

The complaint

Ms D is unhappy that Revolut Ltd won't reimburse money she lost to a scam.

Ms D is professionally represented, however, for ease I have only referred to Ms D in this decision.

What happened

The detailed background to this complaint is well known to both parties. So, I'll only provide a brief overview of some of the key events here.

In summary, Ms D says that between December 2023 and March 2024 she was tricked into sending funds in connection to what she thought was an investment opportunity. Ms D provided her contact details to a company I will refer to as "T". She was then contacted by a representative of T who I will refer to as "the scammer". Ms D advised she carried out checks on T and was happy with the information she found. She began investing believing she was dealing with a genuine company. She was also given access to a trading website where she could monitor her profits.

Ms D sent her funds using a payments service company and then into the control of the scammer. She said she lost around £45,000 as a result of the scam. Some of the funds were transferred into her Revolut account from another banking provider (which I will refer to as "L"). Ms D ran into difficulties when she attempted to make a withdrawal. It was at this point she realised she had been scammed.

Ms D raised a complaint with Revolut. It didn't think it had done anything wrong by allowing the payments to go through. Ms D remained unhappy, so she brought her complaint to our service.

Our Investigator looked into the complaint but didn't uphold it. Our Investigator thought Revolut should have recognised that Ms D was at risk of financial harm when she attempted a payment on 9 January 2024, but he wasn't persuaded that an intervention by Revolut would have made a difference to Ms D's decision to send the payments. This was because L had highlighted concerns when Ms D attempted a payment from her account. Ms D had agreed with the concerns raised by L but chose to continue sending payments. Ms D also provided inaccurate information when L stopped another payment. So, in the circumstances our Investigator didn't feel that further intervention from Revolut would have stopped Ms D from sending the funds.

Ms D didn't agree with the outcome. In summary, she said that Revolut should have identified the payments as unusual and that an appropriate intervention would have revealed the scam. She highlighted that the initial intervention from L was effective, and although the scammers regained her trust, she felt that if Revolut had intervened appropriately the scam could have been prevented.

Ms D didn't agree with the outcome, so her complaint has been passed to me for review and a final 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've come to the same outcome as the Investigator for largely the same reasons. I'll explain why.

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 focussed on what I think is the heart of the matter here. If there's something I have not mentioned, it isn't because I have ignored it. I haven't. 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've thought about the Contingent Reimbursement Model Code (CRM Code) which can offer a potential means of obtaining a refund following scams like this one. But as Revolut isn't a signatory of the CRM Code, these payments aren't covered under it. I've therefore considered whether Revolut should reimburse Ms D under any of its other obligations.

I think it's important to note here that although Ms D has provided chats she had with the scammer, we have not been provided with evidence to show what then happened to the funds after they were sent using the payments service company, or that they were subsequently lost to the scammers. Generally, I would expect to see some more evidence to link the disputed payments to a scam, before considering if Revolut should have done anything else to intervene in the payments. However, I don't think this makes a difference to the outcome of Ms D's complaint because, like the Investigator, I don't think an intervention from Revolut would have made a difference to Ms D's decision to send the payments. So, I'm going to proceed on the basis that Ms D did suffer a loss to the scam she's described.

In broad terms, the starting position at law is that an Electronic Money Institution (EMI) such as Revolut is expected to process payments and withdrawals that a customer authorises it to make, in accordance with the Payment Services Regulations (in this case the 2017 regulations) and the terms and conditions of the customer's account. But, taking into account relevant law, regulators rules and guidance, relevant codes of practice and what I consider to be good industry practice at the time, I consider it fair and reasonable that between December 2023 and March 2024 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;
- 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;
- 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 and the different risks these can present to consumers, when deciding whether to intervene.

I've considered whether there was anything about the circumstances surrounding the payments that could have put Revolut on notice that they were being made as part of a scam. And I think there was. Ms D was making multiple payments in quick succession and when compared to her usual account activity this should have raised suspicions. So, Revolut should reasonably have taken steps to warn her of the risks before sending the payments.

Ms D insists that an intervention from Revolut would have prevented her losses. Where something didn't happen that should have, I'm required to make this decision based on the balance of probabilities; that is, what I find is more likely than not to have happened if things had gone as they should. I've carefully considered all of the available evidence. But having done so, I'm not persuaded that a warning, had it been given, would have made a difference to Ms D's decision to go ahead with the payments.

I have listened to calls Ms D had with L where she discussed some of the payments she was transferring to her Revolut account to help fund the scam. It's clear from one call that Ms D has concerns with the payment she was making. She listened to the advice provided by L. It highlighted that scammers tell customers that they won't lose any money, that they often ask customers for additional funds and that they are very convincing. L also highlighted it couldn't find details for the firm on Companies House. It also highlighted that from the checks it had done that it wasn't confident this was not a scam so it wouldn't be comfortable putting the payment through. L confirmed that she may not be able to get her money back so she shouldn't proceed. Ms D agreed that the destination of the payment raised concerns with her. She also confirmed she didn't think she should continue sending the payment based on L's concerns. Based on this call I am satisfied that L gave sufficient warnings highlighting the risks of investing and that Ms D understood there were concerns with the firm.

Although Ms D initially listened to the concerns of L, further contact from the scammers seems to have changed her mind. She is provided with reassuring information from him and after carrying out further research she continues with her payments. She's confirmed she was dealing with the scammer by phone and messages. Having looked through these messages, it seems that Ms D was convinced that her investment was doing well based on the false information provided by the scammer. The messages highlighted the profits she was making and that she was pleased with the results, so she continues investing, believing that she was dealing with a legitimate company.

L intervened on another call. In this call Ms D advised she was making payment to her Revolut account in order to earn rewards, rather than for investment purposes. She provided misleading information which made it difficult for L to provide appropriate warnings for the payment. It's clear that Ms D now trusted what she was being told by the scammers about the investment and the profits she had made and that she was willing to provide inaccurate information in order to get the payments processed.

I think Ms D was sadly very much under the spell of the scammer. I can also see that Ms D chose to use other accounts to transfer funds, perhaps because of the checks L had applied on some payments, so she seemed determined to make the payments. She also agreed to make payments, despite her earlier concerns even if it meant providing inaccurate information to a firm that intervened. So, I don't think she would have revealed much about the circumstances around the payments, if Revolut had intervened when it should have.

Based on Ms D's responses to L and the level of control the scammers seemed to have, on balance, I believe that Ms D would have answered any questions in a way which allowed the payments to go through or in line with the advice provided by the scammer. In those circumstances I don't think it would be fair to ask Revolut to do anything further.

I'm also not persuaded Revolut could have done anything more to recover Ms D's funds. I say this because the payments were sent from Revolut to a payments service company, from where she then would have moved the funds onto the scammers. So, I don't think there was any realistic prospect of Revolut recovering the funds. There was also a delay in reporting the scam so any funds sent by faster payment were unlikely to have remained in the receiving account.

I realise this means Ms D is out of pocket, and I'm really sorry she's lost money. However, for the reasons I've explained, I don't think I can reasonably tell Revolut to reimburse her.

My final decision

For the reasons I've explained, I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms D to accept or reject my decision before 24 February 2026.

Aleya Khanom
Ombudsman