

## **The complaint**

Miss O complains that Revolut Ltd failed to protect her from losing money in a scam.

A professional representative, C, has brought the complaint to the Financial Ombudsman Service on Miss O's behalf.

## **What happened**

The background to this complaint is well known to both parties, so I won't repeat everything here. To summarise, Miss O fell victim to a job scam and sent several payments from her Revolut account to the fraudulent opportunity between 13-17 February 2025. Revolut didn't reimburse her losses when the scam was reported, so C brought the complaint to us on her behalf.

Ultimately, one of our investigators didn't uphold the complaint and C asked for a final decision. They said the payments were highly unusual and Revolut failed to provide effective intervention which could have prevented the scam occurring. They also stressed that Miss O was vulnerable at the time of the 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.

Having done so, I've reached the same conclusion as our investigator and will not be upholding Miss O's complaint.

There is no doubt that Miss O was the victim of a cruel scam. While I sympathise with the significant loss she has suffered, my role is to assess whether Revolut bears any responsibility for this and I'm unable to conclude this in view of what happened. I'll explain my reasons for this below.

### *Initial Considerations*

While a payment of £20 on 14 February was disputed, there's no evidence that this was connected to the scam. Unlike all the other payments reported, the amount or the payee is not referenced in Miss O's documented correspondence with the scammers. I asked C to clarify this point, but they did not respond to my question about it by the deadline set for a response. Therefore, I'm satisfied that this is not relevant to the job scam that Miss O fell victim to. The payment also isn't material to the outcome I've reached.

Miss O authorised all the disputed payments. Under the Payment Services Regulations 2017 (PSRs), which apply in this case, she is liable for those transactions. The PSRs do not provide specific protection against losses arising from authorised payments, even where they are connected to a scam.

All these transactions would not be covered by the Faster Payment Scheme (FPS) Reimbursement Rules as they were international payments. However, taking into account the regulatory rules and guidance, relevant codes of practice and good industry practice, 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.

### The payment activity and Revolut's interventions

C's main argument in response to the investigator's assessment was that the payment activity was indicative of a scam and should have prompted stronger intervention from Revolut. While I agree that the activity was unusual, Revolut did intervene on several occasions to ask questions about the nature of payments before they were processed. These interventions began with the first disputed payment, and Miss O's responses to them are central to the conclusions I've reached.

Revolut's interventions took place through two in-app methods, described by Revolut as a "static risk warning" and a "high-risk alert". In responding to the investigator's assessment, C asked for further information about how these operated and how Miss O reacted to them. For transparency, I've summarised these below.

#### 1) The static risk warning

This intervention occurred before payments 1, 2, 5, 13, 19, 26, 30, 36 and 43 were processed. When triggered, Miss O was shown a message stating that Revolut's systems had identified the payment as a potential scam. To continue, she needed to answer a series of questions and acknowledge the importance of answers being provided honestly.

On each occasion, she was asked about the purpose of the payment and presented with the following options:

- I'm transferring money to my other account
- It's part of an investment
- It's related to a job opportunity
- I'm paying taxes, or a fine from a legitimate institution
- I'm buying or renting goods or services
- I'm paying a family member or friend
- Other

Given the circumstances, I think it is fair and reasonable to have expected Miss O to select the option relating to the job opportunity on each occasion. She did not do so at any point. Instead, she selected:

- the family and friend option on five occasions
- transferring funds to another of her accounts on three occasions
- buying goods or services on one occasion

Based on her selection, Miss O was then asked additional questions and provided with advice tailored to the scam risks associated with the purpose she had chosen — not the risks linked to job-related scams. She also gave inaccurate information in her subsequent answers. For example, for several payments she said the payee's details were given to her face-to-face, when in reality they had been provided via Telegram.

At the end of each warning, she was asked to confirm that she still wished to proceed with payment in view of all the risks and advice highlighted, and she did so every time.

#### 2) High-risk alert

This intervention occurred three times during payment attempts on 16 and 17 February, none of which were ultimately processed. Under this alert, Revolut first displayed a message explaining that the transaction carried a high scam risk and had been flagged.

The process that followed was similar to the static risk warning: Miss O was required to select the purpose of the payment and answer further tailored questions. On all three occasions, she selected that she was paying a family member or friend, despite the

job-opportunity option being available. Further inaccurate answers were provided following that selection.

The key difference between this intervention and the static risk warning was that Revolut would place the payment on hold while it was manually reviewed and her responses were assessed. However, each time this happened, Miss O cancelled the payment herself before it was completed. When asked why she wished to do this, she selected the option stating that the process was “too complicated”. She did not select the options “I believe I was being scammed” or “I want to investigate my transaction further”. Evidence shows she was instructed to do this by the scammer after sharing screenshots of the process via Telegram.

Having considered the nature of these interventions and the way Miss O responded, I do not think it would be reasonable to hold Revolut liable for processing the payments. Miss O did not provide truthful answers to several of the questions asked each time an intervention was triggered. Had she responded accurately by selecting the option indicating she was making a payment in connection with a job opportunity, she would have been presented with warnings tailored to the relevant scam risks. Instead, by repeatedly avoiding that option, that wasn't possible and I cannot reasonably place fault with Revolut for this.

I recognise that C may argue that the activity should still have prompted further action from Revolut irrespective of the interventions. However, I do not believe that the outcome would have been any different, nor that Miss O would have responded differently to any additional questioning given the consistency of how she answered questions presented to her in a way that didn't reflect what was actually happening. Miss O appears to have been intent on ensuring the payments went through, choosing responses that reduced the likelihood of the transactions being stopped rather than those that reflected the true circumstances.

Even if Revolut had taken further steps — for example, by blocking the account or refusing to process the payments — I think it is likely this would not have deterred Miss O. I consider it more likely than not that she would have continued with the transactions through another provider, and the losses would simply have occurred elsewhere. There is evidence to suggest that she opened an account with another firm offering international money transfer services, and there are indications of further attempted payment activity in her correspondence with the scammer.

For these reasons, I will not be asking Revolut to refund any of the losses arising from the payment activity.

### Recovery

The fraud was reported on 18 February, and Revolut contacted the beneficiary banks the same day in an effort to recover the funds. Although some money was successfully retrieved, it is uncommon for all losses to be recovered in these situations. Fraudsters typically move funds on very quickly once they are received, and in the circumstances I do not think there was anything further Revolut could reasonably have done to recover more than it did.

### Vulnerability

Finally, C also said that Miss O was a vulnerable consumer at the time of the scam. However, Revolut wasn't made aware of any particular circumstances affecting Miss O that placed her at increased risk of scams or suggested she had specific difficulties that would have made it harder for her to protect herself from this type of fraud. While I don't minimise the position she found herself in or the impact this has had on her, I don't think Revolut missed signs of any vulnerability in the circumstances.

### **My final decision**

My final decision is that I do not uphold Miss O's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss O to accept or reject my decision before 5 March 2026.

James Abbott  
**Ombudsman**