

The complaint

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

What happened

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

In summary, Miss Q was looking online for investment opportunities when she came across a company that she took an interest in. Miss Q left her details and later received a call back from an individual that explained the company's business model.

Miss Q was required to make a deposit of £250 to register and have a personal broker assigned to her. Miss Q made the payment and was assigned a broker having been paired with a company I will call X.

X explained to Miss Q where to invest and managed her portfolio. After making several trades Miss Q's account balance with X had fallen significantly and she was advised by X that she would have to deposit more funds to keep the account open.

As Miss Q was having difficulty making payments from another account she held elsewhere X pressured Miss Q to open an account with Revolut where she would be able to make and receive payments more easily. Reluctantly Miss Q opened an account with Revolut and started to make payments.

Miss Q had access to her account with X and could see that after making the payments she was starting to make a profit.

X then offered Miss Q a GAP package. She would have to invest a minimum of £10,000 to make the package worthwhile but would receive 20-30% profit.

Miss Q agreed and made the payment as directed by X. But when she tried to withdraw funds from the account X told her that there were issues with Revolut and delays could be caused by her having a new account.

X explained that in the meantime Miss Q could benefit from a second GAP package. She would need to invest £20,000 but would make a profit of 40%. Miss Q initially declined the offer, but X convinced her by saying it could add a £10,000 credit to her account which she could pay back when her £5,000 withdrawal eventually reached her account. Miss Q agreed and made a further payment.

Having made the final payment Miss Q received the £5,000 withdrawal but was unable to withdraw any further funds despite continued communication with X.

Miss Q made the following payments in relation to the scam:

Payment	Date	Payee	Payment Method	Amount
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1	24 March 2023	Bitnomics	Debit Card	£2,500.00
2	4 April 2023	Bitnomics	Debit Card	£4,000.00
	4 April 2023	Mediana Group		£803.99cr
3	13 April 2023	Bitnomics	Debit Card	£10,000.00
4	25 April 2023	Asterisk Media OU	Transfer	£9,954.10
	2 May 2023	Mediana Group		£5,000.00cr

In my provisional decision sent on 7 February 2025 I said:

“It isn’t in dispute here that Miss Q 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.

Recovering the payments Miss Q made

Miss Q made payments into the scam via her debit card and the method of transfer. When payments are made by card the only recovery option Revolut has is to request a chargeback.

I can see from Revolut’s system notes that it considered this option but as Miss Q made the payments to a crypto exchange and the cryptocurrency was forwarded to the scammer chargeback was not an option.

When payments are made by transfer the only option Revolut has is to contact the operator of the receiving account to request a refund of any funds that remained. I can see that Revolut attempted to recover the funds Miss Q transferred but this was also unsuccessful.

With the above in mind, I don’t think Revolut had any reasonable options available to it to seek recovery of the payments Miss Q made in relation to the scam.

Should Revolut have reasonably prevented the payments Miss Q made?

It has been accepted that Miss Q authorised the payments that were made from her account with Revolut, albeit on X’s instruction. So, the starting point here is that Miss Q 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 Miss Q was making the payments. And if it had intervened, would it have been able to prevent the scam taking place.

Miss Q verified the first three payments via 3DS secure, which essentially means she confirmed the payments were being made by her. But I don’t think Revolut went far enough. Payment 1 was not for such a significant value that I would have expected it to have triggered Revolut’s fraud prevention systems prompting it to intervene. However, payment 2 was for a more significant value as was payment 3, so I would have expected Revolut to have concerns.

Payment 2 was for a value of £4,000. I think a proportionate intervention from Revolut for this payment would have been for it to provide a tailored written warning relevant to

cryptocurrency investment scams.

When payment 3 was made for a more significant value of £10,000 I think a proportionate intervention would have been for Revolut to have questioned Miss Q about the purpose of the payment via its in-app chat facility.

But I don't think either of the above interventions would have made a difference and I will explain why.

When Miss Q attempted to make payment 4 via transfer, she was required to set up the payee as a new payee. When Miss Q did this, she was provided with a warning that stated:

"Do you know and trust this payee? If you're unsure, don't pay them, as we may not be able to help you get your money back. Remember, fraudsters can impersonate others, and we will never ask you to make a payment."

Whilst I don't think this warning was very specific to the scam Miss Q was experiencing, she did not know the person that had requested the payment from her.

Miss Q was then presented with several screens. The first screen stated:

"This transfer can be a scam... your transfer is riskier than 99.2% of all Revolut transfers" After being presented with this warning Miss Q was then required to select from a list of options, the purpose of her payment. There was an option to select "Investment" which I think most accurately reflected the purpose of the payment, but Miss Q selected "Safe account".

When Miss Q was asked why she selected "Safe Account" she told us she selected this option as she had been speaking to X and was told to do so by X as she knew them.

Having selected the safe account option Miss Q was transferred to a chat facility with Revolut where the payment was discussed in more detail.

During this chat conversation Miss Q told Revolut that she had selected "Safe Account" as the reason for her payment in error and that the payment was being made to pay an invoice for consultancy work the company had done for her.

From the information available Miss Q was not telling Revolut the truth about the reason for her payment which would have made it extremely difficult for Revolut to uncover the scam. Miss Q has provided some evidence of the communication between herself and X during the scam, but limited information has been received to evidence the communication between Miss Q and X before payment 4.

Given what Miss Q has told us and the information available I think it is clear that Miss Q was being guided by X on what to say to Revolut, or for some other reason felt the need to be dishonest with Revolut when making payments.

I don't have enough to say that Miss Q would not have been guided by X had Revolut intervened earlier, or that she would have been any more honest when answering its questions. So, I don't think Revolut missed an opportunity to uncover the scam and it is not responsible for Miss Q's loss."

I gave Revolut and Miss Q time to respond to my provisional 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.

Miss Q responded to my provisional decision in summary she said:

- She didn't think her complaint had been properly investigated and I have merely sided with Revolut.
- The decision is contradictory as I have concluded that Revolut had a duty to protect her and did not go far enough but have not upheld the complaint.
- If Revolut had intervened earlier, it would have avoided further losses.
- She selected safe account as she felt like she knew them having spoken to them for some time at that point, she would also have felt less stressed and desperate earlier on.

I have considered the points Miss Q has made following the issue of my provisional decision and can only apologise that she doesn't feel her complaint has been looked into correctly. I can assure Miss Q that I have considered all the information available to me when making my decision and following Miss Q's recent submissions my decision has not changed.

Miss Q has said my decision is contradictory. The decision explains in summary that given the payments Miss Q made in relation to the scam, I would have expected Revolut to intervene earlier on in the scam, But, that a conversation did take place between Miss Q and Revolut later when Miss Q was not honest when questioned about a significant payment.

As Miss Q was not honest when questioned by Revolut later in the scam, and instead fabricated a different purpose for the payment it would not be reasonable for me suggest she would have been honest if questioned by Revolut earlier in the scam and not have followed X's instructions.

I hope this further explanation has helped clarify my provisional decision.

Miss Q says that an earlier intervention would have made a difference, and she had selected "safe account" when making a payment as she felt she knew X, having spoken to X for some time. Miss Q was also less stressed earlier in the scam and not desperate to retrieve her funds.

I appreciate what Miss Q has told us about this but having spoken to X Miss Q was comfortable sending payments of £2,500 and £4,000 early on followed by much larger payments within just a month of the first.

I think this shows Miss Q had trust in the scammer from the outset as I think it's unlikely, she would have considered sending these amounts if she didn't, and as I said in my provisional decision, I don't have enough to say Miss Q wouldn't have followed X's guidance had Revolut intervened sooner than it did.

As I've stated above Miss Q's additional comments have not changed my decision.

My final decision

I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss Q to accept or reject my decision before 27 March 2025.

Terry Woodham
Ombudsman