

The complaint

Miss S complains that Revolut Ltd ('Revolut') won't refund the money she lost after falling victim to a scam.

What happened

The background to this complaint isn't in dispute, so I won't go into detail.

In summary, Miss S fell victim to a job scam. She was looking online for additional income options and found a company I'll refer to as W. W offered Miss S a remote working role that involved liking videos on a social media platform. Miss S was told she could earn significantly more by buying and selling cryptocurrency. Ultimately, when Miss S couldn't afford to send any more money and couldn't withdraw her funds, she realised it was a scam.

These are the cryptocurrency conversions and payments Miss S made on/from her Revolut account.

Date	Pmt no	Details of transaction	Amount
8.8.2025	1	Conversion to ETH	£100
8.8.2025	2	Conversion to ETH	£100
8.8.2025	3	Conversion to ETH	£520
9.8.2025	4	Conversion to ETH	£800
10.8.2025	5	Transfer to C – a cryptocurrency exchange	£780
13.8.2025	6	Transfer to C – a cryptocurrency exchange	£1,500
13.8.2025	7	Transfer to C – a cryptocurrency exchange	£1,790
13.8.2025	8	Transfer to C – a cryptocurrency exchange	£1,620
13.8.2025	9	Transfer to C – a cryptocurrency exchange	£1,790
13.8.2025		<i>Transfer to C – a cryptocurrency exchange - declined</i>	£1,850
15.8.2025	10	Transfer to Miss S's account with another bank	£1,852

Miss S reported the scam to Revolut who declined to refund her. Revolut said they're not liable for her loss.

Miss S wasn't happy with Revolut's response, so she brought a complaint to our service.

An investigator looked into her complaint and didn't uphold it. The investigator felt Revolut should've intervened when Miss S made payment seven, however they weren't convinced that it would've prevented Miss S's loss. As Miss S was being guided by the scammer in how to answer Revolut's questions, the investigator thought it was unlikely Revolut could've uncovered the correct scam type and provide a relevant warning.

Miss S disagreed with the investigator's opinion and asked for an ombudsman to review her case. She raised the following points:

- She may have been coached by the scammer, but that doesn't remove Revolut's responsibility.

- If her answers were obviously coached or inaccurate, Revolut should've picked up on this.
- Revolut should've blocked the payments, which would've prevented her loss.

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.

Where there is a dispute about what happened, and the evidence is incomplete or contradictory, I've reached my decision on the balance of probabilities. In other words, on what I consider would more likely than not have happened in light of the available evidence.

I'm really sorry to hear about the difficult personal circumstances that Miss S has faced and the serious impact the loss of this money has had on her. It's clear that she was the victim of a very cruel scam. Unfortunately, being the victim of a scam doesn't necessarily mean she is entitled to a refund.

Having carefully reviewed the evidence, I've reached the same answer as the investigator. I realise that this will be extremely disappointing for Miss S, but I'll explain why.

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 (in this case the 2017 regulations) and the terms and conditions of the customer's account. Here it's not in dispute that Miss S authorised the payments, although she did so not realising she was the victim of a scam. So, the starting position is that Revolut isn't liable for her loss.

But, taking into account relevant law, regulators rules and guidance, relevant codes of practice and what I consider to have been good industry practice at the time, I consider it fair and reasonable in August 2025 that Revolut should:

- have been monitoring accounts and any payments made or received to counter various risks, including preventing fraud and scams;
- have had systems in place to look out for unusual transactions or other signs that might indicate that its customers were at risk of fraud (among other things). This is particularly so given the increase in sophisticated fraud and scams in recent years, which firms are generally more familiar with than the average customer;
- have acted to avoid causing foreseeable harm to customers, for example by maintaining adequate systems to detect and prevent scams and by ensuring all aspects of its products, including the contractual terms, enabled it to do so;
- in some circumstances, irrespective of the payment channel used, have taken additional steps, or made additional checks, or provided additional warnings, before processing a payment;
- have been mindful of – among other things – common scam scenarios, how the fraudulent practices are evolving (including for example the common use of multi-stage fraud by scammers, including the use of payments to cryptocurrency accounts as a step to defraud consumers and the different risks these can present to consumers, when deciding whether to intervene).

Based on the size of the payments and because they were identifiably related to cryptocurrency, I would've expected Revolut to have intervened when Miss S made payment

seven. I wouldn't have expected Revolut to have intervened prior to this, based on the low value of the conversions to ETH and the first couple of transfers to C. However, payment seven was the second payment Miss S had made on the same day and took the total she had transferred to over £3,000.

Revolut should be aware of the increased risk associated with cryptocurrency payments, so I would've expected Revolut's intervention to have involved them asking questions to establish the specific type of scam Miss S was at risk of, so they could provide a better automated warning. This warning should've been provided onscreen and explained the key features of the type of scam identified based on the answers Miss S gave to their questions.

However, just because Revolut didn't intervene when I'm satisfied it should've, doesn't automatically mean that Miss S is entitled to a refund. I have to consider what I think would more likely than not have happened in response to that warning, and whether I'm persuaded the warning or intervention would've prevented Miss S's loss.

In this case, Miss S was being heavily coached by the scammer in how to answer Revolut's questions. When Revolut intervened on 13 August 2025, after payment nine, Miss S was sharing screen shots of the questions with the scammer, and they were telling her how to answer the questions.

Revolut also called Miss S on 14 August 2025, based on their concerns about her payments, and Miss S was asking the scammer how to respond to their questions. This meant Miss S wasn't honest about the reason for the payment, whether she was being guided in answering Revolut's questions and how she found the investment. Miss S told Revolut that her cousin had been trading in cryptocurrency for a couple of years and that she had been watching them for a few months before deciding to invest herself. Based on the answers Miss S had given, Revolut believed she was potentially the victim of an investment scam.

If Revolut had given Miss S an onscreen warning about cryptocurrency investment scams, I'm not satisfied it would've resonated with her as the circumstances under which she found the investment wasn't through the usual social media, celebrity endorsed, investment opportunity. Miss S initially was the victim of a job scam, which Revolut were prevented from identifying based on the answers she gave them. The job scammers then told her she could increase her earnings by trading in cryptocurrency. So, the usual cryptocurrency investment scam key features didn't apply to Miss S's situation.

I realise that scammers coach victims in how to answer questions to avoid detection. However, Revolut can only issue a warning based on the information that is made available to it about the payment. And, in these circumstances, I'm not satisfied that open and probing questions would've uncovered the job scam because Miss S was sharing screen shots with the scammer and selecting answers based on their guidance.

Miss S says that Revolut should've identified that she was being coached and that her answers weren't accurate. But, having listened to the phone call, I'm not satisfied that Revolut should've identified this. Miss S did ask Revolut to repeat some of the questions, which appears to have been so she could share them with the scammer and get an answer. But this didn't come across in the call as an obvious delay tactic as the Revolut agent was hard to hear, and Miss S only asked him to repeat some of the questions. Also, the answers Miss S gave on the call matched the answer she gave in the in-app chat with Revolut – so she was consistent in her answers. On that basis, I'm not persuaded that Revolut should've realised or identified that Miss S was being coached in answering their questions.

So, I'm not persuaded that better intervention would've prevented her loss.

Miss S believes Revolut should've blocked her account or her payments. However, based on the answers she was giving and the information that was available to them, I'm not satisfied that I can fairly say Revolut should've blocked her account earlier. And it's important to note that when they did block her account after the failed payment to C, she simply moved to making payments from an account she held with another bank. So, I can't say it's more likely than not Revolut blocking her account, would've prevented her loss.

I'm really sorry that Miss S was the victim of a scam, but I'm not satisfied that I can fairly hold Revolut liable for her loss.

My final decision

My final decision is that I don't uphold this complaint against Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss S to accept or reject my decision before 18 March 2026.

Lisa Lowe
Ombudsman