

## The complaint

Mrs C complains that Revolut Ltd won't refund her the money she lost in a work tasks scam.

## What happened

The circumstances surrounding this complaint are well-known to both parties, so I've summarised what I consider to be the main points.

Mrs C says she was cold-called by someone with details of a job opportunity in around March 2024. Mrs C was interested, as the work was flexible and could be carried out online from home. The job involved performing certain work tasks in return for which she would be paid.

Her employer provided her with a work account and she says she was able to earn £154 on her first day, which she was able to transfer from that work account to her account with Revolut. The next day, she was told she needed to deposit some money before she could begin her daily work tasks and so she deposited the money, as instructed. As the scam progressed, she was required to deposit more money in order to complete her work tasks.

Mrs C needed to borrow money from family and friends in order to make the deposits to her work account. When Mrs C attempted to withdraw money from her work account she was unable to and was asked to deposit even more money. At this point, she realised she had been the victim of a scam. She reported the scam to Revolut on 19 April 2024.

Mrs C says she was told to credit her account by purchasing cryptocurrency and transferring it to the scammers, and as part of this scam she made the following payments from her Revolut account.

Transaction	Date	Amount	Destination
1	08/03/2024	£275.84	Payee A
2	08/03/2024	£63.27	Payee A
3	08/03/2024	£8.64	Payee A
4	09/03/2024	£47.66	Payee A
5	12/03/2024	£201.40	Payee B
6	12/03/2024	£1,023.00	Payee C
7	16/03/2024	£202.00	Payee D
8	16/03/2024	£505.00	Payee D
9	16/03/2024	£505.00	Payee D
10	16/03/2024	£505.00	Payee D
11	16/03/2024	£505.00	Payee D
12	16/03/2024	£505.00	Payee D
13	25/03/2024	£202.00	Payee D
14	25/03/2024	£202.00	Payee D
15	26/03/2024	£202.00	Payee E
16	26/03/2024	£50.86	Payee E
17	26/03/2024	£202.00	Payee F

18	26/03/2024	£202.00	Payee F
19	26/03/2024	£202.00	Payee F

Mrs C says Revolut ought to have intervened due to the suspicious nature of the transactions. She says multiple payments were made to new payees on the same day, including several large payments made on 16 March 2024. She believes she should have been asked probing questions about the transactions and given suitable warnings about the particular type of fraud she was falling victim to. She was sent some pop-up warnings, but she doesn't consider they were sufficient. If Revolut had intervened appropriately, she considers the scam would have been uncovered.

Revolut says all the transactions were authorised. It says it intervened in transactions made from Mrs C's account on 17 separate occasions during March 2024. It says it asked Mrs C questions about the transactions, but she was not open and cooperative, and this prevented it from uncovering the scam. It considers it is not responsible for Mrs C's losses.

Our investigator said she thought Revolut ought to have intervened on 16 March 2024, by which point multiple, similar transactions were being made to the same payee within a short space of time. She noted that Revolut did intervene, several times, on 16 March 2024 and had in fact intervened earlier, on 12 March 2024, which was more than she would have expected.

The investigator said the evidence showed Mrs C was not open with Revolut and didn't answer its questions about the payments accurately. Mrs C seemed to have referred many of these questions to the scammer for advice on how to answer them and she appeared to have followed that advice. She thought Mrs C's responses prevented the scam from being uncovered and she didn't think Revolut could reasonably have done more.

Mrs C didn't agree and so her complaint has been passed to me for an ombudsman's 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.

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 to have been good industry practice at the time, I consider it fair and reasonable in March 2024 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 – (as in practice Revolut sometimes does including in relation to card payments);
- 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.

The first intervention came on 12 March 2024 and there were frequent interventions after that. Before that, while several transactions took place in quick succession on 8 March 2024, to the same payee, they amounted to less than £350 in total and all the other transactions on the account were low in value. Overall, I don't consider the transactions before 12 March 2024 ought to have caused Revolut sufficient concern for it to have intervened.

Revolut says it intervened in a transaction on 12 March 2024, for £1,023, and it asked Mrs C why she was making the payment. Revolut has provided details of the questions it asked and the responses it received. Mrs C selected that she was paying a family member or friend. Other options she could have selected from the list provided by Revolut included "It's related to a job opportunity". She was asked for further details and she told Revolut she was buying a gift for her son. She said she wasn't being guided to give answers to Revolut's questions.

While I don't necessarily consider the transaction was sufficiently concerning for Revolut to have needed to intervene, I consider the questions Revolut asked were reasonable in all the circumstances. They appear to have been designed to identify whether Mrs C was at risk from a particular type of scam and warnings were provided based on her responses. For example, having asked the purpose of the payment – paying family or friends – Revolut probed further by asking what she was paying the friends or relatives for and whether she was being guided in the answers she was giving. Mrs C didn't give accurate responses to Revolut's questions and I consider this prevented Revolut from providing more relevant warnings and from uncovering the scam.

The pattern of transactions on 16 March 2024 was unusual, with multiple payments on the same day to the same payee for similar amounts. I have not included unsuccessful payments in the list of transactions above, but there were further transactions attempted on 16 March 2024 that did not ultimately complete.

Further interventions took place on 16 March 2024 and because of the suspicious pattern of transactions mentioned, I consider this was an appropriate step. In one of those interventions Revolut contacted Mrs C through in-app messaging. I wouldn't necessarily have expected Revolut to have made contact in person, as opposed to sending an automated warning that asked the payment purpose and tried to narrow-down the particular scam risks she was facing, with appropriate warnings. Revolut went further than I would generally have expected it to.

Mrs C was asked the purpose of the payment. She said she was buying a gift for her son and when asked for further details she said she was buying him an electric bicycle and said

she already had the item. Eventually she asked Revolut to cancel the payment, expressing frustration with its questions. Revolut confirmed it had cancelled the transaction.

A further transaction, for £252.50, flagged with Revolut on 25 March 2024 and it made contact with Mrs C once again. She told Revolut the payment was for gifts she was buying, she had met the seller face to face and she hadn't received any guidance from anyone. Mrs C appears to have been unhappy with the questions she was being asked and told Revolut to cancel the transaction.

A further transaction and intervention took place later that same day. She again told Revolut she was buying gifts for her son. This time Revolut queried why the payment was being made in parts and not all at once. It also asked why she was using Revolut as an intermediary account. Again, Mrs C expressed her unhappiness with Revolut's questions and asked it to cancel the transaction.

While other transactions were completed, I find it likely that if Revolut had intervened further, based on how Mrs C responded to Revolut's interventions, Mrs C wouldn't have been open and accurate with her answers to any questions Revolut might have asked. It seems she was willing to try and disguise the real reason for the transactions and I consider this prevented Revolut from uncovering the scam. From the copies of messages between Mrs C and the scammer, it seems she did ask for the scammer's guidance on how to answer Revolut's questions and seems to have trusted and believed the scammer and that made it difficult for Revolut to prevent her losses.

I understand that Mrs C has been the victim of a cruel scam here. These scams are designed to be convincing and I imagine being able to make a withdrawal at the outset also helped persuade Mrs C that this was a genuine work opportunity. But in order to uphold her complaint, I would need to be persuaded that Revolut was at fault in some way and that this led to Mrs C's loss. In this case, I'm not persuaded that Revolut was at fault, for the reasons given above. I consider it intervened at appropriate points, with reasonable questions, but due to the answers Mrs C gave it, I consider it unlikely it could have prevented her losses.

### Recovery

All the transactions were push-to-card transactions, with the funds sent directly to the recipient's debit card or prepaid card. I don't consider there was a realistic prospect of Revolut being able to recover the money sent via this payment method and in any event, given that the fraud was reported 24 days after the last transaction took place, I consider it likely no funds would have been available to recover in any event.

### My final decision

I don't uphold Mrs C's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs C to accept or reject my decision before 7 August 2025.

Greg Barham  
**Ombudsman**