

## The complaint

Mr S complains that Revolut Ltd ('Revolut') didn't do enough to protect him when he was a victim of a job scam.

Mr S is being represented by a third party. However, to keep things simple, I will refer to Mr S throughout my decision.

## What happened

The background to this complaint is well known to both parties, so I won't repeat everything here. In summary, Mr S was contacted on an instant messaging application and offered a task-based job where he was required to rate hotels in exchange for commission. I'll refer to the company Mr S believed he was working for as 'MH'.

Mr S was asked to open an account with MH on its platform and convinced to open accounts with genuine cryptocurrency providers, where his "commission" would be paid into. He was also required to deposit funds, in the form of cryptocurrency, into his account with MH to complete 'luxury offer' tasks (which supposedly paid a higher commission).

Initially, Mr S made transactions to MH via another one of his banking providers which I will refer to as 'H'. He was also able to withdraw some funds, so he was satisfied the opportunity was genuine. Mr S then transferred funds from H to his Revolut account to continue making the disputed payments. He said he realised he had been a victim of a scam when he tried to withdraw his funds but he was unable to access the MH platform.

Mr S made the following payments from his Revolut account to the scam via legitimate cryptocurrency exchanges in his own name:

Payment	Date and time	Payment Method	To	Amount
1	9 July 2023 – 15:14pm	Card payment	Cryptocurrency provider 1	£1,758
2	9 July 2023 – 19:07pm	Card payment	Cryptocurrency provider 2	£2,707
3	12 July 2023 – 17:17pm	Card payment	Cryptocurrency provider 2	£4,820
4	18 July 2023 – 15:59pm	Card payment	Cryptocurrency provider 2	£1,111
<b>Total Loss</b>				<b>£10,396</b>

Revolut didn't uphold Mr S's complaint, so he referred his complaint to this service.

Our Investigator looked into the complaint but didn't think it should be upheld. In short, she said:

- Payments 1, 2 and 4 didn't appear so unusual that Revolut should have had cause for concern.

- She felt Revolut should have been concerned by Payment 3 due to the associated risks with crypto related transactions, that are well known to Revolut and the increased value of the payment.
- She felt Revolut should have taken additional steps before processing Payment 3 and provided a tailored warning that was specifically about the risks of cryptocurrency scams.
- However, she didn't feel such a warning would have resonated with Mr S as he wasn't making payments for investment purposes, so the warning wasn't relevant to his circumstances.

Mr S didn't agree. In summary, he said:

- Revolut should have intervened from Payment 2, as he had made two cryptocurrency payments on the same day for increasing amounts, which is a clear sign of something untoward taking place.
- Revolut should have provided a tailored crypto scam warning, not just about investment scams, but including paying money to an employer, which was relevant to his situation. He felt this simple warning could have unravelled the scam and prevented his loss.

As no agreement could be reached, Mr S's complaint has been passed to me for review and 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.

I appreciate how strongly Mr S feels about his complaint. Although I may not mention every point raised, I have considered everything but limited my findings to the areas which impact the outcome of the case. No discourtesy is intended by this, it just reflects the informal nature of our service.

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 be good industry practice at the time, I consider it fair and reasonable that in July 2023 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,
- 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),

- 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 light of the above, I've considered whether Revolut acted fairly and reasonably in its dealings with Mr S. I've thought about whether the payments identified that Mr S might be at a heightened risk of financial harm due to fraud or a scam.

In the circumstances of this case, although the account was opened in April 2020, it was rarely used until the scam payments, so Revolut didn't know what would constitute as 'typical account usage' for Mr S. With this in mind and when considering payments 1 and 2, I don't think what was happening was remarkable enough to have caused Revolut any concern. This is because I'm not persuaded there was enough of a pattern formed here to suggest there might be a heightened risk of financial harm due to fraud or a scam, even taking into consideration both payments were made on the same day, they were made to two separate crypto exchange providers. The payments were also relatively modest in value. So, I'm not persuaded Revolut ought to have been concerned about these payments. And Revolut must strike a balance between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate.

But when making payment 3 for £4,820, I think Revolut should've identified a potential scam risk. I say that because by this point a pattern of increased spending had begun to emerge. Alongside this, the payment was identifiably cryptocurrency related and, although buying cryptocurrency is a legitimate exercise, by July 2023, there had been widespread coverage in the media about increased losses to cryptocurrency investment scams. I therefore consider Revolut should have had sufficient reason to suspect Mr S could be at risk of financial harm at this point.

When considering all these factors, on balance, I think that a proportionate response to that risk would have been for Revolut to provide a tailored warning that was specifically about the risk of crypto scams, given how prevalent they had become. In doing so, I recognise that it would be difficult for such a warning to cover off every permutation and variation of crypto scams, without significantly losing impact. But I think it would've been a proportionate response to the risk the £4,820 payment presented at that time.

So, I think that such a warning should have addressed the key risks and features of the most common crypto scams – crypto investment scams. The warning Revolut ought fairly and reasonably to have provided should have highlighted, in clear and understandable terms, the key features of common crypto investment scams, for example referring to: an advertisement on social media, promoted by a celebrity or public figure; an 'account manager', 'broker' or 'trader' acting on their behalf; the use of remote access software and a small initial deposit which quickly increases in value.

I recognise that a warning of that kind could not have covered off all scenarios – such as job scams involving crypto. But I think it would have been a proportionate way for Revolut to minimise the risk of financial harm to Mr S by covering the key features of scams affecting many customers but not imposing a level of friction disproportionate to the risk the payment presented.

I've thought carefully about whether such a warning would've resonated with Mr S for the third payment, and to the extent whereby he wouldn't have proceeded with making it. Having

done so, I don't think it would. This is because the most common features of crypto investment scams – which, as per above, I would've expected Revolut to have highlighted – wouldn't have been relevant to Mr S's circumstances. Mr S wasn't making the payments for investment purposes, nor had he come across the opportunity through an advertisement on social media. And while there was a third party that had guided him on how to complete the tasks as part of the job, they weren't acting on his behalf.

I've also considered whether, on being alerted to the scam, Revolut could reasonably have done anything to recover Mr S's losses, but I don't think they could. The only possible option for recovery here, given the payments were made by debit card, would have been via a chargeback claim. But given the payments were made to a legitimate crypto provider, I don't consider they would have had any prospect of success given there's no dispute the crypto was provided to Mr S. And so, I don't think Revolut could've recovered Mr S's loss.

I have a great deal of sympathy for Mr S and the loss he's suffered, and while I do sympathise with him, it would only be fair for me to direct Revolut to refund his loss if I thought Revolut was responsible – and I'm not persuaded that this was the case here.

### **My final decision**

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr S to accept or reject my decision before 8 August 2025.

Israr Ahmed  
**Ombudsman**