

The complaint

Mrs C is unhappy that Revolut Ltd won't reimburse money she lost to a scam.

Mrs C initially brought her complaint with the assistance of a professional representative but she is now representing herself. For ease I'll refer to all the submissions as being from Mrs C.

What happened

On 22 July 2025 I issued my provisional decision on this complaint. I wanted to give both parties a chance to provide any further evidence or arguments before I issued my final decision. That provisional decision forms part of this final decision and is copied below.

What happened

Mrs C found an advert on the internet about an investment opportunity in a company I'll call 'B'. She struggled to conduct her own 'due diligence' in B because it was a cryptocurrency investment, but didn't find any negative information online. She was reassured both by B's website and the professionalism of its representative that it was a genuine cryptocurrency investment firm. The representative said she'd be Mrs C's agent and would assist her to make big profits in cryptocurrency. Sadly it turned out that the 'investment' was a scam and B's 'agent' was a scammer.

The scammer advised Mrs C to download remote access software so they could help her make the investments, which they said was normal practice. The scammer also guided Mrs C to open a crypto wallet account and gave her a trading account and password. Mrs C also opened an account with Revolut.

With the scammer's assistance via the remote access software, on 12 October 2023 Mrs C made an initial investment of £1,000 and says she saw her online trading account balance increase to £2,500. This further reassured her given the trading platform appeared professional and legitimate.

Mrs C asked to withdraw her £1,500 profit. The scammer told her she could do so but would need to match her investment in order to withdraw her profits, in order to keep the investment afloat. Mrs C didn't understand this but says her subsequent payments were all 'matching' payments based on the scammer's advice that this was for anti-money laundering regulations and checks carried out by the crypto wallet provider.

In addition to making payments from her savings, Mrs C says the scammer suggested she take out two loans for £10,000 each. The scammer said if the loans were not repaid from the investment's profits within the 14 days cooling off period, then the scammer would take responsibility for repaying the loans.

Mrs C made the following relevant faster payment transfers totalling £30,900:

	Date	Payee	Amount
1	16 October 2023	Payee 1	£1,900.00
2	20 October 2023	Payee 2	£4,500.00
3	21 October 2023	Payee 3	£5,000.00
4	23 October 2023	Payee 4	£6,795.00
5	23 October 2023	Payee 4	£705.00
6	24 October 2023	Payee 5	£2,500.00
7	24 October 2023	Payee 6	£9,500.00

Mrs C says that by 24 October 2023 her profits appeared to stand at £35,500. But when she was asked to pay £10,000 into an escrow account to prove her capital before she could withdraw her money she realised she'd fallen victim to a scam.

Mrs C didn't initially report the scam to Revolut. But with the help of her professional representative she complained in April 2024, saying that Revolut had failed to give her effective fraud warnings. She said the initial payment of £1,000 was not part of the scam because the agent was showing her how to transfer money in and out of the account with B.

Revolut said Mrs C had authorised the payments and it had given her effective and sufficient warnings about them, including educational stories about scams. Revolut also said it had been able to recover £4,218.13. It credited this to her Revolut account on 15 June 2024.

Mrs C accepted she'd authorised the payments but disagreed that Revolut had given her effective warnings so she asked this Service to look into her complaint. To resolve the complaint she wanted Revolut to refund her the £31,900 (which included the initial £1,000) that she lost to the scam, with 8% interest and £300 compensation.

Our Investigator ultimately didn't uphold Mrs C's complaint. He thought the warnings Revolut had given Mrs C were proportionate to the risks they presented. But even so he wasn't persuaded that any additional warning would have made a difference. Mrs C had given incorrect answers both to Revolut and her high street bank S (from which she'd transferred the loan money to her Revolut account) in response to its questions and he didn't consider it likely any further questions from Revolut would have uncovered the scam.

Mrs C disagreed. She made various points but in summary she said:

- Revolut is aware and acknowledges in its questions that customers are coached by scammers to mislead the bank. Revolut did not meet its obligations under the Financial Conduct Authority's (FCA) Consumer Duty to account for this behaviour within its fraud prevention system.*
- Revolut's pop up warnings failed to combat the known consumer bias to skip through messages popping up on a screen, given the volume of such pop-ups – particularly for advertising cookies. Its messages were in small text in muted grey, rather than being presented in an alarming or attention grabbing way. Such pop-ups are not 'fit for purpose'.*

- *Revolut was required under the Consumer Duty to go further in its intervention. All it did was confirm the answers Mrs C had previously given, rather than probe where the money was going and why, who she was paying and their links to her. There was no context to the questions nor a cryptocurrency warning – despite Revolut operating a cryptocurrency product at the time, which would equip it to warn customers about crypto scams.*
- *Revolut failed to ask Mrs C tailored or probing questions put to her by a human about her payment. Had that happened she says she would have realised she'd fallen victim to a scam. Instead, the intervention was 'robotic, nonspecific and over generalised'. Its questions did not allow for the foreseeable harm to her detriment, and it's not fair for her to bear all the liability.*
- *She understands Revolut had the capability to see whether remote access software was being used on her device at the time of the payments, which is a vital tool in uncovering scammer coaching but Revolut seems not to have made use of it.*
- *Mrs C's bank S didn't question her about the home improvements, despite knowing consumers choose this option as a lie. If it had done so – asking for details for example – she'd not have been able to answer these questions.*
- *Had she been pressed on the context of the payments and received warnings that struck the core of what she was falling victim to, she would have listened and stopped.*

Developments

After my initial review of the file our Investigator asked Mrs C for some further information, to understand why she gave Revolut (and her own bank S) the answers she did. She said, in summary:

- *She did not knowingly mislead Revolut (or bank S) and at no point did she understand she was participating in fraudulent activity. She believed she was making legitimate investment transactions based on information provided by the scammer (B's agent), who had befriended her.*
- *During conversations with the bank regarding the money transfers the scammer was simultaneously on another phone line coaching her. The scammer told Mrs C exactly what to say and how to respond to the bank's questions, and positioned herself as the professional who was helping Mrs C. Mrs C was nervous but the scammer used phrases like "banks don't want customers to invest and make more money", "I'm the professional, you need to listen and learn from me" and that Mrs C needed to follow her instructions so "we can invest your moneys [sic] and get that back to you".*
- *She was subject to controlling behaviour that made her depend on the scammer's guidance. This included intimidation tactics that made her afraid to question the scammer's instructions and psychological manipulation that made Mrs C believe the bank was the obstacle to her financial situation.*
- *When the loan cancellation didn't occur and the scammer asked her for more payments to return her own money, it became clear to Mrs C that that she'd been the victim of a fraud.*

Mrs C also sent us her communications with the scammer, including their requests for advance fees in order for her to withdraw her money.

Our Investigator explained his view that having remote viewing access software downloaded on a device is not, of itself, suspicious given the wide customer base for this type of software. He didn't agree that having this software meant Revolut should have questioned Mrs C further about this. Mrs C had told Revolut that she had not been asked to download software so this ruled out further suspicion.

Our Investigator also explained Revolut's response to Mrs C's point about remote access software detection. Revolut had told us that its application ('app') is able to detect when a screenshare is in progress on a customer's mobile device and, in such a scenario, blanks out the screen for the customer and anyone remotely viewing it.

In response, Mrs C said that the prevalence of remote access software in scams means Revolut should ask for the reason it's been installed rather than just a simple closed question.

What I've provisionally 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.

It isn't in dispute that Mrs C authorised the transactions in question. She is therefore presumed liable for the loss in the first instance. However, Revolut is aware, taking longstanding regulatory expectations and requirements into account, and what I consider to be good industry practice at the time, that it should have been on the look-out for the possibility of fraud and made additional checks before processing payments in some circumstances.

What did Revolut do to warn Mrs C?

Revolut says it gave Mrs C warnings each time she set up a payment to a new payee, which said:

"Do you know and trust this payee? If you're unsure, don't pay them, as we may not be able to help you get your money back. Remember, fraudsters can impersonate others, and we will never ask you to make a payment."

In addition, for payments two (£4,500), five (£705) and seven (£9,500) Revolut blocked the payments until Mrs C had engaged in a 'payment purpose review' conversation with an agent. She received an online notification that such payments were considered high risk, being "99.2% higher risk than typical transactions".

Revolut then asked Mrs C "Why are you making this transfer" with the options being:

Transfer to my other account

Pay a family member or friend

As part of an investment

Buy or rent goods or services

Pay taxes or law enforcement fines

Something else.

Mrs C responded "Something else" and was asked to answer truthfully a series of questions. The questions are below with Mrs C's responses in italics

If you're being scammed, the fraudster may ask you to hide the real reason for this payment

I understand

Is anyone telling you how to answer these questions?

Is someone telling you which options to choose or telling you this is urgent?

No, I am not being assisted through this questionnaire

Why are you making this transfer?

We'll only use this information to help protect your account

Something else

Were you told which option to select?

If someone is guiding you through this process, it could be a scammer

No, I am selecting on my own accord

Were you told your account isn't safe?

Fraudsters will lie to victims, telling them their account is no longer safe and that they need to move their funds to another account

No, I was not told my account isn't safe

Have you been asked to install software?

Scammers might ask you to install software (e.g. Anydesk) to view your screen, spy on your personal details and help you to set up your investment

No, I was not asked to install any software

Have you been told to ignore these warnings?

If someone is telling you to ignore our warnings, it's likely a scammer

No, I have not been told to ignore warnings

Mrs C was then redirected to an online chat with Revolut, in which it warned her there was a high chance her money might be at risk if she made the transfer. Revolut gave her a scam warning, which included investments being initiated because of a "too good to be true" opportunity at stake. In response to her answer "something else" Revolut told her the importance of answering its questions honestly, that this was a very risky transfer and if she made it it's most likely she'd lose her money and Revolut wouldn't be able to get it back for her. It recapped its earlier warnings and asked her whether her responses to its questions were correct or whether she'd like to proceed.

Mrs C said "I'm happy to continue with the transfer".

Revolut then confirmed she could continue with the transaction.

This process was repeated for payment five and Mrs C responded to say "I confirm the answers to be correct and would like to proceed, thank you." She was then able to make the payment.

Revolut went through the same questions and warnings for payment seven, but asked an additional question "Would you be so kind as to clarify the purpose of payment? as it is just to make sure your account and funds are safe?"

Mrs C responded to say "As answered this is a personal payment".

Revolut then gave Mrs C the same warning as with earlier payments and asked her to be sure the answers to her questions were correct or whether she'd like to cancel the payment.

Mrs C responded to say "I'm happy to continue, thank you". She then went ahead with the transfer.

What type of warning should Revolut have provided?

It's clear that Revolut had identified the transactions as high risk and I think it should have done more to establish whether Mrs C was at risk of financial harm. On three occasions, Mrs C was in a live chat environment, speaking to a member of staff, and I think Revolut should have done more to understand the context behind the transactions Mrs C was making, through asking open ended and probing questions, and through being reactive to the information Mrs C was giving at the time. However, having reviewed the live chat, I can see that Revolut mostly asked closed questions, which largely required only one word answers from Mrs C. It did give some context behind the questions, but when Mrs C gave the answers it didn't probe further. For example, it didn't question what type of "personal payment" Mrs C was making, the reason for it, who she was paying and why.

If Revolut had provided a warning of the type described, would that have prevented the loss Mrs C suffered?

But even if Revolut had asked more probing questions, I'm not currently persuaded that this would have uncovered the scam and prevented Mrs C's loss.

I will explain my reasons. In doing so, I should emphasise that I'm not making any findings about bank S's involvement in this matter. As I understand it, Mrs C has not complained about bank S and I cannot compel her to do so under our rules. My decision is confined to Mrs C's complaint about Revolut. My observations about bank S relate only to Mrs C's responses to the questions she was asked and whether it's likely any additional questioning by Revolut would have uncovered the scam.

- *Mrs C has explained that she did not intend to deceive her bank S or Revolut. I appreciate that the scammer told Mrs C that the reason for misleading bank S and Revolut was because the banks didn't want her to invest and make money. But she has told us that she was being guided by the scammer in her responses - where the scammer was simultaneously on another line with Mrs C while she was responding to the questions - and Mrs C gave answers she knew were not truthful in response to the questions she was asked.*

I think it's more likely than not, on the balance of probabilities, that Mrs C would have been similarly guided through any additional questions asked by Revolut and have given answers she knew weren't true. So I don't think it's likely more open and

probing questions would have made any difference, because she was under the spell of the scammer. I think it's likely, on balance, that the scammer would have given Mrs C the answers to any further probing questions by Revolut. My findings are supported by the answers that Mrs C gave to the questions she was actually asked, as set out below.

- Mrs C misled her own bank 'S' with whom she had a longstanding customer relationship about the reason she was making transfers totalling £10,000 to Revolut. She said she was making the payment for home improvements, which was not true.

Mrs C's bank S: gave Mrs C a fraud warning which emphasised the importance of Mrs C being honest so it could protect her; the risk to her payment if part of a scam; that convincing criminals could ask her to lie to the bank to avoid detection – and if anyone had asked her to lie or mislead the bank this would be a scam; this would include giving a different payment reason to one that was true or moving money to keep it safe. Mrs C responded to say she'd not been asked to lie or mislead bank S. But she hadn't given the true reason for moving money – that she was investing in cryptocurrency.

When Mrs C said she was moving money to her own account that she'd transferred to before, bank S said that criminals will pretend to be an individual or business helping her with her money. It said that if someone she didn't know well was helping her move her money, this was very high risk. But Mrs C said 'no' in response to bank S's questions about whether someone was helping or advising her. Again, this was not correct because the scammer was both advising and helping her.

- Mrs C also didn't give the correct reason for the transfers in response to Revolut's question. The correct option was "As part of an investment" and yet Mrs C selected "Something else". This meant the scam warning given by Revolut didn't resonate with Mrs C, which might not have been the case had she selected the correct reason. I'm not persuaded that the type of payments Mrs C was making had features that Revolut should have identified as being for cryptocurrency. As such, I can't see that Revolut should reasonably have given Mrs C a cryptocurrency scam warning (one that might have resonated with Mrs C). Indeed, the warnings she'd been given by her bank S gave her information about key features of scams, including some of the features of the scam she was victim to, and she'd not responded to those warnings.
- Mrs C didn't answer truthfully when asked if she'd been asked to download remote access software to her device. On the scammer's instructions, she'd downloaded 'AnyDesk' which was the software example given in Revolut's question. I've noted her points about the prevalence of this type of software in scams. But even if Revolut had asked more probing questions about the software, I'm not persuaded that Mrs C would have answered differently, given the scammer was coaching her on the answers she should give to Revolut's questions.

Recovery

Mrs C did not report the fraud to Revolut for around six months after her final payment. It's a common feature of this type of scam that the fraudster will move money very quickly to other accounts once received to frustrate any attempted recovery. Revolut was successful in recovering £4,218.13 but I don't think anything Revolut could have done differently would have led to any additional amount being successfully recovered.

Summary

I have been very sorry to learn that Mrs C has been the victim of a cruel scam and I do not underestimate the impact this has had on her.

But having considered all the available evidence and surrounding circumstances, I don't consider it's more likely than not, on balance, that Mrs C would have responded honestly and without guidance from the scammer to any further questions put to her by Revolut. It follows that I don't consider I can fairly hold Revolut responsible for the loss she sadly suffered due to the scam.

My provisional decision

For the reasons I've explained, my provisional decision is that I don't intend to uphold this complaint.

Revolut did not respond to my provisional decision.

Mrs C responded to say she disagreed with my provisional decision and asked me to reconsider it. In summary, she said:

- She was a victim of a sophisticated criminal operation and was not someone who ignored obvious warnings.
- She did not recall the verbal conversation with Revolut set out in my provisional decision. I had concluded she would have given false answers to any additional questions. But she was under active psychological coercion with the scammer telling her in real time what to say. This was not just being 'coached', it was active criminal control during a state of extreme anxiety. She can't recollect the questions for her to give the right answer, having been manipulated. This was a completely unfamiliar and overwhelming situation and not a case of clear customer negligence.
- The Consumer Duty requires Revolut to understand and protect against the known tactics used by fraudsters, such as those described above. I had not properly considered how Revolut's responsibilities should be assessed when dealing with victims of sophisticated criminal operations designed to exploit psychological pressure and maintain victim compliance.
- The experience is still causing her extreme emotional distress, fear and anxiety.
- Revolut initially closed her account after the transactions and later sent her an apology and reopened the account.
- The sum of money involved has caused significant financial hardship and the reason she didn't report the scam for six months was due to a period of ongoing criminal harassment, designed to isolate and play on her mind as the victim.
- Multiple callers continued to harass her, including ones who said they would help her recover the money. She is very frustrated by these callers.
- When she realised she'd been scammed she contacted the police and relevant action groups, but it was through her phone that she found her professional representative.

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 am sorry that Mrs C has been the victim of a cruel and sophisticated scam, and I don't underestimate the emotional and financial impact this has had on her.

I've carefully thought about all the comments Mrs C has made, but they don't persuade me to change my decision on her complaint for the reasons given in my provisional decision and below.

As Mrs C recalls, she didn't speak with Revolut (though she did speak with her bank S). But she had an exchange with one of Revolut's agents through its in-application 'chat' function during which she answered the series of questions I set out in my provisional decision.

As I explained in my provisional decision, I need to decide if it's more likely than not, on the balance of probabilities, that Mrs C would have given different answers had Revolut asked her more probing questions. I'm not deciding whether there was any consumer negligence in this case, but rather whether it's likely Revolut could reasonably have uncovered the scam.

Sadly, because Mrs C was subject to social engineering and emotional manipulation, at the time she answered Revolut's questions, I don't think it's likely on balance that more probing questions would have uncovered the scam. Mrs C had given incorrect answers to her own bank S and the scam warning it gave her did not resonate with her. She also gave incorrect answers to Revolut as guided by the scammer and I'm not persuaded further questioning by Revolut would have broken the spell of the scammer.

I have taken into account that under the Consumer Duty Revolut should 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.

And with this in mind I have considered Mrs C's point about Revolut's responsibilities where consumers are victims of sophisticated scams. I accept that Mrs C was being manipulated about the answers she gave. She's explained that she was under psychological coercion by the scammer and the scammer was telling her what to say. But while that was the case, I can't reasonably hold Revolut responsible for that where her non-disclosure of the scammer's involvement inhibited Revolut's ability to identify she was being scammed.

I understand why Mrs C didn't report the scam earlier. But I still don't think that anything Revolut could have done differently would have led to any additional amount being successfully recovered. And I think Revolut responded properly to Mrs C following the closure of her account by reopening it and apologising to her.

I'm sorry to learn that Mrs C is still being targeted by scammers who suggest they can help her recover the money she's lost. I appreciate she did contact the police and relevant action groups. But if she's not already done so, she can obtain further information and help from Victim Support. Our Investigator can give Mrs C the contact details if required.

I have a great deal of sympathy for Mrs C and the loss she's suffered. I want to reassure her that I'm not placing blame or responsibility on her for what happened. Unfortunately she's been the victim of a cruel scam, which is still having an impact on her life. But it would be fair for me to direct Revolut to refund her loss only if I thought any further intervention by Revolut would have prevented her loss, and I'm not persuaded this was the case. I appreciate this will come as a further and considerable disappointment to Mrs C but I don't uphold this complaint.

My final decision

For the reasons I've explained, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs C to accept or reject my decision before 10 September 2025.

Amanda Maycock
Ombudsman