

The complaint

Mr A complains about Revolut Ltd.

He says that Revolut didn't do enough when he fell victim to a scam and would like Revolut to refund him the money he has lost.

What happened

Mr A unfortunately fell victim to a task-based job scam where he would be required to pay via cryptocurrency to purchase tasks and would then earn a commission.

He was approached via a messaging app about a job where he would need to rate different apps. Initially he declined the opportunity, but when he was off work from his full-time job, decided to take up the opportunity.

He made the following payments as part of the scam.

Payment	Date	Payee	Amount
1	16/12/23	C	1 EUR
2	16/12/23	C	80 EUR
3	17/12/23	C	£86.11
4	17/12/23	C	£107.66
5	18/12/23	C	£1,294.28
6	18/12/23	C	£3,887.01
7	18/12/23	C	1,000 EUR
		Total	£5,375.06 1,081 EUR

After initially being able to withdraw a small amount, he was soon asked to pay more and more money, but couldn't make any further withdrawals.

Mr A complained to Revolut about what had happened, but it didn't uphold his complaint, so he brought it to this Service.

Our Investigator looked into things and thought that Mr A's complaint should be upheld in part. They explained that Revolut missed an opportunity to uncover the scam, and so should refund him from payment five – they also said that Mr A wasn't as careful as he should have been, and so responsibility for the loss should be shared between Mr A and Revolut.

Mr A accepted this, but Revolut did not. As no resolution was reached, the complaint has been passed to me to make 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.

Having done so, I've decided to uphold this complaint in part, for broadly the same reasons as our Investigator.

It isn't in dispute here that Mr A has been the victim of a scam and has lost money as a result. However, even when it is clear that a scam has taken place, and an individual has been tricked out of their money, it doesn't necessarily follow that a business will need to refund the money that has been lost.

In broad terms, the starting position at law is that an Electronic Money Institution ("EMI") such as Revolut is expected to process payments and withdrawals that a customer authorises it 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 having been good industry practice at the time, I consider it fair and reasonable in September 2023 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;
- 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.

In this case, I need to decide whether Revolut acted fairly and reasonably in its dealings with Mr A when he authorised payments from his account or whether it could and should have done more before processing them.

I don't think that Revolut should have had concerns about the first four payments, they were relatively small, and although they were going to a crypto provider, not every transaction like this is as a result of a scam, and Revolut can't reasonably be expected to intervene on every such payment.

However, Revolut has shown that for payment five, Revolut blocked the payment and asked Mr A some questions about what he was doing. One of the questions asked if Mr A was being assisted through the questionnaire. Mr A said that he was.

Revolut says that it then presented Mr A with a warning that he could be being scammed, but Mr A continued with the payment. But I don't think this went far enough – as Mr A said he was being guided, I think this should have prompted Revolut to direct Mr A to its in-app chat, to discuss the payments in more detail.

Had Revolut done this, and asked Mr A more about what he was doing, I think that he would have explained that he was purchasing crypto (which Revolut should have already known) in relation to a job opportunity. I haven't seen anything to suggest that Mr A wouldn't have been

truthful about what he was doing, and so I think that Revolut could have uncovered the scam at this point.

I recognise for the next payment, Mr A selected that he wasn't being guided through the questionnaire presented to him, but I don't think this matters, as the transfers should have been explored further at the previous intervention – and given the amount of this payment, I don't think that this intervention went as far as it should have either. By this point, Mr A had transferred over £4,000 in one day, but despite this, Revolut didn't provide him with any warnings about common crypto scams (including job scams) at this point either.

I also note that Mr A was directed into a forced chat for the final payment that caused Mr A's loss (there were further payments, but these were either reversed or didn't eventually end up in the hands of a scammer) – but I also don't think that this intervention went as far as it should have done either.

Revolut did engage with Mr A further down the line, and Mr A shared multiple screen shots of his engagement with the scammer – and Revolut deduced that he was falling victim to a scam and warned him against making further payments. But I think it could have done this much sooner than it did, and I think it could have prevented the scam from the point Mr A told it he was being guided through the questionnaire.

The final thing I need to consider is if Mr A should bear some responsibility for the loss from this point. As he has already agreed with our Investigator to share this on a 50% basis with Revolut, I won't go into too much detail here. But I will say that Mr A wasn't as careful as he should have been before parting with his money. I don't find that the job opportunity presented to him made much sense, given he was being asked to pay money in order to earn it – and the opportunity came out of the blue from an unsolicited message, with no interview or usual onboarding formalities taking place.

Therefore, I agree that responsibility for the loss should be shared equally between Mr A and Revolut from the point I think the scam could have been uncovered.

Putting things right

Revolut Ltd should refund Mr A 50% of transactions from payment five. On top of this, it should also pay Mr A 8% simple interest from the date of the payments until settlement.
Your text here

My final decision

I uphold this complaint in part. Revolut Ltd should put things right as set out above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr A to accept or reject my decision before 23 April 2025.

Claire Pugh
Ombudsman