

The complaint

Miss M complains Revolut Ltd didn't stop payments she made to third-party companies for gambling, despite having a gambling block on her account.

What happened

Miss M said she made multiple payments to third-party online gambling companies over a period of 12 months. She said she understood the third-party companies she paid used 'incorrect' Merchant Category Codes (MCCs), which allowed transactions to bypass the gambling block she had setup with Revolut.

Miss M said Revolut acknowledged the third-party companies had not used the correct MCCs but refused to take further action. Miss M explained Revolut also refused to intervene or manually alter the MCCs the companies were using.

Miss M explained the funds she authorised didn't go directly to the gambling companies, but were routed through cryptocurrency exchanges and other payment platforms. She explained this meant non-gambling MCCs were used and the payments weren't therefore blocked.

Miss M said Revolut had failed to apply proper safeguards and protect her from foreseeable harm. She also said Revolut had failed to monitor her account or intervene, even when repeated high-value transactions were made across multiple merchants.

To support this Miss M highlighted she made over 500 transactions to one merchant and 400 to another, suggesting this should have triggered some intervention by Revolut, especially as she had a gambling block in place at the time. Miss M explained, in total, she made 1,200 transactions for gambling purposes, many within minutes of each other. She therefore thought the nature of these transactions, coupled with the gambling block she had placed on her account, should have provided reasonable notification to Revolut of gambling issue regardless of the MCCs used.

Miss M also said there was evidence of 'borrowing behaviour' to fund these transactions on her Revolut account, with transfers regularly coming in from friends and family to fund her compulsive gambling. She also explained she had signed up to GamStop and Revolut should have been aware of this.

Miss M provided evidence of two chats she had had online with Revolut advisers. One was regarding a significant payment she expected from an online casino, and another was when she tried to raise a series of chargebacks against a business, where she mentioned gambling. She asserted this clearly demonstrated to Revolut she was gambling during this period, yet despite this it didn't intervene or help.

Miss M explained this error had caused her significant financial difficulties and emotional distress. She wanted Revolut to reimburse the funds she had lost, which she calculated to be over £50,000, and action taken to prevent this happening again in the future.

Revolut issued a final response. It explained the MCC codes it blocks when a gambling block is in place. It explained it has no control over the MCCs business use and pointed out it states 'we'll do our best to identify and block these payments, but Revolut isn't liable for any successful payments' when a gambling block is instructed by a customer.

Revolut concluded its gambling block worked as intended and would have blocked payments to gambling businesses using correct MCCs, it therefore didn't uphold Miss M's complaint.

Our investigator didn't think Revolut needed to take any further action or refund the money Miss M had paid to gambling businesses.

They agreed with Revolut's explanation that MCC blocks work by identifying payments using recognised gambling codes. They explained some gambling businesses, often based overseas, specifically use codes to avoid gambling blocks, or use third-party money transfer companies or cryptocurrency exchanges to avoid gambling codes, as appears to have sadly been the case with Miss M.

Our investigator explained Revolut wouldn't have automatically been aware Miss M was registered with GamStop, which limited access to online gambling sites with UK based companies.

Finally, they said they hadn't seen any evidence Miss M had mentioned her compulsive gambling or vulnerabilities to Revolut before raising her complaint. They also thought the payments had been authorised by Miss M and therefore couldn't fairly conclude Revolut were at fault or liable for the payments.

As Miss M rejected our investigator's recommendation, her complaint has been passed to me to make 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 would firstly like to express my sympathy for Miss M. I can see from the evidence and emails provided to our service this has been a very difficult time for her, and I was sorry to read of the effects compulsive gambling has had on her.

I appreciate how strongly Miss M feels about her complaint. Although I may not mention every point raised, I have considered everything but limited my findings to the areas which impact the outcome of the case. No discourtesy is intended by this, it just reflects the informal nature of our service.

The issue for me to decide here is whether Revolut should have done more to protect Miss M based on the wider circumstances.

I will firstly discuss the gambling block and whether I think this should have stopped the payments in question.

Miss M has explained she set up a gambling block with Revolut shortly after opening the account, the evidence I have seen suggests she opened this account in late 2023. I can see Miss M has said this should have strongly indicated to Revolut that she had vulnerabilities regarding gambling. Miss M has suggested Revolut should have therefore considered the transactions she made more closely.

However, Revolut has explained it didn't know about Miss M's compulsive gambling until she raised issues more recently. Miss M has accepted in correspondence to our service that she *'didn't directly tell Revolut I had a gambling problem'*, I am therefore satisfied Miss M hadn't engaged with Revolut or explained these issues previously.

Gambling blocks, which are not offered by all banks, generally work by blocking transactions made with certain MCCs which are aligned with gambling transactions. These blocks rely on the merchant applying a category code associated with gambling. Revolut has explained the merchants used codes not associated with gambling for the transactions in question.

Having examined many of the transactions, and the screenshots provided by Miss M, I can see payments were to services I wouldn't usually expect to be using an MCC associated

with gambling. As highlighted, payments went to payment service companies and cryptocurrency exchanges. I am therefore satisfied it is unlikely these transactions would have been stopped by the gambling block. I also accept these codes are set by the merchants, and Revolut has no control over them.

Revolut has listed and named the MCCs it stops under its gambling block and explaining the codes used by the various companies in question would not have triggered a payment block. I therefore don't think it is reasonable to conclude Revolut should have identified these transactions as gambling.

In summary, Revolut made the payments Miss M instructed and the MCC used didn't identify the payments for gambling.

I now move on to whether I am persuaded there was any indication, or reason for Revolut to intervene.

Businesses need to ensure they monitor accounts for suspicious activity, but customers bank accounts and transactions are not usually routinely monitored or examined. There would usually need to be a reason for a business to examine transactions, this could be due to going overdrawn, struggling to pay regular mandates, customer contact or suspecting fraud on the account.

Having examined her account, I generally can't see evidence of Miss M struggling to fund the gambling. Whilst I accept she did receive regular payments in from friends and family, and missed some direct debits, she didn't appear to go overdrawn to any significant degree or have serious financial difficulties which would have reasonably caused Revolut to contact her. I therefore think it unlikely Revolut would have needed to examine her account or contact her during the period in question because of this reason.

Secondly, the payments she made are not in dispute in terms of their authorisation. Miss M appears to have used the correct prescribed processes to authorise these payments and I therefore think it is unlikely Revolut would have had cause to question or delay the payments.

However, I do accept Miss M's positions regarding the extent and frequency of some payment. I have examined the statement and can see there were many payments over short periods of times to some merchants, these are clearly in the hundreds, and on balance I think it is reasonable to think Revolut should have noticed this and contacted Miss M. I will return to this below.

Finally, on this point, I can see evidence Miss M contacted Revolut twice during this period via the 'chat bot'. I have considered these contacts to see whether I am satisfied Revolut ought to have done more.

I can see Miss M attempted to raise a series of chargebacks regarding a single merchant in June 2024. I have examined this chat and can't see Miss M mentioned she had an issue with compulsive gambling during this conversation. In summary, Miss M said she had not had '*any dealings*' with the merchant but also admitted she had authorised the transactions, just not to the merchant shown on the statement. Revolut apparently dealt with this matter as a disputed transaction issue, explaining it couldn't undertake a chargeback in the circumstances described. Miss M alluded to gambling only once during the chat, saying; '*I sent my money to a online casino [sic]*'. Revolut didn't respond, inquire in any further detail about these payments or offer any assistance with compulsive gambling after this comment.

The second contact was in November 2024. Miss M explained she was waiting for a payment into her account from a '*casino*'. Miss M clarified that the payment in was for £1,000 explaining such payments usually arrived in Euros but she didn't know the country the payment was coming from.

Revolut then transferred Miss M to a live agent, who explained the process for receiving payment and focused on Miss M's query, which was she hadn't received a payment she was expecting. I can see a payment credited Miss M's account for £1,196.63 the day afterwards. Miss M didn't express any issues with gambling during this contact, with the focus very much on a payment she was expecting not being credited to her account.

FCA guidance from 2021 regarding vulnerable customers explains businesses should monitor accounts for '*unusual activity*'. This guidance is aimed as a trigger for front-line staff within businesses, describing what to look out for when '*engaging with customers*'. Again, this suggests Miss M would have needed to have engaged with Revolut and explain her compulsive gambling for it to have had any opportunity to recognise unusual activity.

There are two issues here with this guidance. The evidence I have seen suggests Miss M only opened her account with Revolut towards the end of 2023. What would constitute 'unusual activity' is therefore difficult to define in these specific circumstances. Revolut wouldn't have had records to understand what was 'usual' activity to establish whether Miss M's activity was unusual. Secondly, as discussed, Miss M hadn't advised of any vulnerabilities at this time.

Revolut appears to have understandably concentrated on the issues Miss M raised with it during the chats. Having considered these circumstances carefully, I am not persuaded, on balance, there was enough evidence during these contacts for Revolut to reasonably have considered Miss M needed assistance with her gambling and should have taken steps to assist her.

In summary, I am satisfied Miss M didn't tell Revolut about her compulsive gambling or her vulnerabilities. Whilst there were two contacts with Revolut during the period in question, I am not persuaded that on either occasion, on balance, Revolut should have recognised compulsive gambling. Whilst gambling was mentioned, it wasn't the main reason for each contact.

I do accept there is some evidence Revolut could have recognised the spending patterns and intervened. However, having recognised this, I must then consider whether I think there is evidence any such intervention during this period would have led to a different outcome.

There is evidence Miss M knew she was using '*offshore*' casinos to gamble, which would therefore not have had been subject to UK law and would circumvent certain checks and responsibilities. Furthermore and importantly, I can see Miss M said in May 2025 she had continued to sadly compulsively gamble after raising her complaint with our service.

I therefore think there is evidence to show it was unlikely any intervention by Revolut would have stopped Miss M from continuing to compulsively gamble, and it is more likely than not Miss M would have continued to gamble.

To further support this view I can see Miss M used a series of different online gambling sites which would have circumvented the blocks she had in place and GamStop.

For these reasons I do not think it would be fair or reasonable to hold Revolut liable for the losses complained about. I therefore do not uphold this complaint.

I appreciate this will be disappointing to Miss M and would reiterate I was very sorry to hear about the struggles she has had with her health and compulsive gambling. I would fully encourage her to seek the support of independent services offered in the final response letter by Revolut and wish her well in the future.

My final decision

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

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss M to accept or reject my decision before 25 September 2025.

Gareth Jones
Ombudsman