment
7	21/10/2023	£1,537.57	Push to card payment

In October/November 2023, Mrs D says the scammers' website disappeared and she was unable to contact them. It was at this point she realised she had been the victim of a scam.

Mrs D says she cannot recall any interventions from Revolut. She considers the transactions ought to have prompted intervention from Revolut because the transactions were unusual. For example, she says there was a sudden increase in spending on the account and the balance in her account was quickly depleted. If Revolut had paused any of the payments and asked her probing questions, she thinks it's likely the scam would have been uncovered.

Revolut says it provided sufficient scam warnings, but didn't have sufficient grounds to

believe the transactions were fraudulent. It says it tried to recover Mrs D's money when she reported the scam.

Our investigator considered Mrs D's complaint but he didn't uphold it. He didn't consider the transactions were particularly unusual or suspicious, to the point that Revolut ought to have intervened. He found that Revolut had sent Mrs D warnings for some of the transactions and he thought these were proportionate in all the circumstances.

Mrs D didn't agree with the investigator and she asked for an ombudsman's decision. She said none of the warnings the investigator referred to were relevant to the scam she was actually falling victim to – they related to investment, purchase and impersonation scams, not work task scams. Revolut's interventions amounted to continuously asking her to resubmit payments until she selected an option that allowed the payment to go through. During its in-app messaging with her, Revolut said several times that it thought the transactions were a scam. She questions why it had allowed her to resubmit payments.

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.

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 October 2023 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 Mrs D's complaint should be upheld.

On balance, I agree that the transactions were not sufficiently unusual that I consider Revolut ought reasonably to have intervened. The payments were generally for relatively small amounts and made to a variety of different payees. The account had only recently been opened, so there wasn't an established pattern of usage on the account that could be

used to judge whether the transactions were out of character. The transactions also appear to have been consistent with the account opening purpose Mrs D gave.

It's arguable that a pattern of suspicious transactions was starting to emerge by payment 7, which was the third similar sized payment made on the same day. But in any event, I can also see that Revolut did intervene, several times. Overall, I agree with the investigator that the interventions and warnings provided were proportionate.

Revolut contacted Mrs D on 19 October 2023, when Mrs D was trying to make a payment for £539.75. It appears she was asked to select the payment purpose from a list of options and was then asked further questions based on the payment purpose. Revolut then contacted Mrs D through its in-app messaging and asked further questions about the payment.

Mrs D appears to have said the payment was an investment and Revolut provided appropriate warnings based on that payment purpose. Ultimately, Revolut blocked this payment, which appears reasonable in the circumstances.

Mrs D told Revolut she knew the person she was trying to pay and so attempted to make the payment again. Once again, Revolut paused the payment and asked her questions. Mrs D's answers to the next set of questions posed by Revolut changed from her earlier answers. She told Revolut she was paying friends and family and was making a payment to her cousin, that she had spoken to her cousin and had confirmed the payment. Revolut asked if she had been contacted by anyone asking for money unexpectedly. Mrs D said that she had and so Revolut cancelled the payment. I consider that too was appropriate, based on Mrs D's answers.

Mrs D tried to make another payment to a different payee and explained that she had called her cousin and she was trying to pay her cousin for something she had bought. Revolut asked further questions, such as whether Mrs D had been told to select "pay a family member or friend" as an option when that wasn't the true payment purpose and whether she had been asked to ignore warnings. Revolut said if this was the case, then this was a scam. Mrs D said she had not been told to ignore warnings or select this payment purpose. Revolut allowed the payment to proceed. From the copies of messages between Mrs D and the scammer it appears that she had received advice from the scammer to ignore such warnings and to select "pay a family member or friend" as a payment option.

I don't agree that the questions and warnings provided were not relevant to the scam Mrs D was facing. It's true that some of the questions and warnings were more relevant to investment, purchase and impersonation scams, but that appears to have been due to Mrs D selecting inaccurate payment reasons from the list of available options.

I understand that If Mrs D had not selected that she was making an investment, or paying family and friends, (neither of which were accurate) there was an option to choose "something else". Had she selected that, she would have had the further option to choose "as part of a job opportunity". Had she selected that option, I consider it likely Revolut wouldn't have allowed the payment to proceed.

I also consider some of the warnings Mrs D received were directly relevant to her situation. For example, Revolut asked whether she had been asked to select a payment option that wasn't accurate and it said if she had, then this was likely to be a scam.

I take Mrs D's point that Revolut said several times that it thought these payments were likely to be part of a scam. She essentially tried to make the same payment three times, in quick succession, changing the payee and giving different payment purposes or slightly

different answers to other questions each time. And it's clear Revolut did have concerns because it blocked payment twice.

Overall, though I do consider Revolut asked relevant questions, designed to find out if Mrs D was at risk of falling victim to a scam. I consider her answers, which were not accurate, ultimately made it more difficult for Revolut to uncover the scam at this point and when Mrs D repeatedly told Revolut she was making a payment to her cousin and had called her cousin to confirm that the payment was correct, Revolut had little basis on which to refuse to make the payment.

Revolut intervened again, on 21 October 2023. Mrs D was attempting to make a payment for £1,537.57. Revolut paused the payment and asked Mrs D the payment purpose. Mrs D said the payment was going to her brother via someone she knew personally. Revolut advised her to take her time and to make checks to be sure she was paying the right person, but Mrs D wanted to proceed.

I consider that if Mrs D had answered Revolut's questions accurately, Revolut might have uncovered the scam. However, as she didn't give accurate answers to the clear questions asked by Revolut, I'm not persuaded Revolut was at fault here.

Recovery

Revolut says it was unable to attempt recovery due to the nature of the payments, being transfers to a card belonging to the payees. In any event, Mrs D didn't report the scam until 26 October 2023, five days after the last transaction, so I consider it very unlikely any funds would have remained available for recovery after that period of time, given how quickly scammers tend to move funds on.

It's clear Mrs D has been the victim of a cruel scam. Such scams are designed to be convincing and I'm sure this has been a very distressing situation, but despite my natural sympathy, I'm not persuaded Revolut is responsible for Mrs D's losses.

My final decision

I don't uphold Mrs D's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs D to accept or reject my decision before 26 June 2025.

Greg Barham
Ombudsman