

## The complaint

Ms M complains that Revolut Ltd (Revolut) is refusing to refund her the amount she lost as the result of a scam.

Ms M is being represented by a third party. To keep things simple, I will refer to Ms M throughout my decision.

## What happened

The background of this complaint is well known to all parties, so I won't repeat what happened in detail.

In summary, Ms M tells us she was contacted via a well-known messaging service by a business I will call "X". X appeared to be helping investors with investing in stocks and cryptocurrency.

Ms M was added to a group chat where she observed the interactions of others and started to learn about investing. X then contacted Ms M again and provided her with details of a trading platform it was using.

Ms M tells us that she was given details about different subscriptions and high yield programmes and ended up investing most of her money. But when she tried to make a withdrawal Ms M was told she would have to make a further payment of £30,000 first.

Ms M enquired on the group chat and realised she was the only real person in the chat, at this point Ms M realised she had fallen victim to a scam.

Ms M has disputed the following payments made from her Revolut account:

Payment	Date	Payee	Payment Method	Amount
1	3 April 2024	EPL Trading Ltd	Transfer	£17,000
2	9 April 2024		Crypto Withdrawal	5,000 USDT
3	9 April 2024		Crypto Withdrawal	7,700 USDT
4	10 April 2024		Crypto Withdrawal	6,900 USDT
5	15 April 2024		Crypto Withdrawal	4,400 USDT
6	16 April 2024		Crypto Withdrawal	4,450 USDT
7	22 April 2024		Crypto Withdrawal	10,000 USDT
8	23 April 2024		Crypto Withdrawal	10,150 USDT
9	25 April 2024		Crypto Withdrawal	7,500 USDT
10	1 May 2024		Crypto Withdrawal	2,700 USDT
11	2 May 2024		Crypto Withdrawal	8,050 USDT
12	8 May 2024		Crypto Withdrawal	6,152 USDT
13	10 May 2024		Crypto Withdrawal	6,226 USDT
14	11 May 2024		Crypto Withdrawal	6,200 USDT
15	14 May 2024		Crypto Withdrawal	6,194 USDT

Our Investigator considered Ms M's complaint but didn't think it should be upheld. Ms M

disagreed, so this 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.

It has not been disputed that Ms M has fallen victim to a cruel scam. The evidence provided by both Ms M and Revolut sets out what happened. What is in dispute is whether Revolut should refund the money Ms M lost due to the scam.

#### *What I can and can't look into in relation to this complaint*

Our service can't consider all complaints that are referred to us. The rules under which we operate are set out in the Financial Conduct Authority's Handbook and are collectively known as the DISP rules. We can only consider complaints that fall within our jurisdiction, in line with these rules.

Particularly relevant to Ms M's complaint is DISP 2.2 which states:

"DISP 2.2: Which complaints can be dealt with under the Financial Ombudsman Service?  
2.2.1 The scope of the Financial Ombudsman Service's two jurisdictions depends on:

(1) the type of activity to which the complaint relates..."

Those activities are then listed in DISP 2.3 (although I will not list all of them here). We can only consider complaints that relate to an act or omission by a financial business in carrying out one or more of the activities listed in DISP 2.3.

Cryptocurrency isn't electronic money or fiat currency according to the Financial Conduct Authority. Instead, it classifies cryptocurrency, and similar cryptocurrency-assets, as 'exchange tokens'. The operation of cryptocurrency services isn't currently regulated by the financial regulator in the UK.

There are no activities listed in DISP 2.3 which would cover the activity this part of Ms M's complaint relates to – namely, withdrawing the cryptocurrency and sending it on to the scammer. And so, I don't think her complaint in relation to the cryptocurrency withdrawals relate to an activity covered by us.

I am mindful that Ms M deposited fiat currency to her Revolut account and then exchanged this into the cryptocurrency which was withdrawn and ultimately lost to the scam. But the sending of the cryptocurrency was provided separately from the provision of Ms M's main e-money account. In the circumstances, I don't consider Revolut's provision of sending cryptocurrency services to be sufficiently closely linked to its provision of payment services to Ms M (through the provision of her e-money account) that it should be deemed ancillary to this. So, I'm satisfied that this service is unable to investigate the withdrawal of cryptocurrency here.

What I can look at, is whether Revolut should have intervened when the deposits into Ms M's account were made, and when the funds were converted into crypto.

I can also look at payment 1 in its entirety, as this payment was a normal transfer.

#### *Recovering the payments Ms M made*

Ms M made payments into the scam via transfer and the withdrawal of cryptocurrency that was then moved to the scammer.

When payments are made by transfer Revolut has limited options available to it to seek recovery. Revolut has confirmed that it contacted the operator of the receiving account for payment 1, but no funds remained. I don't think Revolut had any other reasonable options available to it to seek recovery of this payment.

As I explained above, I am unable to look at the cryptocurrency withdrawals.

Should Revolut have reasonably prevented the payments Ms M made?

It has been accepted that Ms M authorised the payments that were made from her account with Revolut, albeit on X's instruction. So, the starting point here is that Ms M is responsible.

However, banks and other Payment Services Providers (PSPs) do have a duty to protect against the risk of financial loss due to fraud and/or to undertake due diligence on large transactions to guard against money laundering.

The question here is whether Revolut should have been aware of the scam and intervened when Ms M made payments related to the scam. And if it had intervened, would it have been able to prevent the scam taking place.

When Ms M made payment 1 she was making a payment for a significant value to a new payee, as this payment was not in keeping with how Ms M normally operated her account I think Revolut should have had concerns and it should have intervened by providing a human intervention, for example by directing Ms M to its in-app chat facility and asking questions about the payment.

Ms M deposited large funds into her Revolut account. As depositing funds into to an account held in your own name comes with little to no risk of financial harm, I don't think Revolut was required to intervene when funds were deposited.

However, Ms M then converted those funds into cryptocurrency. This was not in keeping with how Ms M usually operated her account, and I think it could be argued that Revolut should have intervened when some of these exchanges took place.

I can see that Revolut did intervene when Ms M made payment 1. Revolut saw the payment as a potential scam risk and provided Ms M with several screens. Ms M confirmed she was not being guided on what options to select when making the payment.

Ms M was then directed to a questionnaire where she confirmed:

- She was not being assisted through the questionnaire
- She was transferring to her other account
- The type of account was a checking or savings account
- She had not installed any software
- The account was in her control

The information Ms M had provided was incorrect.

Ms M was then directed to Revolut's in-app chat facility where she confirmed she was buying goods, she had to pay an invoice, and she was not being guided on how to answer Revolut's questions. Ms M then provided a fake invoice to Revolut that had been provided to her by X.

Before attempting payment 1 from her Revolut account Ms M attempted a similar payment to the same payee from another account she held elsewhere. The payment was flagged, and a conversation took place between Ms M and her other account provider via phone.

During this call an incorrect reason for the payment was fabricated. Ms M explained she was volunteering abroad for the second year with a charity providing toys to children. The account provider explained that the business Ms M was attempting to pay was showing as dissolved on companies' house and this payment was eventually declined.

The other account provider also intervened when two other payments were attempted, and she received warnings about the risk associated with cryptocurrency related payments.

Despite a payment being declined and clear warnings being provided to Ms M she was still adamant to make payments in relation to the scam and started making multiple smaller payments to her Revolut account, that were then used to finance the scam.

Ms M has told us that the information she provided when making the payments was not convincing and Revolut should have done more to protect her.

I think Revolut could have intervened further than it did but it's also clear that Ms M was taken in by X and was willing to take its advice providing dishonest information to multiple banks to make payments in relation to the scam, even when she was warned about some of the potential risks.

Providing false information would have made it very difficult for Revolut to uncover the scam that was taking place, and even if it had Ms M has demonstrated that she was willing to evade efforts to protect her and make the payments from other accounts she held elsewhere when faced with obstacles in making payments. With the above in mind, I don't think Revolut missed an opportunity to prevent the scam, and it is not responsible for Ms M's loss.

### **My final decision**

I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms M to accept or reject my decision before 14 August 2025.

Terry Woodham  
**Ombudsman**