

## **The complaint**

Miss K complains that Revolut Ltd won't refund money she lost when she fell victim to an investment scam.

## **What happened**

The full details of this complaint are well known to both parties and have been previously set out by the investigator. So, I'll focus on giving my reasons for my decision. The complaint concerns four payments – three transfers and a card payment – totalling approximately €8,400 which Miss K made from her Revolut e-money account in late 2023. These were made in connection with an investment opportunity which she came across on a social media platform. She subsequently discovered that the investment scheme was a scam.

## **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.

The starting position is that liability for an authorised payment rests with the payer, even where they are duped into making that payment. It isn't in dispute that Miss K made the payments, so under the relevant rules – the Payment Services Regulations 2017 – they were authorised. As such, Ms C is presumed liable for the loss in the first instance. But, having taken into account relevant law, regulator's rules and guidance (including Consumer Duty), relevant codes of practice and what I consider good industry practice at the time, Revolut ought to have been on the look-out for the possibility of fraud and made additional checks before processing payments in some circumstances.

All but one of the disputed payments flagged as suspicious on Revolut's fraud detection systems. After informing Miss K that the transaction had flagged as a potential scam payment, Revolut asked her to review the risks involved. It asked her to answer a series of questions, including whether she was being guided on what to do. Revolut has provided Miss K's response to that question, as well as subsequent questions, for each intervention. I can see she told Revolut that no one was assisting or guiding her.

The next question Miss K was asked was why she was making the payments. She was required to select from one of the payment purposes listed on the screen and the information provided shows that "paying a family member or friend" was submitted on each occasion. Based on the option selected, Miss K was shown a scam warning over a series of screens which couldn't be skipped. These included a warning that there was an increase in scams involving victims being contacted by someone claiming to be a friend or a family member, and covered scenarios such as scammers faking messages and calls from loved ones in distress, and convincing customers to urgently transfer funds. Miss K was told to double check the account details and to be wary of sending money to someone she'd only met online. At the end of the warning, Miss K was presented with the option of cancelling or sending the payment. She indicated that she wanted to send the payment. Revolut provided a final warning in the form of an attestation which required Miss K to confirm that she

understood and accepted the risks tied to the payment. Following Miss K's confirmation, the payments were processed.

I've thought very carefully about what happened here. Revolut recognised that the transactions carried a heightened risk of financial harm from fraud and took additional steps. Having considered when the transactions were made, their value and who they were made to, I'm satisfied that the steps Revolut took, i.e., establishing the nature of the transaction to provide a better automated warning, was proportionate to the risk involved. For the avoidance of any doubt, I don't think Revolut needed to take additional steps for the payment it didn't intervene on.

Unfortunately, Miss K didn't respond to Revolut's queries accurately. For instance, she reassured it that she wasn't being guided. We know now that she was being coached by the scammer on how to answer the questions. I can only ask Revolut to reimburse Miss K if I find that any wrongdoing on its part caused her loss. Revolut couldn't reasonably have known that an inaccurate payment purpose selection had been made, given there were no other concerning factors about the payments. I've kept in mind that one of the payments Revolut intervened on was identifiably cryptocurrency related. But, as mentioned, there were no other concerning factors about that payment. So, I don't think Revolut acted unreasonably in processing that payment once Miss K confirmed that she wanted to go ahead with it.

I've considered whether there are any ways Revolut could have recovered Miss K's money, but I don't consider it could have. This is because the funds were used to purchase cryptocurrency from legitimate providers.

In conclusion, I know that Miss K will be disappointed with this outcome. Not least because of how long this complaint has been ongoing. Despite my natural sympathy for the situation in which she finds herself due to the scammer's actions, for the reasons given, it wouldn't be fair of me to hold Revolut responsible for her loss.

### **My final decision**

For the reasons given, my final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss K to accept or reject my decision before 30 October 2025.

Gagandeep Singh  
**Ombudsman**