

The complaint

Mrs G complains that Revolut Ltd won't refund the full amount of money she lost to a scam.

What happened

The background to this complaint is well-known to both parties, so I won't repeat it in detail here. But in summary and based on the submissions of both parties, I understand it to be as follows.

Mrs G complains that she sent several payments to what she thought was a legitimate investment.

When Mrs G realised she had lost her money, she raised a complaint with Revolut.

Revolut looked into the complaint but didn't uphold it. So, Mrs G brought her complaint to our service.

Our investigator looked into the complaint but didn't uphold it. Our investigator found Revolut did intervene on a payment but the information Mrs G gave about the payment wasn't entirely accurate. He also found a Revolut advisor gave Mrs G proportionate warnings that she was likely falling for a scam, but she continued to make the payments anyway. Lastly our investigator didn't think Revolut could have recovered the money.

Mrs G said she was vulnerable at the time due to the passing of her late husband. Our investigator considered this point but didn't find Revolut were aware of this at the time the payments were made. So, although he acknowledged Mrs G was going through a difficult time, he didn't change his outcome.

As Mrs G didn't agree with the investigator's view, the complaint has 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.

I'd like to start by saying how sorry I am that Mrs G lost her husband. I have no doubts that falling victim to this scam has added to what was an already upsetting and difficult time. 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 don't doubt Mrs G has been the victim of a scam here – she has lost a large sum of money and has my sympathy for this. However, just because a scam has occurred, it does not mean Mrs G is automatically entitled to recompense by Revolut. It would only be fair for me to tell Revolut to reimburse Mrs G for her loss (or a proportion of it) if: I thought Revolut reasonably ought to have prevented all (or some of) the payments Mrs G made, or Revolut hindered the recovery of the payments – whilst ultimately being satisfied that such an outcome was fair and reasonable for me to reach.

I've thought carefully about whether Revolut treated Mrs G fairly and reasonably in its dealings with her, when she made the payments and when she reported the scam, or whether it should have done more than it did. Having done so, I've decided to not uphold Mrs G's complaint. I know this will come as a disappointment to Mrs G and so I will explain below why I've reached the decision I have.

I have kept in mind that Mrs G made the payments herself and the starting position is that Revolut should follow its customer's instructions. So, under the Payment Services Regulations 2017 (PSR 2017) she is presumed liable for the loss in the first instance. I appreciate that Mrs G did not intend for her money to ultimately go to fraudsters – but she did authorise these payments to take place. However, there are some situations when a firm should have had a closer look at the wider circumstances surrounding a transaction before allowing it to be made.

Considering the relevant: law and regulations; regulators' rules, guidance and standards; codes of practice; and, where appropriate, what I consider to be good industry practice at the time - Revolut should fairly and reasonably:

- Have been monitoring accounts and any payments made or received to counter various risks, including anti-money laundering, countering the financing of terrorism, and preventing fraud and scams.
- Have had systems in place to look out for unusual transactions or other signs that might indicate that its 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 payment service providers are generally more familiar with than the average customer.
- In some circumstances, irrespective of the payment channel used, have taken additional steps, or make additional checks, before processing a payment, or in some cases decline to make a payment altogether, to help protect customers from the possibility of financial harm from fraud.

So, I've thought about whether the transactions should have highlighted to Revolut that Mrs G might be at a heightened risk of financial harm due to fraud or a scam.

I have kept in mind the payments were to cryptocurrency providers, but that doesn't mean they should automatically be treated as suspicious, particularly when there are no other concerning factors about the payments.

I do not think the values of payments one or two were remarkable enough to have caused Revolut any concern. Nor do I consider enough of a pattern formed here to suggest Mrs G might be at a heightened risk of financial harm due to fraud or a scam. The payments were not made in quick succession and were spread out across several days. So, I'm not persuaded Revolut reasonably ought to have been concerned about these payments.

Payment three of £4,800 was of a value far more significant than Mrs G's normal account usage and was going to a known cryptocurrency provider.

Here I'm satisfied Revolut should have intervened, and I think a proportionate intervention would have been an automated warning. Here though Revolut called and spoke to Mrs G, so I've gone on to decide whether I think the intervention it undertook was sufficient in the circumstances of the payment, and if it wasn't, what more it should have done.

Having listened to the intervention call between Mrs G and the Revolut advisor, it's clear Mrs G is not being accurate with her responses to the questions being asked. Mrs G doesn't explain that she found the investment opportunity online but instead tells the advisor that a good friend had told her about it. Mrs G says she had carried out research on the company, but the advisor very quickly finds negative reviews that leads him to explain to Mrs G that he thinks she is being scammed.

The advisor then goes through some of the common characteristics of an investment scam. Some of these matched the details of the scam Mrs G was falling victim to. So, I'm satisfied that Revolut couldn't have done anything else to prevent this scam. Mrs G was told she was likely being scammed and went on to make the payments anyway. Mrs G later tells the scammer that she should have listened to the bank when they told her the investment wasn't legitimate.

Even if I were to be convinced that Revolut ought to have prevented the payments completely, based on what I've said above, I'm not convinced Mrs G wouldn't have made it by another means.

I have not taken lightly the situation Mrs G was in with her late husband passing. Unfortunately, I've not seen anything to persuade me Revolut were aware of this at the point the payments were being made. Having listened to the telephone call with the advisor, I'm also not convinced there was an opportunity within that call that the advisor missed to pick up on the fact Mrs G may have been in a vulnerable position.

Therefore, due to the reasons I have outlined above, I am not persuaded Revolut ought to have done more and that it could have prevented Mrs G's losses.

Recovery

As the money went to accounts in the name of Mrs G, no recovery by Revolut would be possible. Had any money remained in those accounts, Mrs G would be able to transfer it back herself.

Mrs G feels that Revolut should refund the money she lost due to the scam. I understand that this will have been upsetting for her. 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 pay Mrs G any compensation. I realise this means Mrs G is out of pocket and I'm really sorry she's lost this money. However, for the reasons I've explained, I don't find I can reasonably 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 G to accept or reject my decision before 20 February 2026.

Tom Wagstaff
Ombudsman