

## The complaint

Mrs B complains that Revolut Ltd won't refund her the money she lost in a work tasks scam.

Mrs B is represented by a professional representative, but for ease of reading I'll just refer to Mrs B.

## What happened

The circumstances surrounding this complaint are well-known to both parties, so I've summarised what I consider to be the key points.

Mrs B says she was contacted by someone, around 1 August 2024, over a popular messaging application asking if she was interested in a job. They presented themselves as representatives of a company connected with travel and the job was to boost the profile of tourist attractions by making them appear higher in internet search results, in return for commission payments. She couldn't find any negative reviews online and it appeared to be a legitimate company.

She questioned how they had found her name and contact details, how she knew who they really were. The person suggested they worked with regular recruitment companies.

Mrs B was told if she worked five days straight, she would be paid a bonus of £299 and each day's work involved 3 rounds of 29 tasks. She was told she would need to deposit £50 to reset her account and that at the completion of each day's tasks she would be able to withdraw her earnings.

Mrs B questioned why she was being asked to make the deposits to a person and not the company and when given an explanation, she asked how she could trust this and how she knew she who she was dealing with. Despite the concerns she expressed, she trialled the first day and was able to make a withdrawal. On day 2, Mrs B was able to withdraw £713 on completion of her works tasks. By 3 August 2024, Mrs B was expressing further doubts about the legitimacy of the job, as she was receiving tasks which required her to deposit amounts before she could complete them, but she could not afford to make the deposits, which were increasing in size.

From 6 August 2024, Mrs B started borrowing money to pay the deposits needed to reset her account so she could complete her tasks and withdraw her earnings, but each time she completed her tasks, further tasks appeared, requiring further deposits to be made.

Between 3 and 11 August 2024, Mrs B made 158 payments to this scam, totalling £8,186.80, and I don't propose to list each one here, but in summary the following transactions took place:

Date	Cumulative amount	Number of transactions	Payee
3 August 2024	£302.22	3 transactions	Payee 1
3 August 2024	£1,607.21	28 transactions	Payee 2
6 August 2024	£2,413.42	49 transactions	Payee 1

6 August 2024	£1,378.45	28 transactions	Payee 3
11 August 2024	£2,485.50	50 transactions	Payee 4

On 12 August 2024, Revolut emailed Mrs B asking her to get in touch with it. Revolut said her account had been limited because it believed it was highly likely she was making transactions that were part of a scam. Mrs B got in touch via in-app chat. It asked if anyone was telling her what to say on the in-app messaging. Mrs B responded the next day and answered "No". Revolut asked her what the payment purpose was for her recent payments. She said she was making transfers abroad, sending money to friends. Revolut asked if she'd been asked to make these payments urgently. It asked how the request for money had been made to her and she replied that it was via popular messaging platforms. Revolut asked for screenshots of the conversations. She then said the conversations had been via calls on those messaging platforms. She provided a screenshot of the call records from her phone. Revolut then specifically asked her if she was making the transfers to four named people as part of a job. She replied that the transfers were to a friend, cousin and her daughter.

On 16 August 2024, Revolut responded and asked her to take some time to read through its message, which contained some common scam scenarios, including if she was being advised on how to reply to Revolut on its in-app chat. Mrs B acknowledged the message and confirmed that the payment purpose was returning money owed to a friend. It then sent her a detailed message about scammers creating fake jobs involving completing a set of tasks, after being contacted unexpectedly over social media or popular messaging platforms. It described people initially making money through completing remote tasks on-line and then being asked to deposit further amounts. It asked her to let it know if she had been in a similar situation. She replied that no one had contacted her about such things.

Revolut said, on 17 August 2024, that it thought it was highly likely Mrs B was the victim of a work tasks scam or an investment scam and asked her to provide details of the websites through which she was dealing with the scammers. At this point, Mrs B accepted that she probably was being scammed and provided the details to Revolut.

Mrs B said she thinks Revolut ought to have intervened earlier than it did and if it had done so, she would have heeded its warnings and the scam would have been uncovered.

Revolut said the payments were all authorised and the payments were not out of character, given the stated account opening purpose, which included overseas transfers. It did intervene, through in-app messaging on 12 August 2024. Mrs B gave it inaccurate information at that time and had sought advice from the scammer on how to answer its questions, so if it had intervened earlier, it's likely Mrs B would not have answered its questions accurately.

Our investigator said she thought Revolut ought to have intervened on the tenth payment because Mrs B had made several transactions to the same payee, for similar amounts, within a short space of time. She thought this suspicious pattern of transactions ought to have led Revolut to make a human intervention by a member of staff. She said that at the time of the tenth payment, Mrs B hadn't sent much money, hadn't been coached by the scammer and had already expressed doubts about the scam, so overall she thought Mrs B would have been receptive to warnings from Revolut. She thought a human intervention and tailored warnings would have been effective and would have led Mrs B to stop making any further payments. While she acknowledged that on 13 August 2024, Mrs B had given Revolut inaccurate information when it intervened, she said if Revolut had intervened earlier, before Mrs B paid significant amounts to the scammer, before she was being coached and when she had already expressed doubts about the job, she thought warnings would have resonated with Mrs B.

She thought responsibility for Mrs B's losses ought to be shared between Mrs B and Revolut. She thought the nature of the job, requiring Mrs B to make deposits to complete tasks, having first exchanged her money for cryptocurrency, ought to have raised suspicions. She thought the absence of an employment contract and unrealistic returns also ought to have caused concern.

The investigator said Revolut should refund 50% of the payments from payment 10 onwards. She said Revolut should only pay interest at 8% on these amounts if Mrs B can send evidence that she had made some repayments towards the loans she took out with third parties in order to fund these transactions.

Revolut responded and said:

- It can't understand how a heavily-coached customer, who was clearly under the spell of the scammer, would have heeded earlier warnings.
- The customer was provided with a cover story and sought guidance from the scammer about how to respond to Revolut's questions. It is highly likely Mrs B would have sought advice from the scammer if Revolut had intervened at an earlier point. There's no guarantee the customer would have been more forthcoming if Revolut had intervened earlier.

Revolut didn't accept the investigator's assessment and I issued a provisional decision in which I said:

*"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 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 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;*
- *have been mindful of – among other things – common scam scenarios, how 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.*

Should Revolut have recognised that Mrs B was at risk of financial harm from fraud?

Mrs B made around 150 payments to the scammers before Revolut intervened. The payments on 3 August 2024 consisted of 3 payments totalling £302.33 to payee 1, followed by 28 payments to payee 2 the same day for a combined amount of £1,607.21. Whilst the payments were not large, both individually and cumulatively, they were made in quick succession and there was a pattern of transactions for the same amount, or almost identical amounts, being made repeatedly, to these two new payees. I consider that pattern of transactions was suspicious and ought to have prompted Revolut to intervene on 3 August 2024. I agree with the investigator that by the time of the tenth transaction, Revolut ought to have intervened. This was the seventh payment to the same payee, taking place within around 38 minutes, with each transaction being for an amount of either £87 or £49.

What did Revolut do to warn Mrs B?

Until 12 August 2024, Revolut provided Mrs B with new payee warnings, which were quite general and asked whether the payment was being made to the intended payee, warning that it might not be possible to get Mrs B's money back. They didn't contain any information about different scam types and I don't consider they would have been particularly relevant to the situation Mrs B found herself in.

What kind of warning should Revolut have provided?

The investigator concluded that Revolut should have intervened with person to person contact by a member of staff. Given the relatively low value of the transactions to that point, I consider a proportionate intervention would have been a better automated warning, that is, a warning designed to narrow-down the scam risk to the particular scam risk Mrs B was facing, and provide tailored warnings based on that risk. I'm mindful that the cumulative value of the payments at that point was less than £1,000. For reasons I'll go on to explain, I consider either type of intervention would have uncovered the scam at that point.

If Revolut had provided a warning of the type described, would that have prevented the losses Mrs B suffered from payment 10?

Revolut has expressed doubt that earlier intervention would have been effective because it says Mrs B was under the spell of the scammer, was heavily-coached, was provided with a cover story and sought the advice of the scammer when Revolut did intervene on 12 August 2024 and after. But I don't agree Mrs B was "under the spell" of the scammer. She was wary of this job from the outset, questioning aspects of it on several occasions on 1 August and she seems to have been particularly suspicious after she was required to deposit increasing amounts of money on 3 August, expressing her doubts to the scammer. I consider it likely that being able to withdraw earnings on 1 and 2 August went some way to allay her suspicions, but I don't consider it is correct to say Mrs B was under the spell of the scammers – she appears to have remained wary throughout.

There is little, if any evidence to suggest Mrs B was given a cover story or coached by the scammer before 12 August 2024. By that time that Mrs B was desperate to recover her money, and while there was perhaps an element of that desperation on 3 August, it was not to the same degree, having invested so much less into this scam. Mrs B appears to have followed the advice of the scammer in large part due to the desperation to get her money back, but that would have been less of a factor on 3 August, especially if an intervention had taken place at payment 10, before significant amounts had been paid to the scammer.

It's possible Mrs B would have attempted to mislead Revolut, as she attempted to do following Revolut's intervention on 12 August, but I consider that is unlikely. I consider 3

August was the turning point between Mrs B having deposited some money, completed work tasks and having received the expected returns back and her beginning to encounter problems and starting to chase her losses, which she did by starting to make more substantial payments from 6 August onwards. Overall, I consider it likely that had Revolut intervened on 3 August, by providing either a better automated warning or through human intervention, Mrs B is likely to have been open with Revolut, given she hadn't paid that much to the scammers at that point, (especially given the returns she'd been paid) and given her clear concerns about the job from the outset, which had heightened on 3 August.

If Revolut had asked her the purpose of the payments, either through a better automated warning or through human contact, I'm persuaded it's more likely Mrs B would have told Revolut she was making the payments in connection with a job and that would have alerted Revolut to the scam since it was familiar with this type of scam by August 2024, and this would likely have led to the scam being uncovered at that point.

#### Is it fair and reasonable for Revolut to be held responsible for Mrs B's loss?

In reaching my decision about what is fair and reasonable, I have taken into account that Mrs B moved funds to Revolut from an account held with her bank and she also took out loans with other businesses. So, there may have been opportunities for those businesses to have intervened.

But, as I've set out, I consider Revolut ought to have intervened earlier than it did and that such an intervention would, most likely, have prevented Mrs B's further losses. The fact that money used to fund the scam came from other sources doesn't change my view that Revolut can fairly be held accountable for Mrs B's loss.

#### Should Mrs B bear any responsibility for her losses?

Mrs B had doubts about the work she was being offered and from the outset there were a number of things that I think ought to have led her to realise she was at risk. The manner in which she was contacted, unexpectedly over a messaging application, was unusual. She appears to have recognised this, because she queried how the scammer had obtained her contact details, she questioned how she knew who she was really dealing with and questioned other aspects of the role. She also continued to make payments as her suspicions grew and so on balance, I consider it is reasonable that Mrs B should bear 50% of her losses.

#### Recovery

Mrs B reported the scam on 18 August 2024, seven days after the last transaction. Revolut then attempted to recover Mrs B's money by contacting the receiving banks on 19 and 20 August.

The receiving bank responded and told Revolut that no money remained in the beneficiary accounts and while its response was not completely clear on this point, it appears to suggest, from the timestamp information it has provided, that the funds were moved on from the beneficiary accounts on the same day they were received.

While I think Revolut could have contacted the receiving banks more promptly, given that it took seven days from the date of the last transaction to report the scam to Revolut and the information from the receiving bank that suggests Mrs B's money was quickly moved on from the receiving banks, I'm not persuaded Revolut could have recovered any of Mrs B's money.

### Other matters

*While Mrs B did receive some money from the scammers at first, this appears to have been paid back to the scammers on 3 August before the point at which I consider Revolut ought to have intervened. As such, I don't think it's reasonable to deduct this amount from the redress.*

*Revolut should refund 50% of each of the payments Mrs B made as part of this scam from (and including) payment 10 onwards.*

### **Putting things right**

*The investigator didn't award interest on Mrs B's loss on the basis that the payments appear to have been funded by money Mrs B received from loans and it wasn't clear that any repayments had been made in respect of those loans.*

*However, I can see that Mrs B's payments to this scam were made from a variety of sources, including loans and her regular bank account balance.*

*Overall, I consider Revolut should add interest to the amount of the refunded payments, at the rate of 8% simple per year, since this represents a combination of money Mrs B had borrowed or saved and which she has lost the use of."*

Mrs B responded and said she accepted my provisional decision.

Revolut responded and said it had no further comments, but didn't indicate whether or not it accepted 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.

Having done so, and in view of the fact that neither party has made any further arguments or provided further evidence, I have reached the same conclusions as set out in my provisional decision and for the same reasons. It follows that I uphold Mrs B's complaint.

### **Putting things right**

Revolut should refund 50% of each of the payments Mrs B made as part of this scam from (and including) payment 10 onwards. It should add interest to each of these partial refunds, at the rate of 8% simple per year from the date of each payment to the date of settlement.

If Revolut considers that it's required by HM Revenue & Customs to deduct income tax from that interest, it should tell how Mrs B much it's taken off. It should also give Mrs B a tax deduction certificate if she asks for one, so she can reclaim the tax from HM Revenue & Customs if appropriate.

### **My final decision**

I uphold Mrs B's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs B to accept or reject my decision before 14 October 2025.

Greg Barham

**Ombudsman**