

The complaint

Mrs A complains that Revolut Ltd won't refund money she lost when she was the victim of a scam.

What happened

The background to this complaint is well known to both parties and so I'll only refer to some key events here.

Mrs A fell victim to a job scam in March 2025. The job involved completing tasks to increase the download rates of apps by improving their ranking in app stores. Mrs A would earn a commission for completing the tasks, along with a salary based on the number of consecutive days worked. As part of the scam, Mrs A received combination tasks that paid higher commission but also put her account into a negative balance. To rectify this, Mrs A had to fund her account by purchasing crypto that she forwarded to the scam platform.

Mrs A made 13 transactions, totalling about £15,000, to a legitimate crypto provider between 12 and 17 March 2025 using her Revolut account. Mrs A realised she'd been scammed when, despite making multiple payments to complete the tasks, she was unable to withdraw her earnings unless she deposited more funds.

With the assistance of a third party, Mrs A complained to Revolut in March 2025 – saying they didn't do enough to protect her from the scam. Revolut rejected the complaint, as they said they didn't have enough information to investigate despite their requests for it.

The complaint was referred to the Financial Ombudsman. Our Investigator didn't think Revolut had to do anything further. This was because they thought Revolut carried out proportionate checks before processing some of the payments, but Mrs A provided inaccurate information and disregarded Revolut's warnings. Our Investigator also didn't think any further intervention would've likely made a difference – as they thought Mrs A similarly wouldn't have been truthful. Nor did they think Revolut could've done anything to recover her funds.

Mrs A disagreed with our Investigator, and so the matter has been passed to me to decide.

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'm sorry Mrs A has been the victim of a scam. I understand this is a lot of money for her to lose and so, I understand why she would do everything she can to try and recover it. But I must consider if Revolut are responsible for Mrs A's loss. Having done so, and while I know this won't be the outcome Mrs A is hoping for, I don't think they are. I therefore don't think Revolut have acted unfairly by not refunding the payments.

It isn't disputed that Mrs A authorised the payments from her Revolut account. Generally, consumers are liable for payments they authorise and Revolut are also expected to process authorised payment instructions without undue delay. However, taking into account the regulatory rules and guidance, relevant codes of practice and good industry practice, including the Consumer Duty, there are circumstances where it might be appropriate for Revolut to take additional steps or make additional checks before processing a payment to help protect customers from the possibility of financial harm from fraud.

I've considered whether the payment instructions given by Mrs A to Revolut (either individually or collectively) were unusual enough to have expected additional checks to be carried out before they were processed.

Here, Revolut have shown that they carried out additional checks before processing the second and tenth payments. I wouldn't have expected them to have done so for the first payment due to its low value (£20). And I think it was reasonable for Revolut to have carried out further checks when processing the tenth transaction (£3,000) as it was much greater than those that preceded it. Also, by the point of this £3,000 payment, Mrs A had made five transactions with a combined value of over £5,500 on that day. So, this type of account activity to a crypto provider – which carries a known fraud risk – should have been seen by Revolut as suspicious and that it presented a heightened risk of financial harm from fraud. I've therefore thought about whether Revolut's checks were proportionate to the risk associated with the payments. For both transactions, the checks included:

- Revolut told Mrs A that something didn't look right and that they'd identified the transfers as a potential scam. They then told her to answer their questions honestly, and that if she was being pressured to hide any details about the payments then she could be being scammed. Mrs A acknowledged this warning, confirming that she understood she might not get her money back if she didn't answer honestly and it turned out to be a scam.
- Mrs A confirmed that she was completing the transactions by herself. This was despite Revolut warning that if anyone was telling her what to say then it may be a scam.
- Revolut informed Mrs A that they could see she was making an investment, but she selected "*No, I'm not investing*". This prompted Revolut to ask Mrs A why she was making the transactions. But even though there was the option to select "*It's related to a job opportunity*", Mrs A instead selected "*I'm transferring money to my other account*" followed by "*My account with another bank*".
- Mrs A confirmed – through further questioning - that her bank had asked her to make the transactions, she hadn't been asked to install software, nobody had told her that her account wasn't safe, and the money was going to an account in her control.
- Revolut provided scam warnings based on the information Mrs A provided, which were mostly tailored toward impersonation scams. Mrs A then confirmed that she wished to proceed with the transactions, and that Revolut had warned her the payments were suspicious and she understood the risk of losing her money.

Revolut took steps to understand the surrounding circumstances of the payments. Unfortunately, due to the influence of the scammer, Mrs A didn't provide accurate information. Because of this, Revolut were prevented from being able to establish the true risks associated with the payments. I appreciate Mrs A was manipulated by the scammer at a time when she's explained she was vulnerable, due to personal circumstances, and told how to respond to Revolut's questions to ensure the payments were processed. While I sympathise with Mrs A, I can't fairly hold Revolut responsible for that. They were reliant on Mrs A providing accurate information and engaging positively with their fraud prevention checks to enable them to provide Mrs A with warnings relevant to her situation.

That said, having considered some of the responses Mrs A provided, I think there was reason for Revolut to suspect she might be at risk of financial harm. This is because, even though the payments were identifiably going to a crypto provider, Mrs A denied they were for investment purposes but, instead, said they were going to her other bank account. And although Mrs A confirmed this was an account she controlled, she said her bank had asked her to make the transactions. These responses were inconsistent and ought reasonably to have given Revolut reason to suspect Mrs A might be falling victim to a scam – thereby prompting further checks before processing the payments.

Considering the low value of the second payment (£54.50), I think it was reasonable for Revolut to provide the scam warnings tailored to impersonation scams. I consider it to have been a proportionate response to the risk associated with the payment, particularly as Mrs A had received £74.50 shortly before it was made. And so, at this point, I don't think there was a heightened risk of financial harm that warranted a greater level of intervention by Revolut.

I think this changed by the point of the tenth transaction. This is because, as I've said, Mrs A's payment activity to the crypto provider had increased significantly. And so, considering the responses Mrs A provided to Revolut's questioning (which included common features of scams), I think there was an increased risk that Mrs A could be falling victim to a scam when making this payment. I similarly think Revolut ought to have been concerned when Mrs A made the last two payments, as they were again greater in value (£4,000 and £4,800).

In these circumstances, I think a proportionate response to the risk associated with these payments would've been for Revolut to have contacted Mrs A to have attempted to establish the circumstances surrounding the payments before debiting her account. I think they should have done this by, for example, by directing Mrs A to their in-app chat to discuss the payments further.

At which point, I should explain that for me to find it fair and reasonable that Revolut should refund Mrs A requires more than a finding that Revolut ought to have intervened. I would need to find not only that Revolut failed to intervene where they ought reasonably to have done so - but crucially I'd need to find that but for this failure the subsequent loss would've been avoided. That latter element concerns causation. A proportionate intervention will not always result in the prevention of a payment. And if I find it more likely than not that such a proportionate intervention by Revolut wouldn't have revealed the payments were part of a fraud or scam, then I couldn't fairly hold Revolut liable for not having prevented them from being made.

I've given careful consideration to what would've likely happened had Revolut contacted Mrs A to discuss the payments. When doing so, I've taken Mrs A's view into account that it is speculative to conclude that she would've responded similarly to how she answered prior questioning when the circumstances, her emotional state and questioning would've been materially different. Further to this, Mrs A has said that the fact an earlier intervention was unsuccessful doesn't negate the possibility that a later, more proportionate intervention could've prevented her loss.

I can't be sure what would've happened had Revolut intervened as I've described. I've therefore had to make my decision on what I think is most likely, on balance, in these specific circumstances. And as Mrs A has pointed out, subsequent effective interventions can successfully uncover and prevent scams where previous interventions have been ineffective.

But here, Mrs A has said she “*truly believed*” what she was doing was for a legitimate job – as she was manipulated, through psychological pressure, into thinking it was safe and that she wasn’t doing anything wrong. I sympathise with Mrs A greatly, and I’m not trying to place any blame on her for what happened. But as a consequence of this, Mrs A placed a great deal of trust in the scammer. And this is evident in her WhatsApp conversation with the scammer – as she asked the scammer “*what should I choose?*” when Revolut intervened on the second transaction. So, Mrs A specifically sought the guidance of the scammer and followed their instructions when processing the payment – hiding the true purpose as to why she was making it. This was despite Revolut clearly warning that the payment had been identified as a potential scam, that she needed to answer their questions honestly, and that if she was being pressurised to hide any details about the payment or being told what to say then it might be a scam.

I understand this was because of the scammer’s influence on Mrs A. And that Mrs A says this, along with her personal circumstances, meant she wasn’t in a “*strong position to critically assess risk or recognise the scam for what it was*”. But because of this, and as I consider Mrs A would’ve been more invested in the job by the point of the tenth transaction onwards, I think it’s most likely – on balance - that she would’ve similarly sought and relied upon the scammer’s guidance to ensure the payments were processed. It follows that I think Mrs A, through the coaching and direction of the scammer, would’ve responded to any further questioning from Revolut in such a way that would’ve reassured them the payments were being made for legitimate purposes.

I understand Mrs A has also referenced Revolut’s obligations to consider their customers’ vulnerabilities to protect them from financial harm, including taking reasonable steps to detect them. But in these circumstances, I don’t think Revolut ought reasonably to have been able to establish any underlying vulnerability. This is because, as Mrs A accepts, she hadn’t informed them. Nor am I persuaded, from her interactions with Revolut, that there was sufficient reason for Revolut to suspect Mrs A could have an underlying vulnerability either. I therefore don’t think Revolut have acted or treated Mrs A unfairly in this respect. Although I think Revolut ought to have done more before processing some of the payments Mrs A made, I don’t think they could’ve reasonably uncovered the scam through a proportionate intervention. So, I don’t think Revolut is responsible for the loss Mrs A suffered.

I’ve also considered whether, on being alerted to the scam, Revolut could reasonably have done anything to recover Mrs A’s losses, but I don’t think they could. This is because the funds had already been sent from Mrs A’s crypto wallet to the scam. But even if there were any funds remaining, they would’ve remained in Mrs A’s control anyway. I know Mrs A will be disappointed by this outcome. I realise she is the innocent victim of a scam and that this is impacting her greatly. As I’ve said, I’m not putting blame on Mrs A for what happened. But it would only be fair for me to direct Revolut to refund her loss if I thought they were responsible – and I’m not persuaded that this was the case. For the above reasons, I’m not going to tell Revolut to do anything further.

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 Mrs A to accept or reject my decision before 5 March 2026.

Daniel O’Dell
Ombudsman

