

## **The complaint**

Ms M has complained about Revolut Ltd not refunding several payments she says she made and lost to a scam.

Ms M has referred the complaint with a professional representative, however for ease I will refer to Ms M throughout.

## **What happened**

The background to this complaint is well known to both parties, so I won't repeat it in detail here. In summary, Ms M was contacted by a scammer about a job opportunity. Ms M believed the company to be a legitimate one as it was impersonating a well-known company. As it was only a part-time job for a US based firm Ms M didn't consider it unusual that there was no formal employment contract, or that she had to invest her own funds to withdraw her commission. The business model was to simulate purchasing items through the platform, to improve the merchants algorithms for selling the items. Ms M first transferred her funds to another entity to purchase cryptocurrency, before sending it to the scammer. In total she sent circa £12,000 in November 2024. Ms M subsequently realised she had been scammed after speaking with a friend.

Ms M then contacted Revolut to be refunded for her losses. However, it did not compensate her and so she referred the complaint to us. Our Investigator didn't uphold the complaint as, although he thought Revolut ought to have been aware of potential financial harm to Ms M, he wasn't persuaded that Revolut could have prevented the loss. This was because when Revolut did intervene Ms M provided inaccurate information. Unhappy with this Ms M requested a decision be issued.

As our Investigator couldn't resolve the matter informally the case 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'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 Ms M 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 she is 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 proportion of it) if: I thought Revolut

reasonably ought to have prevented all (or some of) the payments Ms M made, or Revolut hindered the recovery of the payments she made – whilst ultimately being satisfied that such an outcome was fair and reasonable for me to reach.

I've thought carefully about whether Revolut treated Ms M 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 Ms M's complaint. I know this will come as a disappointment to her and so I will explain below why I've reached the decision I have.

I have kept in mind that Ms M 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 Ms M did not intend for her money to ultimately go to a scammer – but she did authorise these payments to take place. However, there are some situations when a bank 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.
- 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.

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

Revolut should have identified when Ms M's payments were going to a cryptocurrency exchange as the merchant is well-known. However, that doesn't mean they *all* should automatically be treated as suspicious; particularly when there are no other concerning factors about the payments. Many banks have made the commercial decision to prevent their customers from using their service to send money to cryptocurrency exchanges. Albeit investing in cryptocurrency is a highly risky endeavour, it is ultimately a legitimate one and so certain banks and Electronic Money Institutions (EMI) do permit transfers to cryptocurrency exchanges.

Considering the initial payments made I do not think they were remarkable enough to have caused Revolut any concern. They were not of large amounts and nor were there sufficient common hallmarks of a scam taking place. However, I have noted that Revolut still chose to intervene on Ms M's second payment and asked her some questions prior to allowing the payment to be released. In response, Ms M confirmed no-one was 'guiding / rushing' her to

complete the transaction and also that she was making the transfer to her 'account in another bank'.

However, this was not entirely accurate of Ms M and had she selected the correct options (that she was making the transfer for a job opportunity) she would have been shown a targeted warning for that particular scam. Instead, due to the options she did choose, she was shown a less applicable warning to be wary of impersonation scams. As the payments continued, Ms M was questioned on payment four and answered as she had above. This too meant she was not shown a warning that would have been applicable to her circumstances compared with if she had informed Revolut of the 'job opportunity'.

Additionally, when Ms M spoke with Revolut via its in-app chat prior to allowing her payment of £5,000 on 15 November 2024, she became irate as to why the payment wasn't being made. She threatened to switch banks, sent multiple messages chasing Revolut to return her money and then cancelled the payment. It appears clear at this point Ms M was desperate to make the payment to release her 'earnings' and other deposited funds. As Ms M highlights, she was not familiar with this type of part-time work for a US based firm and considered herself to be employed by a known genuine firm. I think this highlights why the different actions Revolut did take failed to prevent her sending payments - even when a payment was delayed giving her additional time to consider her actions. Therefore, on balance, I'm persuaded she would have sought to make the payment regardless of the actions Revolut took – including, as she informed Revolut, moving funds to another bank to do so.

Consequently, I think the actions Revolut took to attempt to protect Ms M from the risk of financial harm were reasonable.

I am sorry to hear about the vulnerable situation Ms M was in at the time of the scam. The repercussions such a cruel scam has had on Ms M is not something I have overlooked when reaching my decision. However, I have not seen a pattern emerge that would have highlighted to Revolut that Ms M was in a vulnerable position because of her financial pressures, or that her situation may have been impairing her decision-making during this scam. I am empathetic towards her, but I do not consider her circumstances, in isolation of any other clear indicators of a potential risk of financial harm, to be something that should have triggered further red flags for Revolut.

I've noted Ms M has referenced decisions that she believes are close to her circumstances. However, we consider each case on its own individual merits and although she believes the circumstances of other decisions seem to be similar, there are key differences.

Whilst Ms M has undoubtedly been the victim of a cruel scam, I can only uphold her complaint if I'm satisfied the losses stemmed from a failing by Revolut. Ultimately, for the reasons given, I'm not persuaded it did.

### Recovery

Ms M didn't make the payments to the scammer directly, but to a cryptocurrency exchange. Revolut would only have been able to attempt to recover the funds from her own account at this exchange. If these funds had not already been transferred to the scammer, they would be in her control to access as and when she chose.

So, in light of all of the above findings, there's no fair and reasonable basis under which I can ask Revolut to reimburse Ms M's loss.

### **My final decision**

For the reasons given above, my final decision is that I don't 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 26 February 2026.

Lawrence Keath  
**Ombudsman**