

The complaint

Mr S is complaining that Revolut Ltd didn't do enough to prevent him from making payments to a cryptocurrency investment scam.

The complaint is brought on his behalf by a professional representative but for ease I'll refer mainly to Mr S in my decision.

What happened

Both parties are familiar with the circumstances, so I'll only summarise what happened here.

Mr S came across an investment opportunity online. He entered his details and received a call from the investment company. He says he looked at reviews of the company online and didn't find anything to concern him. Mr S decided to go ahead with the investment.

In April 2024 Mr S made or attempted to make the following faster payment transfers from his account with Revolut to his account with a cryptocurrency exchange, and from there he transferred the cryptocurrency to the investment scheme. Mr S says he also received returns of £11 and £2,450 from the scheme.

Payment number	Date	Amount
1	3 April 2024	£2,000
2	15 April 2024	£6,000
3	16 April 2024	£5,000
4	18 April 2024	£5,000
5	22 April 2024	£4,000
6 (reverted)	23 April 2024	£3,500

Mr S says that things appeared to go well for a few months but then his investments disappeared. He was then contacted by someone who said they were a supervisor at the investment company and could recover the lost funds if Mr S invested more. Two weeks after he did so, the investments disappeared again, and Mr S says he realised he'd been scammed. In November 2024 the Financial Conduct Authority issued a warning about the investment company Mr S had made the payments to, to say it wasn't authorised in the UK.

Mr S reported what had happened to Revolut in September 2024. Revolut thought it had done enough to provide Mr S with relevant scam warnings and so it didn't agree to reimburse the payments to him.

Mr S brought his complaint to the Financial Ombudsman Service. Our Investigator looked into what had happened but she didn't think Mr S's complaint should be upheld. She thought that the actions Revolut had taken to warn Mr S about the possibility of a scam were proportionate in the circumstances.

Mr S didn't agree so his complaint has been passed to me for review and a 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'm sorry to disappoint Mr S, but I'm not upholding his complaint - for much the same reasons as the Investigator.

It's not in dispute that Mr S authorised the payments. And Revolut had a duty to act on his instructions. But in some circumstances an Electronic Money Institution (EMI) such as Revolut should take a closer look at the circumstances of the payments – for example, if it ought to be alert to a fraud risk, because the transaction is unusual for the customer, or otherwise looks characteristic of fraud. And if so it should intervene, for example, by contacting the customer directly before releasing the payments. But I'd expect any intervention to be proportionate to the circumstances of the payment.

But I've also kept in mind that EMI's such as Revolut process high volumes of transactions each day. There is a balance for it to find between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate.

At the time Mr S made these payments Revolut should also have been aware of the increased risk of multi-stage scams, often involving cryptocurrency. And it ought reasonably to have recognised that its customers could be at an increased risk of fraud when using its services to purchase cryptocurrency, notwithstanding that the payment would often be made to a cryptocurrency wallet in the customer's own name.

Revolut did identify a heightened risk of financial harm through fraud to Mr S when he instructed it to make Payment 2. I think this was reasonable. Payment 1 wasn't significant in value and wasn't particularly out of line with Mr S's usual account activity. But Payment 2 was potentially out of character when compared with the payments Mr S usually made from his account (which appears to have mainly used to pay for holidays, in line with the payment purpose Mr S had selected when he opened the account).

Revolut asked Mr S for the purpose of the payment and he said he was making a transfer to his own account. Revolut then presented Mr S with some further questions about the payment. Mr S answered these questions to say the payment was for an investment, was for gains from cryptocurrency, he'd invested in cryptocurrency before, he'd researched the company both on the Financial Conduct Authority's website and through online reviews, and he hadn't been asked to install any software. He did tell Revolut he'd found the investment opportunity through "*unsolicited contact*" – although he's told us he entered his details into a website when looking for an investment opportunity and received a call from the company afterwards - but in any case, I would have expected Revolut to have had some concerns about how he'd answered this question.

Revolut then went on to show Mr S a written warning based on how he'd answered the questions. The warning was tailored to cryptocurrency investment scams and pointed out some of the key features of these types of scam – such as the use of professional looking investment platforms, social media promotions and remote access software. Mr S went on to make the payment.

Although Mr S had answered that he'd found the investment opportunity through unsolicited contact, he also said he'd invested in cryptocurrency before and that he'd researched the investment company. With this in mind I don't think Revolut ought to have done any more to warn him about making the payment – I think the written warning it gave here was proportionate to the scam risk it had identified, from the answers Mr S gave to its enquiries

and the overall circumstances of this payment. The warning didn't resonate with Mr S and he went on to make the payment, but this doesn't mean it wasn't proportionate in all the circumstances.

Revolut also intervened on Payment 6, which was a payment into Mr S's account intended to be paid on to the cryptocurrency exchange, but which Revolut returned due to it appearing suspicious. Revolut blocked the account and spoke to Mr S in its in-app chat. It told Mr S it had limited his account as it suspected the payments he was attempting were part of a scam. Mr S told Revolut, in summary, that he was making an investment, he was depositing funds into his own account, and he had researched the company. He also said that he was able to make withdrawals.

Revolut asked for evidence to establish whether Mr S was in control of the account the payments were going to and that he was able to make withdrawals from it. Mr S provided screenshots and details of his account with the cryptocurrency exchange, but Revolut wasn't initially satisfied with what Mr S had provided. This went on for around six days before Mr S told Revolut he didn't intend to go ahead with any further payments to the cryptocurrency exchange from Revolut. He was asked to provide some more screenshots to show the payment journey between the source account, Revolut and the cryptocurrency exchange and Revolut then unblocked his account.

Mr S says Revolut should have done more to warn him about a scam here and if it had done so he wouldn't have gone on to make further payments to the investment company from his account with a different business. But I think what Revolut did here was broadly proportionate in the circumstances. It didn't allow Mr S to make the payment to the cryptocurrency exchange and ultimately, I don't think it was reasonable to expect it to do any more to investigate what was happening here after Mr S told it he didn't intend to go ahead with any further payments from Revolut and bearing in mind it had already given him a cryptocurrency investment scam warning.

Revolut did attempt to recover Mr S's funds from his account with the cryptocurrency exchange when the complaint was raised but was unsuccessful – but because this was an account Mr S was in control of, and he'd already moved the funds on from there, it's difficult to see how recovery could ever have been possible here.

I'm sorry to disappoint Mr S – but ultimately, I don't think Revolut ought reasonably to have done anything more than it did to prevent him from making the disputed payments. So, I don't think it would be fair or reasonable to ask it to reimburse the payments he made.

My final decision

My final decision is that I'm not upholding Mr S's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr S to accept or reject my decision before 29 August 2025.

Helen Sutcliffe
Ombudsman