

The complaint

Mrs P has complained about Revolut Ltd not refunding several payments she says she made and lost to a scam.

What happened

I issued my provisional decision on this complaint on 25 July 2025. I wanted to give both sides a chance to provide any further evidence and arguments before I issued my final decision. That provisional decision forms part of this final decision and is copied below.

I've considered the relevant information about this complaint. Based on what I have seen I am not upholding this complaint. However, I am doing so for some additional reasons alongside our Investigator's outcome.

The deadline for both parties to provide any further comments or evidence for me to consider is 8 August 2025. Unless the information changes my mind, my final decision is likely to be along the following lines.

If I don't hear from Mrs P, or if they tell me they accept my provisional decision, I may arrange for the complaint to be closed as resolved without a final decision.

The background to this complaint is well known to both parties, so I won't repeat it in detail here. In summary, Mrs P fell victim to a fake job scam after she was contacted on a messaging app by a scammer without warning. She says she was told she would be paid for completing a number of tasks, but she would also have to pay in funds to the task platform periodically to unlock more tasks and receive payment. After creating an account, she received a payment bonus and was able to complete a withdrawal. She also connected with other "employees" via a group chat as well as having a dedicated contact to support her. So, Mrs P thought this was a legitimate job opportunity and between 20 September 2023 and 23 September 2023 sent funds.

Mrs P subsequently realised she had been scammed when she did not receive her "earnings".

Our Investigator didn't uphold the complaint as he was not persuaded that Revolut could have prevented Mrs P's losses as it intervened multiple times, yet she still continued because of the scammer's influence. Mrs P disagreed and said in summary had Revolut contacted her via human intervention it would have made a difference.

As our Investigator couldn't resolve the matter informally the case has been passed to me for a decision.

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.

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.

I don't doubt Mrs P 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 she is automatically entitled to recompense by Revolut. It would only be fair for me to tell Revolut to reimburse Mrs P for her loss (or a proportion of it) if: I thought Revolut reasonably ought to have prevented all (or some of) the payments Mrs P made, or Revolut hindered the recovery of the payments Mrs P made – whilst ultimately being satisfied that such an outcome was fair and reasonable for me to reach.

I've thought carefully about whether Revolut treated Mrs P 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 Mrs P's complaint. I know this will come as a disappointment to her and so I will explain below why I've reached the decision I have.

I have kept in mind that Mrs P 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 Mrs P did not intend for her money to ultimately go to a scammer – but she did authorise these payments to take place. However, there are some situations when a bank should have had a closer look at the wider circumstances surrounding a transaction before allowing it to be made. I'll note here I am satisfied that Mrs P did authorise these transactions.

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 transactions should have highlighted to Revolut that Mrs P might be at a heightened risk of financial harm due to fraud or a scam.

As this was a new account Mrs P had opened there was no history for Revolut, or for me, to consider the context of these payments and whether they were unusual for her. Considering the initial four payments Mrs P made, I do not think the value of these payments were remarkable enough to have caused Revolut any concern. Although I've noted she was making these payments in reasonably quick succession, in isolation of any wider red flags, I do not think Revolut should have been concerned. At this early stage I do not consider enough of a pattern formed here to suggest she might be at a heightened risk of financial harm due to fraud or a scam.

I have noted that on 21 September 2023, Revolut did intervene on payment 5, requesting the reason for the transfer Mrs P was making. In response she selected "Transfer to a safe account" and was shown the applicable scam warning. However, I do not think this written warning was sufficient and Revolut instead should have intervened with a human intervention, such as via its in-app chat, and questioned her before releasing this payment. I say this because the transaction reason Mrs P selected did not align with sending funds to a third-party's account. This should have been a red flag for Revolut. This type of scam was well-known and so Revolut should have been monitoring Mrs P's account for such a risk, even without an account history.

However, I'm not persuaded that such an intervention would have prevented Mrs P's loss. Mrs P believed this to be a genuine job opportunity and so when Revolut did flag one of her other transactions, requiring her to answer generated questions before releasing her funds, she reverted to the scammer. The scammer informed her not to answer the questions without first sending them screenshots of every question asked so they could answer the questions for her. The scammer made it clear that Mrs P should not reply to the questions herself. Mrs P then followed this guidance and was reassured by the scammer informing her this is normal protocol for a new account. Therefore, I am not persuaded an intervention, even a human one e.g. via their in-app chat, the day prior to this intervention would have made any difference. I'm also not persuaded that any additional intervention would have prevented her losses occurring. I say this because Mrs P continued to mislead Revolut with the answers she gave whenever an intervention did occur. Considering the available evidence, I am satisfied Mrs P was being heavily coached by the scammer and influenced by them very early in this scam.

Whilst Mrs P has undoubtedly been the victim of a cruel scam, I can only uphold her complaint if I'm satisfied Revolut's failing made a material difference to what happened. Ultimately, for the reasons given, I'm not persuaded it did.

Recovery

Due to the time that had passed from when Mrs P made these payments it was unlikely Revolut would have been able to recover any funds. I've noted that Revolut did attempt to do so, however it was not successful. I do not think Revolut could have done anything further here.

So, in light of all of the above findings, there's no fair and reasonable basis under which I can ask Revolut to reimburse Mrs P's loss.

Revolut did not respond to my provisional findings. Mrs P responded and disagreed with my findings. Briefly she said:

- Revolut was negligent, breached its regulator duty (including Principle 6) and failed to meet the expectations under the CRM Code.

- The unusual activity on a newly created account should have triggered an intervention and meaningful warnings given. Had Revolut contacted her directly she believes she would have recognised she was being scammed.
- Revolut did not contact her to confirm the payments were completed by her. Nor did they block, delay or query them to verify if she was being deceived or making them under duress. There was no opportunity for her to reflect upon them.
- The scam has led to an emotional and physical impact on her.
- Moral and human elements should also be taken into consideration when reviewing her complaint.
- She is seeking a full reimbursement of the funds she lost to the scam and a distress and inconvenience award.

I'll note that even though I have not included all Mrs P's points in full above, and may not respond to them all individually, I have considered them all prior to issuing this 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 do not dispute this was a cruel scam and do not doubt the level of physical and emotional impact this has had upon Mrs P. Each aspect of Mrs P's complaint has been considered fairly and impartially - whilst keeping in mind all points raised by both parties.

As I explained in my provisional decision, Mrs P made the payments herself and the starting position is that Revolut should follow her instructions. There was nothing to suggest it was not her making these payments, so I would not have considered it necessary that it needed to block them all to first ensure it was her prior to allowing them. This would not have been a reasonable action.

I do agree with Mrs P about Revolut failing to sufficiently intervene. As I explained in my provisional decision, I would have expected it to have intervened with a human intervention, questioning her prior to allowing payment 5 to be made. However, this does not automatically mean the complaint should be upheld. I say this because on an occasion where Mrs P was questioned, she reverted to the scammer. Mrs P then chose to allow the scammer to answer the questions for her – allowing herself to be reassured by the scammer this was normal protocol. Ultimately preventing Revolut the opportunity to uncover the scam.

Consequently I am not persuaded, but for Revolut's failing to intervene with a human intervention (which would likely have been via in-app chat), that Mrs P's losses could have been prevented. It is more likely than not that whatever the obstacle she would have reverted to the scammer for guidance, rendering any effort by Revolut to protect her void.

Regarding Mrs P's points about the CRM Code, Revolut is not a signatory of it and so it would not apply here.

The repercussions such a cruel scam has had on Mrs P are not something I have overlooked when reaching my decision. However, I can only uphold her complaint if I'm satisfied Revolut's failing to sufficiently intervene made a material difference to what happened. Ultimately, for the reasons given, I'm not persuaded it did.

My final decision

For the reasons given above, my final decision is that I don't uphold this complaint against Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs P to accept or reject my decision before 19 September 2025.

Lawrence Keath
Ombudsman