

## The complaint

Mr P complains that Revolut Ltd failed to protect him from losing money in a scam.

A professional representative, R, has brought the complaint to the Financial Ombudsman Service on Mr P's behalf.

## What happened

R explained that Mr P fell victim to a job scam in 2023. After being contacted via WhatsApp, Mr P was directed to a website and given instructions to complete work, or 'tasks', for profit. He made payments believing he was buying products on behalf of a company and would be reimbursed this money alongside a commission.

Mr P said that the first task went as expected, with funds credited to his cryptocurrency account. However, the cost for purchasing products during the second task increased significantly, leaving him unable to complete it or withdraw any money. After raising further funds to make payments to complete the task three months later, further excuses were provided on why withdrawals weren't possible. At that point, he realised he had been scammed.

The disputed payments processed via Mr P's Revolut account consisted of the following bank transfers:

Payment number	Date and time	Payee	Amount
1	3 June 2023 3.00pm	Payee N	£4100
2	6 June 2023 10.35am	Payee C	£1500
3	6 June 2023 12.30pm	Payee C	£2000
4	6 June 2023 5.38pm	Payee N	£3000
5	13 June 2023 3.55pm	Payee C	£6000
6	16 June 2023 8.11am	Payee C	£7500
7	18 September 2023 8.20am	Payee C	£2900
8	19 September 2023 10.38am	Payee C	£4150

Before being debited, each of the first four transactions were individually placed on hold by Revolut after its systems flagged them as suspicious and potentially linked to a scam. On each occasion, Mr P was shown general scam warnings in the Revolut app and asked to select the payment purpose from a list of options. Each time, he chose "Payment for Goods and Services," which prompted additional warnings and advice relevant to that option, such as researching the seller. At the end of the process, Mr P confirmed in the app that he wished to proceed with the payment.

The scam was not reported to Revolut until January 2025. Complaints were also raised against HSBC and Lloyds. This was on the basis that Mr P had made payments from accounts with those banks in connection with the same scam.

The common issue raised by R across all three cases was that the firms had failed to intervene effectively or ask sufficient questions that would have prevented Mr P falling victim to the scam. After each firm denied responsibility for the losses, the complaints were referred to our service for investigation. The Lloyds and HSBC cases have been considered separately, and my decision here concerns only the complaint about Revolut.

One of our investigators decided not to uphold the complaint against Revolut. His key findings are set out below:

- While it was accepted that Mr P had been the victim of a scam, the investigator felt the extent of the loss was not clearly evidenced, particularly in relation to the payments made to Payee C.
- Although all the disputed payments from the Revolut account were concerning, the investigator concluded that Revolut's actions in relation to the first four transactions were sufficient and it was not at fault.
- Revolut could not reasonably have been expected to ask questions specifically about job scams. The effectiveness of its in-app warnings were limited because Mr P failed to select "Cryptocurrency" as the payment purpose when prompted.
- Even if Revolut had taken stronger action, the investigator said it wouldn't have made a difference. Evidence showed that Mr P had repeatedly provided misleading explanations to HSBC about the purpose of transfers to Revolut, making it likely he would have done the same during any further intervention by Revolut to ensure the payments were processed and avoid scrutiny of his true intentions.

R disagreed with the investigator's findings for the following key reasons:

- While acknowledging the limitations of the evidence, R argued there were sufficient grounds to conclude, on the balance of probabilities, that the payments to Payee C formed part of the job scam described by Mr P.
- R maintained that Revolut's interventions were inadequate and that a manual, human review should have been carried out, which would have prevented the loss.
- R cited several final decisions from our service involving payments made before those subject to this complaint, which concluded that firms were expected to recognise job scams and tailor their warnings accordingly by 2023.
- R argued that Mr P's selection of "Goods and Services" as the payment purpose should have triggered a manual review in its own right, given the payments were clearly being directed to cryptocurrency exchanges.
- Finally, R felt it was wrong to rely on Mr P's answers to HSBC when assessing what might have happened had Revolut intervened in a similar way. The explanations Mr P gave HSBC would not have been plausible if presented to Revolut, and the scam would have been uncovered to prevent the loss.

With no agreement reached, the case has been passed to me to make a final decision.

### **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 have decided not to uphold the complaint and I set out my key findings below.

### Initial Considerations

Although there are gaps in the evidence provided by R to demonstrate exactly how the funds were lost, I am satisfied that all the payments were linked to a job scam. The contemporaneous evidence demonstrates common hallmarks of such scams and explains how the payees' bank details were obtained for the purpose of carrying out these 'tasks'.

There's no dispute that Mr P instructed Revolut to make the payments. In broad terms, the starting position at law is that an Electronic Money Institution (EMI) such as Revolut is expected to process payments and withdrawals that a customer authorises it to make, in accordance with the Payment Services Regulations 2017 (PSRs) and the terms and conditions of the account.

The PSRs do not provide specific protection against losses arising from authorised transactions. While these were bank transfers to UK based accounts, it is also important to highlight that Revolut was not a signatory to the Contingent Reimbursement Model (CRM) code at the time of the payments, which can offer certain protections to victims of Authorised Push Payment (APP) scams. Accordingly, the starting position is that Mr P is liable for these transactions.

### The HSBC account activity

As highlighted by the investigator, Mr P provided misleading information on several transactions involving his HSBC account which went towards funding the tasks in the job scam. For example:

- On 6 June 2023, £1500 was received into Mr P's HSBC account from another personal account with the reference "bills." This amount was then transferred to Revolut at 8:17am and subsequently paid to Payee C.
- Later that day, £2000 was sent from HSBC to his Revolut account at 11:52am with the reference "holiday." At 12:30pm, the same amount was transferred to Payee C.
- On 13 June 2023, £6000 was sent from HSBC to his Revolut account at 2:30pm under the reference "car payment." HSBC carried out an intervention call before this transfer, during which Mr P claimed he was buying a car because his old one had broken down. In reality, the exact amount was sent to Payee C from Revolut within two hours.
- On 16 June 2023, £7500 was sent to his Revolut account from HSBC under the reference "House (Poland)," and then forwarded to Payee C the same morning.

In response to the investigator's assessment, R argued that if Mr P had tried to use a cover story for any payment with Revolut, the scam would have been exposed because Revolut could see the intended payees and they were inconsistent with explanations he gave HSBC. For example, the "car purchase" narrative would not have been credible given that Revolut could identify Payee C as being linked to cryptocurrency.

I do not agree with R on this point. In my view, the activity outlined above demonstrates that Mr P was willing to provide misleading answers to conceal the true purpose of several payments. He also used various narratives when carrying out these transactions, so I consider it likely he would have adapted his answers in response to any further intervention by Revolut—even if questions had been specific to cryptocurrency scams. Ultimately, I cannot say with confidence that the scam would have been prevented if Revolut had taken additional steps.

Separately, I note that the £6,000 payment on 13 June was funded by a loan from HSBC. Neither the bank nor Mr P could provide evidence of the stated purpose in the loan application. However, during the intervention call, Mr P told the agent he applied for the loan to buy a car, consistent with the payment reference. On balance, I consider it reasonable to conclude that Mr P likely misrepresented the purpose of the loan to obtain funds for the scam.

### Recovery attempts

When R notified Revolut about the scam in January 2025, Revolut said it lacked sufficient details about the nature of the fraud and the flow of funds to begin recovery efforts. It requested additional information twice, but said R did not respond.

R later explained to our investigator that they did not provide further details once Revolut's final response to the complaint had been received. I would still encourage Mr P or R to engage with Revolut if they wish to pursue recovery. However, given that the scam was reported almost two years after the first disputed payment, I consider it highly unlikely that Revolut will be able to recover any funds from the payees.

I'm sorry Mr P was scammed and lost money. However, despite my natural sympathy, I can't fairly tell Revolut to reimburse him in circumstances where I am not persuaded that it should have prevented the payments or could have recovered the funds.

### **My final decision**

My final decision is that I do not uphold Mr P's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr P to accept or reject my decision before 5 January 2026.

James Abbott  
**Ombudsman**