

The complaint

Ms R complains that Revolut Ltd (“Revolut”) won’t refund her the money she lost after she fell victim to an Authorised Push Payment (‘APP’) scam.

What happened

The background to this complaint is well known to both parties and has been laid out in detail by our Investigator in their view, so I won’t repeat it all in detail here. But in summary, I understand it to be as follows.

In or around February 2024, Ms R received a message, through a well-known messaging app from somebody claiming to be a recruiter, about a job opportunity. She was told the job entailed reviewing hotels online to increase their rating, for which she would earn commission. Believing everything to be genuine, Ms R proceeded, but unknown to her at the time, she had been contacted by fraudsters. The fraudsters then persuaded Ms R to pay her own money in order to proceed with the work.

As part of the scam, as well as using accounts she already held, Ms R was instructed by the fraudsters to open multiple accounts, with other payment service providers (including opening a Revolut account), as well as with cryptocurrency platforms.

Between 10 February 2024 and 8 March 2024, Ms R made a number of transactions through her newly opened Revolut account in relation to the fraud. Our Investigator has laid these payments out in detail in their view, so I don’t intend to list them all again here. But in summary the transactions, which were made by faster or card payments, saw Ms R moving money to/from her Revolut account to other accounts she held to facilitate payments, making faster payments to individuals who were selling cryptocurrency through ‘peer-to-peer’ (P2P) exchange platforms and also saw her sending money directly to accounts she had set up with cryptocurrency platforms herself. Ultimately payments were then converted into cryptocurrency and subsequently transferred into accounts that were controlled by the fraudsters.

Ms R realised she’d been scammed when she was still unable to withdraw any of the money she had sent and was asked by the fraudsters to continue making payments.

Ms R raised the matter with Revolut, but it didn’t uphold her complaint. In summary, it didn’t think it was at fault for processing the transfers that Ms R authorised.

Unhappy with Revolut’s response, Ms R brought her complaint to this service. One of our Investigators looked into things, but didn’t think the complaint should be upheld. In summary, our Investigator considered that even if Revolut had done more to question Ms R about the circumstances of the payments, it wouldn’t have made a difference as, when Revolut did ask Ms R questions, she had given it inaccurate information to hide the real reasons for making the payments. She did this under the guidance of the fraudsters.

Ms R didn’t agree with our Investigator’s view. As agreement couldn’t be reached, the complaint has been passed to me for a final 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.

I'm very aware that I've summarised this complaint briefly, in less detail than has been provided, and in my own words. No discourtesy is intended by this. Instead, I've focussed on what I think is the heart of the matter here. If there's something I've not mentioned, it isn't because I've ignored it. I haven't. I'm satisfied I don't need to comment on every individual point or argument to be able to reach what I think is the right outcome. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts.

Having thought about everything carefully, I agree with our Investigator, and I don't think Revolut is responsible for refunding the money Ms R sadly lost. I'm sorry to hear that Ms R has been the victim of a cruel scam. I know she feels strongly about this complaint, and this will come as a disappointment to her, so I'll explain why.

I'm satisfied Ms R 'authorised' the payments for the purposes of the Payment Services Regulations 2017 ('the Regulations'), in force at the time. So, although she didn't intend the money to go to scammers, under the Regulations, and under the terms and conditions of her account, Ms R is presumed liable for the loss in the first instance.

However, that isn't the end of the story. Good industry practice required that Revolut be on the lookout for payments that were out of character or unusual to the extent that they might have indicated a fraud risk. On spotting such a payment, I'd expect it to intervene in a manner proportionate to the risk identified.

In this case, I need to decide whether Revolut acted fairly and reasonably in its dealings with Ms R when it processed the payments, or whether it should have done more than it did.

Firms, such as Revolut, process a high volume of transfers and transactions each day. And a balance has to be struck as to when it should possibly intervene on a payment(s) against not holding up or delaying its customer's requests. I'm also mindful here that Ms R's Revolut account was newly opened. What this means is that Revolut would have had no historical account activity, upon which to compare the transactions that were being made as part of this scam.

I can see that Revolut, through its automated systems did intervene, on 2 March 2024 in respect of a payment for £202, and asked Ms R a number of questions around the purpose of the payment. Ms R told Revolut she was 'paying a family member or friend' – she added that she wasn't being assisted with the answering of the questions. Satisfied with the answers Ms R had given, Revolut allowed the payment to be progressed.

Later the same day, Revolut contacted Ms R, through its in-app chat, to ask her about a transfer for £1,100 that she was attempting to make. Ms R explained that she was sending the money to an account she held elsewhere. Revolut asked Ms R to show it evidence of the account she held with the other firm and provided her with a fraud warning related to impersonation scams. Ms R provided the evidence requested and confirmed to Revolut that she wasn't being guided. This transaction was automatically declined by Revolut's systems as it had timed out.

The following day, Revolut contacted Ms R again, in respect of another transaction that she had attempted. Again, it asked Ms R to provide it with evidence of the account she held with the provider she was transferring the money to (which was a different provider to who she

had attempted the transfer the previous day). Revolut also questioned Ms R about other payments she'd made in recent days – with Ms R telling it that she was repaying friends who she had borrowed money from. Revolut provided Ms R with warnings relating to investment scams and job scams.

I'm satisfied that Revolut's intervention and questioning was a proportionate response, and I wouldn't have expected it to have done any more.

In the circumstances of this case, while it was a newly opened account, on 10 February 2024, Ms R did make several payments in rapid succession, which can sometimes be indicative of fraud. So, for the purposes of this decision, I've also thought about what would have happened if Revolut had intervened sooner than it did. In doing so, I'm required to base my findings on the balance of probabilities; that is, whether a particular possible outcome of that intervention was more likely than not.

Ms R has told us, and the evidence of the messages that I've seen, between Ms R and the fraudsters, show that she had been subject to social engineering and was being coached extensively by the scammer. This coaching included how she should answer questions posed about the payments she was making. From what I've seen, Ms R broadly followed the fraudsters instructions, which I think is evident with what happened with Ms R giving Revolut (and the providers of other accounts she held) inaccurate information about the purpose of the payments and moving passed warnings she had been given about potential scams.

So, even if Revolut had intervened sooner, I think it's more likely than not Ms R would've reverted to the fraudster, as she had done before, on how to answer any questions and would likely have done so in such a way as to avoid alerting Revolut to what was really happening. Sadly, it seems to me that she was so determined to make the payments that, even if further intervention from Revolut had gone as far as preventing her from making payments and blocking her account, she'd have simply sent the funds from another of her accounts. Which I'm satisfied is evident and supported by what she went on to do, when other providers did just that and blocked her account.

Thinking next about the recovery of payments, given Ms R sent the money from Revolut to another account that she held, or through transferring money directly to P2P cryptocurrency sellers or to cryptocurrency wallets she held herself – there would have been no opportunity for Revolut to have recovered any of the money she sadly lost.

I don't intend any comments or findings I've made in this decision to downplay or diminish the impact this scam has had on Ms R. I have a great deal of sympathy for Ms R being the victim of what was clearly a cruel scam that has had a significant impact on her. But I can only compel Revolut to refund Ms R if it is responsible for the loss incurred. For the reasons explained, having carefully considered the circumstances of this complaint, I can see no basis on which I can fairly say that Revolut should be held liable for the loss Ms R has sadly suffered.

My final decision

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms R to accept or reject my decision before 5 September 2025.

Stephen Wise
Ombudsman

