

The complaint

Mrs C complains that Revolut Ltd won't refund money she lost when she fell victim to a job 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.

Mrs C fell victim to a job scam in 2025. She was contacted by a person on an instant messaging application about a remote working opportunity. The job involved completing tasks (orders) to help merchants optimise their social visibility. Mrs C was told the work would take around one hour per day and, in addition to commission earned by completing the tasks, she would earn a basic salary of £350 if she worked for five consecutive days.

As part of the scam, Mrs C received 'commercial' tasks that paid greater commission but required her to deposit funds into her account on the scam platform. To do this, Mrs C sent funds from her Revolut account to four payees via a third-party money remittance provider. Mrs C sent nearly £2,700 between 6 and 8 February 2025 across about 20 push-to-card transactions.

Mrs C realised she'd been scammed when she was being told she had to pay £3,500 to withdraw her earnings, and she was being told to borrow funds from friends and family to do so. Mrs C notified Revolut of the scam and raised a complaint, but they didn't uphold it.

The complaint was referred to the Financial Ombudsman. Our Investigator didn't think Revolut had to do anything further. She said Revolut carried out additional checks before processing some of the transactions Mrs C made as part of the scam. But unfortunately, Mrs C didn't provide Revolut with accurate responses to their questions as she was following the scammer's instructions which hindered Revolut's ability to uncover the scam. Our Investigator also didn't think any further intervention would've made a difference. Nor did she think Revolut could've done any more to recover the funds upon being informed of the scam.

Mrs C didn't agree with our Investigator and so, her complaint 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 Mrs C has been the victim of a scam. I know it is a lot of money she has lost and so, I understand why she is doing everything she can to recover it. But I must consider whether Revolut is responsible for her loss and, while I know this will come as a disappointment to Mrs C, for similar reasons as our Investigator, I don't think they are. I'll explain why.

Before I do, I want to reassure Mrs C that I've considered everything she has submitted in support of her complaint. And so, while I've summarised this complaint in far less detail than what has been provided, I want to stress that no courtesy is intended by this. If there is a

submission I've not addressed; it isn't because I have ignored the point. It's simply because my findings focus on what I consider to be the central issue in this complaint – that being whether Revolut is responsible for Mrs C's loss.

In broad terms, the starting position in law is that an Electronic Money Institution (EMI) is expected to process payments that their customer authorises them to make. It isn't disputed that Mrs C knowingly made the payments from her account and so, I'm satisfied she authorised them. Therefore, under the Payment Services Regulations 2017 and the terms of her account, Revolut are expected to process Mrs C's payments, and she is presumed liable for the loss in the first instance.

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.

Here, although the payments were individually of a relatively modest value, I think there was reason for Revolut to suspect Mrs C could be at risk of financial harm from fraud. This is because she made several payments within a short period of time to different payees on a newly opened account. So, I think Revolut should've carried out additional checks before processing some of the payments Mrs C made – which they did. I've therefore thought about whether these checks were proportionate to the risk the payments presented in the circumstances.

Revolut's checks involved:

- Revolut warned Mrs C that if she was being pressurised to hide any details about the transactions, she could be being scammed. And that she should take this warning seriously.

Mrs C acknowledged this warning and that she understood the importance of answering Revolut's questions honestly.

- Revolut warned Mrs C that if she was being told what to say, or that she needed to act quickly, it may be a scam.

Mrs C confirmed that nobody was assisting with the transaction and she was completing them by herself.

- Revolut warned Mrs C that if someone was telling her to ignore their warnings, then they were a scammer.

Mrs C continued with the transactions.

- Mrs C confirmed the purpose of the transactions as 'I'm paying a family member or friend', either for 'rent or bills' or 'paying money I owe'. And that these persons hadn't 'asked for help urgently or unexpectedly', and she obtained the payment details 'face to face'.

- Revolut provided warnings tailored to the response Mrs C provided – which were predominantly relating to the risk of impersonation and romance scams.

I understand Mrs C was being manipulated by the scammer and coached on how to respond to Revolut's questions. Mrs C has also explained she was told that, as they weren't a scammer, she should ignore Revolut's warnings. While I appreciate Mrs C thought the job opportunity was legitimate and might not have fully understood the consequences of providing inaccurate responses, I don't think I can fairly hold Revolut responsible for that.

Revolut were relying on Mrs C engaging with them openly and honestly so they could assess the type of scam risk she might be exposed to. Unfortunately, Mrs C denied any third-party involvement relating to the transactions she was making. And despite Revolut

specifically warning that she could be being scammed if she was being told to hide any details about the transactions, she said she was making them to pay a family member or friend even though there was an option to select 'It's related to a job opportunity' – which would've been a more accurate payment description.

Because of this however, Revolut wouldn't have had sufficient reason to suspect Mrs C might be at risk of falling victim to a job scam. Instead, the likely scam associated with the responses Mrs C provided would've included impersonation or romance scams. I therefore think it was reasonable for Revolut to provide warnings tailored to these types of scams. Sadly, these weren't relevant to Mrs C's situation and so they wouldn't have resonated with her. But upon Mrs C confirming she wished to proceed, I think it was reasonable for Revolut to process the transactions – as, having shown the warnings, they would've been satisfied Mrs C was making them for legitimate purposes.

I've thought about whether Revolut ought to have gone further than they did before processing the transactions. But even if they had, I'm not persuaded it would've made a difference. This is because I think Mrs C would've similarly followed the scammer's guidance on how to respond – whether in response to further automated questioning or if directed to Revolut's in app chat. It follows that I don't think Revolut could reasonably have uncovered the scam through a proportionate intervention in the circumstances.

I've thought about whether Revolut could reasonably have done anything else to recover Mrs C's payments after she reported the scam. Revolut contacted the beneficiary banks on the same day that she reported the scam, but they didn't respond. This was outside of Revolut's control, and they couldn't have done anything more as they were reliant on the cooperation of the beneficiary banks.

I appreciate Mrs C is the innocent victim of a scam and that this won't be the outcome she is hoping for. 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 have 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 Mrs C to accept or reject my decision before 6 January 2026.

Daniel O'Dell
Ombudsman