

## The complaint

Mr L is unhappy that Revolut Ltd (“Revolut”) won’t refund the money he lost to a job scam. Mr L is represented by a firm of solicitors.

## What happened

In November 2023, Mr L was contacted by someone on a social media messaging service about a remote job opportunity. The job involved completing a set number of tasks each day on an online platform, and in return Mr L was told he would receive commission paid in cryptocurrency which appeared on the job platform.

Mr L made the following payments to individuals (as I understand it) to buy cryptocurrency on the peer-to-peer market. From there he moved the cryptocurrency to the scammer.

Transaction #	Date	Type	Amount	Payee
1	12/11/2023	Card transfer	£1,483.35	Payee 1
2	12/11/2023	Card transfer	£409.20	Payee 2
3	12/11/2023	Card transfer	£402.80	Payee 3
4	12/11/2023	Card transfer	£460.35	Payee 4
5	1/12/2023	Card transfer	£358.05	Payee 5
6	7/12/2023	Card transfer	£296.67	Payee 6
7	16/12/2023	Card transfer	£301.78	Payee 6
8	28/12/2023	Card transfer	£30.69	Payee 2
9	28/12/2023	Card transfer	£30.69	Payee 7
10	3/1/2024	Card transfer	£26.07	Payee 8

Payment 1 was not processed.

The investigator who considered this complaint didn’t recommend that it be upheld. She found that the payments made by card transfer were spread out and for relatively low amounts. She didn’t think the payments looked unusual or would have appeared out of character on the account.

Mr L’s representative did not agree. It said the payments were made over six weeks. And on the first day three transactions were made totalling over £1,000.

I issued my provisional decision on 24 April 2025 explaining why I was thinking of reaching the same outcome as the investigator but explained my reasoning in more detail. Neither party has provided any further comments.

## 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.

As neither party has provided any further evidence or arguments for consideration, I see no reason to depart from the conclusions set out in my provisional decision. For completeness, I have set this out below.

I'm sorry to hear of all Mr L has been through. Not just in terms of this scam, but also what's happened subsequently and the impact of the financial loss he has suffered. I've no doubt that he has been through a lot, and I don't doubt that his mental health has suffered as a result. And no doubt the scam has impacted him further.

I can understand why he wants to do all he can to recover the money he has lost. He's lost a lot of money through no fault of his own. But that alone doesn't mean that Revolut must reimburse him. It's important to emphasise that I'm only considering whether Revolut, which had no involvement in the scam itself, should be held responsible for what happened.

In deciding what's fair and reasonable, I am required to take into account relevant law and regulations, regulators' rules, guidance and standards, and codes of practice; and, where appropriate, I must also take into account what I consider to have been good industry practice at the time.

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 November 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;
- 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 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.

It isn't in dispute that Mr L has fallen victim to a cruel scam, nor that he authorised the payments he made by card to buy cryptocurrency which was subsequently transferred to the scammer.

Whilst we now know the circumstances which led Mr L to make the payments using his Revolut account and the process by which that money ultimately fell into the hands of the fraudster, I am mindful that, at that time, Revolut had much less information available to it upon which to discern whether any of the payments presented an increased risk that Mr L might be the victim of a scam.

The payments were all made to different individuals on the peer-to-peer market – so it wouldn't have been apparent to Revolut that Mr L was purchasing cryptocurrency. Whilst I appreciate it's a lot of money to Mr L, the individual payments were unremarkable and, apart from the initial four payments, they were spread out. Even if I consider the three payments made on 12 November 2023, following a failed transaction for £1,483.35, there was nothing to link the individual payments/payees with each other – so they didn't look like a fraud or scam.

Revolut can't be involved in every transaction. There's a balance to be struck between Revolut identifying concerning payments and responding appropriately to any concerns, and minimising disruption to legitimate payment journeys.

Revolut says it took the following steps to warn Mr L:

For all ten payments Revolut provided a 'transfer review' warning which said

*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.*

For the first payment on 12 November 2023, Revolut asked Mr L, via an automated questionnaire, what the purpose of the payment was for. Mr L said it was to pay a family member or friend. Revolut then provided an educational story tailored to the purpose of the payment Mr L selected. Mr L was then directed into Revolut's in-app chat for further questioning. However, Mr L left the chat before Revolut could ask further questions - resulting in its decision to reject the payment. Therefore payment 1 failed to be processed and wasn't lost to the scam.

Mr L was also asked about the purpose of the payment for the following six transactions followed being provided with educational scam stories based on the purpose Mr L gave. For payments 2, 3 and 4 Mr L said the purpose of the payment was for goods and services. And for payments 5, 6 and 7 Mr L said the purpose was to pay a family member or friend.

I think Revolut's intervention was proportionate in the circumstances and there was nothing about the payments or the information Mr L provided that it ought reasonably have realised Mr L was the victim of a job scam.

I've also thought about whether Revolut could have done more to help Mr L to recover the funds once it was made aware of the scam, but I don't think it could. The payments went to legitimate cryptocurrency providers which carried out the service they were required to. So, I don't think Revolut could reasonably have done more to recover the funds.

So, while I'm very sorry about Mr L's loss, I don't think it was caused by a failing on Revolut's part. It therefore follows that I don't think that Revolut's refusal to reimburse Mr L was unfair or unreasonable.

### **My final decision**

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr L to accept or reject my decision before 6 June 2025.

Kathryn Milne  
**Ombudsman**