

The complaint

Miss P complains that Revolut Ltd ('Revolut') won't refund the money she lost to an investment scam.

She's represented by a Claims Management Company. For simplicity, I'll refer to Miss P throughout this decision.

What happened

The background is known to both parties, so I won't repeat all the details. In summary, Miss P says that, in 2020, she connected with an individual (a scammer) through social media where they shared an interest in investing and trading. She believed he had an FCA-licence.

A relationship then started to develop. The scammer introduced her to a trading platform ('X'). And, between 2020-2022, she allowed his 'clients' to transfer funds into her account with her personal bank ('B') for her to send on, through her account with a crypto-platform ('L'), to what she believed were their 'trading accounts'. Each time she followed those instructions, she would appear to receive an additional credit into her trading account. She now believes she may have been acting as an unsuspecting money mule.

At some point, the scammer told her that X had gone bust and her funds had been lost. She thought he was pursuing recovery through the courts and our Service and that this would take time. Then, in May 2023, she says she was persuaded to transfer funds from a property sale to her Revolut account for the purchase of cryptocurrency, which she thought would be 'invested' in its "*earning program*". Remote access was used as part of the process.

Between 20-29 May 2023, she exchanged fiat into cryptocurrency and withdrew some of this through Revolut's platform. A large part was instead exchanged back into fiat and sent from Revolut to her account with another crypto-platform ('S'). In total, she says over £45,000 was ultimately sent to wallets belonging to the scammer – and that she realised she'd fallen to a scam when she didn't receive the expected returns and the scammer stopped responding.

A complaint was made to Revolut in July 2023 and later referred to our Service. Two of our Investigators considered it and didn't uphold it. In brief, the second Investigator wasn't persuaded an intervention would have prevented the scam given the relationship that had grown between Miss P and the scammer. He thought Miss P would have likely continued to follow their instructions and used alternative methods to send funds if necessary. He was concerned that Miss P's more recent account activity appeared similar to the activity when she was transferring funds on behalf of the scammer's 'clients'. He also wasn't satisfied we'd been provided with all the scam communication or enough to evidence Miss P's losses.

As the matter couldn't be resolved informally, it's been passed to me to decide.

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.

Having done so, I've reached the same conclusions as the Investigator. These are the key reasons for my decision.

The operation of cryptocurrency services isn't generally regulated by the UK's financial regulator. And a complaint relating to the cryptocurrency withdrawals isn't something we have the power to consider. But Miss P deposited fiat into her Revolut account. She also exchanged fiat into cryptocurrency (some of which was withdrawn through its platform). I think it's arguable that our Service can look at these earlier steps in relation to this complaint – whether Revolut should have intervened on the fiat deposits or on the exchange of fiat into cryptocurrency – as well as the later payments she made directly to her account with S.

Authorisation and Prevention

In line with the Payment Services Regulations 2017, a firm is expected to execute authorised payment instructions without undue delay. Here, it's not in dispute that Miss P authorised the transactions in question, so the starting position is that she's responsible for them in the first instance. That's usually the position even where the money has been lost to a scam.

But, as Revolut is aware, there are some situations where, taking into account relevant rules, codes and best practice, it should reasonably have taken a closer look at the circumstances of a transaction – if, for example, it's particularly suspicious.

In this case, I agree with the Investigator that Revolut should probably have stepped in on concerns of a heightened risk of fraud when Miss P exchanged her fiat into cryptocurrency, considering the amount involved and the increase in scam trends over the years. It should probably also have intervened on some of Miss P's payments to S. But it's important to note that for me to uphold this complaint requires more than a finding that Revolut should have done more. I'd need to be satisfied that a proportionate intervention would have likely made a difference to what happened. And, on balance, I'm not persuaded that it would have.

I say this partly because Miss P was, in my view, heavily under the scammer's 'spell' at the time of the disputed transactions. She thought they were FCA-registered. It's significant she'd been communicating and 'investing' with them for around three years (since 2020) by then. And, putting aside the gaps in the communication that's been provided (nothing before June 2022), I can see the messages they exchanged had become personal in nature long before the transactions in question came about. In her submissions, even if they may have never met in person, Miss P referred to there being a *romance* element to their relationship.

For me, it's also significant that the scammer's influence was such that, despite not having received the returns she expected from earlier 'investments', Miss P still seemingly accepted the scammer's explanations with little to question or check (independently of the scammer), what she was being told or asked to do. Instead, she went on to seek their advice on what to do with other assets she held and was then persuaded to 'invest' significant amounts more.

Another important factor here is the extent of the scammer's involvement, specifically when the transactions were made. I can't overlook that, according to Miss P, she was "*simply following the scammer's instructions*". Over time, she was guided to make payments from different accounts and through various crypto-platforms. The payments in question were funded by transfers from her account with B. And there's evidence to indicate that, on the scammer's advice, she transferred to Revolut in smaller amounts, over several days, in an attempt to avoid detection. For example, on 6 April 2023, the scammer messaged, "*transfer some to Revolut and I will call to teach how to make payments and everything*". On 18 April 2023, "*Don't transfer it all at once but bit by bit...when can we speak and I will help you*".

I also can't overlook that when B did block a payment to Miss P's Revolut account on 21 April 2023, she was warned about the scam risks around the use of remote access. She reassured B she'd not been instructed to open her Revolut account, that it was her choice to make the payment and that she wasn't following instructions. There was no mention of a third-party having guided her, that same day, to download remote access on her new device and asking her to transfer the funds. I note that, still on 21 April 2023, the scammer was seemingly actively involved and asking Miss P *"Are you still on the phone to them...make sure to turn off your laptop and remember to not speak with anyone else"*. And again, on 15 May 2023, *"Have [B] said anything? Or questioned you...It's good we did it this way"*.

I recognise that, if Revolut had intervened, it would have had a different set of information to B, on which to assess a scam risk. But I consider it relevant that Miss P had been repeatedly giving the scammer access to her device for some time. As referred to by the Investigator, there's little in the 'scam chat' to show the scammer providing Miss P with the necessary instructions to complete the transactions on the Revolut account. And the evidence there is, would suggest the scammer was likely either carrying out the actions through remote access or talking Miss P through which steps to take in real time. In such scenarios, also bearing in mind Revolut's primary method of communication, I think it's unlikely the scam would have been exposed even if Revolut had stepped in to find out more about what was happening.

In other words, taking all the above into account, especially the length of the relationship, the level of trust that had developed, the 'spell' Miss P was under, and the extent of the scammer's control when the transactions were made, I think she'd likely have continued to follow their instructions, been guided to find a way around the truth, or another way to send her money if necessary. In reaching this view, I note we haven't been provided with a convincing explanation as to why a further payment was made in June 2023, after Miss P had been warned by B she'd been scammed and the reasons around why that was.

So, while I'm again very sorry Miss P was the victim of a scam that's affected her deeply and I'm mindful of the information she's shared with us about her health and vulnerabilities at the time, I can't reasonably find that Revolut should refund her losses in circumstances where I think it's unlikely proportionate steps on its part would have prevented them.

Other matters

I've seen Miss P has more recently provided some additional screenshots to evidence her losses she says she incurred and I note she contacted the relevant crypto-platforms when she became concerned she may have been scammed. But, for the reasons above, I don't think an intervention would have made a difference at the time the transactions were made.

As for recovery, I agree with the Investigator that there was little Revolut could have done here in relation to the crypto-withdrawals on its platform. And, for the card payments to S, it's unlikely a chargeback would have succeeded, given there's no dispute the cryptocurrency was provided before Miss P says it was sent on as part of the scam.

For completeness, I'll add that there seems to be some discrepancy around the information we've been given around the source of the money used to fund the scam. In April 2024, we were told the money came from Miss P's sale of a property and reference was made to funds credited to her account with B in April 2023. However, I note that credit was from an individual ('M'). In later correspondence, we were told the funds came from the sale of a specific property but, looking at the statements, those sale proceeds weren't paid to Miss P until July 2023. She then sent the full amount to M about a week later. So it's still not entirely clear how those proceeds could have been used to fund the transactions in question.

My final decision

For the reasons I've given, I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss P to accept or reject my decision before 30 January 2026.

Thomas Cardia
Ombudsman