

The complaint

Ms M complains Revolut Ltd won't refund the full amount of money she lost to a scam.

What happened

The background to this complaint is well-known to both parties, so I won't repeat it in detail here. But in summary and based on the submissions of both parties, I understand it to be as follows.

Ms M complains that she sent three payments from her account held with Revolut to what she thought was a legitimate investment. After making the payments, she realised she had been scammed. So, she logged a complaint with Revolut.

Revolut looked into the complaint and but didn't uphold it. It said it held one of the payments and asked Ms M a series of questions where it found it was likely Ms M was being scammed. Revolut said Ms M went ahead with the payment anyway, so there was nothing more it could do to prevent the scam. Revolut also told Ms M later that she was being scammed.

Ms M remained unhappy. So, she brought her complaint to our service.

Our investigator looked into the complaint but didn't think it should be upheld. Ms M and her representative didn't agree with the investigator's view.

As no formal resolution could be reached, the complaint has been passed to me for a final 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'm very aware that I've summarised this complaint briefly, in less detail than has been provided, and in my own words. No discourtesy is intended by this. Instead, I've focussed on what I think is the significant part here. If there's something I've not mentioned, it isn't because I've ignored it. I haven't. I'm satisfied I don't need to comment on every individual point or argument to be able to reach what I think is the right outcome. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts.

I've thought carefully about whether Revolut treated Ms M fairly and reasonably in its dealings with her, both when she made the payments and when she reported the scam, or whether it should have done more than it did. Having done so, I've decided to not uphold Ms M's complaint. I know this will come as a disappointment to Ms M and so I want to explain why I've reached the decision I have.

I've kept in mind that Ms M made the payments herself, and the starting position is that Revolut should follow its customer's instructions. So, under the Payment Services Regulations 2017 (PSR 2017) she is presumed liable for the loss in the first instance. I appreciate that Ms M did not intend for her money to ultimately go to fraudsters – but she did authorise these payments to take place. However, there are some situations when a business should have had a closer look at the wider circumstances surrounding a transaction before allowing it to be made.

Considering the relevant law and regulations; regulators' rules, guidance, and standards; codes of practice; and, where appropriate, what I consider to be good industry practice at the time – Revolut should fairly and reasonably:

- Have been monitoring accounts and any payments made or received to counter various risks, including anti-money laundering, countering the financing of terrorism, and 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 payment service providers 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, before processing a payment, or in some cases decline to make a payment altogether, to help protect customers from the possibility of financial harm from fraud.
- 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.

I'm conscious that the investigator went into a lot of detail explaining to both parties what was said in the intervention conversation between Ms M and Revolut. As this has been done already, I'm not going to go into that level of detail in my decision. As both parties are aware of the contents of the chat, as it's been sent to Ms M and her representative, I see no benefit in doing so again.

My normal starting point when thinking about a scam complaint is whether the business should have intervened on any of the payments before processing them. But here Revolut did intervene. Ms M spoke to several Revolut advisors and also gave Ms M a written warning. So, in these circumstances, I don't need to make this finding.

What I am tasked to do here is decide whether the interventions Revolut undertook was sufficient in the circumstances of the payments, and if it wasn't, what I think it should've done instead. I've also considered the impact (if any) an earlier intervention would have had. Here I've not found that Revolut could have done anything more to prevent this scam. I'll explain why.

When Ms M was asked the first series of questions by Revolut, she told it that she hadn't found the investment opportunity through social media. We now know that wasn't accurate, as Ms M found the opportunity through a social media platform. Although Ms M wasn't completely accurate with her responses, she was still given a warning that it was likely she was being scammed.

Having read through the intervention conversations when Ms M attempted to make more

payments, the advisors are clear on several occasions that they think its likely Ms M is being scammed. Ms M's representative has said that Ms M was confused by an earlier scam, and the Revolut advisors mention this. I've considered this point carefully, and whilst I agree both scams are mentioned, I'm satisfied the advisors are clear that the payments Ms M is trying to make are at risk and she is currently being scammed. Although Ms M agrees at one point with the advisor, we know she goes on to make payments from her other account to the same beneficiary after these dates.

The Revolut advisors cover off several of the characteristics of a scam of this type, including finding the opportunity through a social media platform, funding the investment through a loan, investing for high profit with no risk and being assisted by a third party – all of these are relevant to the scam Ms M was falling for at the time.

The Revolut advisor told Ms M to carry out her own research, which she said she did. From the research I've completed from the point in time Ms M made the payments, there are several reviews on the site Ms M said she checked highlighting the fact the company Ms M was sending money to be a scam.

It's worth noting that even if I did think Revolut should've intervened or prevented Ms M from making any further payments earlier, I'm convinced Ms M would've most likely found an alternative way to make them, probably by using a different bank account. Because of this, I don't think it can be reasonably concluded that Revolut is responsible for the loss Ms M suffered.

Ms M feels that Revolut should refund the money she lost due to the scam. I understand that this will have been frustrating for her. But I've thought carefully about everything that has happened, and with all the circumstances of this complaint in mind I don't think Revolut needs to pay Ms M any compensation. I realise this means Ms M is out of pocket and I'm sorry she's lost this money. However, for the reasons I've explained, I don't think I can reasonably uphold this complaint.

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 Ms M to accept or reject my decision before 29 October 2025.

Tom Wagstaff
Ombudsman