

## **The complaint**

Miss A complains that Revolut Ltd (“Revolut”) won’t refund the money she lost to a scam.

## **What happened**

In summary, Miss A says that on 23 January 2025 she was contacted by a fake employment agency about a job opportunity. She was told she could earn extra money by completing sets of tasks for an advertising company that involved reviewing online adverts.

She was given access to a ‘work’ platform and to a group chat for support. She says that, believing the opportunity was genuine, she made a small initial payment from her Revolut account, which was returned to her the same day, making the scam appear more credible.

She says that while she continued completing ‘tasks’ and depositing funds into Revolut from her personal accounts with two banks (“Bank B” and “Bank L”), she believed these deposits were part of a “verification process”. And that all payments after the small initial payment were taken from her Revolut account without her knowledge and consent.

The disputed transactions included both “push-to-card” payments to various individuals and card payments made to Miss A’s own account with a legitimate crypto-platform. Miss A says that by the time she realised she had been scammed, £16,000 had been taken as a result of a series of unauthorised transactions between 24 and 29 January 2025.

She reported the matter to Revolut on 29 January 2025. A complaint was raised and referred to our Service. Our Investigator didn’t uphold it. In short, the Investigator concluded all the disputed payments should fairly be treated as authorised. She didn’t think a proportionate intervention by Revolut would have prevented Miss A’s losses, given also what happened when Revolut and Bank B intervened during the scam period. While the Investigator thought Revolut’s handling of Miss A’s fraud claim and of her complaint could have been better at times, she didn’t think this sufficient to warrant a compensation award.

## **Provisional decision**

I issued my provisional decision explaining why I wasn’t minded to uphold this complaint. I set out the background as above and provided the following reasons.

*Under the Payment Services Regulations 2017 (PSRs), the starting position is that Miss A is liable for payments she authorised. With some exceptions, Revolut is liable for unauthorised ones. A payment is usually considered authorised because a customer made it themselves. But a payment can also be treated as authorised where the customer has allowed someone else to make it on their behalf or they’ve instructed their payment service provider to let the payment proceed.*

*In this case, Miss A doesn’t dispute making the first payment, which she describes as a “registration fee” sent to details provided by the scammer. Because she accepts consenting to that payment, it is considered authorised under the PSRs, even though it was made as part of the scam. It’s important to note that consent under the PSRs isn’t the same as*

*'informed consent'. The validity of a payer's consent doesn't depend on the circumstances surrounding the payment being fully explained to them before it is made. And while Miss A then says that she had no knowledge of all subsequent payments from her account, I'm not persuaded that this is the more likely scenario based on the evidence I've seen.*

*For example, in parts of her complaint, Miss A has said she believed her funds were being "held" on the fake work platform. In October 2025, she also told us that she followed the scammer's instructions because she believed that, if she didn't, then she "would forfeit the significant sums I had already deposited". This indicates awareness that the funds weren't being held in her Revolut account and that she did knowingly send significantly more than the initial "registration fee" – which she's told us was returned to her in any event.*

*The disputed transactions were made over days. Miss A regularly topped up her Revolut account to fund further payments as and when her balance reduced. Audit logs show she accessed her Revolut app throughout the scam period and 'viewed' the account. Although she says she thought the deposits into Revolut were for "verification purposes" or "visibility of funds", I'm not persuaded she wouldn't have seen her balance decreasing. The outgoing payments would also have been visible. I would have expected Miss A to have questioned all this if the payments were unexpected. In addition, the screenshots Miss A sent to Revolut when she reported the scam show she shared several payment-confirmation screens with the scammer. Revolut's technical evidence also shows that only one device was used throughout the scam period to initiate the push-to-card transactions and to approve the 3DS authentication for the later card payments. There is no indication that anyone other than Miss A had possession of her device, nor any evidence of remote access.*

*So while I recognise Miss A was tricked into believing the opportunity was genuine and her comments that she was under the scammer's influence, I'm satisfied – considering all the above – she was aware of the payments and made them from her Revolut account. This aligns with the type of scam she described where, for example, victims are made to deposit funds into a scam platform to "activate tasks". It's also consistent with the fact payments continued despite Revolut stepping in to question Miss A and providing warnings on several payments during the scam period – warnings Miss A acknowledges receiving. For all these reasons, I'm satisfied that all the payments were authorised for the purposes of the PSRs.*

*Could Revolut have done more to prevent the scam?*

*In broad terms, the starting position at law is that Revolut is expected to process payments and withdrawals that a customer authorises it to make. But taking into account relevant law, regulators' rules and guidance, relevant codes of practice and what I consider was good industry practice, Revolut should have taken additional steps or made additional checks, before processing a payment in some circumstances.*

*Here, I agree with the Investigator there were times that Revolut should have stepped in on concerns that Miss A was at a heightened risk of fraud before processing some payments – considering, for example, some of the spending activity as well as some of the payment amounts and the elevated risks associated with some of the recipients. But, as noted above, Revolut did intervene on several payments to find out more about what was happening.*

*The first was on Miss A's initial push-to-card payment to an individual on 24 January 2025. Miss A was asked to answer the screening questions honestly and was warned that being asked to hide details about the payment, being pressured to make the payment or being told what to say and to act quickly could all be signs of a scam. She confirmed she was making the payment herself. When asked for the payment purpose, she chose "I'm paying a family member" and "rent or bills", even though "It's related to a job opportunity" was available. Similar questions and answers were given on several further push-to-card payments, each*

*time Miss A was making a payment to a new payee. And each time, based on Miss A's responses that were inconsistent with the truth, Revolut provided warnings relevant to impersonation scams. These didn't resonate and prevent her from going ahead.*

*A £1,000 payment to Miss A's crypto-platform on 28 January 2025 was also declined for further checks. Miss A was again asked to answer the questions honestly and warned that being coached on what to say could indicate a scam. When asked why she was making the payment, she selected "I'm transferring money to my other account" and when probed "My investment account." The option "It's related to a job opportunity" was available but again not chosen. She also confirmed she hadn't been asked to download remote access, that the account belonged to her, and that she had learned about the opportunity from a "Friend or family member." I again note Miss A's responses didn't lead naturally to warnings specific to job scams, but I don't think it'd be fair to find that was as a result of failings on Revolut's part.*

*Looking at the account and the payment activity, it's arguable that Revolut should have taken additional steps beyond issuing automated warnings. At times, it may have been appropriate for Revolut to contact Miss A directly, through its 'live' chat for example, to better understand what was happening, particularly given the number of payees and the frequency of payments. However, to uphold this complaint, it isn't enough to say Revolut could have done more. I must be satisfied any proportionate intervention would likely have prevented Miss A's losses. Based on the evidence, I'm not persuaded that it would have.*

*Throughout our investigation, Miss A was asked to explain why she took the actions shown in the evidence, including why she responded to Revolut's interventions as she did. She told us that she was coerced into following the scammer's instructions, believing she would otherwise lose access to her money. She says she was manipulated by the scammer into focusing on "completing actions rather than questioning them". She told us that she was led to ignore what she saw and to rely on the scammer's explanation. And that while she did click through Revolut's warnings, she did so under direct instruction from the scammer who was sending her marked-up screenshots showing exactly what to press when responding.*

*I'm satisfied Miss A was heavily under the scammer's influence. It's significant that when Revolut intervened, she reverted back to the scammer for guidance and followed their instructions without challenge. And given Revolut's primary method of "live" intervention is through its in-app chat, I think it's unlikely the scam would have been exposed even if it had gone further or intervened more often than it did. I'm not persuaded Miss A wouldn't have continued to follow the scammer's directions to ensure the payments went through – or that she wouldn't have been guided to find another way to make the payments if needed.*

*In reaching this view, I note that Miss A has only been able to provide very limited excerpts of her messages with the scammer. This makes it harder for me to find Miss A would have been likely to open up about her circumstances as part of a 'live' intervention. I also note that when Bank B called Miss A on 28 January 2025 about a payment she was making to her Revolut account, she confirmed that no one had asked or forced her to make it. While this was a low-level intervention, I still can't overlook that Miss A has also clearly told us that she was in fact acting under the scammer's instructions, and that payments from Bank B were made under coercion created through "repetition and pressure tactics".*

*I'm very sorry Miss A was scammed. I understand that she feels Revolut didn't do enough to protect her at a time when she was particularly vulnerable. I recognise she was the victim of a highly persuasive fraudster and that the experience has affected her deeply. But, as I've explained, I can only hold Revolut liable for her losses if proportionate steps on its part would likely have prevented them. For the above reasons, I'm not convinced that they would have.*

*Other matters*

*In terms of recovery, there was little more Revolut could have done. The push-to-card payments were sent internationally. Revolut contacted the receiving bank, but recovery was deemed unsuccessful when no response was received. For the card payments, it's unlikely a chargeback would have succeeded, as the payments were made to Miss A's own account with a legitimate crypto-platform, and the merchant provided its services as expected.*

*Miss A is also unhappy about delays in Revolut's investigation. The evidence shows that once she reported the scam on 29 January 2025, Revolut asked her for further information so it could investigate. She was asked to complete a form, and her claim was logged. On 31 January 2025, Revolut told her that recovery efforts had so far been unsuccessful, and that a final outcome was expected by 19 February 2025. On 22 February 2025, she received Revolut's recovery decision. I accept some of Revolut's communication was then confusing.*

*Revolut continued to tell Miss A that recovery attempts were ongoing, despite having already said they had been unsuccessful. It would have been clearer if Revolut had explained the chargeback process was separate and still in progress. I also think Revolut could have communicated more clearly and promptly about its complaint process. At the same time, I'm mindful much of the distress was caused by the scammer's actions and Miss A had already referred her complaint to our Service by February 2025 in any event. I don't consider any short-comings in the service Revolut provided were significant enough to justify an award.*

## **Responses to provisional decision**

I invited further comments and evidence from both parties. I explained that, unless any new information changed my view, my final decision was likely to be in line with my provisional conclusions. Revolut didn't add anything more. Miss A disagreed with my provisional decision. In summary, she said that:

- Her actions were carried out under deception, manipulation and sustained pressure from the fraudster. She argued that, in the context of the PSRs, consent must be genuine and that the transactions should not fairly be treated as authorised.
- It's been accepted that Revolut should have done more to protect her. The automated warnings and standard prompts were insufficient. She disagreed further proportionate intervention – such as human intervention, account restrictions or payment blocks – would not have prevented her losses.
- The responses she gave when Revolut intervened were given under the fraudster's instructions, with step-by-step guidance on what to select. She said reliance on those responses was insufficient and should have led to escalation. She believes it is more likely than not that timely/effective human intervention would have stopped the scam.

## **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 decided not to uphold it for the reasons set out in my provisional decision, which is copied above and forms part of this final decision.

I'm satisfied Miss A made the payments in question for the reasons previously given. And Miss A no longer appears to dispute this. I note she believes that consent under the PSRs must be genuine. However, as before, while I accept she was deceived as to the wider context, consent under the PSRs doesn't depend on the circumstances of a payment being fully explained to the payer. The payments in question were authorised because Miss A took the steps to make them. There is no exception to this for payments made to a scam.

I also explained that, although Revolut should arguably have gone further at times with its interventions, I can't overlook the fact Miss A provided misleading responses when it did intervene. I again acknowledge she was acting under the influence of a scammer, who she has consistently said was guiding her step by step on how to respond. However, taking into account the extent of that influence and Revolut's primary method of "live" intervention, I'm still not persuaded proportionate intervention would likely have exposed the scam.

So, while I'm again sorry Miss A was scammed and I don't imagine she went along with any of it thinking she would lose her money in this way, I'm not persuaded Revolut could likely have prevented what happened such that it would be fair to hold it liable for the losses.

### **My final decision**

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

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss A to accept or reject my decision before 29 April 2026.

Thomas Cardia  
**Ombudsman**