

The complaint

Miss G complains that Revolut Ltd won't refund money she lost when she was a victim of a job scam.

Miss G is represented, however, to keep things simple, I'll refer to Miss G throughout my decision.

What happened

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

Miss G paid just over £22,500 between November 2023 and January 2024, to what she was led to believe was a genuine remote job opportunity, which involved paying for and completing various tasks to earn commission. Miss G realised she had been a victim of a scam when she tried to withdraw her funds and was told she had to pay withdrawal fees.

Our Investigator didn't uphold Miss G's complaint, as although she found Revolut ought to have done more and asked further questions on the payment she made on 7 December 2023 for £8,663.79, she wasn't persuaded that would have prevented Miss G's loss and she still would have wanted to go ahead with the payment. This was because during the scam, when Revolut did intervene on some earlier payments, Miss G had provided inaccurate responses when it attempted to identify why the payments were being made, which meant Revolut was denied an opportunity to identify the hallmarks of a scam and provide appropriate scam warnings. The Investigator also said Miss G sought guidance from the scammer on what to say when questioned by Revolut, which included sending screenshots of the questions it asked when they intervened on some of the payments. Because of this the Investigator thought Miss G relied heavily on the scammer, which included opening a Revolut account on the instructions of the scammer and being guided throughout the scam in making sure the payments went through smoothly. And so, given the level of coaching, our Investigator wasn't persuaded a better intervention or warning would have prevented the loss.

Miss G asked for the matter to be referred to a decision. She said Revolut failed in its duty of care to provide an effective intervention that would have prevented her losses. She also felt Revolut failed to prevent foreseeable harm to her which is something they are expected to do under Consumer Duty. Miss G said Revolut should have provided human intervention on the third payment she made on 6 November 2023, and it should have asked her about the purpose of this payment as it was clearly out of character and representative of well-known fraud trends which Revolut were aware of, especially as they had already flagged the earlier payments she made on the same day. Miss G argued that rigorous interventions, whereby Revolut ensured she understood the warnings provided, would've helped her realise the gravity of the situation and led to her breaking free of the scammer's influence. As a result, Miss G felt it would be fair for Revolut to reimburse her loss in full.

As no agreement could be reached, Miss G's complaint was passed to me to decide. I issued a provisional decision on 16 October 2025, and I said:

I'm sorry Miss G has been the victim of a scam and suffered a significant financial loss. I'm sympathetic to the impact this has had on her. But I must consider whether Revolut is responsible for the loss she has suffered. I know this won't be the outcome Miss G is hoping for but I don't think they are. And so, I don't think Revolut has acted unfairly by not refunding the payments. I'll explain why.

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 Miss G knowingly made the payments from her account – albeit under the direction of the scammer – and so, I'm satisfied she authorised them. Therefore, under the Payment Services Regulations 2017 and the terms of his account, Revolut are expected to process Miss G'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.

So, the starting point here is whether the instructions given by Miss G to Revolut (either individually or collectively) were unusual enough to have expected additional checks to be carried out before the payments were processed. When considering this, I've kept in mind that EMIs 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 account and questioning transactions to confirm they're legitimate.

Revolut needs to take an appropriate line between protecting against fraud and not unduly hindering legitimate transactions. In this case, Miss G opened her Revolut account specifically to make payments associated with this scam. So, Revolut had no account history against which to compare those payments to see if they were unusual or concerning, it would therefore be relying on generic indicators of risk. I've reviewed Miss G's statements and considered if the payments in question warranted intervention from Revolut prior to them being processed.

On balance, I don't think the initial payments Miss G made, either individually or collectively, were of a monetary value whereby I would've expected Revolut to have sufficient reason to suspect Miss G was at risk of financial harm from fraud. However, I do think it was reasonable to expect that Revolut should have intervened in some way with some of the later payments Miss G was attempting to make, especially as she made three payments on the same day (6 November 2023) totalling just over £11,000 within five hours, with each payment doubling in value and going to three separate individuals. Given what Revolut knew about the payments, I think that the circumstances should have led Revolut to consider that Miss G was at a heightened risk of financial harm due to the fraud pattern that was emerging. In line with good industry practice and regulatory requirements, I am satisfied that it is fair and reasonable to conclude that Revolut should have warned Miss G before allowing these payments to go ahead.

Revolut says it provided a warning to Miss G when she set up a new beneficiary prior to making the first transfer. It says it warned Miss G that she might be falling victim to a scam by providing the following message:

"Do you know and trust this payee?"

If you're unsure, don't pay them, as we may not be able to help you get your money back. Remember, fraudsters can impersonate others, and we will never ask you to make a payment"

The above warning was provided to Miss G each time she made a payment to a new beneficiary, so she would have seen the above warning on multiple occasions as she made payments to various individuals as well as some payments via crypto providers.

I think this warning was a proportionate additional check to the risk presented when she made payments to a new beneficiary taking into consideration the values involved. And so, I think it was reasonable for Revolut to process the payments upon receiving Miss G's confirmation that she wished to proceed (and understood the potential risks).

I also note that Revolut evidently did have concerns about some of the later payments Miss G was trying to make, most notably the three payments she attempted on 6 November 2023 (as mentioned above) which resulted in each payment being blocked and further questions being asked. Revolut said they provided a warning for each payment that was tailored to the payment purpose she selected. Miss G selected 'Pay a family member or friend' on each occasion. As part of the questionnaires, Miss G then also told Revolut the following:

- She understood if she was being scammed, the fraudster may ask her to hide the real reason for this payment.*
- She wasn't being assisted through the questionnaire.*
- She was making the payment to a family member or friend to buy something from them.*
- No one had asked her for help unexpectedly.*
- She hadn't paid the person before.*
- She received the payment details via a messaging service.*

Based on the payment purpose Miss G selected, Revolut provided warnings tailored to the associated risks of paying a family member or friend. However, these warnings weren't relevant to Miss G's situation and I can't hold Revolut responsible for Miss G selecting inaccurate payment purposes for the transactions.

Miss G has argued that her payment activity warranted a greater level of intervention from Revolut especially when she made her third payment of the day (£6,802.40) on 6 November 2023. That did however happen on each payment she made on 6 November 2023, with Revolut directing Miss G to their in-app chat function before processing the payments. As part of this conversation, Revolut explained to Miss G that they needed to check a few details regarding the transactions to protect her from a potential scam. Revolut provided Miss G with the following warning:

"I've looked through your answers, and I can see that you mentioned that this payment is to a family member or friend. Unfortunately, our fraud detection systems show that there is a high likelihood that you're being scammed, and the person you are trying to send money to is not who they say they are. If you continue with this transfer, the most likely outcome is that you will lose your money and we will not be able to get it back. Are you making this transfer because a family member or friend told you they urgently need money?"

Miss G confirmed this was not the case and asked Revolut to let her send the money, which they did. At this stage Miss G was making payments to individual

accounts and from the information she had provided, the reasons for the transfers seemed plausible. So, based on what Miss G told them, Revolut would've likely been reassured she was making the payment for legitimate purposes – as she remained consistent in explaining she was paying a family member or friend.

I've also reviewed the scam chat that took place between Miss G and the scammer and I can see that she was guided by the scammer to open the Revolut account. Miss G also relied heavily on the scammer to make sure the payments went through smoothly. This is evident by Miss G sharing questions she received with the scammer when any payments got blocked or questioned. The scammer then provided her with the answers in response to make sure the payments were released. The scam chats also show Miss G was promised unrealistic returns which should have raised concerns. This is evident on 27 November 2023, when the scammer told Miss G, she could earn "\$15000 per day?" which Miss G responded with that's nearly "2 million a year". The scammer reassured her this was possible and something that she has been able to achieve since she joined so it was realistic for her too.

Having reviewed all the information provided, I've also thought about whether, had Revolut probed Miss G further, as she has suggested they ought to have, this would've led to the scam being uncovered. Having done so, I'm not persuaded this would've made a difference. I think it's most likely that Miss G would've continued to have withheld the true surrounding circumstances of the payments and, ultimately, I'm not persuaded that Miss G would've disclosed the true reasons for making the payments – but, instead, she would've continued to respond in a similar manner.

I also don't think any further interventions from Revolut were necessary as the payment that Miss G made on 7 December 2023 for £8,663.79 was being made to an already established payee which she had told Revolut was a 'family member or friend', and that she wasn't being pressurised into making the payment. So, I don't think any further intervention a month later was necessary or would have resulted in a different response being provided by Miss G.

On a final note, I've considered whether, on being alerted to the scam, Revolut could reasonably have done anything more to recover Miss G's losses, but I don't think they could. This is because the payments she made via transfers, Revolut were told by the beneficiary banks no funds remained, and in relation to the card payments these were either unable to be recalled as they were processed as "push to card" payments which aren't recoverable, or they would not be covered under chargeback rules.

I have a great deal of sympathy for Miss G and the loss she's suffered. I appreciate she is the innocent victim of a scam, and she has lost a significant sum of money. 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 provisional decision

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

Revolut didn't respond to my provisional decision.

Miss G replied to say she disagreed. In short, she said:

- Revolut should have intervened more robustly with probing questions and not just accepted her answers at face value.
- The payments she made were indicative of a job scam, so Revolut should have provided job scam warnings.
- The warnings it provided were not adequate or proportionate to the risk identified, and a proportionate intervention would have been for Revolut to have contacted her by phone to discuss the payments further, which would have resulted in the scam being uncovered.
- Revolut should have requested evidence of why the payments were being made as they do when it suspected them of being fraudulent, which was not done in this situation. As she wouldn't have been able to provide any documentation, the scam would have again been uncovered.
- Overall, Revolut's failure to effectively intervene at any point was a failure to prevent her from foreseeable harm, which directly contributed to her loss. So, Revolut should be asked to reimburse her loss in full.

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.

In doing so, I have thought carefully about the additional points Miss G has made, but it doesn't persuade me to reach a different outcome to my provisional decision.

Miss G has mentioned Revolut should have intervened more robustly and not accepted her answers at face value when she made a payment of £6,802.40 on 6 November. However, as I mentioned in my provisional decision, I am satisfied the in-app intervention Revolut carried out on the above payment and the warnings they provided were proportionate to the risk identified based on the answers Miss G provided. As a result, I wouldn't have expected them to have done anything else.

As mentioned in the provisional decision, Miss G was clearly being guided by the scammer and relied heavily on the scammer to make sure the payments went through without any issues. This is evident from Miss G sharing questions she received with the scammer when any payments were blocked or questioned and answering accordingly as directed by the scammer. Based on the information I've been provided; I'm not satisfied any further probing from Revolut or any additional intervention would have led to the scam being uncovered.

I've also noted the comments of Miss G about the Financial Conduct Authority's Consumer Duty and I've taken account of Revolut's obligations following its introduction, but I'm not persuaded this changes the outcome here. While Revolut was expected to avoid causing her foreseeable harm, I'm not persuaded its actions (or failure to act) were the cause of the harm she has suffered, nor do I think that harm was reasonably foreseeable given the information that was available to Revolut at the time she made the payments. I therefore see no reason to depart from the provisional decision I issued.

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 Miss G to accept or reject my decision before 1 December 2025.

Israr Ahmed
Ombudsman