

## **The complaint**

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

Miss N is represented by a third-party firm, but I will refer to Miss N here.

## **What happened**

The background to this complaint is well known to both parties, so I won't repeat everything here. In summary, Miss N fell victim to a task-based job scam in which she was required to review apps. I'll refer to the company Miss N believed she was working for as "C".

Miss N did searches on C and was added to a group chat with other "employees" which made her think the role was legitimate. She then used her Revolut account to send money to a genuine cryptocurrency provider where the funds were converted into cryptocurrency before being sent on to the scammer. She was also told she needed to make payments for certain tasks as part of the job before she could receive her earnings. She made the payments in October 2023.

Miss N said she was able to make a withdrawal. But she realised she had been scammed when her funds were frozen, and she was asked to send more and more funds. Miss N has said she lost a total of £21,352 as a result of the scam.

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

Our Investigator looked into the complaint but didn't uphold it. He explained that Revolut had provided warnings to Miss N before releasing some of the payments, so he thought the actions taken by it were proportionate to the risks it identified. He also didn't think any further intervention from it would have made a difference to Miss N's decision to send the payments. This is because she had provided misleading or inaccurate information to ensure the payments were sent so he didn't feel that further intervention from Revolut would have stopped her from sending the payments.

Miss N 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.

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 in October 2023 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 (including for example the common use of multi-stage fraud by scammers, including the use of payments to cryptocurrency accounts as a step to defraud consumers) and the different risks these can present to consumers, when deciding whether to intervene.

I think Revolut were right to be suspicious of some of the transactions on Miss N's account given the activity on the account. And I agree with the Investigator that the payment of £3,600 on 16 October 2023 should have raised concerns. In those circumstances I would have expected Revolut to take additional steps, in an attempt to narrow down a possible scam risk.

Revolut confirmed it intervened on several payments, including some before 16 October 2023. It recognised they were high-risk transactions and provided Miss N with advice and warnings to try and protect her from being scammed. It did this through its app and also discussed the transactions with Miss N through its in-app chat service. Overall, I think Revolut asked Miss N appropriate questions to ascertain the purpose of the transactions and to establish whether there was a risk of a scam.

I have included some of the points made in the interventions below:

- Miss N confirmed she would answer questions truthfully.
- She confirmed she was not being told what to say and that she was completing the transactions herself.

- Miss N advised the money was going to an account she controlled. Revolut advised that scammers ask you to move money to accounts customers don't control and that they can end up losing their funds.
- She confirmed she was not asked to install remote access software.
- Revolut also asked if Miss N was buying cryptocurrency and she confirmed she wasn't.

Revolut also provided a number of warnings tailored to the answers Miss N provided which gave the option for her to cancel the payment mentioned above. It also highlighted that she should never ignore its warnings and that if she's been told to do this then it would be a scam.

The warnings provided, albeit not specially tailored to the type of scam Miss N fell victim to, were somewhat relevant to her circumstances. In its in-app chat Revolut highlighted that scammers are targeting cryptocurrency investors and asking them to move funds to wallets they don't control. It highlighted that scammers show you fake returns and the scam will only materialize when you attempt to withdraw your funds. So, given the similarities to her situation, I think the scam warnings presented by Revolut across the payments ought to have resonated with her – thereby prompting her to question the legitimacy of what she was being asked to do. And in the circumstances, I think the actions Revolut took were proportionate to the risks identified at the time.

Based on what Miss N has highlighted about the scam, even if Revolut had probed her further, I don't think it would have made a difference here. It's clear that Miss N trusted what she was being told by the scammer and that she was willing to follow all his instructions. The messages with the scammer confirm she was being guided on how to answer questions from Revolut. She was told to advise Revolut the payments she was making was for friends and family and that she would be paying the funds to another account of hers. It's clear that Miss N gave inaccurate information in order to get the payments processed. As she trusted what she was being told by the scammer, I don't think she would have revealed much about the circumstances around the payments, if probed further.

Based on the above, I think the actions Revolut took for the payments were proportionate to the risks it identified.

I'm also not persuaded Revolut could have done anything more to recover Miss N's funds. I say this because Miss N has taken the funds out of accounts she controls and sent these on to the scammer. Therefore, I don't think there was any realistic possibility of recovery.

To summarise, I'm sorry Miss N was the victim of a cruel scam. I'm also sorry about the information she's shared with us about how the scam has impacted her and her family. But for the above reasons I don't think Revolut can fairly be held responsible for her loss. And so, I can't tell it to refund Miss N's money in this case.

### **My final decision**

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 N to accept or reject my decision before 6 November 2025.

Aleya Khanom  
**Ombudsman**