

## **The complaint**

Mr D is complaining about Revolut Ltd because it declined to refund money he lost as a result of fraud. He's been represented by a complaints manager and a family member at different stages of this complaint and to avoid potential confusion I'll refer to all submissions as if they came from Mr D himself.

## **What happened**

Sadly, Mr D fell victim to a cruel investment scam after responding to an advert he saw on social media. He already held an account with Revolut and used it to make multiple payments totalling around £30,000 that were lost to the scam.

These payments included a series of over 30 push to card payments to an overseas account in his own name, which he said was set up and controlled by the scammers using his stolen identity details. The payments took place between 27 March and 17 April 2025 and the amounts varied between £234 and £547.

Mr D then made approximately a number of exchanges to cryptocurrency with Revolut between 17 April and 8 May 2025, after which the currency was transferred to the scammers. The highest value exchange was for £3,000 but the majority were between £500 and £1,000.

Our investigator didn't recommend the complaint be upheld. In short, they felt any further intervention by Revolut wouldn't have stopped Mr D from wanting to go ahead with the payments, noting that it did ask on a number of occasions what the payments were for and that he didn't provide accurate answers.

Mr D didn't accept the investigator's assessment and made the following key points:

- This was a sophisticated scam in which the scammers cloned a legitimate firm and operated a professional-looking website.
- He was vulnerable at the time due to his mental state and the scam has had real physical and psychological consequences for him.
- He was coerced manipulated, with every transaction supervised by the scammers during multiple phone calls. This included pressure to borrow money to correct fake errors on his account and threats over stock market debt. This duress and the coercion involved means that Mr D can't be considered to have consented to the transactions.
- The pattern of activity, including a high velocity of transactions with unusual funding sources and the involvement of cryptocurrency, were all indicative of a scam.
- The warnings given by Revolut weren't relevant to Mr D's situation and its interventions weren't adequate.

- Mr D answered questions he was asked about the payments in the way he did because he was guided by the scammers on how to bypass security questions, demonstrating sophisticated attempts to circumvent bank safeguards.

The complaint has now been referred to me for review.

### **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.

My review included a consideration of the original and uncorrected version of the investigator's assessment. Having completed my review, I've reached the same overall conclusion as the investigator. I haven't necessarily commented on every single point raised but concentrated instead on the issues I believe are central to the outcome of the complaint. This is consistent with our established role as an informal alternative to the courts. In considering this complaint I've had regard to the relevant law and regulations; any regulator's rules, guidance and standards, codes of practice, and what I consider was good industry practice at the time.

There is some dispute that the payment instructions were authorised by Mr D. In this context, '*authorised*' essentially means the customer gave the business an instruction to make a payment from their account. In other words, they knew that money was leaving their account, irrespective of where that money actually went. While Mr D did give the instructions, he's effectively arguing that the coercive tactics and duress applied by the scammers nullified his consent and that the payments should be treated as unauthorised.

I've considered this issue carefully, but I don't believe sufficient evidence has been provided support Mr D's assertions on this point. It seems much of the manipulation and coercion referred to took place during telephone calls that aren't available for me to listen to. Without being able to hear exactly how the scammers operated to direct his actions, I don't think I can reasonably conclude the payments should be treated as if they weren't authorised by Mr D himself.

I've also noted the references to Mr D's vulnerability, including his mental state at the time, but no medical evidence have been provided to indicate he wasn't capable of making his own decisions at the time. Further, there's no record of Revolut having been informed about any vulnerability, meaning it couldn't reasonably be expected to take this into account in deciding whether to process the transactions in line with the instructions it received.

With these points in mind, I've proceeded on the basis that the payments were indeed authorised by Mr D. In broad terms, the starting position at law is that an Electronic Money Institution (EMI) such as Revolut is expected to process payments a customer authorises it to make, in accordance with the Payment Services Regulations and the terms and conditions of their account.

There are, however, some situations where we believe a business, taking into account relevant rules, codes and best practice standards, shouldn't have taken its customer's authorisation instruction at 'face value' – or should have looked at the wider circumstances surrounding the transaction before making the payment.

Revolut also has a duty to exercise reasonable skill and care, pay due regard to the interests of its customers and to follow good industry practice to keep customers' accounts safe. This includes identifying vulnerable consumers who may be particularly susceptible to scams and looking out for payments which might indicate the consumer is at risk of financial harm.

Taking these things into account, I need to decide whether Revolut acted fairly and reasonably in its dealings with Mr D.

### *The payments*

I must take into account that many similar payment instructions Revolut receives will be entirely legitimate. One of the key features of its accounts is that they facilitate payments that sometimes involve large amounts, transfers to overseas accounts and the purchase and transfer of cryptocurrency. I also need to consider its responsibility to make payments promptly.

Having considered what Revolut knew about the initial payments in late March and early April, I'm not persuaded it ought to have been particularly concerned. In addition to the fact the amounts were relatively low (the highest just over £400), most of them appeared to be going to an account in Mr D's own name. So I don't think there were sufficient grounds for Revolut to suspect he was at risk of harm from fraud at this stage and I can't reasonably say it was at fault for processing the payment in line with his instructions.

However, by 10 and 11 April, the volume of transactions and their combined value was such that I think Revolut should have identified Mr D may be falling victim to a scam and carried out some kind of proportionate intervention before continuing to process them.

It appears Revolut did identify the risk here and it's confirmed that it did intervene in many of the payments from this point onwards. Each of these interventions required Mr D to confirm the reason for the payment. And each time this question was preceded by a warning about the importance of answering honestly and that he may not be able to get his money back if he didn't. Mr D was also asked whether he was being pressured to make the payments, to which he said he wasn't, and also warned that if anyone was telling him what to say, they're a scammer.

On each occasion Mr D selected the option that said he was *'transferring money to my other account'* or *'paying a family member or friend'* rather than the option that said it was *'part of an investment'*, which I think he should have realised was the correct answer. Once the payment purpose was selected, Mr D was shown various warning screens relating to safe account and impersonation scams. These weren't relevant to the scam he was falling victim to but they did relate directly to the payment purpose he'd selected.

At this stage, I'm satisfied these interventions were proportionate to the risks presented by the payments. The success of any scam intervention by Revolut was dependent to some extent on Mr D providing accurate information about the payments he was making. Despite repeated warnings about the importance of providing accurate information and that only scammers would tell him not to do this, he continued to provide inaccurate information on multiple occasions. I appreciate Mr D was acting on the instructions of the scammers but I think it's undeniable that the way he engaged with Revolut's interventions hampered any attempt to uncover the scam and provide appropriate warnings.

There is an argument that Revolut could have gone further as the volume of payments continued later into April, perhaps by requiring Mr D to speak to one of its agents over the phone or online chat facility. But if it had done that, I don't think it's likely he'd have been any more open about the payments he was making. By his own admission, Mr D was guided by the scammers in how to circumvent Revolut's safeguards and I think this is shown in the history of his text chats with the scammers that he's provided. In particular, I note that on 16 April, around the same time as I've said Revolut could have tried to speak to him, Mr D told the scammers he'd spoken to his bank (from where he transferred money to Revolut) about

a transfer and had answered its questions *'as you advised me'* despite being told he was likely being scammed.

I think this evidence supports Mr D's recollection that he was heavily influenced by the scammers and acting on their instructions to the point where he was prepared to hide what he was doing from his bank and Revolut despite warnings about the need to be open and that only scammers would tell him to do otherwise. In the circumstances, I don't think it's likely that any further intervention from Revolut would have led Mr D to disclose the true purpose of the payments such that it would have been in a position to identify the type of scam that could be taking place and provide relevant tailored warnings, or that such warnings would have been effective in stopping him from wanting to make the payments.

I want to be clear that it's not my intention to suggest Mr D is to blame for what happened in any way. He fell victim to a sophisticated scam that was carefully designed to deceive and manipulate its victims. I can understand why he acted in the way he did. But my role is to consider the actions of Revolut and, having done so, I'm not persuaded these were the cause of his losses.

#### *Recovery of funds*

I've also looked at whether Revolut could or should have done more to try and recover Mr D's losses once it was aware that the payments were the result of fraud.

I understand Mr D first notified Revolut of the fraud on 19 May 2025, several days after the last payment. It's a common feature of this type of scam that the fraudsters will move money very quickly to other accounts once received to prevent any attempted recovery. So it's not a surprise that attempts to recover the card payments from the receiving bank weren't successful. Further, cryptocurrency transactions are particularly difficult to trace and recover. In the circumstances, I don't think anything that Revolut could have done differently would likely have led to these payments being recovered successfully after this period of time.

#### *In conclusion*

I recognise Mr D has been the victim of a cruel scam and I'm sorry he lost this money. I realise the outcome of this complaint will come as a great disappointment but, for the reasons I've explained, I don't think any further intervention by Revolut would have made a difference to the eventual outcome and I won't be telling it to make any refund.

#### **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 Mr D to accept or reject my decision before 3 March 2026.

James Biles  
**Ombudsman**