

## The complaint

Ms R is unhappy Revolut Ltd won't refund payments she made as part of a scam.

## What happened

In 2023 Ms R received a message out of the blue, on an instant messaging service, from someone purporting to be from a recruitment agency, about a job opportunity. The work was task based, and required Ms R to simulate purchasing items through a platform – a service the merchants supposedly paid for as it would improve the algorithms related to the products, and increase actual sales. In order to facilitate the simulated purchases (each representing a task) Ms R had to deposit money into her account on the platform, but would earn commission from every completed task. At the end of completing a set of tasks Ms R was told she'd have the opportunity to withdraw the commission earned, as well as the deposited funds used to 'purchase' the items.

The deposits needed to be made in cryptocurrency, so Ms R was advised to open an account with Revolut to facilitate those purchases – which she did on 18 June 2023. She was added to a group chat seemingly with other people involved in work, which further encouraged her the opportunity was legitimate. So Ms R transferred funds from her bank account to her newly opened Revolut account, and made the below transactions as part of the scam. Each payment was to an individual abroad, and was in fact a cryptocurrency purchase through a peer-to-peer platform (as directed by the scammer).

No.	Date	Time	Type	Payee	Amount (inc. fee)
1	18 June 2023	13.50	Faster payment	New payee 1	£1,999.17
2	18 June 2023	15.53	Faster payment	New payee 2	£942.94
3	18 June 2023	16.05	Push to card	New payee 3	£1,206.79 (£8.45)
4	19 June 2023	21.22	Push to card	Payee 2	£833.69 (£8.34)
5	20 June 2023	18.49	Push to card	New Payee 4	£589 (£5.89)
6	21 June 2023	20.04	Faster payment	New payee 5	£662.40
	21 June 2023	20.22	<i>Failed</i>	<i>New payee 6</i>	<i>£718.18 (7.18)</i>
7	21 June 2023	20.25	Push to card	New Payee 6	£718.18 (£7.18)
8	22 June 2023	11.33	Faster payment	New payee 7	£410
9	22 June 2023	11.47	Faster payment	Payee 7	£410
10	22 June 2023	13.37	Push to card	New payee 8	£837.16 (£8.37)

11	22 June 2023	15.16	Push to card	New payee 9	£822.17 (£5.76)
	22 June 2023	15.59	<i>Failed</i>	<i>New payee 10</i>	<i>£844.15 (£5.91)</i>
12	22 June 2023	16.00	Push to card	New payee 10	£844.15 (£5.91)
13	22 June 2023	17.35	Push to card	New payee 11	£3,700 (£37)
14	22 June 2023	17.55	Push to card	Payee 11	£1,387.04 (£13.87)

Revolut asked for purpose before processing every payment, and Ms R selected 'something else' for all of them except for payment 8 – where she selected 'cryptocurrency'. Selecting something else produced a generic scam warnings, and prior to payment 8 she was shown a warning covering cryptocurrency investment scams. On payment 11 Ms R was asked a series of automated questions, including whether she'd been asked to ignore scam warnings, threatened with the risk of fines or being arrested, to pay someone she barely knew or recently met online, asked to pay an upfront fee in the promise of receiving a larger payment later, or unexpectedly provided with new bank details for the person they were trying to pay. Ms R answered no to all of the automated questions, and Revolut then brought her into a chat with an agent. During that conversation she was further questions, including whether she was buying cryptocurrency – and she confirmed she wasn't. Revolut was satisfied Ms R wasn't at risk based on her answers, and released the payment.

The tasks became increasingly expensive, and Ms R's account went into a negative balance. She was told she wouldn't be able to withdraw her commission unless she deposited large amounts to bring the account into a positive position. On 23 June 2023 £12,800 was paid into the account and held by Revolut for further checks. A couple of agents spoke to Ms R again via the chat function, and both times she denied buying cryptocurrency with the transactions. Instead she said she was paying friends and family.

Revolut wasn't satisfied by her answers, and held the funds for a further two weeks while it investigated. In the end Revolut decided to close the account, and later in July 2023 Ms R transferred the funds back to the originating account. She went on to send further payments to the scammer from other accounts, with the final one made in December 2023. Ms R eventually realised she'd been scammed when she still couldn't access her funds, despite making the further deposits asked for.

A complaint was raised in March 2024, via professional representatives, to Revolut – which said the firm should have done more to prevent the loss. Revolut's final response said it didn't think it was liable, as it had carried out fraud checks and provided warnings, but the answers provide during those interventions had meant they were less effective. Unhappy with the response, Ms R referred her complaint to our service for review.

One of our investigators considered the complaint and didn't recommend it was upheld. In her view, a pattern indicating Ms R was potentially falling victim to a scam formed on 22 June 2023 – but Revolut had provided proportionate automated scam warnings for the payments, based on the purposes selected. The investigator also considered the later intervention Revolut carried out following the large deposit into the account on 23 June 2023, and thought the firm had acted reasonably. Some of Ms R's answers hadn't been correct and she hadn't been forthcoming about the true circumstances involved, so the investigator didn't think Revolut could have done more to protect its customer from the scam.

Ms R didn't accept the investigator's opinion, and requested that an ombudsman reconsider

the matter. She was adamant that Revolut's interventions weren't sufficient, and the right level of probing would have revealed what was happening – preventing further loss. So the complaint was passed to me for a decision on the fair outcome.

I issued a provisional decision that didn't uphold the complaint, but for slightly different reasons. I've copied below the part covering my rationale for the outcome:

*“Having done so, I’m not intending to uphold the complaint. I know that’s not the answer that Ms R was hoping for, and so this will come as a disappointment. There’s no doubt Ms R fell victim to a cruel and sophisticated scam, and I was sorry to hear about what she went through. But I haven’t found that Revolut could have reasonably prevented the loss of any more of her funds. I’ve explained my rationale below.*

*In deciding what’s fair and reasonable, I am required to take into account relevant law and regulations, regulators’ rules, guidance and standards, and codes of practice; and, where appropriate, I must also take into account what I consider to have been good industry practice at the time.*

*In broad terms, the starting position at law is that Electronic Money Institutions (“EMI’s”) such as Revolut are expected to process payments and withdrawals that a customer authorises them 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.*

*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 June 2023 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 their 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;*
- 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 – (as in practice Revolut sometimes do);*
- 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.*

*Revolut has a difficult balance to strike in how it configures its systems. It needs to detect unusual activity, or activity that might otherwise indicate a higher than usual risk of fraud, whilst not unduly hindering legitimate transactions. There are many millions of payments made each day, and it would not be possible or reasonable to expect firms to check each one. In situations where firms do (or ought to) carry out checks, I would expect that intervention to be proportionate to the circumstances of the payment. Revolut intervened prior to processing all of the payments. So the question for me to decide is whether the checks carried out were proportionate to the risks involved.*

*There were risks involved with transactions 1 to 7 – with money going to multiple new*

payees using different payment channels. But I think the automated warnings provided were sufficient for those, as none of them were concerningly high in value, or sent in quick succession, or forming an obvious scam pattern. The account was new, so Revolut didn't have prior activity to go on, in order to determine if these were out of character. Ms R had also said the purpose for opening the account was 'transfers', so those initial payments were broadly in line with that intended use.

However, I think the activity did become concerning on 22 June 2023 – as Ms R continued to pay new beneficiaries, and Revolut wasn't learning anything additional about the risks involved through asking for payment purpose alone. By transaction 11 Ms R had paid nine new payees in the few days since opening the account, had told Revolut that payee 7 was both for 'cryptocurrency' and 'something else', and had started sending similar amounts across multiple transactions. I consider it rightly brought her into a chat with an agent at that point for further questioning. During that conversation Ms R didn't provide accurate answers, telling Revolut the payments were going to 'friends and family', and that she wasn't buying cryptocurrency. That certainly hampered Revolut's efforts in uncovering the scam – but I still don't think that intervention was proportionate in circumstances.

The transactions looked risky, and I don't think they were sufficiently explained by Ms R's assertion she was sending money to friends and family. Revolut should also have been alive to the possibility that Ms R had been given a cover story by the scammers. So it ought to have probed further into the circumstances, and questioned her on the aspects of the transactions that appeared unusual or concerning (like why she was paying so many new payees, why she was sending money to friend and family using 'push to card' when there would be cheaper ways to do that, and why she said payment 7 was for cryptocurrency). I don't think Ms R would have been able to satisfy Revolut the transactions were for legitimate purposes with her answers, or provide evidence to corroborate the cover story.

I've gone on to consider what would likely have happened if Revolut had intervened proportionately – and I'm not convinced that Ms R would have been forthcoming about what she was doing, even if it had questioned her further. She wasn't honest during the interventions she did have with Revolut, though I appreciate she was convinced by the scammer that she shouldn't reveal the true purpose of the payments (she was told that if she let on they were cryptocurrency related her account would be blocked). So I think it's likely Revolut would have still blocked Ms R account, just on 22 June 2023 (without allowing payment 11) instead of the day after. Even when the account was blocked and the funds were held for weeks Ms R still didn't come clean, though I can see she discussed that option with the scammer. Revolut then fairly closed the account, as it rightly suspected Ms R wasn't being forthcoming about what was actually going on, and sent the funds back to her.

I think that's what would have always happened – but the money returned to Ms R when closing the account should have included the funds from payment 11 onwards (as Revolut shouldn't have allowed those transactions to go through). Ms R continued to send payments to the scammer for months after that though, so I'm satisfied she would have still likely sent the funds represented by transactions 11 onwards to the platform, just through other channels. She was convinced those further payments were needed, despite commenting that her bank, Revolut and her friends had all told her it was a scam. Ms R also hadn't allowed the firms involved to provide more tailored scam advice. So I don't think there was anything that could have been done to convince her otherwise, and therefore I find that money would have always likely been lost – even if the payments needed were covered using funds elsewhere while the Revolut account was blocked.

I've considered whether Revolut could have done more once alerted to the fraud – and I'm satisfied it couldn't have. The disputed transactions were all legitimate cryptocurrency purchases from sellers, with the cryptocurrency then subsequently sent on to the scam

*afterwards – so recovery from those payees wouldn't have been an option, as Ms R received what she paid for. I haven't seen any service issues that I consider would warrant compensation either. I note that Ms R had to repeat herself on 23 June 2023 when questioned, and that she was frustrated that her money was held for a time while checks were carried out before the account closure – but that was done for her benefit, and it stopped those particular funds from being sent to the scam during that period. So I don't think an award for the inconvenience or distress that likely caused would be appropriate in the circumstances.*

*I'm sorry Ms R fell victim to this cruel scam. But, having carefully considered everything, I'm not directing Revolut to refund anything further, as I don't think proportionate intervention would have ultimately prevented the loss of the additional funds it shouldn't have allowed to be sent. That's because I think it's likely that the money represented by payment 11 onwards would have always been sent to the scam, through other accounts, so I'm not holding Revolut responsible for its loss."*

Ms R's solicitors told us they would no longer be representing her on the case – and we didn't hear from her directly by the deadline. Revolut had nothing further to add.

### **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.

Given there were no challenges to my provisional findings, I see no reason to depart from the outcome I reached. I have every sympathy for what Ms R has been put through at the hands of the fraudsters, and I truly hope she's doing better now after falling victim to this awful scam. But I don't think Revolut could have prevented the loss in this case, so I'm not directing it to refund the payments.

### **My final decision**

My final decision is I don't uphold Ms R's complaint against Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms R to accept or reject my decision before 17 December 2025.

Ryan Miles  
**Ombudsman**