

## **The complaint**

Mr K has complained Revolut Ltd did nothing to stop payments he made which turned out to be part of an employment advance fee scam.

## **What happened**

In 2024 Mr K became aware of potential job opportunities through social media and got in touch with the individuals responsible. They communicated with him through WhatsApp and told him he would have a freelance position generating data and traffic on apps. Completing various tasks on apps would enable him to earn money and, in some cases, there'd be bonus commissions available.

To assist him in making payments which he was required to do, Mr K set up an account with a crypto trading platform that I'll call C. In January 2024 Mr K made a few initial payments over a couple of days. These were mostly low-value but gained in value to £300. Within a couple of days of those payments, Mr K made four payments from his Revolut account to C. These were for £3,100, £3,000, £2,600 and £1,800 and were made in under five hours. During that period, Mr K received two payments in from his account with C.

Mr K realised he was involved in a scam after being asked for further payments. This being money he didn't have. Mr K contacted Revolut online to ask for their help and to see whether he'd get a refund.

Revolut confirmed they wouldn't refund Mr K. There was nothing in his payment behaviour that looked unusual. They'd provided specific warnings to him for certain of the payments and now understood that Mr K had not been truthful. They also confirmed their terms and conditions made it clear that Mr K was taking on a level of risk by making the payments he was making.

Using a representative, Mr K brought his complaint to the ombudsman service.

After reviewing the evidence, our investigator confirmed she was going to ask Revolut to refund half of the money he'd lost after the first large payment made on 31 January. She felt that Revolut should have intervened further because of the nature of the transactions Mr K was making. However, only half of the money should be refunded as Mr K had not taken all the steps he could have taken to protect himself.

Mr K accepted this outcome but Revolut didn't. Mr K's complaint has been referred to an ombudsman for decision.

## **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've reached the same outcome as our investigator. I'll explain why.

Where there is a dispute about what happened, I have based my decision on the balance of

probabilities. In other words, on what I consider is most likely to have happened in the light of the evidence.

Mr K was scammed. This has had an impact on his finances and the future he wants to build with his family. He has my sympathy about what he has gone through.

I've not written in detail about the different aspects of what happened. I hope neither party think I'm being disrespectful but much of what happened isn't in dispute. Both Revolut and Mr K's representatives have shared the detailed chats between Mr K, the fraudsters and Revolut. I've also noted the detailed view – laying out the different steps of what happened – our investigator provided in September 2024. I see no need to repeat some of this, but I have obviously taken the evidence into account in coming to my decision.

There's no dispute that Mr K made and authorised payments totalling over £10,000 from his Revolut account to an account with C. Two of these transactions were made using Mr K's debit card, whilst the others were payment transfers.

I'm satisfied the disputed transactions were authorised under the Payment Services Regulations 2017

Our starting point is that banks and electronic money institutions are required to follow their customer's instructions. 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 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. Specifically job scams follow a similar format and have been well-known to banks and electronic money institutions;
- 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 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.

I've reviewed these payments and can see that Mr K had opened his account with Revolut back in 2019. Revolut has suggested that his primary bank account holder would have had a better opportunity to identify what was going on with Mr K but I disagree. I've seen many pages of Mr K's payment activity so I believe Revolut would have known what Mr K's normal or average account behaviour would have been by this stage.

I can see that Revolut immediately queried the first payment Mr K made as he set up C as a new payee. But at this stage the payments were low-value so I wouldn't expect these to have raised any alarms.

A payment of £300 on 29 January did trigger Revolut's automated system to intervene. This showed Mr K an automated scam warning and he was asked to identify the purpose of the payment. Mr K chose to state he was making this as part of an investment, which presented him with a specific set of scam warnings. None of these would trigger an alarm with Mr K as the circumstances didn't apply to the payment he was making.

Mr K accepted Revolut had advised him of the risk and that he understood he could be losing his money before this payment was made.

It would seem that after this warning, no other payment caused any further intervention, And I have to wonder why not? As on 31 January. Mr K made a payment of £3,000. Then an hour later made a payment of £3,100. Revolut would have been able to spot these payments had only been enabled by money Mr K had paid into his Revolut account. These payments were to an account with C which Revolut would have been able to identify. They'd also know that this payment behaviour didn't match how Mr K used his Revolut account. After a payment of £3,000 and before the payment of £3,100 was made an hour later, I'd have expected Revolut to intervene further.

And I believe this intervention should have been in terms of an individual discussing what was going on with Mr K. This would have been a reasonable step because of the increased amount of money involved and based on the automated answers Mr K provided when the payment of £300 is queried. Revolut would have every reason to query rapid payments that were supposedly part of an investment, regardless of the real reasons Mr K was making these payments.

If they'd done this, I'm in no doubt, Mr K would have explained what he was doing. There's no reason why at that stage, he wouldn't have realised he was the victim of a scam. There's nothing to suggest he was working to a script.

I'm satisfied that because Revolut did nothing further, this led to Mr K losing more money than he might have done.

I've also looked at what Revolut did to see whether any money could be recouped after being informed by Mr K when he realised he'd been the victim of a scam. I think they did all they could at that stage.

### **Putting things right**

In those circumstances it's fair and reasonable to ask Revolut to refund Mr K. However, I agree with our investigator that it wouldn't be fair to ask them to pay all of the money back that Mr K lost after the payment for £3,000.

I say this because I don't believe Mr K did the basic checks I'd have expected after being approached out of the blue with a job opportunity. He didn't query what the job involved, or took the time to check whether the company was bona fide. He could have done more – even if that was as simple as discussing this with friends who I believe may have suggested he did some investigation into what was going on before moving forward and paying money into an account with C.

Taking this into account I will only be asking Revolut to reimburse half of Mr K's losses after the payment of £3,000 was made on 31 January.

### **My final decision**

For the reasons given, my final decision is to instruct Revolut Ltd to:

- refund half of Mr K's net losses after he made the £3,000 payment to C on 31 January 2024; and
- Add 8% simple interest a year to those losses from the date the payments debited Mr K's account to the day of settlement.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr K to accept or reject my decision before 19 August 2025.

Sandra Quinn  
**Ombudsman**