

## **The complaint**

Mr O complains that Revolut Ltd won't refund money he lost when he was the victim of a job scam.

The details of this complaint are well known to both parties. So, if there's a submission I've not addressed; it isn't because I've ignored the point. It's simply because my findings focus on what I consider to be the central issues in this complaint – that being whether Revolut was responsible for Mr O's loss.

## **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 agree with the conclusions reached by our Investigator, and for largely the same reasons. I'll explain why.

I want to first make it clear from the outset that there is no doubt that Mr O has been victim of a cruel and sophisticated task-based job scam and has lost a considerable amount of money as a result. I don't underestimate the impact this has had on Mr O. But while there are certain obligations on EMIs (such as Revolut) to protect consumers and prevent losses to scams in certain circumstances, these are not absolute. And so, there are unfortunately occasions where a consumer will lose out but have no recourse to a refund.

Firstly, it isn't in dispute that Mr O authorised the faster payments he made for the purchase of crypto to facilitate the scam. The funds were then unfortunately transferred on to the scammer.

In broad terms, the starting position in law is that 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.

However, I consider that as a matter of good industry practice that Revolut ought to have taken steps to intervene prior to processing a payment instruction where it had grounds to suspect a payment might be connected to fraud or a scam.

Mr O has explained to us that after a couple of weeks of being involved in the job scam, part of which involved the buying and selling of crypto, the scammer had introduced him to the idea of investing in crypto himself through his account with a legitimate crypto exchange; and advised him to open an account with Revolut. Mr O opened that account on 5 October 2023, stating the purpose of the account as 'crypto'.

At the time these payments were made there was a high prevalence of crypto related scams; and so, the risks of making crypto related payments should've been well known to Revolut. The question then arises whether Revolut ought reasonably to have held such suspicions or concerns in relation to Mr O's payments — and if so, what might've been expected from a proportionate intervention.

So, taking all of this into account, I need to decide if Revolut acted fairly and reasonably in its dealings with Mr O when he made three payments lost to the scam between 6 and 11 October 2023. Specifically, whether it should've done more than it did before processing the

payments – and if it had, would that have made a difference. I also need to decide if Revolut could've reasonably recovered the lost funds.

Revolut blocked the first payment Mr O made on 6 October 2023 for £2,000 and wanted to understand more about it. This was done via in-app warnings, educational scam warnings, and by way of Revolut's chat function. This payment was then released, along with the two further payments.

Our Investigator thought Revolut should've been concerned about Mr O's payments and done more to establish their purpose. But based on the information Mr O provided to Revolut about the first payment, and the influence the scammer held over him, our Investigator thought it was unlikely Revolut could've uncovered the scam and prevented Mr O's loss. He also thought Revolut had done all it could to try and recover the lost funds.

It's not disputed that Revolut should've been concerned about Mr O's payments. But Mr O has essentially argued that when Revolut blocked the £2,000 payment it didn't go far enough to protect him. He's said that the in-app warnings were not an *"effective tool of scam intervention"* because they don't counteract the fact that most scam victims are coached on how to respond to such warnings. Mr O also argued the warnings and educational scam information were hard to read and poorly laid out. He said their graphological nature of using a small font size and muted shades impacted their clarity and distracted from the importance of the information being presented.

In terms of the interaction Mr O had with Revolut via its chat function, he said it failed to ask probing questions to fully understand the risk it had identified. He said Revolut had failed in its duty to protect him from foreseeable financial harm.

When provided with the in-app warnings in relation to the first payment – Mr O confirmed the payment was part of an investment for *"gains in crypto currency"*. That was in line with the account purpose.

Mr O then went on to confirm that he hadn't been asked to install any remote access software, had found out about the 'investment' by way of a friend or family member, had invested in crypto before, and checked that the company he was dealing with was FCA registered.

Revolut was still concerned about the payment and invited Mr O to join its chat function. Revolut asked no further questions about the payment, but issued the following warning:

*"Make sure any research you do is your own – fraudsters may appear knowledgeable, create convincing-looking posts on social media, or share articles about investing. If someone says you need to send money as a tax or fee to access your funds, you are being scammed."*

*"Our fraud detection systems show that there's a strong chance that this investment is a scam. That means that if you make this transfer, the most likely outcome is that you'll lose your money permanently."*

Whilst the scam Mr O fell victim to started out as a job scam, at the point of Revolut's involvement, it had seemingly morphed into something more akin to a crypto investment scam. And so, the answers Mr O provided to Revolut were not, in my opinion, wholly inaccurate.

But having said that, Mr O still assured Revolut that he wasn't being prompted or guided on what to say, that he'd invested in crypto before, that he'd been introduced to the investment by a friend or family member and that he'd checked the company was FCA registered. None of which aligns with what Mr O has now told our Service.

The premise of Revolut's intervention in the first payment was on the basis that Mr O was involved in a crypto investment. While crypto investment scams were prevalent at the time these payments were made, payments involving the purchase of crypto can be part of a

legitimate investment. And so, at the point Mr O confirmed the purpose of the payment to Revolut (that being as part of an investment) – it wouldn't, in my opinion, have been automatically evident to Revolut that Mr O had in fact initially fallen victim to a job scam.

Revolut asked Mr O the type of questions I'd reasonably expect it to ask to ascertain if he was falling victim to a crypto investment scam. And I can accept how the answers he gave satisfied Revolut that Mr O had opened a Revolut account to legitimately invest in crypto.

Mr O has said the warnings were unclear and don't take account of the fact scam victims are coached on what to say. I'm afraid I don't agree with Mr O here when looking at the specific circumstances of his complaint. Revolut asked a clear question of Mr O as to whether he was being prompted or guided. It also asked how he found about the investment. Both these questions are, in my opinion, designed to tease out the presence of a third party (a classic hallmark of a crypto investment scam) – with additional information saying:

*"if you're being scammed, the fraudster may ask you to hide the real reason for the payment".*

And:

*"Is someone telling you how to send this payment, which buttons to tap, giving you instructions over the phone or telling you this is urgent etc."*

In relation to how the opportunity was introduced, Revolut added the following:

*"Scammers use social media to entice victims by advertising fake investments"*

Mr O was introduced to the scammer via an advert on social media and was being guided and coached on both the job opportunity/purchase of crypto and the investment, as well as on what to say in response to warnings. And I think the risks of those such scenarios, as well as the consequences of being dishonest in response to Revolut's questions, were made clear to Mr O within the in-app warnings and should've therefore resonated with Mr O as such.

At which point, I'm aware that Mr O has criticised the way Revolut presented their warnings and educational scam information – as he says it distracted from the importance of their message. While I've considered this, I'm afraid I disagree. I think the warnings were clear, relevant and delivered in a way that highlighted their importance and emphasised significant risks that could be associated with the payment being made. And I think it was reasonable for Mr O to have taken the time to digest Revolut's warnings and questions before proceeding to make the payment. I don't think I can fairly hold Revolut responsible for Mr O not doing so.

I can fully appreciate that, with the benefit of hindsight, Mr O feels Revolut should've done more to protect him. But taking everything into account I'm not persuaded, on balance, that the information Mr O provided Revolut with when questioned about the £2,000 payment would've indicated he was in the process of being scammed. I don't therefore think Revolut acted unreasonably in allowing Mr O to make the £2,000 payment. Nor do I think it was unreasonable of Revolut to let the second payment be processed without further question. This payment was to the same payee as the first, and for a lesser amount (£1,000).

The third and final payment Mr O made as part of the scam was for £5,350 and was to an individual payee, seemingly for the purchase of crypto (on the peer-to-peer market). Arguably, Revolut should've intervened in this payment given its value and because it was being made to a new payee. But I don't think this would've prevented Mr O's loss. I'll explain why.

Mr O was clearly completely under the spell of the scammer and had been speaking to them for several weeks prior to his interaction with Revolut. He's said he didn't know about job scams and everything about the job opportunity appeared entirely genuine.

Of particular significance is that I can see from the communication between Mr O and the scammer that he was regularly asking for guidance on how to respond to warnings; with the scammer responding with exactly what to say. Mr O also sought constant reassurance from the scammer on the job task process and the purchasing of crypto – at times finding it difficult to navigate. The scammer maintained all was well and that his funds were 'safe'.

Mr O also demonstrated a significant degree of frustration at the restrictions put in place when trying to purchase crypto – and was keen to open the account with Revolut given the delays he'd faced from his other bank. And he actively ignored warnings from that bank, and from Revolut, that he was likely falling victim to a scam.

As I've also discussed above, Mr O wasn't entirely honest with Revolut, despite its questions being relevant to his situation – particularly around the presence of a third party guiding him and how the opportunity was introduced. He also said he'd invested in crypto before despite telling the scammer "*I honestly have no idea about cryptocurrency*".

And so, given how heavily influenced Mr O was by the scammer – and the sophisticated nature of what seems to have been an evolving, multilayered scam – I think it's unlikely, on balance, that *any* further intervention by Revolut in *any* of his payments would've resonated with Mr O.

In terms of Revolut's attempts to recover the lost funds at the point it was alerted to the scam, I also agree with our Investigator here. Revolut has shown recovery was attempted, but the funds had been moved on.

I have a great deal of sympathy for Mr O and the loss he's suffered, as I appreciate it is a significant sum of money. But it would only be fair for me to direct Revolut to refund his loss if I thought it was responsible – and I'm not persuaded that this was the case. For the above reasons, I think Revolut has acted fairly and so I'm not going to tell it to do anything further.

### **My final decision**

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr O to accept or reject my decision **before 28 November 2025**.

Anna Jackson  
**Ombudsman**