

### The complaint

Miss M is being represented by a claims manager. She's complaining about Revolut Ltd because it declined to refund money she lost as a result of fraud.

### What happened

Sadly, Miss M fell victim to a cruel job scam after she was contacted by text message from someone claiming to be a recruiter offering online work reviewing products. The role required Miss M to complete sets of tasks that she needed to pay to access. To fund the scam, she opened a new account with Revolut on 28 April 2025 and used it to fund the following payments:

No.	Date	Amount £	Fee £	Total £
1	28-Apr	37.39	0.86	38.25
2	28-Apr	11.75	0.86	12.61
3	29-Apr	50	0.86	50.86
4	29-Apr	100	1.00	101.00
5	30-Apr	127	1.27	128.27
6	30-Apr	158.92	1.59	160.51
7	01-May	246	2.46	248.46
8	01-May	99	0.99	99.99
9	01-May	508	5.08	513.08
10	01-May	500	5.00	505.00
11	01-May	500	5.00	505.00
12	01-May	500	5.00	505.00
13	01-May	30	0.86	30.86
14	01-May	500	5.00	505.00
15	01-May	500	5.00	505.00
16	01-May	500	5.00	505.00
17	01-May	500	5.00	505.00
18	01-May	500	5.00	505.00
19	01-May	500	5.00	505.00
20	01-May	500	5.00	505.00
21	01-May	500	5.00	505.00
22	01-May	500	5.00	505.00
23	01-May	500	5.00	505.00
24	01-May	500	5.00	505.00
25	01-May	1,000	10.00	1010.00
26	01-May	99	0.99	99.99

27	01-May	1,000	10.00	1010.00
28	01-May	1,000	10.00	1010.00
29	01-May	1,000	10.00	1010.00
30	01-May	1,000	10.00	1010.00
31	01-May	1,000	10.00	1010.00
32	01-May	1,000	10.00	1010.00
33	02-May	1,000	10.00	1010.00
34	02-May	99	0.99	99.99
35	02-May	1,000	10.00	1010.00
36	02-May	1,000	10.00	1010.00
37	02-May	1,000	10.00	1010.00
38	02-May	1,000	10.00	1010.00
39	02-May	1,000	10.00	1010.00
40	02-May	1,000	10.00	1010.00
41	02-May	1,000	10.00	1010.00
42	02-May	1,000	10.00	1010.00
43	02-May	1,000	10.00	1010.00
44	02-May	1,000	10.00	1010.00
45	02-May	1,000	10.00	1010.00
46	02-May	1,000	10.00	1010.00
47	02-May	1,000	10.00	1010.00
48	02-May	1,000	10.00	1010.00
49	02-May	1,000	10.00	1010.00
50	02-May	394	3.94	397.94

These were push to card payments to the overseas accounts of four different individuals. In the early stages of the scam, Miss M did receive some money back - £247 on 29 April and £436 on 30 April. I understand the rest of this money was lost to the scam.

### **My provisional decision**

After the complaint was referred to me, I issued my provisional decision setting out why I thought it should be partly upheld. My reasons were as follows:

*There's no dispute that Miss M authorised these payments. In broad terms, the starting position at law is that an Electronic Money Institution (EMI) such as Revolut is expected to process payments a customer authorises it to make, in accordance with the Payment Services Regulations and the terms and conditions of their account. In this context, 'authorised' essentially means the customer gave the business an instruction to make a payment from their account. In other words, they knew that money was leaving their account, irrespective of where that money actually went.*

*But, taking into account relevant law, regulators' rules and guidance, relevant codes of practice and what I consider to have 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; and*
- *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.*

*Taking these points into account, I need to decide whether Revolut acted fairly and reasonably in its dealings with Miss M.*

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

*I must take into account that many similar payment instructions Revolut receives will be entirely legitimate. One of the key features of this type of account is that it facilitates payments that sometimes involve large amounts to overseas beneficiaries. I'm also conscious this was a new account and there was no history of past activity against which these payments might have looked suspicious. Finally, I need to consider the responsibility to make payments promptly.*

*Having considered what Revolut knew about the initial payments at the time, including that the amounts involved were low, I'm not persuaded it ought to have been particularly concerned about them. Revolut says it did ask Miss M to confirm she knew and trusted the new payee and I don't think any further intervention was required at this point.*

*It appears Revolut did identify Miss M was at harm of risk from fraud by 1 May and it's said that further intervention was attempted around the time of payment 8. In my view, this was a reasonable time for Revolut to conclude that further intervention was required.*

*What did Revolut do to warn Miss M?*

*At the time she was instructing payment 8, Revolut says it asked Miss M to confirm the purpose. She initially answered that it related to a job opportunity, but then cancelled the instruction when asked further questions saying she'd input the incorrect amount. Miss M then tried to make the payment again a few minutes later, this time saying she was paying a family member or friend. Again, she cancelled this after being asked further questions and shown a tailored scam warning relating to impersonation scams, saying the process was too complicated.*

*Payment 8 went through at the third attempt. This time Miss M said she was buying or renting goods and services. After answering further questions, she was shown a tailored warning covering the types of scams that can be associated with purchasing goods and this time she continued with the payment. Similar interventions were*

*attempted at the time of payments 26 and 34. On both occasions, Miss M again said she was buying or renting goods and services and was shown the same warnings.*

*Aside from being asked to confirm she knew and trusted the recipient each time a new payee's details were entered (four occasions in total), Revolut hasn't provided details of any other intervention.*

*What kind of warning should Revolut have provided?*

*On balance, I'm satisfied the intervention at the time of payment 8 was proportionate to the risks that payment presented. Miss M was asked to confirm the reason for the payment and I don't think there's enough to say Revolut should have doubted her when she said she was buying goods and services. It then went on to show her a tailored warning that should have resonated if she had been falling to some kind of purchase scam.*

*The fact the warning didn't resonate was likely because Miss M was actually doing something else with her money, but I don't think it's reasonable to hold Revolut responsible for the consequences of her not answering its questions accurately. The evidence provided, including a call with her bank on 1 May where she also hid the purpose of a transfer to her Revolut account, strongly suggests Miss M was being coached by the scammers on how to respond to any questions she was asked.*

*While this intervention may reasonably have allayed any suspicion at the time, I think the volume and rapidity of payments that followed, as well as their combined value, should have prompted further intervention by Revolut. As the payments continued, I find the belief that she was genuinely purchasing goods or services and wasn't falling victim to a scam was becoming less and that Revolut should have stepped in again. The next intervention came at the time of payment 26 but I think it should have been much sooner. It's my view that the appropriate time for Revolut to act would have been at the time of payment 16. This was Miss M's tenth payment of the day, nine of which were to the same payee she'd previously said she was buying goods and services from.*

*Having thought carefully about the risks payment 16 presented, I think a proportionate response to that risk would have been for Revolut to have attempted to establish the surrounding circumstances before allowing it to leave Miss M's account. I think it should have done this by, for example, calling her on the phone or directing her to the in-app chat to discuss the payment with one of its agents.*

*If Revolut had intervened as I've described, would that have prevented the losses Miss M suffered from payment 16?*

*In considering this issue, I have been conscious of the fraud intervention call Miss M had with her bank earlier in the day when she transferred £1,500 to Revolut that seems to have been used to fund payments 10, 11 and 12. During that call, Miss M said she wanted the money for a holiday and explained to the agent where she was going and when. While we don't have full records of her communications with the scammers, I think the fact she provided the bank with a cover story in this way indicates she'd been coached by the scammers and was under their spell to some extent. The bank did provide some warnings about various types of scam during the call, but job scams weren't discussed and the scam wasn't uncovered.*

*If Revolut had spoken to Miss M about payment 16 later the same day, I think it's likely she'd have again begun by trying to hide the real reason for the payment. But*

*as Revolut knew about the ultimate destination of the money and given the volume of transactions on the day, I think she'd have found it difficult to come up with a cover story about a holiday or purchasing goods and services that would have stood up to any significant scrutiny.*

*By asking appropriate probing questions, I think one of Revolut's agents should have been able to identify Miss M may well have been falling victim to a scam. Even if she hadn't been open about what the payment was for, the pattern of the payments on 1 May and previous days was consistent with many known job and investment scams. The possibility that this was a job scam should also have been made more apparent by the fact she'd said earlier in the day that this was what she was paying money for before cancelling that payment instruction.*

*In the circumstances, I think a Revolut agent should have taken the opportunity to explain how investment and job scams work, including common features of these scams. Common features of job scams include that scammers often impersonate legitimate companies and recruiters, victims are often contacted online by somebody they don't know, set up with accounts on professional-looking platforms, asked to complete sets of tasks in exchange for payment, asked to pay up front to access those tasks, paid small amounts initially to help convince them the job is legitimate, and asked for fees and other payments before their money is released.*

*Revolut has outlined the screens Miss M was taken through when she first tried to make payment 8 and said this was linked to a job opportunity. According to the information provided, she wasn't shown any detailed warnings as she cancelled the payment. The only one of these features I can see that was explained to her in the screens she was shown was that scammers 'will ask you to do tasks to earn a fee, but then demand money from you to release that fee'. While this comment was relevant to the particular question being asked on the screen, I don't think it constituted a detailed and tailored warning about job scams.*

*If Miss M had received an appropriate tailored warning about job scams at the time of payment 16, I think it's likely she'd have recognised many of these common features in her own situation. On balance, I find it's most likely that her eyes would have been opened to the scam at this point and she'd have ultimately decided not to go ahead with the payment.*

*I think it follows that if the scam had been uncovered at the point of payment 16, payments 17 to 50 would also have been prevented.*

*What about the actions of Miss M's bank?*

*This was a multi-stage fraud that saw Miss M move money from her bank to Revolut before it was sent to scammers. This complaint is about Revolut and it's not appropriate for me to comment here on whether or not the bank should have identified she was at risk of harm from fraud and whether it reacted proportionately. But to obtain a full picture of what took place, we have contacted the bank to establish if it attempted any kind of intervention before transferring her money to Revolut.*

*As discussed above, the bank has confirmed that it did speak to Miss M about a transfer early on 1 May. But its agent didn't know where the money was ultimately going and had no particular reason to disbelieve her when she said she was transferring it to Revolut in advance of a holiday. I heard nothing in the call to make*

*me believe the bank's agent should have identified Miss M could be falling victim to a job scam and this possibility wasn't covered in the warnings that were given.*

*Overall, I don't think there was any intervention by Miss M's bank that should have alerted her to the fact she was speaking to scammers or that changes my views about how Revolut should have dealt with this situation. Miss M's bank has also confirmed it has no record of her making a complaint about it and I cannot compel her to do that. Further, I don't think it would be fair to reduce her compensation because she's only complained about one business, as I consider that Revolut should have prevented the loss.*

*Should Miss M bear any responsibility for her losses from payment 16?*

*I've considered the evidence carefully to decide what's fair and reasonable in the circumstances. While I accept Miss M genuinely believed these payments were being made in connection with a legitimate employment opportunity, I'm not persuaded that belief was a reasonable one for the following reasons:*

- I'm unaware of any formalisation of the arrangement between Miss M and the employer, for example a written contract or other clear setting out of the terms of employment.*
- The returns Miss M has said she was told to expect in return for the work she was being asked to complete seem very high and I think she should reasonably have questioned whether this was too good to be true.*
- The arrangement was very different to the normal employer-employee relationship. People normally expect to be paid by their employer, rather than the other way around.*
- It seems likely that Miss M followed instructions from the scammers to hide the real reason for the payments from her bank and Revolut. This only hampered any effort by either of them to protect her money and I think she should reasonably have questioned whether a legitimate business would really ask her to do that.*
- It appears some of the later payments were fees Miss M was told she needed to pay to access the money she'd earned but I've seen nothing to suggest she was told about this when the arrangement started.*

*In the circumstances, I think Miss M should have proceeded with great caution. If she'd carried out any further research, for example online searches, I think she'd have discovered her circumstances were similar to those commonly associated with many job scams. Overall, I think it's fair and reasonable for Revolut to make a 50% deduction from the redress payable.*

*Recovery of funds*

*I've also looked at whether Revolut could or should have done more to try and recover Miss M's losses once it was aware that the payments were the result of fraud.*

*Miss M's contact history with Revolut indicates she didn't tell it about the scam until a number of weeks after the last payment was made. It's a common feature of this type*

*of scam that the scammers will move money very quickly to other accounts once received to frustrate any attempted recovery so it's not surprising that efforts to get her money back from the receiving bank weren't successful.*

*I'm also mindful that these were push to card payments, meaning Miss M transferred money directly to a bank card instead of a bank account. There's no clear mechanism for a successful recall to take place in these circumstances, meaning there's no realistic prospect of successful recovery, especially for international payments.*

*In the circumstances, I don't think anything that Revolut could have done differently would likely have led to these payments being recovered.*

*In conclusion*

*For the reasons I've explained, I don't think Revolut acted fairly and reasonably in its dealings with Miss M and I'm proposing to uphold this complaint in part. While I don't think it acted incorrectly in processing payments 1 to 15 in line with her instructions, if it had carried out an appropriate intervention before payment 16 debited her account, I'm satisfied payments 16 to 50 would have been prevented.*

## **The responses to my provisional decision**

Revolut responded to say it accepted my provisional decision. Miss M's representative also confirmed her acceptance, but highlighted that I hadn't included Revolut's transaction fees in the compensation calculation.

## **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.

As both parties have accepted my provisional decision, my findings haven't changed from those I set out previously. But Miss M's representative is correct to observe that I didn't include Revolut's fees in my calculation and I've amended the above table of payments and redress calculation accordingly. I apologise for my oversight on this point.

## **Putting things right**

The principal aim of any award I make must be to return Miss M to the position she'd now be in but for the errors or inappropriate actions of Revolut, while allowing for any responsibility she should reasonably bear. If Revolut had carried out an appropriate intervention as I've described, I'm satisfied the scam would have been stopped and Miss M would have retained the money that was lost from payment 16 onwards. As outlined above, I've applied a 50% deduction to the amounts to be refunded in recognition of her own contribution to the loss.

I can also see Miss M received money back that she understood to have been earnings from the work she'd completed. Given she was falling victim to a scam and the job wasn't genuine, I don't think this money should be attributed to any specific payment. Instead, I think it should be deducted from the amount lost by apportioning it proportionately across all of the payments made to the scam. This ensures that these credits are fairly distributed.

To put things right, Revolut should pay Miss M compensation of E + F, where:

- A = £32,281.81, representing the total of the payments to the scam;

- B = £683, representing the amount returned to her;
- C = £31,598.91, representing the total loss to the scam (A - B);
- D = 97.88%, representing the proportion of A that was lost to the scam (C divided by A);
- E = a refund of 48.94% of each of payments 16 to 50, representing a 50% refund of the proportion of these payments that were lost to the scam; and
- F = simple interest on each amount being refunded in E at 8% per year from the date of the corresponding payment to the date compensation is paid.

Interest is intended to compensate Miss M for the period she was unable to use this money. HM Revenue & Customs (HMRC) requires Revolut to deduct tax from any interest. It must provide Miss M with a certificate showing how much tax has been deducted if she asks for one.

I'm satisfied this represents a fair and reasonable settlement of this complaint.

### **My final decision**

My final decision is that I partly uphold this complaint. Subject to Miss M's acceptance, Revolut Ltd should now put things right as I've set out above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss M to accept or reject my decision before 19 March 2026.

James Biles  
**Ombudsman**