

The complaint

X complains Revolut Ltd (“Revolut”) didn’t do enough to protect her when she fell victim to a scam.

What happened

X said she received a message about a missed parcel delivery. She said as she was expecting a parcel, she clicked the link in the message and followed the instructions which included payment, so X input her card details, she said she believed the site to be genuine.

A few days later X said she took a call from a private number with someone who I’ll refer to as the scammer, saying they were a fraud specialist from a high street bank X held an account with, I’ll refer to it as Bank A. X said she was told the above-mentioned link was fake, her account had been compromised and she needed to act quickly. X said she questioned why the call was from a private number and she was told it was because the scammer was calling from a private line within Bank A.

X said she transferred her funds to her Revolut account and then on again at the direction of the scammer. She said she was told to move her funds into an account that had been set up in the name of a branch manager and the scammer told her they’d move the funds to her new account with Bank A and call her back after 30 minutes. X said when she wasn’t called back, she called Bank A and realised she’d been scammed.

Below are the transactions X made from her Revolut account towards the scam:

Date	Type of transaction	Payee	Amount
21 November 2023	Card payment	Cryptocurrency provider	£7,900
21 November 2023	Transfer	Payee 1	£2,350

X complained to Revolut, and her complaint wasn’t upheld. Unhappy with Revolut’s response X raised the matter with the Financial Ombudsman. One of our Investigators looked into the complaint and upheld it in part. While they thought Revolut should have intervened when the first payment was made, they thought a proportionate intervention by Revolut wouldn’t have prevented X from making the payment due to the guidance she’d received from the scammer. They thought Revolut hadn’t acted soon enough to recover X’s funds and if it had, some but not all, of the second payment could have been recovered. They therefore recommended Revolut refund £246.15 with 8 % simple interest from the date of loss to the date of settlement.

Revolut accepted the outcome. X didn’t agree. In summary, she said:

- The scammer coached her and she was panicked by the situation.
- X believes Revolut ought to have frozen her account because the payments were unusual.

As an agreement could not be reached, the complaint has been passed to me for a final decision.

My provisional decision

I issued my provisional decision on 1 May 2025. I decided, provisionally, that I wasn't going to uphold X's complaint. This is what I said.

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

I'm sorry that X has been the victim of a scam. I realise she's lost a significant sum of money and I don't underestimate the impact this has had on her. And so, I'd like to reassure her that I've read and considered everything she's said in support of her complaint. But I'll focus my comments on what I think is relevant. If I don't mention any specific point, it's not because I've failed to take it on board and think about it, but because I don't think I need to comment on it to reach what I think is a fair and reasonable outcome. I know this will come as a disappointment to X but having done so, I won't be upholding her complaint. I'll explain why.

In broad terms, the starting position at law is that banks and other payment service providers are expected to process payments and withdrawals that a customer authorises it to make, in accordance with the Payment Services Regulations and the terms and conditions of the customer's account.

X authorised the payments in question here – so even though she was tricked into doing so and didn't intend for her money to end up in the hands of a scammer, she is presumed liable in the first instance.

But as a matter of good industry practice, Revolut should also have taken proactive steps to identify and help prevent transactions – particularly unusual or uncharacteristic transactions – that could involve fraud or be the result of a scam. However, there is a balance to be struck: as while banks and Electronic Money Institutions (EMIs) should be alert to fraud and scams to act in their customers' best interests, they can't reasonably be involved in every transaction.

I've thought about whether Revolut acted fairly and reasonably in its dealings with X when she made the payments, or whether it should have done more than it did. In doing so I've considered what Revolut knew about the payments at the time it received X's payment instructions and what action, if any, Revolut took prior to processing the payments.

Revolut told us payment 1 was authorised by X using a feature known as 3D Secure whereby a customer is sent a notification in their Revolut app which requires them to enter their Revolut account password to confirm the transaction. Revolut said after this the payment was processed.

Payment 2 was a transfer to an individual and as this was a new beneficiary Revolut told us it displayed a warning to X asking if she knew and trusted the payee and if she was unsure not to pay them. The warning also said Revolut may not be able to help her get her money back and gave a reminder that fraudsters can impersonate others. X continued past this warning.

X was shown educational warnings. These highlighted the importance of carrying out research before making a payment and that fraudsters can make their calls seem legitimate. Revolut asked X the reason for making payment 2 and she said it was to 'pay a family

member or friend' which we know wasn't the case. While there wasn't an option that specifically fit the reason for her payment, X could have selected the option 'something else' but didn't.

Revolut went on to ask X a series of questions regarding the circumstances around the payment and asked her to be truthful when answering.

The questions included saying a fraudster may ask her to hide the reason for the payment, to which X said she understood. She was also asked if someone was telling her which options to choose or telling her the payment was urgent, to which she answered no, which we know wasn't the case. She was also asked more questions around paying a family member or friend. After which she was shown educational warnings about impersonation scams where fraudsters impersonate family or friends. None of these warnings Revolut presented X resonated with her and she continued to make payment 2. I appreciate these warnings weren't relevant to the scam X was falling victim to, which is why they may not have positively impacted her, but because she had answered Revolut's questions inaccurately it prevented Revolut from being able to provide a tailored warning that better reflected the scam she was falling victim to.

I've thought carefully about whether Revolut's actions were proportionate to the risks these payments presented. I think Revolut's actions for payment 2 were proportionate but I don't think Revolut did enough with regard to payment 1 given what it knew about the payment at the time it received X's instruction. Due to the value of the payment and its destination, a known cryptocurrency provider, and as it wasn't in keeping with X's usual account activity, I would have expected Revolut to have intervened prior to processing the payment.

I consider a proportionate warning in light of the risk payment 1 presented would be in these circumstances and find Revolut ought to have asked X a series of questions in order to identify the scam she was potentially falling victim to. This would be a proportionate way for Revolut to minimise the risk of financial harm to X but without imposing a level of friction disproportionate to the risk the payment presented.

I therefore need to make a decision on the balance of probabilities of what would most likely have happened if Revolut had intervened in this way and if it would have more likely than not have prevented X from making payment 1 and I don't think it would have.

I say this because the proportionate intervention I've described above forms part of the action Revolut took for payment 2 and it didn't positively impact X and prevent her from making payment 2. The payments were made within minutes of each other, and we know X was on the phone with the scammer at the time. X has also been open with both Revolut and us in saying the scammer told her to ignore any warnings from Revolut and actively guided her through the payments, telling her what to select. So, I think it's fair to conclude that if Revolut had intervened as I've described for payment 1, X would have behaved in the same way as she did when Revolut intervened for payment 2. That's to say she would have followed the scammer's instructions and given inaccurate answers and ignored any warnings.

X told us before she transferred her funds from Bank A to Revolut she increased the payment limit for her account to £10,000. Bank A told us when X did this it gave her a warning about safe account scams. The warning asked:

'Have you been asked to move money?'

It went on to say:

'Bank A or the police will never ask you to move your money to keep it safe. If you're told to move your money to a 'safe' or newly opened account, or to help an investigation, it's a scam!'

This is important as this warning is specific to the scam X was falling victim to and it didn't cause her to pause and consider what the scammer was telling her. It therefore further supports that X would more likely than not, have ignored any warnings Revolut presented her and continued to make the payments.

I don't believe Revolut should, as X has suggested, have frozen her account. While payment 1 ought to have alerted Revolut that X was potentially at risk of financial harm from fraud, I don't believe the payment was suspicious enough to warrant her account being frozen. I also wouldn't have expected Revolut to freeze her account for payment 2 for the same reason.

I believe Revolut's actions prior to processing payment 2 were reasonable. And whilst I've found that Revolut missed an opportunity to intervene on payment 1, I don't think a proportionate intervention as described above, would have led to a different outcome. And as I find a proportionate intervention from Revolut wouldn't have prevented X's loss, it wouldn't be reasonable for me to hold Revolut responsible for it.

Recovery

I've thought about whether there's anything else Revolut could have done to help X — including if it took the steps it should have once it was aware that the payments were the result of fraud.

As the first transaction was a debit card payment, the only option of recovery was via chargeback. But given the payment was made to a legitimate cryptocurrency provider, I don't consider it would have had any prospect of success given there's no dispute the cryptocurrency was provided to X. And so, I don't think Revolut could've recovered X's loss here.

Payment 2 was a transfer and our Investigator thought Revolut hadn't started the recovery process for this payment within a reasonable timeframe. They thought if it had, some of X's funds could have been recovered. Because while most of the funds had been moved on, some remained within the receiving account at the time Revolut had what it needed to start recovery. Having considered things, I disagree with our Investigators findings on this. I'll explain why.

X reported the matter to Revolut soon after the payments were made. Revolut gathered the information it needed and within a matter of hours had contacted the receiving bank. While it could be argued that Revolut could have started the recovery process sooner, I'm not persuaded this would have made a material difference to the outcome here.

The receiving bank responded to Revolut over a week later by which time there were no funds remaining in the account. And I've seen evidence that the funds were moved on by the end of the day on 22 November 2023. So even if Revolut contacted the receiving bank sooner I'm satisfied it wouldn't have been able to recover X's money. It therefore wouldn't be fair for me to ask it to refund this payment, or any part of it.

I recognise X has been the victim of a cruel scam and I'm sorry she lost this money. But for the reasons I've explained, I think Revolut acted fairly and reasonably in its dealings with X, so I won't be asking it to refund her.

Responses to my provisional decision

X replied to say she disagreed with my provisional decision. I've summarised the points she made below.

- She said she was emotionally vulnerable at the time of the scam due to a recent bereavement, her mum's health and worries regarding her job. This impacted her ability to think clearly.
- The scammer was convincing and pressed on her how urgent the matter was.
- The payments were made in quick succession and there wasn't enough time or questions asked to make her realise anything was wrong.
- She said the scammer explicitly instructed her to ignore the warnings.

Revolut confirmed it had no further points to add.

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've fully considered X's recent submission in response to my provisional decision, while I may not comment on every point, I've thought carefully about them all and it doesn't change my decision that I'm not upholding this complaint. I'll explain why.

The scam she fell victim to relied in part on her fear of losing her funds and she was pressured to act quickly. And I appreciate the scam took place during an already stressful time for her. That said, my role is to consider Revolut's actions or inactions and if it could reasonably have prevented the loss she suffered as the result of the scam.

Revolut intervened on payment 2, and I find its intervention was proportionate for the risk the payment presented, and while it missed an opportunity to intervene when payment 1 was made, I don't think any further intervention would have made a difference as X was following the scammers guidance which included being asked to ignore warnings, as explained in my provisional decision. And while X said not enough questions were asked, I think even if Revolut had intervened further I think it's unlikely X would have answered any questions accurately such that Revolut could reasonably have uncovered the scam or that she'd have heeded any further warnings. And given that she appeared to be under the spell of the scammer, I'm not persuaded that any further intervention from Revolut would ultimately have prevented her from making the payments or uncovered the scam.

As I find Revolut couldn't have prevented X's loss it wouldn't be fair for me to hold it liable for those losses. I realise this means X is out of pocket and I'm really 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'm not upholding this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask X to accept or reject my decision before 12 June 2025.

Charlotte Mulvihill
Ombudsman

