

## The complaint and background

Ms K complains Revolut Ltd won't reimburse over £2,000 that she lost when she fell victim to an employment scam.

Our investigator didn't uphold the complaint. He didn't think any of the payments looked suspicious such that Revolut ought to have made additional checks before processing any of them. But he found Revolut did interact with Ms K about the first disputed transaction and was satisfied this interaction was proportionate to the risk identified. He also found that Revolut intervened in a further attempted payment advising Ms K they thought she was likely being scammed. Ms K cancelled the payment and proceeded to make some lower value payments instead. Our investigator wasn't convinced any further intervention from Revolut would've prevented Ms K from making any more payments to the scam. That's because he found that whenever Ms K faced any obstruction, she interacted with the scammer relying on their guidance to overcome them.

Ms K disagreed asking for her case to be referred to an ombudsman for a 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.

Before I proceed into the body of my decision I'd like to address comments raised by Ms K regarding the Contingent Reimbursement Model ('CRM') code. I should explain the CRM code doesn't apply here. It's a voluntary code which Revolut is not a signatory. However, taking into account longstanding regulatory expectations and requirements, and what I consider to be good industry practice, Revolut ought to have been on the look-out for the possibility of fraud and make additional checks before processing payments in some circumstances.

Revolut did find one of Ms K's payment's suspicious as it paused the payment to make some further enquiries about it. Ms K was required to respond as to the purpose of her payment. In doing so she was provided with a warning by Revolut relating to payments being made to a *'family member or friend'* - which she'd selected. Given the total payment value of £410.80 (which was made up of a payment value of £401.56 and a transaction fee of £9.24), I agree with our investigator that Revolut's intervention here was proportionate to the risk presented to them.

But Revolut didn't stop there, it paused another payment of £640 to make some further enquiries of Ms K. This time however she cancelled the payment and proceeded to make four smaller value payments instead equivalent to £640. Our investigator was persuaded Revolut ought to have found Ms K was at risk of financial harm from fraud when she attempted these payments. But he wasn't convinced this would have stopped her from making the payments. It's arguable whether Revolut ought to have intervened again when Ms K proceeded to make these payments. And I think this was likely done so as to avoid any further detection from Revolut. But I'm in agreement with our investigator. I'm not persuaded any further intervention would have prevented her loss.

I say this because this was a sophisticated scam and having carefully reviewed her interactions with the scammer, they show Ms K had evidently been subjected to social engineering and was being coached extensively throughout. Before Ms K's losses from her Revolut account, she had made payments towards the scam from accounts she held with another bank. And on each occasion Ms K encountered a problem with making any payments, she would revert back to the scammer who would coach her with how she ought to respond. These included how she should respond to have her card unblocked as well as being guided to open accounts with other financial businesses like Revolut to facilitate making payments towards the scam instead.

I'm satisfied had there been any further intervention by Revolut, Ms K would have continued reverting to the scammer on how to answer and would likely have done so in such a way as to avoid alerting Revolut to what was really happening. Therefore, I'm unable to uphold her complaint and I won't be asking Revolut to provide a refund.

I've also thought about whether Revolut ought to have done anything to recover the funds after Ms K reported her loss. The disputed transactions here were "push to card" payments. It's my understanding that currently there's no clear mechanism to request a recall of funds sent in this manner. Furthermore, Ms K didn't report the scam to Revolut until two months after the payments were made which makes it less likely for any funds to remain on a beneficiary account. And what we know of the disputed transactions, Ms K was making payments to people unconnected to the scam who sold crypto currency assets via a P2P service. There's no dispute Ms K received those crypto assets, however those were unfortunately lost only when Ms K transferred those crypto assets to other wallets – albeit at the instruction of the scammers. So, I'm satisfied it is unlikely Revolut could have done anything to recover these payments.

### **My final decision**

For the reasons given above, 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 K to accept or reject my decision before 24 July 2025.

Mark O'Connor  
**Ombudsman**