

The complaint

Miss B has complained that Revolut LTD won't refund money she says she lost to a scam.

What happened

Where the circumstances of the complaint are well known to both parties, I won't detail them again here. Rather, I'll focus on setting out the key reasons for my decision. I hope Miss B and Revolut won't take this as a discourtesy; it's just a reflection of the informal nature of our service.

In short, Miss B was looking for part-time work, so she put her details in several recruitment websites, as such she was expecting to be contacted by recruiters. Some time later Miss B was contacted via a messaging app about a data entry job, this turned out to be the scammer.

Miss B has said the scammer sounded very professional, but she carried out her due diligence by checking the recruitment company. Miss B said the scammer discussed the role in more detail. And said Miss B needed to complete 40 'tasks' to earn £300 for the week. The tasks centred around boosting reviews of household products. Miss B accepted the position and began 'completing tasks'. She could see how many tasks she had completed and the commissions she had earned. Miss B says that initially she didn't have to add money to her account but over time Miss B did have to add money to her account in order to complete the tasks. Eventually, after consistently being asked to make further payments before she could 'complete the tasks' Miss B realised she had been scammed.

Revolut looked into Miss B's concerns and explained they were not upholding her complaint. It said, it had acted reasonably in processing the payment after providing effective warnings to Miss B in order to avoid money being lost to a scam. Revolut said, it provided an intervention on a number of the payments and Miss B chose to continue on each occasion. Miss B remained unhappy, so via a representative, Miss B referred her complaint to our service.

Our investigator looked into Miss B's complaint and didn't recommend it be upheld. Miss B didn't agree, so she asked for the case to be passed to me to consider.

I issued my provisional findings on 2 July 2025 where I said the following:

"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 have reached the same outcome as the investigator but for slightly different reasons, I will explain why.

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 (2017) and the terms and conditions of the customer's account.

But, taking into account relevant law, regulatory 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 December 2023 that Revolut should:

- have been monitoring accounts and any payments made or received to countervarious 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;*
- 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;*
- 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 and as was the case here);*
- 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.*

I am mindful that the account had been opened from 17 July 2022 and the purpose of Miss B opening an account with Revolut was ‘foreign exchange’ and ‘spending abroad’ but the transactions in question were going to a crypto currency exchange.

However, there’s also a balance to be struck between identifying payments that could potentially be fraudulent and minimising disruption to legitimate payments. Whilst EMI’s have obligations to be alert to fraud and scams and to act in their customers’ best interests, they can’t reasonably be involved in every transaction.

However, Revolut did in fact intervene on some of the payments (and earlier than I would have suggested). On 15 December 2023, Miss B attempted a payment of £1,032 but Revolut recognised the transactions carried a heightened risk of financial harm from fraud and intervened. So, it’s just a question of whether it did enough in the circumstances.

The FCA’s Consumer Duty, which was in force at the time these payments were made, requires firms to act to deliver good outcomes for consumers including acting to avoid foreseeable harm. In practice this includes maintaining adequate systems to detect and prevent scams and to design, test, tailor and monitor the effectiveness of scam warning messages presented to customers.

Revolut has had warnings in place for some time. It has developed those warnings to recognise both the importance of identifying the specific scam risk in a payment journey and of ensuring that consumers interact with the warning. So, Revolut should have had systems in place to identify, as far as possible, the actual scam that might be taking place and to provide tailored effective warnings relevant to that scam.

On 15 December 2023, when Miss B attempted to make a payment of £1,032, Revolut did ask a series of automated questions designed around the payment purpose Miss B selected

(she selected 'something else'.) Revolut invited Miss B to answer further questions in its in-app chat. Revolut asked Miss B to confirm why she was sending the money, she explained she had pressed the wrong reason originally, but the real reason was that she was sending money to a friend. Revolut asked if she was being guided and Miss B confirmed she wasn't. Revolut then asked Miss B if she was she was buying cryptocurrency and Miss B confirmed she was.

Based on this, Miss B was asked several questions surrounding crypto currency, such as, what exchange are you using, can you access the account you are sending the money to, have you been able to withdraw funds that you have deposited, and how long have you been purchasing crypto currency. Miss B answered the questions by confirming she has been able to withdraw deposits, she had several months experience and received recommendations from friends regarding the exchange.

Miss B was then asked if anyone had told her how to answer the questions Revolut had asked her and Miss B confirmed her friend. Because of this, Revolut asked further questions to narrow the down the risk and warned Miss B:

"This is a very risky payment, and if you decide to make it, the most likely outcome is that you'll lose your money and we won't be able to get it back for you."

Miss B continued to tell Revolut the person who had told her how to answer the questions was a friend she had known for years, who she trusts and hadn't told her to install anything. Revolut got Miss B to confirm it had warned her it was likely a scam and she may not be able to get her money back. Miss B was told if she wished to proceed, she would need to the app to make the payment.

At this point, I would like to highlight that Miss B did have an option to select (for the reason she was sending money) "to complete a task on job hiring process", which would have resonated with her set of circumstances. However, Miss B didn't choose this option, instead she selected 'something else'. Again, upon being asked why, she did have the option to explain she was sending money to a friend, oppose to giving Revolut accurate information about why she was making a payment. Based on the information Miss B provided Revolut, it warning wasn't specific to Miss B's circumstances, it was given due to the inaccurate information Miss B provided, which I can't hold Revolut responsible for.

However, I do feel further questions ought to have been asked about why Miss B was sending money to a friend via cryptocurrency as opposed to a direct transfer. I say this because, Revolut were able to identify Miss B was making payments to a cryptocurrency exchange, and I don't think it would be the usual method to transfer 'money to a friend'.

Revolut should also have been mindful that cryptocurrency scams have become increasingly varied over the past few years. Fraudsters have increasingly turned to cryptocurrency as their preferred way of receiving victim's money across a range of different scam types, including 'romance', impersonation, investment scams as well as job scams. Our service has seen an increasing number of similar scams to this one in the last year and Revolut ought to have been aware of this risk.

Taking that into account, I am satisfied that, by December 2023, Revolut ought to have attempted to narrow down the potential risk further, as highlighted above. However, whilst I think that a proportionate response to the risk would have been for Revolut to have intervened and ask further/more probing questions, had it done so, I'm not persuaded that would have prevented Miss B's loss.

In Miss B's submissions to our service she has said: "I did not tell the truth. I had invested so

much money at this point and would have done anything to retrieve this, unable to simply leave my funds in the account.”

Therefore, I am satisfied that Miss B was so invested in the scam, and to not lose the funds she had already invested, despite what questions, Revolut would have asked, Miss B wouldn't have provided accurate information, denying Revolut the opportunity to identify what Scam Miss B was potentially falling victim to and provide a proportionate warning. And to have covered off key features of job scams. For example, making payments to gain employment, being paid for 'clicks', 'likes' or promoting products and having to pay increasingly large sums without being able to withdraw any money.

This position is supported by the fact that on 22 December 2023 when Revolut stopped another payment Miss B attempted to make and invited her to join its in-app chat. Again, Miss B was asked further questions about the payment and Miss B provided inaccurate information.

I am persuaded that given Miss B's actions and responses to the questions she was asked, its unlikely further questioning or better intervention, would have made a difference. I'm not persuaded Revolut would have exposed the scam with further proportionate intervention or questioning.

I have gone on to consider if Revolut took reasonable steps to try and recover the funds. As, Miss B made the payments via debit card, the chargeback process is relevant here. The chargeback scheme is a voluntary agreement between card providers and card issuers who set the scheme rules and is not enforced by law. A chargeback isn't guaranteed to result in a refund, there needs to be a right to a chargeback under the scheme rules and under those rules the merchant or merchant acquirer can defend a chargeback if it doesn't agree with the request.

Unfortunately, the chargeback rules don't cover scams. So, Revolut would only be able to process chargeback claims against the merchant she paid. The merchant in this case was a genuine cryptocurrency exchange. The service provided by the cryptocurrency exchange would have been to convert or facilitate conversion of Miss B's payments into cryptocurrency. Therefore, they provided the service that was requested.

I appreciate the cryptocurrency was later transferred to the scammer but that does not give rise to a valid chargeback claim against the merchant Miss B paid. As the cryptocurrency exchange provided the requested service to Miss B any chargeback attempt would have likely failed.

I know that this scam has had a significant impact on Miss B and I'm sorry that she's been the victim of a cruel scam. However, I've explained that while I think Revolut should have done more here, I need to consider whether its failure to do so, on the balance of probabilities, caused some of Miss B's losses. And for the reasons set out above, I don't think it has.

My provisional decision

My provisional decision is that I don't uphold this complaint”

Miss B, via her representative responded to my provisional findings and accepted them. However, Revolut didn't respond.

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 no further evidence or comments have been provided from either party, I don't see any reason to depart from my provisional findings.

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 Miss B to accept or reject my decision before 13 August 2025.

Jade Rowe
Ombudsman