

The complaint

Mrs C says Revolut Ltd (“Revolut”) failed to protect her money when she fell victim to a scam.

What happened

Miss C says she had fallen victim to a crypto cryptocurrency related investment scam. She says she found the investment opportunity on Facebook and signed up after seeing some promotional videos endorsed by celebrities she recognised. Miss C says she was given access to a trading portfolio account online which she believed displayed her investments. She also gave her financial advisor to access her device via remote access software. Miss C says fraudsters deceived her into making payments to what she thought was a legitimate investment. The Revolut transactions in question are:

Payment Number	Date	Time	Description	Amount
1	10/04/2024	11:20	Card Payment to Cro	£978.40
2	11/04/2024	16:06	Card Payment to Cro	£1,235.88
3	12/04/2024	08:51	Card Payment to Cro	£514.49
4	12/04/2024	08:54	Card Payment to Cro	£102.98
5	12/04/2024	13:08	Card Payment to Cro	£514.49
6	12/04/2024	13:10	Card Payment to Cro	£514.95
7	12/04/2024	13:12	Card Payment to Cro	£514.95
8	12/04/2024	13:13	Card Payment to Cro	£514.95
9	12/04/2024	13:15	Card Payment to Cro	£102.86
10	12/04/2024	13:16	Card Payment to Cro	£102.92
11	12/04/2024	13:18	Card Payment to Cro	£25.75
12	12/04/2024	13:18	Card Payment to Cro	£25.73
13	12/04/2024	14:04	Card Payment to Cro	£103.05
14	12/04/2024	14:04	Card Payment to Cro	£102.97
15	19/04/2024	14:05	Card Payment to Cro	£73.44
16	19/04/2024	12:12	Card Payment to Cro	£514.95
17	19/04/2024	12:18	Card Payment to Cro	£514.95
18	19/04/2024	12:20	Card Payment to Cro	£514.95
19	19/04/2024	12:31	Card Payment to Cro	£102.97
20	19/04/2024	12:32	Card Payment to Cro	£102.99
21	19/04/2024	12:34	Card Payment to Cro	£514.95
22	19/04/2024	12:34	Card Payment to Cro	£103.19
23	19/04/2024	12:36	Card Payment to Cro	£514.95
24	19/04/2024	12:38	Card Payment to Cro	£102.99
25	19/04/2024	12:39	Card Payment to Cro	£514.95

26	19/04/2024	12:40	Card Payment to Cro	£102.99
27	19/04/2024	12:42	Card Payment to Cro	£102.99
28	19/04/2024	12:43	Card Payment to Cro	£102.99
29	19/04/2024	12:43	Card Payment to Cro	£102.99
30	19/04/2024	12:44	Card Payment to Cro	£102.99
31	22/04/2024	12:26	Card Payment to Cro	£515.03
32	22/04/2024	12:27	Card Payment to Cro	£514.92
33	22/04/2024	12:29	Card Payment to Cro	£25.73
34	24/04/2024	12:30	Card Payment to Cro	£25.74
35	24/04/2024	13:15	Card Payment to Cro	£514.81
36	24/04/2024	13:15	Card Payment to Cro	£103.02
37	24/04/2024	13:16	Card Payment to Cro	£68.94
38	24/04/2024	13:17	Card Payment to Cro	£514.90
39	24/04/2024	13:18	Card Payment to Cro	£102.93
40	24/24/2024	13:19	Card Payment to Cro	£514.95
41	24/04/2024	13:21	Card Payment to Cro	£68.80
42	24/04/2024	13:22	Card Payment to Cro	£514.96
43	24/04/2024	13:22	Card Payment to Cro	£103.01
44	24/04/2024	13:23	Card Payment to Cro	£514.95
45	24/04/2024	13:25	Card Payment to Cro	£514.79
46	24/04/2024	13:25	Card Payment to Cro	£103.23
47	24/04/2024	13:26	Card Payment to Cro	£68.62
48	24/04/2024	13:27	Card Payment to Cro	£515.01
49	24/04/2024	13:28	Card Payment to Cro	£102.96
50	24/04/2024	13:32	Card Payment to Cro	£25.71
51	24/04/2024	13:33	Card Payment to Cro	£68.70
52	25/04/2024	10:27	Card Payment to Cro	£65.07
53	25/04/2024	10:27	Card Payment to Cro	£25.73
54	25/04/2024	10:28	Card Payment to Cro	£102.99
55	25/04/2024	10:28	Card Payment to Cro	£102.97
56	25/04/2024	10:29	Card Payment to Cro	£102.99
57	26/04/2024	07:59	Card Payment to Cro	£65.84
58	26/04/2024	08:51	Transfer to 3 rd party	£1,500
59	27/04/2024	08:58	Transfer to 3 rd Party	£1,500
60	27/04/2024	08:59	Transfer to 3 rd Party	£1,500
61	27/04/2024	09:32	Transfer to 3 rd Party	£235
62	29/04/2024	17:28	Card Payment to Cro	£103.00
63	29/04/2024	18:07	Card Payment to Cro	£66.70
64	29/04/2024	18:08	Card Payment to C	£514.71
65	29/04/2024	18:09	Card Payment to Cro	£514.96
66	29/04/2024	18:10	Card Payment to Cro	£514.93
67	29/04/2024	18:11	Card Payment to Cro	£514.87
68	29/04/2024	18:13	Card Payment to Cro	£514.79
69	29/04/2024	18:14	Card Payment to Cro	£514.94

70	29/04/2024	18:15	Card Payment to Cro	£514.95
71	29/04/2024	18:21	Card Payment to Cro	£102.99
72	29/04/2024	18:22	Card Payment to Cro	£102.99
73	29/04/2024	18:22	Card Payment to Cro	£102.87
74	30/04/2024	09:12	Transfer to 3 rd Party	£1,820

Revolut refused to refund Miss C for any of the above payments. It concluded that as most of the payments were made to a cryptocurrency account in Miss C's name, she had control over the funds when they left Revolut, so there was no loss at this point. Therefore, it felt it should not be held responsible for the loss of any funds which were later transferred to the scammer from the cryptocurrency account.

Unhappy with Revolut's response, Miss C brought her complaint to us. Our investigator considered this complaint and upheld it in part. In summary, the investigator felt that Revolut should've intervened at Payment 9. And had it done so, she felt it could've prevented Miss C's losses from that point. However, she also felt that Miss C had contributed to her loss by allowing remote access to her device, and therefore her account, and not doing diligent research before making so many payments. Miss C accepted the investigator's findings, but Revolut didn't. So, this has been passed to me for a final decision.

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 would like to say at the outset that I have summarised this complaint in far less detail than the parties involved. I want to stress that no discourtesy is intended by this. If there is a submission I have not addressed, it is not because I have ignored the point it is simply because my findings focus on what I consider to be the central issues in this complaint. Further, under the rules I must observe, I am required to issue decisions quickly and with minimum formality.

In broad terms, the starting position at law is that an Electronic Money Institution ("EMI") such as Revolut is expected to process payments and withdrawals that a customer authorises it 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, considering relevant law, regulators' rules and guidance, relevant codes of practice and what I consider having been good industry practice at the time, I consider it fair and reasonable 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 its customers were at risk of fraud. 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.
- have acted to avoid causing foreseeable harm to customers, for example by maintaining adequate systems to detect and prevent scams and by ensuring all aspects of its products, including the contractual terms, enabled it to do so.
- 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.
- have been mindful of – among other things – common scam scenarios, how 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.

Should Revolut have recognised that Miss C was at risk of financial harm from fraud?

Payments 1 to 8

I have seen that Payment 1 was declined, and Miss C had to provide some further information before it allowed this payment to be made. Miss C was asked about the payment purpose and if she was guided to make this payment. As this payment was being sent to a crypto currency trading platform, she was given a tailored cryptocurrency warning before this transaction was processed.

Revolut's overall position is that none of the payments were out of character for Miss C as she was a new customer, and therefore, none of the payments made were flagged as suspicious. And I think this reasoning is fair in relation to Payments 1 to 8. Each payment was not significantly high individually, and as it had already intervened recently and provided a relevant cryptocurrency scam warning at Payment 1, so I don't think it would be fair to say Revolut ought to have intervened again between Payments 2 and 8.

Payment 9

By Payment 9 Miss C had been making consecutive payments to the same merchant in quick succession. And she had paid a total of £4,015.55 in just over 24 hours to an identifiable cryptocurrency provider. It was also the fifth payment in ten minutes – which ought to have seemed suspicious, especially given the rise in cryptocurrency scams in the recent years. Given the above aggravating factors, to my mind, there was an identifiable risk here. Therefore, I think Revolut ought to have intervened before allowing Payment 9 to be processed. And since these were being sent to a cryptocurrency provider in such quick succession – I think human interaction would've been an appropriate action. This could have been a phone call or a conversation via Revolut's in a chat facility where it could have asked relevant questions and provided a proportionate warning to Miss C based on the information it received.

If Revolut had provided a warning of the type described above, would that have prevented the losses Miss C suffered from Payment 9?

To hold Revolut liable for any of Miss C's loss, I must be persuaded that the intervention outlined above would've made a difference to Miss C's decision to continue with the payment and any further payments. So, I've looked at all the surrounding evidence to come to a decision on this.

The type of human intervention required at this time should've involved open and probing questions about the nature of the payment and the circumstances surrounding it. Such as why the payment was being made, what type of investment she understood this to be, where Miss C had discovered this opportunity to invest, how she had been deciding what to invest in and whether she was being coached or encouraged to make the payments in question. And had Revolut asked these types of questions over chat or on the phone, I think this would've uncovered the scam. I'll explain why.

When completing Payment 1 Miss C was asked to answer a questionnaire on the payment she was making. At this time Miss C was honest with the payment purpose, stating it was for an investment. I've not seen any evidence that Miss C was coached into what to answer to Revolut, or that she had specifically been told to lie. So, I don't think there is any evidence to

suggest Miss C would've lied if Revolut asked the type of questions it ought to have.

Had Revolut intervened in the way I have described before processing Payment 9 I think it's likely it would've uncovered the scam. I say this because the appropriate intervention would've uncovered that Miss C found this opportunity to invest on Facebook and she had given the scammers access to her devices. It is also likely to have discovered that she had not invested in cryptocurrencies previously and she had been acting on the advice given to her by someone she met online. And so, to my mind, there would've been enough concerning factors to alert Revolut to the fact that Miss C was at risk of financial harm, and it should have warned her that this is likely to have been a scam – which I think would've resonated with Miss C.

Miss C was not a knowledgeable investor, and I think if Revolut had educated her on the types of investment scams out there and the likelihood that Miss C's situation was also a scam, I think she would've decided not to send any more money. And so, I think Revolut missed an opportunity to prevent Miss C's losses from Payment 9.

Is it fair and reasonable for Revolut to be held responsible for Miss C's losses?

I have taken into account that Miss C remained in control of her money after making the payments from Revolut. It wasn't lost until she took further steps. But Revolut should still have recognised that Miss C was at risk of financial harm from fraud, made further enquiries about Payment 9 and ultimately prevented her loss from that point. I think Revolut can fairly be held responsible for Miss C's loss in such circumstances.

While I have considered all of the facts of the case, including the role of other financial institutions involved, Miss C has chosen not to complain about any other firm, and I cannot compel her to do so. And I do not think it would be fair to reduce Miss C's compensation because she's only complained about one firm, as I consider that Revolut should have prevented the loss.

Ultimately, I must consider the complaint that has been referred to me (not those which haven't been or couldn't be referred to me) and for the reasons I have set out above, I am satisfied that it would be fair to hold Revolut responsible for Miss C's losses from Payment 9.

Should Miss C bear any responsibility for her losses?

In considering this point, I've taken into account what the law says about contributory negligence as well as what's fair and reasonable in the circumstances of this complaint. Having done so, I think it is fair to hold Miss C responsible for some of her losses as I feel her actions fell below the standard expected of a reasonable person in her circumstances.

Miss C says she found this investment opportunity on Facebook. As a social media platform, this is an informal place to connect with family and friends and not a professional platform. Even though most companies do have a presence on social media, it is also widely known that there are many fake profiles and fake businesses also online. So, I would've expected Miss C to carry out some further checks before paying so much money on the advice of someone she met on social media.

Miss C says she didn't do any research into the company she was investing with. She says she had seen videos of well-known celebrities endorsing this investment opportunity and she believed what she had seen. However, had Miss C carried out any of her own research I think she would've realised this was a scam. I say this because there are several warnings on the FCA register which include the company name the emails were sent from. And this information is accessible on the first page of a google search using the company name from

her email correspondence. Miss C also didn't do any other checks on the financial advisor she was supposedly speaking to.

Miss C says she had allowed the financial advisor to access her device via remote access software. This type of access is highly unsafe, and I think Miss C should've considered the implications. These investors found her on social media, so they were unknown to her and giving them access to her device meant that they could've learnt all her passwords and accessed all her accounts and information. Therefore, I think it's fair to say that Miss C has been negligent and this has contributed to her loss.

Recovery of funds

Most of the transactions in dispute were card payments to purchase cryptocurrencies in her wallet. As such these card payments are subject to the chargeback scheme – where the relevant grounds could be either that the goods and services were not provided or the transaction itself was fraudulent. In this case we know that Miss C made these payments, so they could not be classed as fraudulent payments. So, the only possible grounds for a chargeback would be on the grounds that the goods and services were not received. However, when purchasing cryptocurrencies the goods are said to be delivered as soon as the money is exchanged - so as soon as the funds were moved into the wallet. Therefore, I am satisfied that there was no potential for a successful chargeback.

The remaining payments made were by bank transfer to a third party, which I understand was then used to purchase cryptocurrencies. I've seen that Revolut contacted the receiving bank to try and recover these funds, however the funds had already been moved on.

Overall

So having considered all the evidence and the surrounding circumstances I think it is fair for Revolut to bear some of Miss C's losses here. I say this because I think Revolut should've done more than it did to protect Miss C from financial harm, and had it done this I think she would've realised that she had fallen victim to a scam. However, I also think that Miss C should be held accountable for her negligence in allowing the scammers to access her device and paid them

Putting things right

My decision is that Revolut Ltd should refund Miss C the transactions from Payment 9 onwards, less a 50% deduction for contributory negligence. Revolut Ltd should also add 8% simple interest on each payment due, calculated from the dates each of the payments were made until the date they are refunded.

My final decision

For all the reasons outlined above, I am upholding this complaint in part. Revolut should refund Miss C as outlined above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs C to accept or reject my decision before 18 February 2026.

Sienna Mahboobani
Ombudsman