

The complaint

Mr B complains that Revolut Ltd won't refund the money he lost when he was the victim of a scam.

What happened

In September 2023, Mr B came across an advert for an investment company on a social media platform. And as he was interested in earning additional income, he clicked on the link from the advert, messaged the company and then received a phone call from someone who said they could help him invest.

Mr B was told to allow the caller to have remote access to his computer and then shown how to open an account on the investment company's trading platform. He was also shown how to purchase cryptocurrency from cryptocurrency exchanges and then send this on to the company's platform. And Mr B then made a number of payments from his Revolut account to purchase cryptocurrency, which was sent on to wallet details he was given for the investment company.

I've set out the payments Mr B made from his Revolut account below:

Date	Details	Amount
25 August 2023	To 1 st cryptocurrency exchange	£1,000
25 August 2023	To 1 st cryptocurrency exchange	£995
12 September 2023	To 1 st cryptocurrency exchange	£1,500
15 September 2023	To 1 st cryptocurrency exchange	£1,600
19 September 2023	To 1 st cryptocurrency exchange	£1,000
26 September 2023	To 1 st cryptocurrency exchange	£2,000
26 September 2023	To 1 st cryptocurrency exchange	£1,600
5 October 2023	To 1 st cryptocurrency exchange	£2,900
6 October 2023	To 1 st cryptocurrency exchange	£4,300
9 October 2023	To 1 st cryptocurrency exchange	£1,000
9 October 2023	To 1 st cryptocurrency exchange	£1,250
12 October 2023	To 2 nd cryptocurrency exchange	£4,500
16 October 2023	To 2 nd cryptocurrency exchange	£2,500
17 October 2023	To 2 nd cryptocurrency exchange	£2,500
18 October 2023	To 2 nd cryptocurrency exchange	£2,500
18 October 2023	To 2 nd cryptocurrency exchange	£2,000
19 October 2023	To 2 nd cryptocurrency exchange	£4,500
19 October 2023	To 2 nd cryptocurrency exchange	£3,000

Unfortunately, we now know the investment company was a scam. The scam was uncovered after the company told Mr B he needed to pay significant fees before he could withdraw the profit the platform showed he had made. Mr B then realised he had been the victim of a scam and reported the payments he had made to Revolut.

Revolut investigated but said it wasn't at fault for processing the payments Mr B had authorised and had shown him sufficient scam warnings before allowing the payments to go through. So it didn't agree to refund the money he had lost. Mr B wasn't satisfied with Revolut's response, so referred a complaint to our service.

I sent Mr B and Revolut a provisional decision on 4 July 2025, setting out why I wasn't intending to uphold the complaint. That provisional decision forms part of this final decision and is copied below:

"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 (in this case the 2017 regulations) and the terms and conditions of the customer's account.

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 from September 2023 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 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 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.*

But, even if Revolut had recognised that Mr B was at heightened risk of financial harm from fraud when making some of these payments, I don't think the action I would have expected it to take would have prevented his loss. I'll explain why below.

I'm satisfied Revolut ought to have recognised that Mr B was at heightened risk of financial harm from fraud by at least the point he tried to make the ninth payment here, for £4,300 on 6 October 2023. This payment was for a significant amount. At this point, Mr B had tried to make a number of payments to the cryptocurrency exchange over the past few weeks, with the most recent payments increasing steadily in size – which is a pattern often seen when customers are falling victim to a scam. And the payments were identifiably related to cryptocurrency which, around this time, I think Revolut should have recognised meant they carried an elevated risk of being related to a scam.

I think a proportionate response to the risk I think Revolut should have identified would have been for it to carry out some sort of human intervention with Mr B, asking him a series of questions in order to try to establish the circumstances surrounding the payments and the actual scam risk, and then to provide him with a written warning relevant to that risk. But, had it done this, I'm not persuaded that it would have prevented Mr B's loss.

Revolut did ask Mr B some questions and show him some warnings before some of the payments he made here. It initially showed him a warning saying that his payment had been flagged as a potential scam and so it needed to ask him some questions.

Revolut then asked him to select the purpose of the payment from a list of possible options, and Mr B selected that the payment was a transfer to his other account. Revolut then showed him a number of warning screens, including ones highlighting that this could be a scam and to never ignore these warnings and that if he'd been told to ignore warnings then it was a scam.

It then highlighted that, if Mr B was being scammed, the fraudster may ask him to hide the real reason for his payment and asked him a series of questions, including whether anyone was telling him how to answer the questions, or which options to choose. And Mr B answered that he wasn't being assisted through the questions.

But, from what I've seen of his communication with the investment company, Mr B was being guided through what to say to any questions his banks asked him and was told to hide the real reason for the payments when another bank he made payments from asked him about them. So I think the warnings Revolut gave him here should have resonated with him.

His communication with the investment company also shows that Mr B appeared to be sending them screenshots of warning messages he was shown and asking them how he should respond. And the communication I've seen between Mr B and the other bank shows that he was willing to follow the investment company's instructions and give incorrect answers about the purpose and circumstances surrounding these payments to bank when asked.

Mr B therefore appears to have been being guided through what to say in answer to any questions his banks asked him, been specifically asking the investment company what to tell his banks, given Revolut incorrect information when it asked about whether he was being guided, and given incorrect information to his other bank when it asked about the payments.

So even if Revolut had asked more open-ended and probing questions to establish the scam risk when Mr B made the ninth payment here, I think it's likely he wouldn't have given it accurate information about the purpose of the payment or the circumstances surrounding it – as happened with the questions he was asked by both Revolut and the other bank. And so I don't think Revolut would have had significant concerns following its questions and I don't think any warning I would have expected it to show following those questions would have stopped Mr B from making the payments or losing the money he did.

I appreciate that Mr B has been the victim of a cruel scam and that my decision will come as a disappointment to him. He has lost a significant amount of money and I sympathise with the position he has found himself in. But I can only look at Revolut's responsibilities and, for the reasons I've set out above, I don't think anything I would reasonably have expected Revolut to have done would have prevented the loss he suffered. And so I don't think it would be fair to require Revolut to refund the money Mr B has lost."

I said I'd consider anything further Mr B and Revolut submitted following the provisional 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.

Revolut didn't respond to the provisional decision by the deadline given. Mr B replied, disagreeing with the provisional decision and making a number of points, which I will address below.

Firstly, Mr B said that the payment from his Revolut account was made to another account in his own name, and so he didn't provide misleading information to Revolut. But while the payment purpose of 'transfer to my other account' he selected wasn't incorrect, he appears to have chosen not to select the option of 'as part of an investment' which would have been a more accurate and representative explanation of the purpose for his payments. And, in any event, during the later questions Revolut asked, Mr B answered that no-one was telling him which options to choose – which now appears to have been incorrect.

From what I've seen of Mr B's communication with the other bank he was sending money from and with the investment company, he also appears to have been asking the investment company how he should respond to questions he was asked and to have been willing to give the other bank incorrect information about the purpose and circumstances surrounding the payments.

So I still think it's likely he wouldn't have given Revolut accurate information about the purpose of the payment or the circumstances surrounding it, even if it had asked more open-ended and probing questions about it.

Mr B also said that the warnings Revolut provided didn't align with industry standards or adequately address the risk it should have identified, and that a human intervention with probing questions and more detailed warnings would have prevented the loss he suffered. And I said in the provisional decision that I felt a human intervention would have been a proportionate response to the risk I think Revolut should have identified.

But, as I still don't think Mr B would likely have given Revolut accurate information about the purpose of the payment or the circumstances surrounding it, I also still don't think Revolut would have had significant concerns following these kind of open-ended and probing questions to him. And, as a result of this and that Mr B continued making the payments following the warnings Revolut gave which I think should have resonated with him, I don't think any warning I would have expected Revolut to have shown following these questions would have stopped him from making the payments or losing the money he did.

I therefore still think the conclusions I set out in the provisional decision are correct. I still don't think anything I would reasonably have expected Revolut to have done would have prevented the loss Mr B suffered. And so I still don't think it would be fair to require Revolut to refund the money Mr B has lost.

My final decision

For the reasons set out above, I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr B to accept or reject my decision before 4 September 2025.

Alan Millward
Ombudsman