

## The complaint

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

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

## What happened

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

Ms B says she was looking for a job and saw an advert for a role where she could earn money by working from home. She was contacted about the job over a popular messaging app and given further details. In order to complete the work she was given, she had to deposit small amounts of money, but she was able to make some withdrawals at first – around £480 in total over four transactions. She was advised to set up an account with Revolut in order to make payments. As things progressed, she was asked to deposit larger amounts of money but wasn't able to make withdrawals anymore. At this point she realised she had been the victim of a scam, and she contacted Revolut.

Ms B made the following payments from her Revolut account:

Transaction	Date	Amount	Payment type
1	17/01/2024 12:08	£38.89	Push to card
2	17/01/2024 12:22	£35.22	Push to card
3	18/01/2024 10:50	£51.91	Push to card
4	18/01/2024 15:49	£121.37	Push to card
5	18/01/2024 15:57	£25.90	Push to card
6	19/01/2024 17:37	£140.05	Push to card
7	22/01/2024 11:06	£1,258.83	Transfer
8	22/01/2024 14:21	£1,665.77	Transfer
9	22/01/2024 14:25	£1,415.04	Transfer

Ms B says the three payments of over £1,000 to a new beneficiary, made on the same day, were suspicious and the pattern of low value transactions escalating into larger payments matched known fraud patterns.

While Ms B accepts some warnings were provided by Revolut, she doesn't think they were relevant to her circumstances, for example when she said she was sending money to invest in cryptocurrency, she received warnings about impersonation scams.

She says Revolut didn't ask suitable questions but simply asked if she was comfortable making the payment. She says that if she had been asked appropriate questions and provided with suitable warnings, this would have uncovered the scam.

Revolut says Ms B would have been sent a "new beneficiary" warning when setting up a new payee, which said:

*“Do you know and trust this payee?”*

*If you’re unsure, don’t pay them, as we may not be able to help you get your money back. Remember, fraudsters can impersonate others, and we will never ask you to make a payment.”*

It also says payment 7 was held and it carried out additional checks and provided additional warnings. Revolut says it asked Ms B the purpose of the payment and she replied that it was being made as part of an investment. A conversation with Ms B took place through in-app messaging and she was asked again why she was making the payment. She answered that she was investing in cryptocurrency. Revolut asked if she was being guided in any way to make the transaction and she answered no. It asked her why she had opened a Revolut account and she answered that she wanted a separate account for investment purposes.

Our investigator said he didn’t consider the transactions were particularly unusual or suspicious, to the point that he thought Revolut ought to have intervened. He thought the warnings that Revolut did provide were proportionate to the risk posed by these transactions. He also thought Ms B had misled Revolut with some of the answer she gave it when Revolut asked questions about one of the transactions. On that basis, he wasn’t persuaded that further interventions from Revolut would have worked. So, he didn’t think Ms B’s complaint should be upheld.

Ms B disagreed and so 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.

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 January 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 Ms B's complaint should be upheld.

In my view there were insufficient reasons for Revolut to have intervened in the first six transactions. They were all low value transactions and not out of keeping with Ms B's stated account opening purpose, which included transfers and scheduling payments. On that basis, I consider the "new payee" warning it sent on transaction 1 when the payee was set up, the content of which I have set out above, was reasonable and proportionate to the risk presented.

Revolut did intervene in transaction 7. Ms B was initially sent a "new payee" warning, with identical text to the warning already set out above. The payment was then held pending a transfer review. Ms B was sent another warning, advising that the transaction had been flagged as a potential scam. The warning screens said that a fraudster might ask a customer to hide the real reason for a payment and the next screen asked whether anyone was guiding Ms B to make the payment. Ms B said she was not being guided. Revolut then asked for the payment purpose, to which Ms B said she was making the payment as part of an investment. She selected this from a list of options. Revolut asked what kind of investment Ms B was investing in and Ms B answered that it was a cryptocurrency investment. I consider it was appropriate for Revolut to attempt to identify the payment purpose and then, based on Ms B's response, to narrow down the particular risks posed by the transaction.

Revolut asked whether she had been asked to download any software and she said she hadn't. She was asked further questions and said she had discovered the investment opportunity through friends and family and had invested in cryptocurrency before. Revolut asked Ms B what research she had carried out and she responded that she had checked the FCA register. She also told Revolut that she was transferring money to another account under her control. I find that Revolut did ask probing questions that were relevant to the payment purpose Ms B selected.

Ms B was shown some further warning screens and was directed to a live chat conversation with a member of staff at Revolut. She was asked again what the purpose of the payment was and Ms B repeated that it was for investment in cryptocurrency and that she had opened the account for investment purposes. That wasn't really accurate. Nor were Ms B's answers about having found out about the investment through friends and family and about having checked the FCA register. I think the answers Ms B gave Revolut played a part in preventing it from uncovering the scam because if she had given more accurate answers, Revolut could have asked more relevant questions and provided warnings that were more tailored to the actual risks she was facing.

I do note that the screenshots Revolut has provided me with don't include the option to select "as part of a job opportunity". My understanding is that this would have been shown as an option on another screen if Ms B had selected "something else" rather than "as part of an investment". It's unfortunate that Ms B selected that she was making the payment as part of an investment, rather than selecting something else, but I don't consider I can reasonably fault Revolut for that. I consider Revolut did take reasonable steps to prevent this fraud by intervening in payment 7, asking questions designed to narrow-down the scam risks Ms B was facing and asking further probing questions based on her answers. I consider the warnings Revolut provided were relevant to the answers Ms B provided.

Having intervened in payment 7, I don't consider payments 8 and 9 ought to have caused Revolut to intervene further. While they were payments made on the same day as payment 7, they were relatively low value transactions.

### Recovery

Revolut has provided evidence that it contacted the recipient bank to attempt recovery of the three transfer payments. From the evidence on file, it seems the money Ms B sent was very quickly moved on from the recipient bank, before Revolut was made aware of the scam, so I find there was no reasonable chance for it to recover Ms B's money

In terms of the push-to-card transactions, I'm not persuaded Revolut could have reasonably recovered the payments. There is no clear way in which Revolut would have been able to attempt to recover the money and in any event, the scam wasn't reported to Revolut until three days after the last of these payments, making it unlikely any funds would have been available to recover.

While I understand that Ms B has been the victim of a cruel scam and I don't doubt how upsetting this will have been for her, for the reasons set out above I'm not persuaded that Revolut could reasonably have prevented Ms B's loss.

### **My final decision**

I don't uphold Ms B's complaint.

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

Greg Barham  
**Ombudsman**