

## **The complaint**

Miss B complains that Revolut Ltd won't refund money she lost as part of a task-based job scam.

Miss B is being supported in her complaint by a representative, but for ease, I'll only refer to Miss B throughout this decision.

## **What happened**

Miss B has explained that in September 2023 she was contacted by who she thought was a legitimate recruitment agency about an employment opportunity. The employment worked by Miss B accessing tasks from her account (set up by the scammers) and then completing those tasks, which involved writing film reviews in exchange for commission.

Before having access to these 'tasks' Miss B was required to fund her account to ensure it wasn't in a negative balance. This was done by way of purchasing crypto through the peer-to-peer mechanism. The crypto was then transferred to three different legitimate crypto exchanges in Miss B's name before unfortunately being lost to the scam.

On 10 October 2023 Miss B opened an account with Revolut to facilitate the scam payments. She then transferred funds from several other accounts and credit card facilities to her account with an existing bank (Bank H), before sending them to Revolut to fund the scam payments.

Between 13 October and 26 December 2023 Miss B made 15 international transfers from her Revolut account totalling just under £98,000 to several different payees. The payments ranged from £1,963.82 to £10,776.71. She also paid just over £1,000 in transfer fees.

Revolut provided Miss B with its standard new payee warning when the payees were added to her account, as well as its scam educational stories based on the payment purpose she selected (investment). It also contacted Miss B via its chat function in relation to a £10,280.40 made on 29 October 2023.

During all those interactions, Miss B maintained the position that she was investing in crypto – including the fact she was doing this on her own, had checked the trading company on the FCA register, had been introduced to the investment by a friend or family member, had invested in crypto before and was doing so via an existing crypto wallet. Miss B also confirmed that she wasn't being guided on how to respond to Revolut's questions. Satisfied with Miss B's responses, Revolut processed her payments.

Miss B has explained that initially she received some small commission payments, but that when she was unable to fund her account and access the work tasks, she asked for her funds to be withdrawn. When she was told this wasn't possible without making more payments, Miss B realised she'd been the victim of a scam.

Miss B reported the matter to Revolut in May 2024. In summary, she thought Revolut hadn't done enough to protect her. Revolut thought it had done nothing wrong and that it had taken appropriate and proportionate steps based on the responses Miss B provided when questioned about her payments. It also explained that it had tried to recover the funds, but that this had been unsuccessful. Unhappy with Revolut's response, Miss B referred her complaint to the Financial Ombudsman.

One of our Investigators considered the complaint but didn't uphold it. Essentially, he said that as Miss B hadn't been honest with Revolut about the reason for her payments (as part of a job opportunity) it had no reasonable basis to believe she was falling victim to a task-based job scam, and so it was unable to provide her with appropriate warnings.

And even if Revolut had gone further in its questioning of Miss B by way of human intervention, or intervened in more payments, our Investigator wasn't persuaded this would've made a difference. That was because she'd been dishonest with Revolut, and with Bank H when it spoke to her about several payments made to fund the scam; and because there was evidence to suggest Miss B had been coached by the scammers on how to mislead her banking providers when questioned about the payments.

Finally, our Investigator thought there was no reasonable prospect of Revolut being able to recover the lost funds at the point it was alerted to the scam.

Miss B disagreed and asked for an Ombudsman's final decision. In short, she said Revolut had identified that the payments presented a risk and that she hadn't been dishonest when selecting a payment purpose as 'investment' given she was essentially 'investing' in the job by way of purchasing crypto. And because of that, Miss B said she "*should not be punished for clicking the wrong button on an automated option journey*".

Miss B said that Revolut's chat intervention was insufficient, as it hadn't fully explored the reasons for the £10,280.40 payment by way of open and probing questions. And that it hadn't applied an appropriate level of scrutiny to the responses she'd provided, particularly given the prevalence of job scams and in the knowledge that scammers often coach their victims on what to say in response to such questions.

In terms of her interactions with Bank H, Miss B didn't believe this demonstrated a pattern of behaviour that would've continued if Revolut had asked appropriate and proportionate questions. She said Revolut had more information available to it about the payment destinations – whereby she was paying multiple different international payees. And further to that, there was no evidence to suggest that she'd been given a "*detailed*" cover story by the scammers that would've held up to scrutiny from Revolut. So, Miss B believed appropriate probing and questioning by Revolut would've likely uncovered the scam.

Finally, Miss B referred to several other final decisions issued by the Financial Ombudsman to demonstrate why her complaint should be upheld.

### **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 reached the same conclusion as our Investigator and for largely the same reasons. I'll explain why.

But first, I would like to say that if there's a submission I've not addressed; it isn't because I've ignored the point. It's simply because my findings focus on what I consider to be the central issues in this complaint – that being whether Revolut was responsible for Miss B's loss.

I should also point out that whilst being mindful of previous decisions made by the Financial Ombudsman, I review each case on its own merits. And although, for background and context, I've considered Miss B's interactions with Bank H, my findings here relate *only* to the actions of Revolut.

As a starting point, Miss B doesn't dispute that the payments were made in line with her instructions to Revolut. So, although she didn't intend the money to go to the scammers, under the PSRs and the terms of her account, Miss B is presumed liable for her loss in the first instance.

However, taking into account the regulatory rules and guidance including the Consumer Duty, 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.

The question then arises whether Revolut ought reasonably to have held such suspicions or concerns in relation to Miss B's payments (individually or collectively) — and if so, what might've been expected from a proportionate intervention.

So, taking all of this into account, I need to decide if Revolut acted fairly and reasonably in its dealings with Miss B when she made the payments. Specifically, whether it should've done more than it did before processing them – and if it had, would that have made a difference. I also need to decide if Revolut could've reasonably recovered the lost funds.

### Should Revolut have intervened in the payments?

When considering this point, I've kept in mind that EMIs, such as Revolut, process high volumes of transactions each day, and that there is a balance for Revolut to find between allowing customers to be able to use their accounts and questioning transactions to confirm they're legitimate. Further to that, many of Revolut's customers use their accounts to legitimately invest in crypto; often because many high street banks have placed restrictions on transactions involving the purchase of crypto.

And as Miss B opened her account with Revolut for the purpose of the scam, there was no previous account activity for it to compare the disputed payments to, to decide whether they were out of character for Miss B. So, I've thought about what Revolut did know about the payments and based on that, what reasonable and proportionate steps it should've taken to protect Miss B.

Given the prevalence of task-based job scams at the time these payments were made, I'd expect Revolut to have both questions and warnings in place tailored towards the key risks associated with those types of scams. But that is *only* possible if Revolut is provided with information from the customer to indicate that they're likely involved in a task-based job scam. I've given this point careful thought in relation to Miss B's complaint.

As well as the generic 'trusted payee' warning for each new payee, Miss B was also asked for the payment purpose on multiple payments, each time selecting investment. She was then asked several questions about what she was investing in – to which she said crypto.

This in turn generated tailored warnings relating to crypto investment scams. Miss B has said that selecting a payment purpose of 'investment' wasn't her being dishonest with Revolut, rather she felt this was an accurate reflection of the payment purpose – given she was 'investing' in the job by way of crypto.

Whether Miss B selected the wrong payment purpose intentionally or not doesn't change the fact that this essentially prohibited Revolut from providing a tailored task-based job scam warning. Miss B was consistent in her responses for each payment (including saying she'd been introduced to the investment by a friend or family member, and she wasn't being guided on how to respond to Revolut's questions – both which were incorrect).

So, I can't reasonably say that Revolut had any indication that Miss B's payments were being made in connection to anything other than a crypto investment. Therefore, I'm satisfied that the automated and tailored warnings Revolut provided Miss B with were proportionate and relevant to the payment reasons she'd selected and the responses she'd provided.

By the time of the £10,280.40 payment on 29 October 2023, Revolut had reason to suspect Miss B was at risk of financial harm; and given the pattern that was emerging, I think it was right here to have initiated a human intervention with her by way of its chat function. Where there's an interaction between a customer and Revolut before a high value payment is

processed, as there was here, I'd expect Revolut to take reasonable steps to understand the circumstances of that payment.

Given the consistent responses Miss B had provided to Revolut in relation to the automated payment purpose and associated warnings, Revolut's emphasis in the chat was understandably on crypto investment scams. But Revolut did provide more context to the risks associated with such scams, which, in my opinion, could also be relevant to task-based job scams; those being the risks linked to a third-party guiding Miss B or instructing her to ignore payment alerts, as well as paying fees (which arguably she was having to do to access her tasks and make withdrawals) – all of which were relevant to Miss B's situation.

And yet Miss B's response to Revolut was:

*"I'm personally operating, I'm investing in cryptocurrencies, can you please proceed with my transfer?"*

Again, Miss B was providing a consistent response in line with the information she'd previously provided to Revolut. And so, I don't think it was unreasonable for Revolut to have accepted what Miss B said here without further scrutiny.

But, as I'll go on to explain below, even *if* Revolut had gone further in its questioning of Miss B, I'm not persuaded, on balance, that this would've likely led to the scam being uncovered.

#### Would further intervention by Revolut have prevented Miss B's loss?

For me to find it fair and reasonable that Revolut should refund the payments to Miss B would require more than a finding that it should've done more to intervene when she made her payments. Crucially, I'd also need to find that but for that 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 proportionate intervention by Revolut wouldn't have revealed any of Miss B's payments were part of a fraud or scam, then I couldn't fairly hold it liable for not having prevented them from being made.

I've given the causation point very careful thought and agree with our Investigator for the following reasons:

- Before making the payments from her Revolut account, Miss B is in almost daily contact with the scammers. She's also part of a wider chat group where other 'employees' share the success of their work and the profits they've made. This would've likely reassured Miss B that the job opportunity was legitimate.
- There's significant and clear evidence to demonstrate that the scammers were guiding Miss B on what to say when challenged about the payments by both Revolut and Bank H. Specifically that she shouldn't mention working part time on an online platform. Despite this, Miss B tells Revolut that she hasn't been guided on how to respond to its questions and tells Bank H that she hasn't been told to lie to her bank.
- As I've talked about above, despite Revolut saying to Miss B in the chat that it suspected she was being scammed and that being guided to make payments, to ignore payment alerts or having to make a payment as part of a 'fee' were all things to be cautious of, she wasn't honest with Revolut about the true payment purpose (maintaining that she was investing in crypto) and wanted the payment to proceed.
- Miss B also said the 'investment' had been introduced to her by a friend or family member, that she'd invested in crypto before and that she'd checked the company she was dealing with on the FCA register. This didn't reflect the true situation that Miss B had found herself in; yet it undoubtedly provided Revolut with assurance that

she wasn't likely at risk of financial harm.

- Miss B asked the scammers what to say to Bank H during their call "*If you tell me what to say to [Bank H] I'll call this evening.*" The scammers then advised Miss B to tell Bank H that she was sending the funds to family or colleagues based abroad. Miss B also confirmed to the scammers that she'd followed their instructions to allow the payments to be processed.
- So, whilst as Miss B has argued, the scammers might not have provided her with a "*detailed*" cover story, it advised her on what to say. And from having listened to the calls between Miss B and Bank H, it's evident that she was following the scammers' advice; essentially creating her own cover story that the funds were for her daughter's overseas tuition fees. Miss B's story also stood up to scrutiny from Bank H, where she was able to confirm where her daughter was studying, the total fee amount and how long she'd been abroad for. And when challenged by Bank H on why the amount she was transferring was more than the tuition fees, Miss B confidently replied to say she was sending extra funds to her daughter for living costs.
- During one call with Bank H, Miss B also confirmed that no one was asking her to make the payment and denied any involvement in crypto – despite this being the ultimate payment destination (which Miss B has said repeatedly wasn't an inaccurate payment reason when questioned by Revolut).
- Bank H also asked Miss B if a company or anyone had asked her to make a payment, but despite this being the case to access her job tasks – Miss B maintained this wasn't what had happened.
- There's a clear pattern of Miss B resorting to input from the scammers and fellow 'employees' when she needed any advice or help in making the payments and/or accessing the tasks, and on how to source funds. And whatever advice she was given, Miss B followed without question or pushback; even when that advice was to mislead her financial providers to ensure payments were processed without delay.
- Even when Miss B was having problems getting her money back in late 2023/early 2024, – she reached out to fellow 'employees' for advice and reassurance. One 'employee' consistently maintained that they'd always been able to make withdrawals without issue and advised Miss B to follow the instructions of her agent (the scammers), which Miss B does by making further payments.
- Miss B continued communicating with the scammers and making payments (from Bank H) as late as April 2024 – despite saying in the group chat that she'd been trying to make a withdrawal since October 2023. This, I believe, demonstrated her motivation to continue with the 'employment' still believing it to be legitimate.

Miss B has argued that it's unfair to rely on how she responded to Bank H as evidence of how she'd have likely responded to Revolut, if it had asked more probing questions of her. She also believes the outcome here would've been different given Revolut knew more about the payments and the risks they presented (that they were being made to new international payees, not to accounts in Miss B's own name). I've given this point careful thought, but on balance, I still maintain that it's unlikely Revolut could've uncovered the scam.

I can see from the chat with the scammers that around the time of the payments to Revolut Miss B wasn't completely at ease with the situation of having to make deposits to access the job tasks. But she was under the impression she'd made £42,000 worth of crypto – which I can see provided her with the motivation to continue with the 'employment'.

When Bank H spoke to Miss B on 13 October 2023 about a payment to Revolut, it explicitly warned her about scammers providing convincing stories to entice their victims. And that they're often told not to divulge those stories to their banks. Bank H went on to explain to

Miss B that its unable to fully protect its customers if it's not given the correct information. But Miss B still proceeded to provide inaccurate information to both Bank H and to Revolut.

Bank H also clearly explained to Miss B that if someone had contacted her out the blue with the offer of a chance to make money – then it was a scam. But again, Miss B denied this was the case, despite being exactly what happened to her, albeit she thought she'd been contacted by a legitimate recruiter.

Also, of significance here is that on 29 October 2023 (the same day Miss B spoke to Revolut) she said to the scammers that *"Every time I go to withdraw the system says I have pay more. When I pay it, it says pay more deposit"*. And she goes on to say that she is worried she'll need to pay more. The scammers response is *"this did bother me for a few days, but thankfully it all worked out in the end to receive my withdrawal"*.

So, despite Revolut explicitly warning Miss B that *"If someone says you need to send money as a tax or fee to access your funds, you are being scammed"*, she instead seeks reassurance from the scammers and continues to make payments, even though she repeatedly tells the scammers she can't afford it and talks about utilising her overdraft and taking out loans.

All this leads me to conclude it's more likely than not, on balance, that Miss B would've proceeded with her payments – even if Revolut *had* gone further in alerting her to the risks involved and the checks she should make. Miss B was clearly completely under the spell of the scammers – at no time questioning the advice she'd been given, despite clear warnings from Bank H and Revolut about the need to be honest about payments, being guided on how to respond to warnings, and about paying fees to access funds.

Taking all this into account, I'm not persuaded, in the circumstances of this complaint, that *any* proportionate intervention from Revolut would've likely prevented Miss B's loss on any of her payments.

#### *Did Revolut do enough to try and recover the lost funds?*

In terms of Revolut's attempts to recover the lost funds at the point it was alerted to the scam; I also agree with our Investigator here. Revolut promptly contacted the beneficiary banks but were informed that no funds remained. This isn't surprising given the passing of time, and because payments were for the purchase of crypto which was unfortunately transferred to the scammers.

I have a great deal of sympathy for Miss B and the loss she's suffered, as I appreciate it's a significant sum of money. But it would only be fair for me to direct Revolut to refund her loss if I thought it was responsible – and I'm not persuaded that this was the case. For the above reasons, I think Revolut has acted fairly in the circumstances of this complaint, and so I'm not going to tell it to do anything further.

#### **My final decision**

For the reasons given above, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss B to accept or reject my decision **before 15 January 2026**.

Anna Jackson  
**Ombudsman**