

The complaint

Ms J complains that Revolut Limited won't refund payments she made as part of a scam.

What happened

Ms J was initially represented on this complaint. For ease in my decision I'll refer as though all communication has come from Ms J.

Ms J fell victim to a job scam. Ms J was told she'd receive commission for carrying out online hotel reviews but to allow access she'd need to deposit funds.

Ms J initially made payments to the fraudsters through a third-party financial provider, which I'll call W. I'll be considering this complaint in a separate decision.

Ms J was persuaded to open an account with Revolut, and over two days she made four payments to two new payees totalling just over £6,000.

I've included a timeline of the transactions carried out by Ms J below.

Date	Time	Amount	Action
26 December 2023	6:45pm	£2,160.42	Approved
26 December 2023	9:11pm	£840.15	Approved
26 December 2023	9:40pm	£2,014.19	Declined
26 December 2023	10:11pm	£2,015.33	Declined
26 December 2023	10:23pm	£2,016.17	Declined
27 December 2023	10:45am	£1,509.82	Approved
27 December 2023	11:27am	£1,512.99	Approved

After making the fourth successful payment of £1,512.99 Ms J was still unable to withdraw either her funds or the commission. She realised it was a scam and complained to Revolut. Revolut said they detected the payments were suspicious, put them on hold and advised Ms J that they were riskier payments than usual. On two occasions they carried out a human intervention via an advisor, asked Ms J the nature of the payments and whether anyone was putting pressure on her. But, Ms J informed them she wasn't being assisted and didn't disclose the true nature of the payments, instead she told Revolut she was buying a car. Revolut argue If Ms J had been open and honest then they would have had a chance to warn her and potentially stop the payments.

Ms J wasn't happy with Revolut's response so brought her complaint to our service. She requested a return of the scam funds, plus 8% and £300 compensation. One of our Investigators looked into her complaint, but they thought that the intervention carried out by Revolut was sufficient.

Ms J didn't agree. She explained that she was going through a very challenging time when the scam took place including experiencing depression and financial difficulties. The funds were savings to buy her dream home, and the fraudsters were very persuasive pretending to be from a well-known legitimate company.

As she doesn't accept the outcome reached by our Investigator, 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 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. 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;
- have been mindful of – among other things – common scam scenarios, how 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.

I've considered what Revolut knew about Ms J when she carried out her first payment. And I think this was fairly limited. Revolut didn't have a longstanding customer relationship with Ms J, meaning they didn't know her previous spending patterns. That doesn't mean Revolut weren't still able to identify suspicious activity, but the information they had to make this assessment was more limited.

I've thought about whether the steps Revolut did take were proportionate to the risk the payments presented.

Revolut didn't intervene on the first two payments – for £2,160.42 and £840.15. Both these payments were international and to the same new payee. But, Revolut intervened on attempted payments three, four and five. They started a conversation with Ms J with a view to protecting her from a potential scam. And I can see that Revolut provided several online scam warnings to Ms J which didn't disrupt the scam.

These conversations show that Ms J wasn't open and honest with Revolut regarding her reasons for making the scam payments nor about whether she was being coached or not.

When Revolut initially asked Ms J the reason for the payment she said she was *'earning interest on a savings account'* before telling an advisor that *'I would like to purchase a car for my child to drive'*. The conversations between Ms J and the fraudster show that she was told exactly what to say to Revolut and was provided with photographs of a car and a fake conversation between her and the 'seller' which Ms J shared with Revolut. Revolut remained concerned that Ms J might be at risk of a potential scam. So they didn't allow the payments to go through.

The next day Ms J attempted a slightly smaller payment of just over £1,500. Revolut again blocked it and asked Ms J to complete a questionnaire regarding her reason for the payment. Ms J again explained she was buying a car. She was asked whether anyone was guiding her to make the transaction or asked her to open an account. But Ms J advised she wasn't being coached, and the payment was processed.

I understand why Ms J gave the responses to Revolut she did, due to the persuasiveness of the fraudsters and the fear they wouldn't be processed and didn't disclose the true reasons for the payments. But this impacted Revolut's ability to give specific and appropriate warnings about the type of scam Ms J was a victim of.

I realise this will disappoint Ms J but I'm satisfied there's nothing Revolut could have said or done which would have stopped Ms J making the payments. I say this for several reasons including how reliant Ms J was on what the scammers were telling her – including following their specific instructions by reducing her payments to £1,500 to help it bypass Revolut's security and on the information and answers she gave to Revolut when asked about the scam. Later in the scam journey Ms J also advised the scammers she'd been in contact with the police and they advised her it was a scam. But the scammers persuaded her otherwise, and Ms J discussed ways to obtain more money in an attempt to 'return' her funds.

I've also considered Revolut's attempts to recover Ms J's funds. They don't appear to have contacted the beneficiary bank for several months after the scam was reported. I'd have expected Revolut to have acted more quickly. But, as the receiving bank weren't able to confirm when the funds left the receiving account I can't fairly conclude that Revolut's delay in contacting the receiving bank has impacted what could have been recovered.

Overall, while I understand this will be very disappointing for Ms J, I'm afraid I won't be asking Revolut to do anything further here. I acknowledge that Ms J has been the victim of a cruel scam, and is an innocent party, but being the victim of a scam doesn't automatically mean that Revolut are obligated to refund her. I also empathise with Ms J's vulnerability at the time, including her depression and desire to obtain more funds due to her family situation at the time. However, my role is to make an impartial judgement on a fair and reasonable basis about whether Revolut have done what they are expected to do. And if they haven't, would Revolut taking the correct action have prevented the scam or successfully recovered Ms J's funds. There is a third party involved – the scammers – who tricked Ms J and caused the loss she suffered. As I've determined in this case Revolut isn't at fault and couldn't reasonably have prevented Ms J's loss it wouldn't be fair or reasonable for me to ask Revolut to provide a refund for actions carried out by the scammers.

For the reasons I've explained above I can't say Revolut are responsible for Ms J's loss. It follows I won't be asking them to refund the disputed transactions or pay Ms J any compensation.

My final decision

My final decision is I'm not upholding this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms J to accept or reject my decision before 28 October 2025.

Jeff Burch
Ombudsman