

The complaint

Ms A complains that Revolut Ltd (Revolut, hereinafter) hasn't refunded the losses she's incurred when falling victim to an investment scam.

What happened

Ms A said she had invested on an investment platform I'll refer to as F. In April 2025 she was contacted out of the blue by a person purporting to be working for F and Revolut, who said they could help her withdraw the funds she had invested with F. Sadly, this was a scam.

The scammer guided Ms A to open an account with Revolut and then instructed her to pay money into her newly opened account, convert it into cryptocurrency using Revolut's cryptocurrency exchange services, and then send it on to the scammer's wallet by what is known as a "cryptocurrency withdrawal".

From her Revolut account Ms A made the following payment (the credit into the account is highlighted in bold):

Payment	Date	Time	Type of transaction	Amount
	15 April 2025	09:46	Credit to Revolut account from Ms A's external account	+£1000
	15 April 2025	09:58	Exchange from GBP to BTC	£1000
1	15 April 2025	10:05	Cryptocurrency withdrawal to BTC on Bitcoin	0.01496484
			TOTAL LOSS	£963.56

Ms A realised she had fallen victim to a scam when she didn't receive her returns after she had paid the withdrawal fee and the scammer continued to ignore her messages.

Ms A informed Revolut of the scam on 16 April 2025 and then lodged a complaint when Revolut refused to refund her.

Revolut said it tried to recover Ms A's funds but was unsuccessful due to the nature of cryptocurrency payments. It said it questioned Ms A appropriately at the time she was making the cryptocurrency withdrawal, but sadly it wasn't able to protect Ms A, as she gave misleading answers during its intervention. So, it thinks it's done enough to protect Ms A and declined to refund her loss.

So, Ms A referred the complaint to the Financial Ombudsman Service.

When our service submitted the information request to Revolut for this complaint, Revolut said it didn't think our service had jurisdiction to consider the matter, as it involved cryptocurrency withdrawals.

In response to Revolut's representations to our jurisdiction, our Investigator thought the complaint was a broad one about Revolut's failure to protect Ms A from the scam overall, rather than just about the withdrawal, and so we could consider it. In their view they said that certain aspects of what happened on the account (as a result of the scam) concerned activities covered by our jurisdiction, like payment services, or those ancillary to them.

Specifically, our Investigator thought the depositing and holding of funds as electronic money ("e-money", hereinafter) in the Revolut account was an activity that is covered by us. They also said that, while the exchanging of the money into cryptocurrency wasn't itself listed as part of the financial activities we can investigate, in the circumstances, they thought we could look at that part of the process, as it was ancillary to the payment service of holding e-money.

Our investigator likened this activity to when our service considers complaints about foreign currency exchange that happens as part of a transfer. The exchange isn't itself a separately covered activity, but it's one we can review when ancillary to money remittance (which is a payment service we can investigate).

Our Investigator didn't, however, think the cryptocurrency withdrawal was something we could comment on, as it's not a financially regulated activity, nor is it ancillary to one. With regards to the merits of the complaint, our Investigator said that Revolut's intervention was proportionate to the risks identified at the time, but due to Ms A's misleading answers, it wasn't able to identify and protect her from the scam she was falling victim to. So, they didn't recommend a refund.

Ms A disagreed with our Investigator's view, stating they were unfairly siding with Revolut and that, as a scam victim, we should investigate both Revolut's and F's failures. In light of this disagreement, I have been asked to review everything afresh and reach a decision on the matter.

Preliminary matters

Firstly, I would like to take the opportunity to explain to Ms A that our service is unable to investigate her dealings with F or bring the scammer to justice, as that isn't why this service was set up.

The Financial Ombudsman Service can only investigate complaints against financial firms regulated by the Financial Conduct Authority – that is to say legitimate businesses offering genuine financial services to customers. But F was a scam, which never intended to provide any financial services to Ms A. So, we have no power to investigate it, only law enforcement agencies can.

Therefore, in my review of this complaint, I've only focussed on the role that Revolut has played in the scam, given that Revolut is a genuine e-money provider.

Revolut hasn't responded to our Investigator's findings in relation to our jurisdiction. I've therefore assumed that it now accepts our Investigator's stance, and I only need to decide the merits of this complaint.

For the benefit of Ms A, I would like to reiterate that I'm unable to comment on Revolut's actions at the point she made the cryptocurrency withdrawal, as this isn't an activity within our service's jurisdiction.

So, when reviewing Revolut's role in the scam, I will focus on all aspects other than the cryptocurrency withdrawal.

However, whilst I can't comment on Revolut's intervention at the point the cryptocurrency was withdrawn, I'm still able to consider Ms A's reaction to that intervention, to inform my opinion of how Ms A would have likely interacted with Revolut, had it intervened at a different point in the transaction.

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 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 here. If there's something I've not mentioned, it isn't because I've ignored it. 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.

Where the evidence is incomplete, inconclusive, or contradictory, I must make my decision on the balance of probabilities – that is, what I consider is more likely than not to have happened in the light of the available evidence and the wider surrounding circumstances.

I don't doubt Ms A has been the victim of a scam here – she has lost a large sum of money and has my sympathy for this. However, just because a scam has occurred, it does not mean Ms A is automatically entitled to recompense by Revolut. It would only be fair for me to tell Revolut to reimburse Ms A for her loss (or a proportion of it) if:

- I thought Revolut reasonably ought to have prevented all (or some of) the payments Ms A made, or
- Revolut hindered the recovery of the payments Ms A made

whilst ultimately being satisfied that such an outcome was fair and reasonable for me to reach.

Should Revolut have intervened when Ms A converted her funds into cryptocurrency?

I've thought carefully about whether Revolut treated Ms A fairly and reasonably in its dealings with her, 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 A's complaint. I know this will come as a disappointment to Ms A and so I will explain below why I've reached the decision I have.

I have kept in mind that Ms A 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 A did not intend for her money to ultimately go to fraudsters and was deceived into doing so – but she did authorise these payments to take place. However, there are some situations when a bank or an electronic money institution such as Revolut, 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 make 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.

So, I've thought about whether the exchange of fiat currency (GBP) into cryptocurrency (BTC) Ms A completed on 15 April 2025 should have highlighted to Revolut that Ms A might be at a heightened risk of financial harm due to fraud or a scam.

Revolut didn't intervene at all at the time of the exchange.

Our service is aware that Ms A had opened her account with Revolut on 9 April 2025 and had contacted Revolut on 11 April 2025 to seek advice on whether she should be sending any funds to her external cryptocurrency wallet, in order to release her cryptocurrency investment into her Revolut wallet.

Ms A explained how she had set up the transaction, which seemed to follow the correct process according to the Revolut advisor. She then disclosed that she had been asked to point blank send £1,000 to her external cryptocurrency wallet, if she wanted to withdraw any funds.

At this point the Revolut advisor explained that Ms A should not be sending any additional funds to anyone. They warned her to be cautious and that she should ignore any further requests for additional payments, as that was not the standard process. She should just wait for the transaction to come through.

I think this interaction should have put Revolut on notice that Ms A may be at risk of falling victim to a scam. I think Revolut could have said more to Ms A to warn her about the features of cryptocurrency scams and how scammers persuade their victims to pay for withdrawal fees.

However, I must also bear in mind that Ms A did not proceed to making any payments from her Revolut account on that day or the following three days. Also, Revolut provided advice that, whilst incomplete, was relevant to Ms A's situation.

So, I must decide whether this event should have prompted Revolut to intervene on the cryptocurrency exchange of 15 April 2025.

I don't think that it should have. I'll explain why.

When speaking to the Revolut's advisor, Ms A described the process through which she wanted to transfer funds into her Revolut account from her external cryptocurrency wallet, which was correct. This, coupled with the fact Ms A had selected she wanted to use its facilities to trade cryptocurrency, when she opened her Revolut account, would have given reasonable grounds to Revolut to believe that Ms A was genuinely trading cryptocurrency.

Ms A made the cryptocurrency exchange four days after her conversation with the Revolut advisor, so I don't think that risk should have been at the forefront of Revolut's fraud detection systems, given the amount of time that had passed.

Moreover, the amount Ms A converted was a relatively low sum, that I don't think should have indicated to Revolut that Ms A was at risk of suffering from financial harm from fraud.

Finally, I'm mindful that Revolut didn't have historic information about the account or what Ms A's typical usage was like, because she had just opened her account with Revolut when she made the cryptocurrency exchange. So, Revolut wouldn't have been at first in a position to know whether Ms A's activity was unusual or out of character – as it had nothing to compare it against.

In light of the above, I don't think Revolut should have intervened at the point Ms A completed the cryptocurrency exchange.

Our service is aware that Revolut intervened when Ms A made the cryptocurrency withdrawal to the scammer's wallet.

I think it's important for me to explicitly depart from our Investigator's finding that Revolut's intervention at that point was proportionate.

I have explained above in this decision, that our service doesn't have the power to look into Revolut's actions at the point of the cryptocurrency withdrawal, and therefore I will not comment as to the quality of that intervention.

Even if I was to find that Revolut should have intervened at the point Ms A completed the cryptocurrency exchange, as I'll go on to explain, I don't believe this would have resulted in the scam being unveiled and Ms A's loss being prevented.

Would Revolut's intervention have made a difference?

The question for me to answer next is whether, on the balance of probabilities, Revolut would have been able to prevent Ms A's loss, had it intervened when Ms A converted the GBP into BTC.

I've considered that point carefully and I'm not persuaded it would have been. Whilst I don't have the full transcripts of Ms A's chats with the scammer, what is available to me shows that Ms A was following their advice very closely. Ms A asked the scammer for guidance during every step of the process, including asking what account opening purposes she should select, when setting up the Revolut account.

The transcript shows that on the day of the payment, Ms A had four phone calls with the scammer, one of which lasting over 30 minutes, after which the scammer shared their cryptocurrency wallet on the chat.

As mentioned above in this decision, I can't comment on Revolut's intervention at the point of the cryptocurrency withdrawal because it's outside of my jurisdiction. However, I'm still able to consider Ms A's interaction with Revolut at that point, as an indication of how she may have conducted herself earlier in the transaction, if Revolut had intervened on the payment.

Ms A's actions at that point are particularly relevant to this finding, because they took place immediately after the deposit and conversion of funds into her Revolut's account, meaning Ms A was very unlikely to change her course of action between depositing her funds and sending them to the scammer.

I can't say for certain whether the scammer would have controlled every interaction Ms A held with Revolut, but we're aware that, when Revolut intervened during the cryptocurrency withdrawal, Ms A selected she was sending money to her other account and was completing the transaction by herself. She also acknowledged that, if anyone was guiding her when making the payment or telling her to lie, this was a scam. She then confirmed she wasn't making the payment due to a request from her bank.

The above shows Ms A was intent on misleading Revolut as to the genuine purpose of her payment. I think, in the circumstances, the most appropriate option would have been for Ms A to select that she was sending the funds as part of an investment. Based on what the chat transcripts show, it's also unlikely that she was completing the transaction independently. Finally, Ms A told our service and Revolut she thought the scammer worked for both F and Revolut, so I would have expected her to select that the bank had asked her to make the payment.

I must also take into account that, despite the advice Ms A had received from the Revolut advisor not to make any payments to release her investment, she decided to trust the scammer and proceed anyway, four days later.

So, independently of whether she was heavily coached through the cryptocurrency withdrawal, or if she came up with her responses to Revolut's questions alone, it appears to me that Ms A was deeply under the spell of the scammer and unwilling to take heed of Revolut's warnings.

The above evidence persuades me that, more likely than not, even if Revolut had intervened at the point she completed the cryptocurrency exchange, Ms A would have kept the true reason of her cryptocurrency withdrawal hidden from Revolut.

Overall, based on all of the above, I believe that, on the balance of probabilities, Revolut wouldn't have been able to prevent Ms A's loss, even if it had intervened earlier in the scam.

Recovery

I'm unable to comment on whether Revolut could have done more to recover the funds once it had become aware of the scam.

This is because Revolut's recovery of cryptocurrency is an activity out of my jurisdiction, in line with what I've already explained above.

My final decision

For the reasons given above, I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms A to accept or reject my decision before 12 February 2026.

Daria Ermini
Ombudsman