

The complaint and what happened

Ms B complains Revolut Ltd won't reimburse money she lost when she fell victim to a crypto investment scam.

The full details of this complaint are well known to all parties, so I won't repeat them here. Instead, I'll recap the key points, and focus on giving reasons for my decision:

- Ms B found an investment company, which I will refer to as 'W', via a popular social media platform. She researched W online, reviewed their website and read articles online; to satisfy herself they were a genuine company before investing.
- Between 12 July 2024 to 31 July 2024, she transferred around £22,500 from an account she held at another banking provider, which I will refer to as 'A', to her Revolut account. And from there, Ms B invested just over £22,000 with W.
- In August 2024, Ms B complained to Revolut, who didn't uphold her complaint, so the matter was referred to our service.
- Our Investigator didn't uphold the complaint. She said, Revolut made several proportionate interventions. And she didn't think any further interventions would've prevented Ms B from sending the funds to W, especially considering her responses to the previous interventions carried out by Revolut.

Ms B didn't agree. In summary, she said, she was receptive to the warnings Revolut provided. However, the scam education that it provided was clearly misleading which resulted in her getting back in touch with W and making further payments. Also, the payments were made after Consumer Duty regulations had been introduced, which makes it clear that it need to avoid foreseeable harm to their customers, requiring it to be proactive when delivering good customer outcomes.

As no agreement could be reached, Ms B's complaint has been passed to me to decide. I issued a provisional decision on 14 November 2025, and I said:

I'm sorry Ms B has been the victim of a scam, and I don't underestimate the impact this has had on her. But while I'm sympathetic to her circumstances, I must consider whether Revolut is responsible for the loss she has suffered. I know this won't be the outcome Ms B is hoping for, but for similar reasons as our Investigator, I don't think they are. And so, I don't think Revolut has acted unfairly by not refunding the payments. I'll explain why.

Firstly, I've thought about the CRM code which can offer a potential means of obtaining a refund following scams like this one. But as Revolut isn't a signatory of the CRM code, these payments aren't covered under it. I've therefore considered whether Revolut should reimburse Ms B under any of their other obligations.

In broad terms, the starting position in law is that an electronic money institution (EMI) is expected to process payments that their customer authorises them to make.

It isn't disputed that Ms B knowingly made the payments from her account and so, I'm satisfied she authorised them. Therefore, under the Payment Services Regulations 2017 and the terms of her account, Revolut are expected to process Ms B's payments, and she is presumed liable for the loss in the first instance.

However, taking into account the regulatory rules and guidance, relevant codes of practice and good industry practice, there are circumstances where it might be appropriate for Revolut to take additional steps or make additional checks before processing a payment to help protect customers from the possibility of financial harm from fraud.

When considering this, I've kept in mind that EMI's process high volumes of transactions each day. And that there is a balance for Revolut to find between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate – as it wouldn't be practical for EMI's to carry out additional checks before processing every payment.

Revolut's interventions

Here, as part of the transfer process for the payments, Revolut carried out fraud risk assessments on various payments which included the following warnings:

“Something doesn't look right

Your transaction has been flagged by our system as a potential scam.”

Ms B then confirmed the following:

- *She understood that, if she was being scammed, the fraudster may ask her to hide the real reason for this payment.*
- *She wasn't being assisted through the questionnaire (so, someone wasn't telling her which options to choose or telling her it was urgent).*

To which Revolut explained that “if someone is telling you to ignore these warnings, they're a scammer. Only continue if you're sure that you are not being prompted into making a payment.” Revolut then highlighted that scammers may ask for software to be installed to view a screen, spy on personal details and help set up an investment account.

Revolut also asked Ms B about the purpose of payment on some payments to which she said it was a transfer 'to another account', which resulted in Revolut providing tailored warnings based on the purpose selected. Based on the value of some of the payments, I'm satisfied that these pre-determined questions, which took into consideration the payment purpose Ms B provided, were a proportionate method to assessing the potential risk of financial harm at this point. But despite this, Ms B proceeded to make the payments.

Revolut have also said Ms B was referred to their in-app chat function on 8 July 2024, when she attempted to make a payment of £1,000 to the crypto exchange provider, which resulted in the payment being declined. Ms B was asked various questions, which resulted in her providing the following information to Revolut:

- *She confirmed she was making the payment on her own and no-one was guiding her to make the payment.*

- *She was buying cryptocurrency from a genuine crypto exchange provider.*
- *She was introduced to the crypto exchange provider from a friend and she had been doing investments for 2 years.*
- *She has been able to make withdrawals from her crypto account.*
- *No-one has asked her to install screen sharing software.*
- *The crypto exchange provider she is using is the most popular crypto provider.*
- *She wouldn't be taking money out of her crypto account.*

Ms B decided to go ahead with the payment. However, on the same day (8 July 2024), Ms B came back to the in-app chat with Revolut and said:

"Yes, I think it's a scam. Now I realise".

The Revolut agent responded with the following:

"Please stop any contact with them as they will try to manipulate you in making more transfers"

The agent also reiterated to Ms B that she shouldn't share any more details with the scammer and said the following:

"Please refrain from any contact from the people who were making you invest in cryptocurrency. They will persuade you and might sound very convincing but it will lead you to losing more money."

Ms B has said she was receptive to the warnings Revolut had initially provided and as English is not her first language, the misleading scam education provided by Revolut led her to make further payments to W even after she had realised she had been a victim of a scam. So, she feels, Revolut failed to protect her from foreseeable harm.

However, as outlined by our Investigator, whilst English may not be Ms B's first language, having reviewed the in-app chat and also having listened to the calls she had with A, which I've referenced below, I'm satisfied she knew she had been a victim of a scam and that she shouldn't be sending any more money to W.

The conversation with the Revolut agent took place on 8 July 2024, which was before the first payment Ms B made to W from her Revolut account.

The agent asked Ms B if she is still in touch with W, and she said "yes, tomorrow, they will ask for money to transfer again".

The Revolut agent then said the following:

"Please stop any contact with them as they will try to manipulate you in making more transfers."

"Please refrain from any contact from the people who were making you invest in cryptocurrency. They will persuade you and might sound very convincing but it will lead you to losing more money".

Ms B responded with the following:

“Ok, will do definitely thank you so much for you advice, God bless you!”

Based on the above, I’m satisfied Ms B understood what was happening and she was aware W was operating a scam on 8 July 2024. However, she chose to ignore the warnings provided by Revolut and continued to make payments to W.

Intervention by A

As I mentioned above, to fund the scam payment’s Ms B transferred funds from A to her Revolut account. A have said they provided Ms B with the following tailored warning after she selecting she was paying money to her other account.

“Could this be a scam?”

If someone tells you that you need to ‘keep your money safe’ by moving it to another account, this is definitely a scam. Don’t proceed.

No legitimate company or organisation will ever ask you to move money out of your account.

Scammers can also copy telephone numbers to appear legitimate, so always phone back on a trusted number you’ve found on an official website.

Stop. Challenge. Protect.”

Based on the purpose of payment selected by Ms B, I feel the above warning was reasonable from A to warn her about the risks involved in transferring funds to her other account.

A have also provided our service with a few phone calls they had with Ms B on 17 July 2024, when her account was blocked after she attempted to make a payment of £4,000 to her Revolut account.

On the first call, Ms B called A as her payment had been blocked. A’s advisor first asked if Ms B had opened her Revolut account recently or for a while. Ms B confirmed, she’s had the account for a while. A’s adviser then goes onto say the following:

“The only reason we ask is because some customers are approached by fraudsters and their told they can make quick returns on their investment. And they tend to open Revolut accounts and their told to send the money to those accounts and then their told where to forward the money after you send it to Revolut”.

The adviser then asks Ms B if anyone has advised her to send the money on, which Ms B confirmed “no, no-one advised me”.

The adviser then asks Ms B, what is the reason for sending quite a lot of money over to Revolut? Ms B responds with the following: “I’m going to my country and I want to use this money in my country”.

The adviser confirmed the original payment had been cancelled, however, she can stay on the phone If she wanted to try again. Ms B said she wanted to make the payment whilst on the phone, so the adviser stayed on the call and approved the

payment once Ms B entered the details again.

The second call A provided was from A's fraud department to Ms B. The adviser asked Ms B if she made the payment herself, which she confirmed she did and she was paying herself. The adviser then asked Ms B the purpose of the payment. Ms B again said the following: "This money is for me. I want to go to my country and I want to use the money from Revolut". The adviser went onto read a safe account scam warning and confirmed he would go ahead and release the payment.

On the first call with A, Ms B was warned directly about the type of scam she was falling victim to about customers being promised high returns on investments and being told to send her funds to Revolut and from their onto another account (W's platform). Ms B was also asked twice for the purpose of the payment and she maintained that she was sending the money for when she travels back to her own country, which was not the case.

Further intervention from Revolut

Revolut have said they directed Ms B to their in-app chat again and asked her further questions about the purpose of her payments on 18 July 2024, when she attempted to make further payments to W.

Ms B confirmed the following to Revolut:

- She was transferring funds to her other account.
- She is doing the transactions herself.
- She didn't get any messages to move money to someone.
- She's sending multiple payments as one big payment would take too long.

I've also reviewed the scam chats Ms B had with W and without going into detail, I can see Ms B maintained regular contact with W throughout the scam period. On 9 July 2024, when Ms B had realised W was operating a scam, she told W that her Revolut and A accounts had been blocked and apologised for the inconvenience. Ms B also told W that her husband won't allow her to continue with the investment anymore and she wants the money back that she invested. W told Ms B that it doesn't work like that and that she is trying to deceive him. W said she needs to call him to discuss further, and although Ms B initially said she couldn't call, she eventually agreed to speak with W and ultimately continued to make further payments.

Based on the conversations Ms B had already had with Revolut on the same day (9 July 2024), this was the same scenario the Revolut agent had explained would happen, that the scammer would pressurise her into continuing making the payment and she should cut all contact going forward, which Ms B didn't do.

I've noted Ms B's comments that she was receptive to the warnings Revolut provided and the scam education it provided was misleading, however, I disagree. The evidence available shows Revolut had provided proportionate interventions for the risks identified by the earlier payments Ms B attempted. The scam had also been uncovered by Ms B on 8 July 2024, before she went onto make the reported payments to W from her Revolut account. Having reviewed the scam chats, Ms B was clearly under the influence of and being heavily coached by W, so even if I

thought Revolut should have provided any further interventions, I don't think it would have made a difference here. Ms B also provided A with incorrect information as when she was asked twice what the payment was for, she said it was for spending money when she went back home, which wasn't correct.

I've also considered Ms B's comments about the Financial Conduct Authority's Consumer Duty and I've taken account of Revolut's obligations following its introduction, but I'm not persuaded this changes the outcome here. While Revolut was expected to avoid causing her foreseeable harm, I'm not persuaded its actions (or failure to act) were the cause of the harm she has suffered, nor do I think that harm was reasonably foreseeable given the information that was available to Revolut at the time she made the payments.

On a final note, I've considered whether, on being alerted to the scam, Revolut could reasonably have done anything more to recover Ms B's losses, but I don't think they could. This is because the funds were sent to a crypto wallet in Ms B's own name before being forwarded on to W. So, no funds would've remained. But even if they did, they would've remained in Ms B's control and she could've accessed them herself.

I have a great deal of sympathy for Ms B and the loss she's suffered. I appreciate she is the innocent victim of a scam, and she has lost a significant sum of money. But it would only be fair for me to direct Revolut to refund her loss if I thought they were responsible – and I'm not persuaded that this was the case. For the above reasons, I think Revolut have acted fairly and so I'm not going to tell them to do anything further.

My provisional decision

My provisional decision is that I do not uphold this complaint.

Revolut didn't respond to my provisional decision.

Ms B replied to say she disagreed. In short, she said:

- At the time of the scam, she was not acting with full awareness or mental capacity, due to the state of severe emotional vulnerability; depression, anxiety, financial pressure, and stress caused by a toxic work environment abroad. She said this places her squarely within the definition of a high-risk vulnerable customer under Consumer Duty.
- Her English is limited, especially under stress, and the warnings provided were generic, rapid, and not tailored to her vulnerabilities or language ability.
- Consumer Duty requires firms to identify vulnerable consumers and provide enhanced, tailored protection, not standard automated alerts. Stronger, proactive intervention was required.
- The Financial Ombudsman needs to consider her complaint as a vulnerable consumer, under coercive control from the scammer, who was deserving of enhanced protection under Consumer Duty.

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.

In doing so, I have thought carefully about the additional points Ms B has made, but it doesn't persuade me to reach a different outcome to my provisional decision.

Revolut have confirmed they didn't have any record of the vulnerabilities Ms B has mentioned at the time of the transaction, which Ms B has also confirmed wasn't provided to Revolut. Having reviewed Ms B's communication with both Revolut and A, I feel the warnings provided by Revolut were clear and written in simple language. I find Ms B responded appropriately to its questions. As such, I couldn't reasonably expect Revolut to have identified any difficulties in Ms B's understanding of its warnings. So, as I mentioned in my provisional decision, whilst I appreciate Revolut's obligations following the introduction of Consumer Duty, I'm not persuaded its actions (or failure to act) were the cause of the harm she has suffered, nor do I think that harm was reasonably foreseeable given the information that was available to Revolut at the time she made the payments. I therefore see no reason to depart from the provisional decision I issued.

My final decision

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

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms B to accept or reject my decision before 31 December 2025.

Israr Ahmed
Ombudsman