

## The complaint

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

Mrs H is being represented by a professional representative, but for ease of reading I'll just refer to her.

## What happened

The background to this complaint is well-known to both parties, so I've summarised what I consider to be the key points.

Mrs H says she was approached over a popular messaging application about a job opportunity, in September 2024. The message purported to be from a well-known recruitment agency and as Mrs H had previously worked through that agency, she didn't find anything unusual about being contacted. She searched on the internet for the company she was supposed to be working for and saw that it was a real company.

She was interested in the job, which involved working remotely. The website looked professional and the logos on the website matched those of the real company she had seen in her internet searches. She was given training, completed her first work tasks and received some payments but she was then told that she needed to pay various amounts into her work account to unblock it so that she could withdraw further earnings.

Mrs H made or attempted the following payments as part of this scam.

Transaction	Date and time	Amount	Outcome	Payment type
1	29/09/2024 10:13	£100.99	Declined	Card payment
2	29/09/2024 10:20	£100.99	Completed	Card payment
3	29/09/2024 21:06	£115.99	Completed	Card payment
4	29/09/2024 22:08	£140.99	Completed	Card payment
5	30/09/2024 12:50	£100.99	Completed	Card payment
6	01/10/2024 11:31	£100.99	Completed	Card payment
7	01/10/2024 12:15	£1,010.03	Completed	Card payment
8	01/10/2024 14:23	£1,000.99	Completed	Card payment
9	01/10/2024 14:27	£1,000.99	Completed	Card payment
10	01/10/2024 14:38	£931.86	Declined	Card payment
11	01/10/2024 14:38	£931.86	Completed	Card payment
12	02/10/2024 13:52	£1,000.99	Declined	Card payment
13	02/10/2024 13:52	£1,000.99	Declined	Card payment
14	02/10/2024 14:04	£1,000.99	Declined	Card payment
15	02/10/2024 14:08	£1,000.99	Declined	Card payment
16	04/10/2024 22:08	£1,500.99	Declined	Card payment
17	04/10/2024 22:08	£1,500.99	Declined	Card payment
18	04/10/2024 22:43	£1,500.99	Declined	Card payment
19	04/10/2024 22:43	£1,500.99	Declined	Card payment
20	05/10/2024 04:01	£1,500.99	Declined	Card payment

21	05/10/2024 04:01	£1,500.99	Declined	Card payment
22	05/10/2024 04:01	£1,500.99	Declined	Card payment
23	05/10/2024 11:13	€2,362.47	Declined	Transfer
24	06/10/2024 15:29	€2,300	Declined	Transfer
25	06/10/2024 16:48	€2,500	Declined	Transfer
26	07/10/2024 19:18	€3,295.67	Completed	Transfer
27	07/10/2024 20:47	€1,326.40	Completed	Transfer
28	07/10/2024 21:43	€326.90	Completed	Transfer
29	08/10/2024 09:21	€2,057.28	Completed	Transfer
30	08/10/2024 15:59	€3,830	Completed	Transfer
31	11/10/2024 09:38	€417.60	Completed	Transfer
32	11/10/2024 15:06	€4,149	Completed	Transfer
33	11/10/2024 17:13	€1,395.50	Completed	Transfer

Mrs H says while she did receive some questions from Revolut in relation to some of the transactions, she didn't receive questions on all the transactions and the questions she was asked were not effective. She says she received "boilerplate" warnings, given for all transactions of a similar type. She spoke to two live agents at Revolut on 4 and 5 October 2024 through in-app messaging but she wasn't asked about the purpose of either payment and they didn't mention the words "scam" or "fraud". Instead, she was given advice on how to make payments that wouldn't be detected as suspicious. She says the transactions ought to have been prevented by Revolut because they were unusual and suspicious, the account being newly opened, with money being moved into the account and quickly moved on in a series of transactions made in quick succession.

Revolut says the transactions were authorised. It says Mrs H was negligent in agreeing to send money to the scammers, despite the significant red flags she ought to have noticed. Mrs H misled Revolut by providing misleading information when it asked her questions, which prevented it from uncovering the truth. It doesn't think further intervention would have made any difference because of this.

Revolut says one of the card transactions on 29 September 2024 was declined and it contacted Mrs M through in-app messaging. It blocked a further payment on 1 October 2024, and placed a block on Mrs H's account to transactions being made to that merchant. Revolut advised Mrs H the transaction had been blocked because its systems had identified a possible scam. It asked Mrs H for the payment purpose, but instead of answering that question, she selected the option to keep the merchant blocked.

Two further payments to the same merchant were automatically declined on 2 October 2024, as the block on transactions to this merchant remained in place. A risk warning was sent on 2 October 2024 in relation to another transaction, again saying it had been blocked due to it being identified as a possible scam. Mrs H was again asked the payment purpose, but again chose to keep the merchant blocked.

Mrs H attempted a number of further payments over the next few days, each being automatically declined due to the merchant being blocked.

Revolut says it also intervened when Mrs H attempted the first three transfers and asked her various questions about the payments. Mrs H cancelled those transactions.

Our investigator didn't uphold Mrs H's complaint. He said Revolut ought to have intervened earlier than it had, but he concluded that even if it had intervened earlier, it's unlikely this would have prevented Mrs H's loss. He said Mrs H was provided with several warnings in

relation to some of the later payments. Revolut asked her for information about the payments and Mrs H hadn't provided accurate information to Revolut. Mrs H was receiving advice and instruction from the scammer about how to answer Revolut's security questions and she says she was told to provide inaccurate information. On that basis, he thought that if Revolut had intervened earlier or on other occasions, it was likely Mrs H would also have given inaccurate information and so he thought it unlikely the scam would have been detected or that Mrs H's losses would have been prevented.

Mrs H didn't accept the investigator's findings. She thought Revolut should have given more effective warnings in telephone calls or through in-app messaging. When she did speak to Revolut's live agents through in-app messaging, they provided advice on how to get the payments through Revolut's system, rather than providing any warnings. She had contacted the live agents of her own volition and warnings and questions from a live agent would have been more meaningful and impactful than automated warnings with standard questions. She was not coached on how to answer live questions and so this type of intervention might have been effective.

Mrs H's 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 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. 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 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.

### Should Revolut have recognised that Mrs H was at risk of financial harm from fraud?

I agree with the investigator that Revolut ought to have intervened further. In particular, the investigator identified transaction nine as the point at which Revolut ought to have intervened, because it was the third similar sized payment made that same day, within three hours, and was being sent to a destination that he considered might suggest Mrs H was at higher risk of being scammed. On balance, I agree that Revolut ought to have intervened at that point. I don't consider earlier intervention was warranted, largely due to the small size of the payments, which were not inconsistent with the account opening purpose, which included transfers and overseas transfers.

It is debateable whether Revolut should also have intervened in some of the transfers Mrs H made between 7 and 11 October 2024.

However, I don't consider any further intervention is likely to have made any difference, because when it did intervene, on other occasions, Mrs H didn't provide accurate answers to Revolut's questions and I think this prevented it from uncovering the scam.

For example, when the first transfer was attempted, Revolut asked Mrs H the payment purpose and she was given a list of options that included "It's related to a job opportunity". Mrs H selected "Other" and then she appears to have manually entered "Leisure holiday". She was asked what the reason for the transfer was and it seems that Mrs H chose not to go ahead with that payment at this point and the transaction was cancelled. A similar thing happened with the next two transactions, with Mrs H telling Revolut the transactions were to pay a family member or friend, with the transactions also being cancelled.

Further transfers were made successfully following these interventions. Revolut says new beneficiary warnings were provided on those occasions. These warnings asked whether she knew and trusted the payee and advised that it might not be able to help recover her money.

If Revolut had intervened further than it did in those transactions, I'm not persuaded Mrs H would have given any more accurate information than she did in her other interactions with Revolut, given what happened on the occasions when Revolut did ask her questions about the payments. Mrs H also told us that she gave Revolut inaccurate payment reasons because she had been instructed to do so by the scammers, who said the payments would be processed faster and without problems if she did this. So, it seems to me that she placed more weight on what she was being told by the scammers than she did on the warnings from Revolut.

I don't accept that the words "scam" and "fraud" were not mentioned in Mrs H's interactions with Revolut. For example, Mrs H attempted to make some transfers on 5 and 6 October 2024 and Revolut sent messages saying:

"Something doesn't look right – Your transfer has been identified by our system as a potential scam. To continue, we need your help to understand what's happening."

While no particular warnings were given when Mrs H contacted live agents to ask for help in making the transactions, these weren't interventions from Revolut, but Mrs H asking how she could unblock the card/payee and make transactions. Revolut's live agents did suggest making smaller payments or using a different payment method at one point. Instead, Revolut's live agents could have asked about the suspicious payments, but for reasons I'll go on to explain, I don't think this would have uncovered the scam.

Overall, I think the purpose of Revolut's messages to Mrs H was clear when it intervened – it was contacting her due to concerns about potential scams.

I've considered Mrs H's point that the warnings would have been more effective if given by telephone or by in-app messaging and her view that they would have been likely to have prevented the fraud. I accept she hadn't been coached in how to respond to live questioning and so such intervention might have been successful.

But I don't consider Revolut ought to have intervened in person. A proportionate intervention on 1 October 2024, given all the circumstances, such as the number of payments and the value of those payments, would have been through an automated warning designed to narrow down the scam risks and provide warnings tailored to the risk Mrs H was facing. I say this because these were not large payments and while three similar sized payments had been made on the same day, within a few hours, I don't consider that would have been sufficiently concerning to require human intervention. I consider a similar intervention would have been appropriate for the later transactions. They were of a larger value, but still relatively small considering the type of transactions that might be expected on an EMI account.

In any event, I consider it more likely that Mrs H would have simply requested that the transactions be cancelled if there had been human intervention, as she did with the automated interventions, and attempted to make the payments later. I'm also conscious that she was being guided by the scammers in what to say and if she had been contacted through in-app messaging, might well have simply referred those messages on to the scammer for advice in how to reply.

### Recovery

Mrs H reported the fraud to Revolut on 23 October 2024, 12 days after the last transaction. Revolut appears to have contacted the beneficiary banks to initiate recovery of the transfer payments, on 31 October 2024, eight days after the fraud was reported. I would have expected Revolut to have contacted the beneficiary banks sooner than it did. Revolut asked the beneficiary banks to confirm the dates Mrs H's money had been moved on from the accounts held with the beneficiary banks. It didn't receive a reply on that point, it was just told that no money remained available.

On that basis, I can't be sure whether prompt action by Revolut might have resulted in some of Mrs H's money being recovered. But I consider it unlikely that it would have. In my experience of this type of situation, money tends to be moved on quite quickly from the beneficiary banks and since Revolut wasn't aware of the fraud until 12 days after the final transaction, prompt action at that point seems unlikely to have resulted in Mrs H's money being recovered.

In terms of the card payments, I agree with the investigator that attempted chargebacks are unlikely to have succeeded under the card scheme rules because the payments were made as instructed, to the intended recipient, and to a legitimate merchant.

Mrs H has been the victim of a cruel and sophisticated scam. It involved Mrs H receiving some payments from the scammers, which probably made it seem genuine and it appears the scammers went to some lengths to make their website look professional and legitimate. I can understand how she was tricked into making these payments. But overall, while I don't think Revolut did all it could have done, for the reasons given above, I'm not persuaded if it had done more that it would have prevented Mrs H's losses.

### My final decision

I don't uphold Mrs H's complaint.

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

Greg Barham  
**Ombudsman**