

## The complaint

Mrs H complains that Wise Payments Limited have failed to refund £15,270 she says she lost to a crypto investment scam.

The details of this complaint are well known to both parties. So, if there's a submission I've not addressed; it isn't because I've ignored the point. It's simply because my findings focus on what I consider to be the central issues in this complaint – that being whether Wise was responsible for Mrs H's loss.

## 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 agree with the conclusions reached by our Investigator for the following reasons:

- It isn't in dispute that Mrs H authorised the disputed payments she made to four different payees as part of the investment. The payments were as follows:

Date	Payment
16 December 2022	£500
16 December 2022	£1,500
16 December 2022	£1,000
11 January 2023	£1,000
31 January 2023	£1,000
18 August 2023	£5,500
25 August 2023	£4,770
<b>Total</b>	<b>£15,270</b>

- The payments were requested by Mrs H using her legitimate security credentials provided by Wise. In line with the Payment Services Regulations 2017, consumers are liable for payments they authorise. Wise is expected to process authorised payment instructions without undue delay.
- I've considered whether Wise should've done more to prevent Mrs H from falling victim to the scam, as there are some situations in which an Electronic Money Institute (EMI) should reasonably have had a closer look at the circumstances surrounding a particular transaction. For example, if it was particularly unusual or suspicious.

- At the time these payments were made there was a high prevalence of crypto investment scams; and so, the risks of making crypto related payments should've been well known to Wise.
- But I must keep in mind that Wise process high volumes of transactions each day; and that there is a balance for it to find between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate.
- Mrs H opened her Wise account to facilitate the scam payments; so, there was no previous account activity to indicate whether those payments were out of character.
- She selected the purpose for the account as '*buying goods and services abroad*'. This meant Wise was unaware she was using the account for investment purposes.
- The disputed payments were not identifiably related to crypto and were made to legitimate international beneficiary accounts. And so, from the payments alone, Wise wouldn't have been able to identify any links with a possible crypto investment scam.
- Wise offers a payment remittance service, and its customers often use their accounts for making international payments – as was the case here. Making purchases abroad was also part of the reason Mrs H gave for the account being opened.
- I appreciate that Mrs H has lost £15,270 which is a significant amount of money, but this amount wasn't paid in one large transaction. It was spread over seven separate smaller increments which, in my judgement, wouldn't have appeared particularly suspicious to Wise.
- The payments were also very spread out, having been made over a period of nine months. And they didn't sequentially increase in value. This isn't usually conducive with the hallmarks of a scam and would, in my opinion, have made the payments appear to Wise more like normal account activity.
- I accept that Mrs H made three payments in close succession on 16 December 2022 shortly after the account was opened which, collectively, were of a relatively high value. But given the lack of account history, combined with what I've said above about what Wise knew about the payments and the purpose for the account – I don't think, on balance, there was enough reason here for Wise to have stopped those payments.
- Arguably the last two payments are of a higher value. But it isn't unusual for customers to make larger one-off payments to new payees as part of usual account activity. Those two payments were also made a week apart. So, again, I don't think, on balance, the circumstances of those payments would've been of obvious concern to Wise.
- When setting up the payments, Wise sent a generic scam warning to Mrs H which it says it sends to all customers given the rise in scams. She was asked to provide the payment purpose and said '*paying for goods and services*'. This was in line with the account purpose she provided when opening the account, adding to Wise's position that it had no reason to suspect the payments weren't legitimate.
- Because Mrs H didn't pick the correct payment purpose of '*making an investment*', Wise was prevented from identifying the true reason for the payments and from providing an investment scam related warning.
- And further to that, given Mrs H has admitted to being coached by the scammer on how to respond to Wise, I can't say with any degree of certainty that further intervention by Wise would've likely prevented Mrs H's loss.

- Taking all this into account, I think the action Wise took was proportionate to the potential risk Mrs H's payments presented.
- Finally, I also agree with our Investigator that there was no reasonable prospect of Wise recovering the lost funds at the point it was alerted to the scam. And that Wise took reasonable action in closing Mrs H's account.

I appreciate this will likely come as a disappointment to Mrs H, and I'm sorry to hear she has been the victim of a cruel scam and the impact this has had on her. However, in the circumstances of this complaint, I don't consider it would be fair and reasonable to hold Wise responsible for her loss.

### **My final decision**

For the reasons given above, I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs H to accept or reject my decision **before 15 August 2025**.

Anna Jackson  
**Ombudsman**