

The complaint

Mrs R complains that Revolut Ltd (“Revolut”) won’t refund her the money she lost after she fell victim to an Authorised Push Payment (‘APP’) scam.

In bringing her complaint to this service Mrs R is represented, however for ease of reading I will, in the main, refer to Mrs R within this decision.

What happened

The background to this complaint is well known to both parties and has been laid out in detail by our Investigator in their view, so I won’t repeat it all in detail here. But in summary, I understand it to be as follows.

In or around early 2025, Mrs R received a message, unexpectedly, from somebody claiming to be a recruiter, about a job opportunity. She was told the job entailed reviewing and rating products online to increase their rating, for which she would earn a salary and a commission. Believing everything to be genuine, Mrs R proceeded, but unknown to her at the time, she had been contacted by fraudsters. The fraudsters then persuaded Mrs R to pay her own money in order to proceed with the work.

As part of the scam, as well as using accounts she already held, the fraudsters instructed Mrs R to open multiple accounts, with other payment service providers (including opening a Revolut account), as well as with cryptocurrency platforms.

To facilitate the payments Mrs R has said she used her own money, as well as borrowing money from friends and family and through taking out loans. Mrs R moved money between her own bank accounts and then, from these different accounts, including Revolut, the scam saw her making payments to cryptocurrency wallets she held in her own name, with the funds then being converted into cryptocurrency and subsequently transferred into accounts that were controlled by the fraudsters.

Between 4 February 2025 and 21 February 2025, Mrs R made a number of transactions through her newly opened Revolut account in relation to the fraud, totalling over £13,000. Our Investigator has laid these payments out in detail in their view, so I don’t intend to list them all again here.

Mrs R realised she’d been scammed when she was unable to withdraw any of the money she had sent and was asked by the fraudsters to continue making payments.

Mrs R raised the matter with Revolut, but it didn’t uphold her complaint. In summary, it didn’t think it was at fault for processing the transfers that Mrs R authorised. It added that it had issued appropriate warnings to Mrs R and that she had misled it by providing untruthful information when it had intervened and questioned her about the payments she was making.

Unhappy with Revolut’s response, Mrs R brought her complaint to this service. One of our Investigators looked into things but didn’t think the complaint should be upheld. In summary, he thought Revolut had sufficiently intervened, but Mrs R chose not to disclose anything

about a remote working/new job. Our Investigator added that even if Revolut had done more to question Mrs R about the circumstances of the payments, he didn't think it would have made a difference. He said this as when Revolut did ask Mrs R questions she had given it inaccurate information, which had deprived Revolut of the opportunity to provide more relevant warnings about job scams.

Mrs R, through her representative, didn't agree with our Investigator's view. In summary, her representative said the payments made were highly concerning and should have triggered urgent intervention. They added that Revolut ought to have been alert to the possibility of job scams and overall thought Revolut's intervention should have gone further than it did.

As agreement couldn't be reached, the complaint has been passed to me for 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.

I'm very aware that I've summarised this complaint briefly, in less detail than has been provided, and in my own words. No discourtesy is intended by this. Instead, I've focussed on what I think is the heart of the matter here. If there's something I've not mentioned, it isn't because I've ignored it. I haven't. I'm satisfied I don't need to comment on every individual point or argument to be able to reach what I think is the right outcome. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts.

I'm aware in their submissions Mrs R's representative has referred to other decisions issued by our service. But I would point out that, while on the surface complaints may seem quite similar, each complaint is determined by its own individual circumstances. Here, as I'm required to do, I've looked at the individual circumstances of Mrs R's complaint against Revolut.

Having thought about everything carefully, I agree with our Investigator, and I don't think Revolut is responsible for refunding the money Mrs R sadly lost. I'm sorry to hear that Mrs R has been the victim of a cruel scam. I know she feels strongly about this complaint, and this will come as a disappointment to her, so I'll explain why.

I'm satisfied Mrs R 'authorised' the payments for the purposes of the Payment Services Regulations 2017 ('the Regulations'), in force at the time. So, although she didn't intend the money to go to scammers, under the Regulations, and under the terms and conditions of her account, Mrs R is presumed liable for the loss in the first instance.

However, that isn't the end of the story. Good industry practice required that Revolut be on the lookout for payments that were out of character or unusual to the extent that they might have indicated a fraud risk. On spotting such a payment, I'd expect it to intervene in a manner proportionate to the risk identified.

In this case, I need to decide whether Revolut acted fairly and reasonably in its dealings with Mrs R when it processed the payments, or whether it should have done more than it did.

Firms, such as Revolut, process a high volume of transfers and transactions each day. And a balance has to be struck as to when it should possibly intervene on a payment(s) against not holding up or delaying its customer's requests. I'm also mindful here that Mrs R's Revolut account was newly opened. What this means is that Revolut would have had no historical

account activity, upon which to compare the transactions that were being made as part of this scam.

I can see that Revolut did intervene on a number of the payments Mrs R made, both through its automated systems and also by calling Mrs R to discuss her payments. I'm in agreement with our Investigator, in that I think in the circumstances of this case Revolut's intervention was proportionate and I wouldn't reasonably have expected it to have done anymore.

However, for the purposes of this decision it is also worth noting that even if I thought Revolut's intervention ought to have gone further than it did, I don't think it would have made a difference. I say that as I'd also need to be persuaded that any further proportionate intervention/questioning would have made a difference and prevented the payments from being made. Of course I can't know for sure what would have happened, so I have to base my findings on the balance of probabilities – that is, what I think is more likely than not to have happened, taking into account what I know. The evidence here doesn't support that it's more likely than not that Mrs R would have heeded any further warnings from Revolut.

I say that as I've listened to the calls that Revolut *did* have with Mrs R and I've considered the automated warnings and questions it put to her. During these calls, and when answering questions about the purpose of the payments through Revolut's automated functions, Mrs R consistently gave Revolut inaccurate answers. This included; Mrs R not selecting the purpose of the payments as being related to a 'job opportunity', when she had the opportunity to do so; telling Revolut that nobody had asked her to open a Revolut account; saying that she was acting alone and wasn't being guided or supported by anybody, when she was in constant communication with the fraudster who was guiding her; confirming that she wasn't going to send the cryptocurrency to another wallet; saying that she hadn't been added to a wider group chat and telling Revolut that nobody had told her to mislead her bank.

The evidence of the messages that I've seen, between Mrs R and the fraudsters, show that she had been subject to social engineering and was being coached extensively by the fraudster. This coaching included Mrs R proactively reaching out to the fraudster to ask them how she should answer questions posed about the payments she was making. From what I've seen, Mrs R followed the fraudster's instructions, which I think is evident with what happened with Mrs R giving Revolut (and the providers of other accounts she held) inaccurate information about the purpose of the payments and moving passed warnings she had been given about potential scams. Indeed, even after one of Mrs R's other banking providers had specifically detailed the key hallmarks of job scams to her, she moved passed this, confirming to that provider that she didn't recognise any of what she was being told with her own circumstances.

So, even if Revolut's intervention had gone further than it did, I think it's more likely than not Mrs R would've reverted to the fraudster, on how to answer any questions and would likely have done so in such a way as to avoid alerting Revolut to what was really happening. Sadly, it seems to me that she was so determined to make the payments that, even if further intervention from Revolut had gone as far as preventing her from making payments and blocking her account, she'd have simply sent the funds from another of her accounts. Which I'm satisfied is evident and supported by what she did here, when she was having difficulty making payments through different providers, she simply reverted to the fraudster to identify alternative options for making the payments and set up accounts with different providers in order to facilitate the payments.

I would add that I don't think Mrs R had any malicious intent in answering as she did. I do acknowledge she was under pressure and desperate to recover the money she had sent. And the social engineering techniques fraudsters deploy can be very convincing. But in the

circumstances of this case the evidence supports that she was so taken in by the fraudsters that she was unwavering in her determination to follow their instructions and proceed with the payments.

And I think this would have likely been the same with Revolut, even if its intervention had gone further than it did and specifically mentioned job scams, including the key hallmarks of these to her. The weight of evidence I've seen persuades me that I think it more likely than not Mrs R would have continued to be guided by the fraudsters to provide answers that would have been clearly designed to allay any suspicions that the payments could be linked to a scam.

Sadly, based on the evidence I've seen it's clear that Mrs R was completely under the spell of the fraudsters, and I'm not persuaded Revolut has missed an opportunity here to have broken that spell.

I've thought about whether there was any opportunity for Revolut to have recovered the money Mrs R had lost once it was made aware of the scam. However, given the funds had been exchanged into cryptocurrency and then moved on to accounts controlled by the fraudsters, I don't think there was any opportunity or prospect of Revolut being able to recover any of the money.

I don't intend any comments or findings I've made in this decision to downplay or diminish the impact this scam has had on Mrs R. It's very unfortunate she has lost this money in this way, and I understand the whole experience has been deeply upsetting and I do have a great deal of sympathy for her. But in the circumstances, having carefully considered everything, I don't find Revolut could have reasonably prevented Mrs R's loss here. Neither do I find there were any other failings on Revolut's part that would lead me to uphold this complaint.

My final decision

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

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

Stephen Wise
Ombudsman