

The complaint

Ms S has complained that Revolut Ltd won't refund money she lost to a scam.

What happened

The details of the complaint are well known to both parties, so I will not repeat them again here. Instead, I will focus on giving the reasons for my 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.

Having done so, I agree with the investigator's findings for broadly the same reasons, I will explain why. But before I do so, I want to highlight that I am considering the actions of Revolut in its capacity as a regulated EMI, and whether it ought to have done more to protect Ms S against the alleged scam whilst carrying out the payment service activities which are in jurisdiction.

In broad terms, the starting position in law is that an EMI is expected to process payments that their customer authorises them to make. It isn't disputed that Ms S authorised the payments from her Revolut account. Therefore, under the Payment Services Regulations and the terms of her account, Revolut is expected to process Ms S' requests, and she is presumed liable for the loss in the first instance.

But, 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 in April 2025 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;
- 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);
- 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.

In line with the above, I've considered whether Revolut should have considered the payment/exchanges as being sufficiently unusual or uncharacteristic that it ought to have given it sufficient grounds for suspecting fraud. While I accept that the amount of money Ms

S exchanged and subsequently withdrew was clearly significant to her, this doesn't in itself suggest a heightened risk of fraud. So, I am not persuaded this would have stood out as unusual or suspicious. I say this because the amount exchanged was low in value, over five days and not in quick succession. On top of this Ms S was operating the account in line with what she declared when she opened the account (used for crypto purposes). So, the transactions were also aligned to the intended purpose of the account.

It's important to note that there is a difficult balance to be struck between firms identifying payments that could potentially be fraudulent and minimising disruption to legitimate payments. Of course, we need to consider that spending habits change, unusual needs arise, and it will be impossible to prevent all fraud without a significant number of genuine payments being delayed considerably and inconveniently.

It follows that, while there are circumstances where it might be appropriate for Revolut to take additional steps or make additional checks before processing a payment, for the above reasons, I think at that time it was reasonable for Revolut to assume the transactions were being made for legitimate purposes. And so, I think it was reasonable for Revolut to process Ms S' instructions.

In respect of the losses suffered through the transferring of cryptocurrency, it is not within the jurisdiction of our service to consider Revolut's efforts in respect of this matter (as it is an unregulated activity) and so I am unable to comment on its actions in this respect.

I also note that Ms S has said she feels compensation is required due to the distress and inconvenience she suffered with how Revolut handled her complaint. And while I don't dispute Ms S would have felt distressed due to the scam she fell victim to and the time it takes to investigate such issues, I haven't seen evidence to suggest Revolut's actions warrant financial compensation. For the reasons I have provided above, I can't hold Revolut responsible for this.

My final decision

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms S to accept or reject my decision before 16 February 2026.

Jade Rowe
Ombudsman