

## **The complaint**

Mr P complains that Revolut Ltd failed to protect him from a scam.

Mr P is being represented by a firm I will refer to as “W”.

## **What happened**

In February 2024, Mr P found an investment opportunity online with a company I will call “O”, which offered the chance to make money in cryptocurrency. After sharing his details, Mr P was contacted by someone from O, who told him about the work opportunity which could pay him on a daily basis.

Mr P made multiple payments totalling over £9,000, and it was only when he couldn’t withdraw any money and was told he’d need to pay more to do so that he realised he had been scammed.

Revolut said they launched a request to retrieve the funds via a chargeback claim but confirmed it was unsuccessful. They said as the payments were authorised by Mr P via their 3DS authentication system, the chargeback wouldn’t be valid under the card scheme rules.

W referred Mr P’s complaint to our service on his behalf. Our Investigator looked into everything but didn’t uphold it. He explained that he wouldn’t have expected most of the payments to have flagged with Revolut, but that they should have recognised that the final one was going to cryptocurrency and therefore carried a risk. However, he said that even if Revolut had intervened to establish the circumstances of the payment, it wouldn’t have uncovered the scam as Mr P had showed a lot of trust in the scammer, and when Revolut intervened on the last payment, Mr P provided the payment reason as “part of an investment” rather than “as part of a job opportunity”. This persuaded the investigator that Mr P was determined to get the payments through.

W disagreed with our Investigator’s view so the complaint has been passed to me.

## **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.

Having done so, I agree with the outcome reached by the Investigator. I know this will come as a disappointment to Mr P, so I want to explain why I’ve reached the decision I have.

I’m 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 focused on what I think is the heart of the matter. 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.

In broad terms, the starting position in 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 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 February 2024 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 their 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;
- 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 their products, including the contractual terms, enabled them 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 – (as in practice Revolut sometimes does including in relation to card payments);
- 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 this case, I don't think the payments made prior to the one for £5,185.39 were of a value or were made in such a way whereby I consider Revolut would've had sufficient reason to suspect Mr P might be at risk of financial harm from fraud. The payee had been established over a few payments by then, and those payments hadn't been made in rapid succession, which can be a potential indicator of fraud, but were spread over several days. The value of the payments had however increased in value by the time the payment for £5,185.39 was made.

Because of this, I think there was sufficient reason for Revolut to suspect Mr P could be at risk of financial harm at this point. This is because he had made a number of payments to a cryptocurrency platform that had incrementally increased in value. I therefore would've expected Revolut to have carried out additional checks before processing this payment.

Revolut knew or ought to have known that this payment was going to a cryptocurrency provider. Losses to cryptocurrency fraud reached record levels in 2022, and by the end of 2022, many high street banks had placed restrictions or additional friction on cryptocurrency purchases because of the elevated fraud risk. So, by February 2024, when these payments were made, I think that Revolut should have recognised that payments to cryptocurrency carried a higher risk of being associated with fraud.

Based on the circumstances of the transaction mentioned, I'm persuaded that Revolut ought to have identified that Mr P was at risk of financial harm from fraud, and it should have done more to establish the circumstances surrounding the payment.

However, I don't think any proportionate intervention would have prevented the loss. I say this because having read through the scam chat, it is clear that Mr P placed a lot of trust in the scammer. He sent them screenshots while making the payments, and when payments were declined by Mr P's other bank, he told the scammer who advised him to make the payments via Revolut instead.

Mr P also carried out research before deciding to get involved, and everything appeared to be legitimate. As the scammer was impersonating a legitimate business, even if Revolut had carried out a check, they would have found the same information Mr P did, in that the business he was working with appeared to be genuine.

Revolut have also shown that they asked Mr P for the purpose of the fifth payment before processing it and he selected “making an investment.” This was despite there being a more accurate option being available – “paying to earn money by working online.” The payment was automatically declined and Mr P was directed to the Revolut app where he was presented with questions regarding the payment purpose. He said he wasn’t being guided, and he was making the payment as part of an investment.

While Mr P may have selected an inaccurate payment purpose, I can’t fairly hold Revolut responsible for this, as I don’t think they had enough reason to suspect that Mr P was providing inaccurate information.

I therefore think it was reasonable for Revolut to have provided scam warnings tailored to the payment purpose Mr P selected. But while these warnings weren’t tailored to the true purpose of Mr P’s payments, I think some of it was still relevant to his situation. For example, the warnings alerted Mr P that he could be the victim of a scam and highlighted the risks involved. Sadly, while somewhat relevant to Mr P’s situation, the warnings didn’t resonate with him and he continued to authorise the payment.

Overall, while I appreciate Mr P was following what he thought was a legitimate job process, and while I’m really sorry he’s been the victim of such a cruel scam, the information he provided Revolut prevented them from identifying that he was falling victim to a job scam. Despite this, Revolut did provide warnings that were tailored to the reason he gave for the payment that was questioned. Mr P failed to respond accurately to the warnings he was given and proceeded with the transfer as he was so heavily under the spell of the scammer.

Because the scammer wasn’t telling Mr P what to say when asked about the payments, I don’t think any intervention on the final payment would have been effective. Mr P was seeing profit by this point which would have secured his belief that it was legitimate, and he had already misled Revolut on one occasion. I therefore think it is most likely that he would have continued to do so, had they intervened any further.

Because of this, I can’t fairly and reasonably hold Revolut responsible for Mr P’s loss.

### *Recovery*

I also need to consider whether Revolut did enough after being advised of the scam, to try and recover the funds.

While Revolut have said they raised chargebacks, as the service paid for had been provided, there wouldn’t have been any prospect of success.

It follows that I don’t think Revolut could reasonably have done anything more to recover Mr P’s loss.

Overall, I strongly empathise with Mr P and what he has been through. He has been the victim of a cruel scam and I am sorry this has happened and for the impact it’s had on him. However I can only look at the actions of Revolut, and I don’t think they are responsible for the loss Mr P has suffered. So, while I know this will come as a disappointment to him, I don’t think Revolut have acted unfairly by not refunding the money he lost.

### **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 P to accept or reject my decision before 29 December 2025.

Danielle Padden  
**Ombudsman**