DRN-5765896

The complaint

Mr H is being represented by solicitors. He's complaining about Revolut Ltd because it declined to refund money he lost as a result of fraud.

What happened

Sadly, Mr H fell victim to a cruel job scam. After responding to an advert he saw on social media for online work, he was contacted by scammers and added to a chat group with other members that were allegedly carrying out the same work. The role required him to complete sets of tasks, which he needed to pay to access, and for which he expected to be paid upon completion.

On the instruction of the scammers, Mr H set up an account with Revolut and used it to make the following payments to the scam in July 2023:

No.	Date	Amount £
1	19 July	51
2	19 July	80.01
3	20 July	146.31
4	20 July	509.88
5	20 July	1,206.39
6	20 July	1,711.90
7	20 July	1,711.90
8	20 July	1,711.90
9	20 July	672.68

The payments were sent to a selection of individuals. Mr H says he realised this was a scam when he ran out of money to recharge his account and was cut out of the chat group.

Our investigator recommended the complaint be upheld. He felt Revolut should have done more to prevent the scam and that it should pay compensation based on a refund of payments 4 to 9 with a deduction in recognition of Mr H's contribution to the loss.

Revolut didn't accept the investigator's assessment. It has highlighted the various interventions it carried out and says further intervention wouldn't have made a difference, commenting that Mr H had several chances to explain what the payments were for but didn't do so.

The complaint has now been referred to me for review.

My provisional decision

After the complaint was referred to me, I issued my provisional decision setting out why I didn't think it should be upheld. My reasons were as follows:

> *There's no dispute that Mr H authorised these payments. In broad terms, the starting position at law is that an Electronic Money Institution (EMI) such as Revolut is*

expected to process payments a customer authorises it to make, in accordance with the Payment Services Regulations and the terms and conditions of their account. In this context, 'authorised' essentially means the customer gave the business an instruction to make a payment from their account. In other words, they knew that money was leaving their account, irrespective of where that money actually went.

There are, however, some situations where we believe a business, taking into account relevant rules, codes and best practice standards, shouldn't have taken its customer's authorisation instruction at 'face value' – or should have looked at the wider circumstances surrounding the transaction before making the payment.

Revolut also has a duty to exercise reasonable skill and care, pay due regard to the interests of its customers and to follow good industry practice to keep customers' accounts safe. This includes identifying vulnerable consumers who may be particularly susceptible to scams and looking out for payments which might indicate the consumer is at risk of financial harm.

Taking these things into account, I need to decide whether Revolut acted fairly and reasonably in its dealings with Mr H.

The payments

One of the key features of a Revolut account is that it facilitates payments that sometimes involve large amounts and transfers to overseas accounts. I must take into account that many similar payment instructions it receives will be entirely legitimate. I'm also conscious this was a new account and there was no history of past activity against which these payments might have looked suspicious. Finally, I need to consider Revolut's responsibility to make payments promptly.

Having considered what Revolut knew about the initial payments at the time, including the relatively low amounts involved, I'm not persuaded it ought to have been concerned and I can't say it was at fault for processing them in line with Mr H's instructions.

But as the amount of each payment began to increase and in view of the number of payments in a short space of time, I believe a pattern consistent with known scams had begun to emerge and that Revolut should have intervened before processing the payments. It's my view that Revolut should have begun to suspect Mr H may be at risk of harm from fraud by payment 7 at the latest.

In fact, it appears Revolut identified this risk as early as payment 4. It asked Mr H to confirm the reason for that payment and from the list of options presented, he selected that it was for 'something else'. He was then shown a series of generic warnings, including that this payment may be a scam, that Revolut would never ask him to move money, and that he should never ignore its warnings. He was then required to speak to an agent via the online chat facility.

The chat history shows Revolut's agent asked a number of further questions about the payment, including whether Mr H was paying someone he didn't know or had recently met online, whether he was paying an upfront fee on the promise of receiving a larger payment later, or if anyone was telling him to ignore Revolut's warnings. Mr H answered no to all of these questions.

Considering the risks presented by payment 4, I think an intervention where Revolut asked about the purpose with a view to providing relevant warnings was appropriate.

Job scams were well known by this time and I do think this should have been reflected in the list of options presented to Mr H when he was asked about the reason for the payment. I also think the agent should have made further attempts to press Mr H to explain the actual purpose of the payment rather than accepting that it was for 'something else'.

This notwithstanding, Mr H didn't answer the questions he was asked correctly. If he had disclosed that he was paying someone he didn't know or had only met recently online, was paying upfront in the hope of receiving larger returns later, and was being told to ignore its warnings, I would have expected Revolut to identify that he may be falling victim to a job scam and it would then have been able to provide stronger and more tailored warnings that might have resonated with him.

I've considered why Mr H answered Revolut's questions in the way he did and the various screenshots from his text chat with the scammers provided appear to show he was heavily influenced by their guidance at this time. The evidence shows him sending screenshots from the Revolut app asking how he should answer its questions. He also received multiple assurances from various members of the chat that this is normal practice and that he should ignore Revolut's warnings.

Mr H was also asked similar questions in respect of some of the later payments and was required to speak to agents about those as well. But he consistently answered the questions in the same way and ignored the warnings he was shown. The effectiveness of any fraud intervention does depend to some extent on the customer engaging with the process and providing accurate information. In this case, the answers given by Mr H didn't allow Revolut to identify he may be falling victim to a job scam in order it could provide an appropriate tailored warning.

While I do believe Revolut could have asked different questions and probed Mr H more deeply about the payments, I think the evidence shows an intent (under the influence of the scammers) not to reveal the true circumstances of the payments and to ignore any warnings given. I've thought very carefully about this and, on balance, I don't think any further proportionate questioning or intervention from Revolut would have stopped him from wanting to go ahead with the payments.

I want to be clear that it's not my intention to suggest Mr H is to blame for what happened in any way. He fell victim to a sophisticated scam that was carefully designed to deceive and manipulate its victims. I can understand why he acted in the way he did. But my role is to consider the actions of Revolut and, having done so, I'm not persuaded these were the cause of his losses.

Recovery of funds

I've also looked at whether Revolut could or should have done more to try and recover Mr H's losses once it was aware that the payments were the result of fraud.

I understand Mr H first notified Revolut of the fraud in October 2024, more than a year after the payments were made. 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 and it's not a surprise that Revolut's efforts to get his money back from the receiving banks weren't successful after this period of time.

The payments in this case were push to card payments, meaning Mr H transferred money directly to a bank card instead of a bank account. There's no clear mechanism for a successful recall to take place in these circumstances, meaning *there's no realistic prospect of successful recovery, especially for international payments.*

In the circumstances, I don't think anything that Revolut could have done differently would likely have led to these payments being successfully recovered.

In conclusion

I recognise Mr H has been the victim of a cruel scam and I'm sorry he lost this money. I realise my comments will come as a great disappointment but, for the reasons I've explained, I don't currently think any further intervention by Revolut would have made a difference to the eventual outcome and I'm not proposing to tell it to make any refund.

The responses to my provisional decision

Mr H didn't accept my provisional decision. His representative points to the nature and volume of the payments as something that should have flagged to Revolut there was a heightened risk he was falling victim to a scam and argues that its interventions weren't proportionate in the circumstances. While it accepts Mr H was being influenced by the scammers, it says the coaching he received was minimal and that more through questioning would have uncovered the scam and prevented his losses.

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.

Having done so, my findings haven't changed from those I set out previously. I haven't necessarily commented on every single point raised. I've concentrated instead on the issues I believe are central to the outcome of the complaint. This is consistent with our established role as an informal alternative to the courts. In considering this complaint I've had regard to the relevant law and regulations; any regulator's rules, guidance and standards, codes of practice, and what I consider was good industry practice at the time.

I'm not disputing that Revolut should have questioned the payments Mr H was making and it appears to have identified the risk of fraud as early as payment 4. Given the relatively low amounts involved in the initial payments, I don't think it had any particular reason to be concerned before that.

In view of the risks these payments presented, I think a proportionate response would have been for Revolut to attempt to find out more about the reason for them so it could provide appropriate tailored warnings.

As I've already explained, I do think the list of options presented to Mr H when he was initially asked about the payment purpose should have included one that said he was paying for work. But I'm not convinced he would have selected this option if it had been presented to him. The evidence from his chats with the scammers show he was actually receiving a considerable degree of guidance, to the extent that he was sending screenshots from the Revolut app to seek advice on how to answer its questions, including about the reason for the payments. Despite Revolut warning him on a number of occasions that the reason for asking about the payments was to protect him from potential scams and that he should answer truthfully and not ignore its warnings, he continued to follow the scammer's advice.

This notwithstanding, I'm satisfied the additional questions asked during the various live chats - if they'd been answered correctly along with any questions that would logically have followed – should have been sufficient for Revolut's agents to identify he may be falling victim to a job scam. But based on the answers they received, I don't think the agents could reasonably have been expected to recognise this and the opportunity to uncover the scam was missed.

I appreciate Mr H's representative believes further questioning would have enabled Revolut to find out what was really going on but I'm not convinced that's correct. I don't think there's any reason to believe Mr H wouldn't have sought the scammers' advice again and unless he was willing to be open about what he was doing, Revolut couldn't reasonably have been expected to identify a scam may be taking place such that it could make him aware of this and/or provide relevant warnings.

With these points, it remains my view that Mr H was (under the influence of the scammers) intent on not revealing the true circumstances of the payments and to ignore any warnings given. And, on balance, I don't think any further proportionate questioning or intervention from Revolut would have stopped him from wanting to go ahead. It follows that I don't think it should be held responsible for his losses.

My final decision

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 17 September 2025.

James Biles
Ombudsman