

The complaint

Miss K is unhappy Revolut Ltd didn't refund payments she made as part of a scam.

What happened

In early 2024 Miss K came across an advert on social media for a job. She contacted the person who posted it and was given details for the 'HR department' at a company I'll call "O". Miss K discussed the opportunity via an instant messaging app, and found it entailed completing three sets of 30 tasks per day, where she would review and rate movies. She searched O online and believed it to be legitimate based on the results.

Miss K had to top up her account on the platform when prompted, which she initially did from an e-money account she held at another provider I'll call "W". After completing the first set of tasks she received a payment of £30 into her W account. That persuaded her the job was genuine. Miss K had to pay a clearance fee whenever she received a 'premium ticket', and sent money to various individuals that she believed worked at O.

W eventually blocked a payment Miss K was trying to make, and so O's agent advised her to open an account with Revolut. From there she continued to make payments to an individual purporting to work at O, I'll call "V", whenever top ups were requested.

Miss K made the following 'push to card' payments (which means the funds were transferred directly to the recipient's debit card) from her Revolut account as part of the scam:

Payment	Date	Time	Type/Payee	Amount
1	23 February 2024	14.26	Push to card transfer to V	£165.05
2	23 February 2024	14.28	Push to card transfer to V	£42.02
3	23 February 2024	17.47	Push to card transfer to V	£202
4	23 February 2023	17.48	<i>Cancelled payment</i>	£197.97
5	24 February 2024	20.19	Push to card transfer to V	£159.86
6	24 February 2024	20.28	Push to card transfer to V	£202
7	24 February 2024	20.30	Push to card transfer to V	£96.13
Total				£867.06

Revolut displayed a 'new payee' warning prior to the first payment, and Miss K confirmed she knew and trusted the payee. It also flagged the fourth payment of £197.97 for a check, and asked Miss K for the purpose of it – to which she selected 'goods and services'. She

was asked some more automated questions and then prompted to speak to an agent via Revolut's in-app chat. However she cancelled the payment before that could happen.

Eventually Miss K couldn't afford the payments being demanded by O. So she was blocked from the platform, removed from the instant messaging group, and couldn't access the balance she'd accrued. That's when Miss K realised she'd been scammed and reported things to Revolut.

Revolut considered the fraud claim and didn't refund the payments. It thought it had issued appropriate scam warnings, and there wasn't a mechanism in place for recovering payments like the ones Miss K made. So it couldn't get her money back. A complaint was raised through representatives, but Revolut maintained its position – so the matter was referred to our service for review.

One of our investigators looked at everything and didn't think the complaint should be upheld. In her view, the payments weren't unusual or suspicious enough in appearance that Revolut should have carried out further fraud checks. The investigator said Revolut didn't have any prior activity to compare this usage to, but the value and frequency wouldn't have been overly concerning. When Revolut had intervened to provide a warning Miss K didn't select the option that best fit the circumstances ('as part of a job opportunity') and so the warning provided didn't resonate. Overall, the investigator thought Revolut had acted proportionately.

Miss K didn't accept the investigator's opinion, and asked for an ombudsman to make a final decision on the complaint. So the matter was 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.

Having done so, I'm not upholding Miss K's complaint, for broadly the same reasons given by the investigator. I appreciate that will come as great disappointment to Miss K, who I know feels strongly that Revolut should have done more. I was also saddened to hear about how much the incident had affected her. There's no dispute that Miss K fell victim to a persuasive scam. But what I must decide is whether Revolut ought to have done more before processing any of the payments. On balance, I think it acted fairly in the circumstances – and I've explained my rationale below.

In deciding what's fair and reasonable, I am required to take into account relevant law and regulations, regulators' rules, guidance and standards, and codes of practice; and, where appropriate, I must also take into account what I consider to have been good industry practice at the time.

In broad terms, the starting position at law is that Electronic Money Institutions ("EMI's") such as Revolut are expected to process payments and withdrawals that a customer authorises them 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 in February 2024 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 their 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;
- 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 do);
- 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.

Revolut have a difficult balance to strike in how they configure their systems to detect unusual activity, or activity that might otherwise indicate a higher than usual risk of fraud. There are many millions of payments made each day, and it would not be possible or reasonable to expect firms to check each one. In situations where they do (or ought to) intervene, I would expect that intervention to be proportionate to the circumstances of the payment. Some firms had signed up to a voluntary reimbursement scheme at the time these payments were made, but Revolut wasn't subscribed to it, and these transactions wouldn't have been covered under that scheme anyway.

Miss K has argued that making six payments to the same payee within two days of opening an account was unusual behaviour. She's also said Revolut should have been concerned about the high frequency of payments, and that money was paid into the account before going straight out (depleting the account each time). I've also noted that the (push to card) transfers went to an account abroad – which meant they carried an elevated risk compared to domestic ones, as international payments are often harder to recover. Miss K believes all of those factors meant Revolut ought to have spoken to her before allowing them.

I've thought carefully about those arguments, and the risks that ought to have been apparent to Revolut here. I accept there were some risks attached to the disputed payments, but I don't agree Revolut needed to do more in the circumstances. This was a newly opened account, so Revolut didn't have any prior understanding of Miss K's usual activity. I don't find six payments to the same payee across two days necessarily concerning, or high frequency – and in this case there were significant time gaps between some of them. The amounts involved were also relatively low and not escalating in size, so I don't think a recognisable scam pattern had fully emerged by the time any of them were instructed by Miss K. Accounts like this one are often used for international transfers, with money being paid in to fund them and the balance being depleted once sent. That usage was also in line with Miss K's stated opening reasons (which included transfers), so I don't think Revolut would have found it concerning.

In fairness to Revolut's fraud detection system, it picked up that something might be amiss when Miss K made the fourth payment that day – and intervened to ask some automated questions. She answered that it was to pay for 'goods and services', but if she'd selected 'something else' then the option related to job opportunities would have been available and she'd have got a job scam warning. I've thought about whether Miss K just selected the best fitting answer on the screen in front of her. But she'd received a couple of similar interventions at W, where the option for 'Paying to earn money by working online' was shown alongside all the other options (without needing to first click something else). At those points, when asked by W, she didn't select the best fitting reason on two occasions, so I'm not satisfied she would have at Revolut even if it had been any clearer.

Revolut did try to speak to Miss K, but she cancelled the transfer before it got the chance to. I appreciate that might have been done under the scammer's instruction, but I can only expect Revolut to respond to the risks it was reasonably on notice of – and here I don't think it could have known the true circumstances behind the payments. I've considered whether Revolut should have let the payments made after the cancelled one through, without carrying out further checks, given it had wanted to speak with Miss K. But I've decided it acted reasonably by allowing them. I have to consider its actions in the context of the risks presented overall, and the amounts sent after that point were relatively low in value. Revolut was also entitled to think its warnings might have prompted some checks on Miss K's part, and that she was now happy to proceed having done those.

Having considered everything, and whilst I recognise that Miss K has lost this money to a cruel and sophisticated scam, I don't think Revolut could reasonably have been expected to prevent it. So, I'm not directing Revolut to refund the stolen funds.

My final decision

My final decision is I don't uphold Miss K's complaint about Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss K to accept or reject my decision before 11 July 2025.

Ryan Miles
Ombudsman