

## The complaint

Mr and Mrs H complain that Revolut Ltd hasn't reimbursed the money they've lost to a scam.

## What happened

Mr and Mrs H have fallen victim to an investment scam.

Mr H saw a celebrity-endorsed advertisement on social media for an investment opportunity with a company I'll refer to as 'V'. He registered his interest and a financial advisor ('the scammer') got in touch with him. The scammer told Mr H that he could make over £100,000 in a year by investing with V. V's online reviews assured Mr H of the legitimacy of the investment opportunity, and he decided to invest.

Mr H was given access to a fake trading platform and the scammer used remote access software to guide and assist him with the investment process.

Mr H made a small initial investment of £200 from an account he held with an external provider. The fake trading platform showed that his balance had increased to just over £2,000 within a short timeframe and, excited by this, he decided to invest further. The scammer advised Mr H to open a Revolut account and a wallet with a legitimate cryptocurrency exchange to facilitate this. They also offered him a free trial of a premium account, which he accepted.

Mr H was told he would need to prove that he had at least £10,000, to activate his premium account. After activating his premium account with the required amount, Mr H was told he would need to pay a further £10,000 to withdraw the activation fee. And, after paying the requested withdrawal fee, Mr H was told that he needed to pay a £10,000 security bond. Mr and Mrs H took out loans to fund all three payments. The loan funds were transferred into Mr H's Revolut account before being transferred into the wallet he'd created with the legitimate cryptocurrency exchange and moved on to the scammer from there. The details of the disputed payments out of Mr H's Revolut account are set out in the table below:

Payment number	Date of payment	Payment amount
1	23 August 2024	£9,900
2	26 August 2024	£9,950
3	29 August 2024	£10,000

No funds have been returned from the investment and communication between Mr H and the scammer has ceased.

Mr H raised a fraud claim with Revolut. Revolut wasn't able to recover the disputed payments, and it has declined to reimburse them.

### What did our investigator say?

Our investigator recommended that Revolut refund 50% of the disputed payments. He didn't think that Revolut had done enough to protect Mr H from financial harm from fraud and, as he didn't think that Mr H had done enough to protect himself either, he thought it was fair for the parties to share responsibility for the financial loss.

Revolut asked for an ombudsman's final decision, so the complaint was passed to me to decide.

### My provisional decision

I issued my provisional decision on 3 September 2025. I'll set out my findings below.

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 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 have been good industry practice at the time, I consider it fair and reasonable 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. This is particularly so given the increase in sophisticated fraud and scams in recent years, which firms are 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.
- Have been mindful of – among other things – common scam scenarios, how fraudulent practises are evolving (including for example the common use of multi-stage fraud by scammers, including the use of cryptocurrency accounts as a step to defraud consumers) and the different risks these can present to consumers, when deciding whether to intervene.

Revolut's fraud detection systems were triggered by payment 1, and it intervened with that payment. I think that's reasonable.

Initially, Revolut gave Mr H a 'better automated warning' – that is, a warning which asks a series of questions in order to try and establish the actual scam risk to provide a more tailored written warning. In response to the questions Revolut asked him about payment 1, Mr H said:

- He was completing the transaction himself.
- He was investing in cryptocurrency and had done so before.
- He was paying into his own cryptocurrency account.
- He hadn't been asked to install remote access software.
- He had discovered the investment opportunity via a friend or family member, and he had done his own research online.

Revolut gave Mr H the following written warnings:

***“THIS COULD BE A CRYPTO SCAM***

*STOP. Crypto scams promise high returns in short periods of time, and might even have professional-looking online platforms.”*

***“BEWARE OF SOCIAL MEDIA PROMOTIONS***

*Fraudsters use social media to promote fake investment opportunities. Read online reviews to make sure it’s legitimate.”*

***“DON’T GIVE ANYONE REMOTE ACCESS***

*Scammers may ask you to install software to view your screen. Uninstall software that gives someone else control.”*

***“DO YOUR CRYPTO RESEARCH***

*Most crypto exchanges aren’t regulated. Search for mentions of scams in online reviews.”*

***“DON’T BE RUSHED***

*Take your time and speak with family and friends before making large investments. Say no if you’re being pressured to invest.”*

Revolut then followed up with a telephone call. I’ve listened to a recording of the conversation that took place between Revolut and Mr H. Revolut told Mr H it thought he was being tricked by convincing fraudsters who were attempting to steal his money. Revolut explained that it doesn’t usually call customers, but payment 1 was similar to payments made by other customers who have been the victims of fraud. So, it was going to ask Mr H some questions, and he needed to be truthful. The pertinent questions Revolut asked, and the answers Mr H gave to them, are set out below:

- Revolut asked why Mr H had chosen to become its customer. He said that a family member uses Revolut and they love the EMI.
- Revolut asked if anyone had helped him to set up his Revolut account and he said no. It also asked Mr H if he’d set up any other online accounts recently and he said no.
- Revolut noted that Mr H had transferred money into his Revolut account from an external bank account before instructing payment 1 and asked him why he hadn’t simply instructed payment 1 from his external account. He said it’s easier to use Revolut.
- Revolut asked Mr H if he’d installed any software recently on his devices and he said no, he knows not to do that. Revolut explained that scammers ask their victims to install remote access software, claiming to be helping them with investing, but the software gives them the ability to control their victim’s device/account. Revolut said this is a very big red flag and indicates a scam. Mr H reassured Revolut that he definitely wouldn’t let anyone have control of his device.
- Revolut asked if anyone had asked him to make payment 1, or if anyone was guiding him or pressuring him, and he said no.
- Revolut asked if anyone had contacted Mr H to promote a cryptocurrency investment, and whether a broker was involved. He said no.
- Revolut asked how Mr H heard about the investment opportunity and whether he’d done his own research. He said a family member told him about the opportunity and he’d done his own research online as well as using a scam check site.
- Revolut asked what Mr H intended to do with his cryptocurrency once he’d purchased it and he said it would stay in his wallet.

Revolut ended the conversation with a warning. It explained that it has seen many investment scams where victims have been contacted by phone or social media. It said that scammers pose as financial advisors and ask victims to install remote access software, which no legitimate company will do. At that point, Mr H reiterated that no one had done that. Revolut confirmed that if someone does then it's a scam. Revolut said that scammers may also add victims to fake investment groups, let them withdraw some funds initially, impersonate a well-known institution, ask for a fee to release withdrawals, and use celebrity-endorsed advertisements on social media. It asked Mr H to pause and reconsider before continuing with payment 1, and stop if he suspects a scam. It said there is a very limited chance of recovering funds that have been lost to a scam. Mr H reassured Revolut that he was making payment 1 of his own volition and thanked it for looking after him.

Revolut has said that it didn't have reason to delay payment 1 further or make any more enquiries about it. So, it let the payment go. I think that was reasonable in the circumstances.

I recognise that many customers who wish to purchase cryptocurrency for legitimate purposes will be likely to use the services of an EMI, such as Revolut. I'm also mindful that a significant majority of cryptocurrency purchases made using a Revolut account will be legitimate and not related to any kind of fraud. However, our Service has also seen numerous examples of consumers being directed by fraudsters to use Revolut accounts in order to facilitate the movement of the victim's money from their high street bank account to a cryptocurrency provider. So, where Revolut has identified a risk of financial harm due to a cryptocurrency investment scam, as it did here, I would expect to see that it has proportionately warned its customer before processing a suspicious payment, in line with good industry practice and regulatory requirements.

I think that such a warning (whether automated or in some other form) ought to be specifically about the risk of cryptocurrency investment scams – highlighting, in clear and understandable terms, the key risks and features of cryptocurrency investment scams, for example, referring to: an advertisement on social media, promoted by a celebrity or public figure; an 'account manager', 'broker' or 'trader' acting on their behalf; access to a fake trading platform; the use of remote access software and a small initial deposit which quickly increases in value.

From the evidence I've seen, Revolut intervened proportionately with payment 1, in the way I'd expect it to have done. Unfortunately, Revolut was not able to uncover or prevent the scam with its intervention. But I don't think it would be fair or reasonable to hold Revolut responsible for this, having taken the action I think it ought to have to try and protect Mr H. So, I don't intend to direct it to reimburse payment 1.

It could be argued that Revolut ought to have also intervened with payments 2 and 3. But, if it had, I think it's most likely that any additional interventions would have gone the same way as the intervention with payment 1. I don't think the evidence indicates that Revolut would've been able to uncover the scam and/or prevent the loss of payment 2 and/or 3 with additional interventions, and I don't think it would be fair or reasonable to require Revolut to reimburse payment 2 and/or 3 on that basis.

Finally, I've thought about whether Revolut could've done more to recover Mr H's funds but, given the nature of the disputed payments, I'm not persuaded that it could.

For the reasons I've explained, I've provisionally decided not to uphold this complaint.

*Responses to my provisional decision*

Neither party responded to my provisional 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.

As neither party has provided any new information or evidence for me to consider, I see no reason to depart from the conclusions I set out in my provisional decision.

**My final decision**

For the reasons I've explained, 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 and Mrs H to accept or reject my decision before 16 October 2025.

Kyley Hanson  
**Ombudsman**