

The complaint

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

What happened

The background to this complaint is well known to both parties, and is not in dispute, so I won't repeat it in detail here. In summary, Ms S fell victim to a fake job scam after she was contacted on a messaging app by a scammer. She says she was told she would be paid for completing a number of tasks, but would also have to pay in funds to the task platform periodically, to unlock more tasks and receive payment. In total Ms S sent over £30,000 in less than one week in August 2024. Ms S subsequently realised she had been scammed when she did not receive her "earnings".

Our Investigator upheld the complaint as he believed Revolut should have intervened on payment 50 with a human intervention. He was of the view that had Revolut done so it could have prevented Ms S's losses from, and including, that payment. However, he thought that Ms S also displayed contributory negligence for her part in what occurred. So, our Investigator found it fair to deduct 50% for Ms S's actions.

Revolut accepted our Investigator's outcome. However, Ms S disagreed because, amongst other things, she believed Revolut should have intervened earlier because she had a £1,000 spend limit. She also questions the integrity of Revolut's staff as she believes the scam is linked with one of its staff sharing her account information with the scammers.

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

I considered the complaint and issued my provisional decision on 1 August 2025, which I have included below:

I don't doubt Ms S 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 Ms S for her loss (or a proportion of it) if: I thought Revolut reasonably ought to have prevented all (or some of) the payments Ms S made, or Revolut hindered the recovery of the payments Ms S 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 Ms S 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 partially uphold Ms S'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 Ms S 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 Ms S 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 an EMI 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 Ms S 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 Ms S might be at a heightened risk of financial harm due to fraud or a scam.

Considering the transactions that took place, I do agree with the rationale of our Investigator as to why Revolut should have been concerned with Ms S's account activity. I also agree that a human intervention would have been appropriate and proportionate. What I am not persuaded with is when our Investigator found that Revolut should have intervened.

I would have expected Revolut, even where there is not a lot of account history, to have found the rapid frequency of similar payments all going to the same third-party to be unusual for any account holder. I'm not persuaded that just because they were of a rather modest value it negated the need for concern that Ms S may be at risk of financial harm. Therefore, I think Revolut should have been concerned by the time payment 12 was made on 12 August 2024. This was the tenth payment to the same new beneficiary within less than 30 minutes and so enough of a pattern had formed to suggest Ms S may be at risk of financial harm. I do not think Revolut would have needed as much time as our Investigator stated to ascertain this. I would have expected Revolut to have intervened with the human intervention to ask Ms S why she was making payments in such a fashion. Had it done so, I'm persuaded it would have uncovered the scam.

Whilst Ms S has undoubtedly been the victim of a cruel scam, I have seen nothing that suggests Revolut's staff member was linked with this scam and I would expect/require tangible evidence to prove such an allegation.

Contributory negligence.

I've thought about whether Ms S should bear any responsibility for her losses. In doing so, I've considered what the law says about contributory negligence, as well as what I consider

to be fair and reasonable in all of the circumstances of this complaint including taking into account Ms S's own actions and responsibility for the losses she has suffered.

I do accept there were relatively sophisticated aspects to this scam, such as a platform to manage the user's apparent earnings and tasks. But, ultimately the scam appears to have been fairly dubious. While I haven't seen everything that Ms S saw, the scammer's explanation for how the scheme worked is implausible and I think Ms S ought reasonably to have questioned whether the activity she was tasked with carrying out (which does not appear to have been particularly time-consuming or arduous) could really be capable of generating the returns promised.

The requirement to send funds to acquire the profits she'd supposedly already earned from completing some of the tasks should have been a red flag as well. I also think Ms S ought reasonably to have recognised the platform could effectively prevent her from withdrawing her funds by continuing to grant her 'special' tasks; without a clear explanation of why she was being so 'lucky' to be assigned such tasks.

Receiving an unsolicited job offer via a mobile messaging service app from a firm she hadn't applied to should also have reasonably led her to complete some due diligence. I also think the additional details supplied to her by the scammers should have led to her to question whether the job was genuine, given the overall implausibility of the scam and the risk of being continuously asked to pay additional funds.

Given the above, I think Ms S ought reasonably to have had concerns about the legitimacy of the job offered. In these circumstances she should bear some responsibility for her losses. Weighing the fault that I've found on both sides I think a fair deduction is 50%.

Recovery

Revolut appears to have attempted to recover the funds as well but was not successful in being able to do so. It seems the funds had already been removed. It's not unusual in situations such as this that funds are quickly moved from accounts after receipt. Therefore, I won't be asking Revolut to do anything more here.

Putting things right

For the reasons explained, I uphold this complaint, in part, and now ask Revolut to:

- *refund Ms S 50% of her losses from, and including, payment 12 on 12 August 2024 made to the scammer.*
- *pay interest on this amount calculated at 8% simple per year from the date of loss to the date of settlement (if Revolut Ltd deducts tax from this interest, it should provide Ms S with the appropriate tax deduction certificate).*

I do not find there is any reasonable basis under which I should award anything further to Ms S.

Revolut responded and accepted my provisional decision. However, Ms S did not agree. In summary, she responded stating:

- She was more vulnerable to the scam as she was a foreign national who had come to the UK as a student. She therefore had less of a contextual understanding of the types of work that were available, how the job market operated and what types of wages would be considered 'normal'. She also had less awareness of the fraud landscape in the UK and therefore had fewer means to protect herself than the

typical scam victim.

- She doesn't think Revolut had tried to recover any of her lost funds.
- Revolut behaved like she was a scammer and closed her account before resolving the case. She also believes Revolut were rude to her.
- She is highly suspicious Revolut has some customer agents who are directly involved with scamming. After transferring a large sum of money there she was scammed.
- They have already applied rules to refund scams up to £85,000, so she should receive all her money back.
- The transactions looked unusual and so Revolut should have intervened.
- She has had many physical and mental issues after losing all her money.
- Revolut, or the Financial Ombudsman Service itself, should give her the money she lost.

Although I have only written Ms S's points as a summary, and I may not respond to each individually, the entirety of her points have been considered 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 Ms S. Each aspect of Ms S'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, Ms S made the payments herself and the starting position is that Revolut should follow her instructions. I've noted her points that as a foreign national she was unfamiliar with the job market and potential scams. However, I do not think, in isolation of wider red flags, that it would be reasonable for Revolut to have assumed as a foreign national, who was less familiar with potential scams, that she should not have been able to make payments without being questioned. I also do not believe it is a widely accepted practice anywhere to have to pay funds to acquire wages from one's employer. So, I think the intervention point I highlighted in my provisional decision above is still reasonable – which is the point I think the payments looked unusual.

From the information I have seen I do not think that Ms S was treated by Revolut as if she were the scammer. I appreciate how difficult situations like this are, but there will be times where pertinent questions will need to be asked by financial institutions which may seem insensitive. I've seen nothing to suggest Ms S's account being open or closed had any impact on whether Revolut acted as it should have in relation to its scam investigation. Ultimately, I've seen no evidence which suggests Revolut acted inappropriately towards Ms S. Nor have I seen any evidence Revolut's employees were linked with this scam, or any other.

Although Ms S believes she is automatically entitled to recompense up to £85,000, that is not how the regulations work. For scam situations such as this there is no automatic recompense.

I also do not think Revolut failed in its duty to attempt to recover funds. I say this as scammers will move the funds very quickly away from the designated account to evade the funds being recouped.

The repercussions such a cruel scam has had on Ms S is not something I have overlooked when reaching my decision. However, for the reasons given, I'm not awarding anything further than was within my provisional decision. The Financial Ombudsman Service would also not pay compensation for funds lost in such situations as this is not our role within the industry.

Putting things right

Therefore, in line with my provisional decision, I uphold this complaint, in part, and now ask Revolut to:

- refund Ms S 50% of her losses from, and including, payment 12 on 12 August 2024 made to the scammer.
- pay interest on this amount calculated at 8% simple per year from the date of loss to the date of settlement (if Revolut Ltd deducts tax from this interest, it should provide Ms S with the appropriate tax deduction certificate).

I do not find there is any reasonable basis under which I should award anything further to Ms S.

My final decision

For the reasons given above, my final decision is that I partially uphold this complaint against Revolut Ltd.

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

Lawrence Keath
Ombudsman