

## **The complaint**

Ms J complains that Revolut Ltd won't refund money she lost to a scam.

## **What happened**

The background to this complaint is well known to both parties and so I'll only refer to some key events here.

In 2025 Ms J saw an investment advert on social media for a firm I'll refer to as 'S'. Ms J completed S's enquiry form and, after speaking with them, decided to invest. S provided Ms J with access to their trading platform. And after starting with small amounts, Ms J was encouraged to invest larger sums to get better returns. But when Ms J asked to withdraw funds, she was told she had failed their security process and had to pay fees. Ms J has said she realised she'd been scammed when she failed the security process a third time and, after making enquiries online about S, found negative reviews.

As part of the scam, Ms J made 18 transactions totalling about £9,000 between 22 January and 14 February 2025. All, except for a single debit card payment, were push-to-card transactions.

Ms J complained to Revolut in May 2025 as she wanted her funds to be reimbursed. Revolut rejected the complaint and wouldn't refund her.

The complaint was referred to the Financial Ombudsman. Our Investigator didn't think Revolut had to do anything further. He thought Revolut should've carried out some additional checks before processing some of the transactions, as it was unusual activity for Ms J's account. But he thought the checks Revolut did carry out – which consisted of automated questions and warnings being provided – were proportionate to the risk associated with the payments. And as Ms J didn't provide accurate responses, due to being guided by the scammers on the telephone at the time, he didn't think Revolut could've uncovered the scam. Our Investigator also didn't think Revolut could've done anything more to recover the funds.

Ms J disagreed and so, the matter has been passed to me to decide.

## **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.

I'm sorry Ms J has been the victim of a scam. I appreciate it is a lot of money she has lost and I don't underestimate the impact this has had. I sympathise with Ms J greatly. But I must consider if Revolut is responsible for her loss and, while I know this will come as a disappointment to Ms J, I don't think they are. I'll explain why.

It isn't disputed that Ms J authorised the payments from her Revolut account. Generally, consumers are liable for payments they authorise and Revolut are also expected to process

authorised payment instructions without undue delay. However, taking into account the regulatory rules and guidance, relevant codes of practice and good industry practice, including the Consumer Duty, 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.

At which point, I should explain that for me to find it fair and reasonable that Revolut should refund Ms J requires more than a finding that Revolut ought to have intervened. I would need to find not only that Revolut failed to intervene where they ought reasonably to have done so - but crucially I'd need to find that but for this failure the subsequent loss would've been avoided. That latter element concerns causation. A proportionate intervention will not always result in the prevention of a payment. And if I find it more likely than not that such a proportionate intervention by Revolut wouldn't have revealed the payments were part of a fraud or scam, then I couldn't fairly hold Revolut liable for not having prevented them from being made.

Here, Revolut did carry out additional checks before processing many of the transactions. I think this was reasonable in the circumstances as some of the activity being disputed here was unusual for Ms J's account – as, for example, there were multiple international transactions being made within a short period of time on the same day. Because of this I think Revolut ought to have had reason to suspect Ms J might be at risk of financial harm from fraud.

I've therefore thought about whether the checks Revolut carried out were proportionate to the risk associated with the payments made. And as part of Revolut's checks, they told Ms J that something doesn't look right and the payments had been identified by their system as a potential scam. Revolut then told Ms J that it was important for her to answer their questions about the payments honestly, and that if she was being pressurised to hide any details about the transactions she could be being scammed.

Ms J acknowledged this and chose to proceed. Then, as part of Revolut's checks, Ms J confirmed:

- She wasn't being pressured into making the payments, nobody was telling her what to say (as if they were, Revolut warned they were a scammer) and that she was completing the transactions herself
- She was transferring funds to her account with another bank. This was despite there being an option to select '*It's part of an investment*'. Nor did she, in response to where the funds were being transferred to, select '*My investment account*'
- The funds were going to her own account, but she didn't select the option '*the account was created for me by someone else*'

Revolut then provided several warnings. But based on the responses Ms J provided, they weren't particularly relevant to her situation – as Revolut weren't aware the payments were being made for investment purposes. I can't however fairly hold Revolut responsible for that, as they were reliant on Ms J engaging with their fraud prevention checks openly and honestly. That said, upon Ms J confirming she wished to proceed, Revolut did provide further warnings before the payments were finalised. This included:

- **Research the recipient**

Double-check all the payment information, especially if they've asked you to pay into a different account unexpectedly. Research new or unfamiliar companies on the internet.

- **Don't let anyone talk you through how to respond to Revolut**

Fraudsters often create a sense of urgency to cause panic, or say there's limited time for you to act within. If this happens, cancel the transaction immediately.

These warnings were somewhat relevant to Ms J's situation. This is because S was a new company she was dealing with, and so she could've heeded Revolut's advice to research them online (thereby uncovering the scam as she later did). And S were also talking her through the online payment process with Revolut, which they clearly warned against. So, I think these warnings ought to have resonated with Ms J and given her cause to question the legitimacy of S. Unfortunately, while I understand she was being manipulated by S, she was clearly under their spell and followed their instructions implicitly. Consequently, this prevented Revolut from uncovering the scam and preventing Ms J's loss.

I appreciate Ms J doesn't think Revolut's checks went far enough. I've given this thought. But I'm mindful that there is a balance for Revolut to find between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate. It therefore isn't practical for Revolut to speak with their customers before processing every payment. And here, when considering the risks associated with the payments (including their value, destination and the information Ms J provided), I think the automated questions and warnings Revolut provided were a proportionate action in these circumstances. I therefore wouldn't have expected Revolut to have done anything more before allowing the payments to be processed. But even if Revolut had contacted Ms J to discuss the payments, such as through their in-app chat function, I'm not persuaded this would've made a difference. Given Ms J has said she was being guided by S on how to make the payments, I think it's most likely S would've similarly directed her on how to respond to any questioning from Revolut – thereby assuring Revolut the payments were being made for genuine purposes.

I sympathise with Ms J's situation as I understand she is the innocent victim of a scam. But sadly, due to Ms J not disclosing the payments were for investment purposes, denying any third-party involvement and confirming she was making the transactions herself, Revolut weren't able to uncover the scam. And I don't think they had enough reason to suspect Ms J was being guided by a third-party to mislead them.

I've considered whether, on being alerted to the scam, Revolut could've done anything more to recover Ms J's losses, but I don't think they could. The only option of recovery for the debit card payment was via chargeback, but this didn't have any reasonable prospect of success – as the payment was authorised by Ms J, and she wouldn't have been able to evidence a breach of contract or that the merchant had misrepresented the goods/services paid for. In respect of the push-to-card payments, there isn't a clear mechanism for a successful recall to take place. Nevertheless, Revolut did contact the receiving banks in an attempt to recover the funds but, unfortunately, this was unsuccessful.

I know Ms J will be disappointed by this outcome. But it would only be fair for me to direct Revolut to refund her loss if I thought they were responsible – and I'm not persuaded that this was the case. For the above reasons, I think Revolut has acted fairly and so I'm not going to tell them to do anything further.

**My final decision**

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms J to accept or reject my decision before 19 February 2026.

Daniel O'Dell  
**Ombudsman**