

The complaint

Ms M complains Revolut Ltd (“Revolut”) hasn’t refunded funds she lost as the result of a scam.

What happened

Both parties are familiar with the circumstances of the complaint, so I’ll only summarise the key details here.

Ms M converted GBP into cryptocurrency before withdrawing it from her Revolut account. Ms M sent the funds to a scammer as part of what she thought was a legitimate task-based job. When Ms M didn’t get her money back, she complained to Revolut.

Revolut didn’t uphold her complaint. So, Ms M raised the matter with the Financial Ombudsman Service. One of our Investigators looked into the complaint and also didn’t uphold it.

As an agreement could not be reached, the complaint has been passed to me to decide.

Preliminary matters

Revolut hasn’t provided a response since our Investigator’s view in relation to matters concerning our jurisdiction. For completeness, I agree that I can’t consider cryptocurrency withdrawals in isolation given it’s not a regulated activity. But the exchange of fiat money into cryptocurrency, which although not a regulated activity in itself, is one which our service would consider ancillary to payment services. This is in the same way we consider exchanging GBP into foreign currency an ancillary activity.

Therefore, given the nature of Ms M’s complaint, I’m satisfied that I can consider whether Revolut did what it should have, in relation to her funds and account when she used Revolut to exchange her money from GBP to cryptocurrency.

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 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 focused 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’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 sorry to hear of how difficult things have been for Ms M and that she’s lost a significant sum of money and the impact this has had on her at an already difficult time. However, just because a scam has occurred, it doesn’t mean she’s automatically entitled to recompense

by Revolut. It would only be fair for me to tell Revolut to reimburse Ms M for her loss (or a portion of it) if I thought Revolut ought reasonably to have prevented all, or some, of the conversions she made, or if I believed Revolut hindered the recovery of her loss – whilst ultimately being satisfied that such an outcome was fair and reasonable for me to reach.

In broad terms, the starting position at law is that banks and other payment service providers are expected to process transactions and withdrawals that a customer authorises it to make, in accordance with the Payment Services Regulations and the terms and conditions of the customer's account.

Ms M authorised the transactions in question here – so even though she was tricked into doing so and didn't intend for her money to end up in the hands of a scammer, she is presumed liable in the first instance.

But as a matter of good industry practice, Revolut should also have taken proactive steps to identify and help prevent transactions – particularly unusual or uncharacteristic transactions – that could involve fraud or be the result of a scam. However, there is a balance to be struck: as while banks and Electronic Money Institutions should be alert to fraud and scams to act in their customers' best interests, they can't reasonably be involved in every transaction.

I've thought about whether Revolut acted fairly and reasonably in its dealings with Ms M when she converted her funds, or whether it should have done more than it did. In doing so I've considered what Revolut knew about the conversions at the time it received Ms M's instructions and what action, if any, Revolut took prior to processing them.

I should explain that for me to find it fair and reasonable that Revolut should refund Ms M requires more than a finding that Revolut ought to have intervened. I would need to find not only that Revolut failed to intervene where they ought reasonably to have done so – but crucially I'd need to find that but for this failure the subsequent loss would have been avoided. That latter element concerns causation. A proportionate intervention will not always result in the prevention of a transaction. And if I find it more likely than not that such a proportionate intervention by Revolut wouldn't have revealed the transactions were part of a fraud or scam, then I couldn't fairly hold Revolut liable for not having prevented them from being made.

I believe Revolut ought to have intervened prior to processing some of the cryptocurrency conversions Ms M made, due to either the value of an individual conversion or the combined daily value. However, I'm not satisfied that any intervention from Revolut prior to Ms M making these conversions would have prevented her from making them or uncovered the scam. I'll explain why.

Revolut said when a customer withdraws cryptocurrency to a new wallet address it displays a warning asking if they know and trust the payee and if the customer isn't sure they should refrain from sending the cryptocurrency as Revolut can't help recover it.

Revolut also said it intervened prior to processing a cryptocurrency withdrawal Ms M made. It said it displayed a warning that something didn't look right and the transaction had been identified as a potential scam. It then asked Ms M some questions and highlighted the importance of answering truthfully and that if someone had told her to ignore warnings she was being scammed. During the intervention it asked Ms M for the purpose of the withdrawal and Ms M selected she was transferring to another of her accounts. While this was strictly correct, 'It's related to a job opportunity' was an available option. The questions and warnings that followed were based on the answer Ms M gave.

Ms M also used accounts she held elsewhere to facilitate the scam. I've reviewed a call Ms M had with a firm I'll call L, and another call with a firm I'll refer to as H. In both calls Ms M is asked why she's transferring funds to her Revolut account and each time she says she is sending money to a sibling overseas.

Taking everything into account, I think, on balance, had Revolut intervened prior to any of the conversions, Ms M would more likely than not have behaved in a similar way and failed to give the accurate reason for them. And I don't think the conversions would have suggested to Revolut that Ms M was falling victim to a job scam and I'm satisfied it would only have known this if she had disclosed it. Nor do I think the transactions would have suggested to Revolut that Ms M was vulnerable at the time such that it could have done anything differently.

Additionally, the communications with the scammer show they offered guidance on how to answer questions should a firm intervene. And on more than one occasion when a firm intervened Ms M informed the scammer who told her to remember what she had been told. Also that she shouldn't 'tell banks that we're transferring for this job because it isn't taxed'. On one occasion when she encountered friction when transferring from her account with H to Revolut, Ms M told the scammer she overcame this by transferring to a friend who then transferred the funds to Ms M's account with Revolut. This shows that Ms M was under the scammer's spell and that she sought to avoid interventions from firms by finding alternative ways to make payments.

Furthermore, the communications between Ms M and the scammer show that after she reported being scammed to Revolut on 7 April 2025 she continued to communicate with the scammer. On 9 April 2025 Ms M references a substantial deposit she made the day before. From what I've seen the communications continued for several weeks after Ms M already believed the job was a scam. I think this shows the degree with which Ms M was under the scammer's spell and that even if Revolut had uncovered the scam, I'm not persuaded it would have prevented her losses. It therefore wouldn't be fair or reasonable for me to hold Revolut liable for Ms M's losses. And there isn't any prospect of recovering cryptocurrency transactions.

I'm sorry to disappoint Ms M further, but I've thought carefully about everything that has happened, and with all the circumstances of this complaint in mind I don't think Revolut needs to refund Ms M's money or pay any compensation. I realise this means Ms M is out of pocket and I'm really sorry she's lost this money. However, for the reasons I've explained, I don't think I can reasonably uphold this complaint.

My final decision

My final decision is that I do not uphold this complaint against Revolut Ltd.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms M to accept or reject my decision before 19 March 2026.

Charlotte Mulvihill
Ombudsman