

The complaint

Mr M is being represented by solicitors. He's complaining about National Westminster Bank Public Limited Company because it declined to refund money he lost as a result of fraud.

What happened

Sadly, Mr M fell victim to a cruel romance and investment scam. After meeting someone on a dating app who he thought he was building a relationship with, he was persuaded to invest on a fake platform. The scammer said she was a professional trader and was making substantial profits in this way. In March and April 2024, Mr M made the following transfers from his NatWest account:

No.	Date	Amount £
1	24 March	1,000
2	28 March	1,000
3	5 April	1,000
4	6 April	1,000
5	9 April	500
6	19 April	1,000
7	22 April	1,000
8	23 April	1,000
9	24 April	1,000
10	25 April	1,000

The payments went to two different cryptocurrency exchanges from where I understand the currency purchased was transferred to the scammer. The later payments were funded by a loan of £5,000 Mr M received on 19 April. He says he told the lender that the loan was for home improvements as this is what the scammer advised him to do.

Our investigator didn't recommend the complaint be upheld. He didn't think further intervention from NatWest before the payments were processed was warranted.

Mr M didn't accept the investigator's assessment. His representative has explained that his particular vulnerabilities made him especially susceptible to this type of scam. It's also said that the nature of the payments was out of character for him and this should have prompted NatWest to contact him to discuss their purpose.

The complaint has now been referred to me for review.

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 reached the same overall conclusions as the investigator. I haven't necessarily commented on every single point raised but concentrated instead on the issues I believe are central to the outcome of the complaint. This is consistent with our established

role as an informal alternative to the courts. In considering this complaint I've had regard to the relevant law and regulations; any regulator's rules, guidance and standards, codes of practice, and what I consider was good industry practice at the time.

There's no dispute that Mr M authorised these payments. In broad terms, the starting position at law is that a bank 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.

There are, however, some situations where we believe a business, taking into account relevant rules, codes and best practice standards, shouldn't have taken its customer's authorisation instruction at 'face value' – or should have looked at the wider circumstances surrounding the transaction before making the payment.

NatWest also has a duty to exercise reasonable skill and care, pay due regard to the interests of its customers and to follow good industry practice to keep customers' accounts safe. This includes identifying vulnerable consumers who may be particularly susceptible to scams and looking out for payments which might indicate the consumer is at risk of financial harm.

Taking these things into account, I need to decide whether NatWest acted fairly and reasonably in its dealings with Mr M.

The payments

I must take into account that many similar payment instructions NatWest receives will be entirely legitimate and I also need to consider its responsibility to make payments promptly. On the other hand, it knew the payments were going to cryptocurrency providers. Losses to cryptocurrency fraud reached record levels in 2022 and, by the end of that year, many high street banks had placed restrictions or additional friction on cryptocurrency purchases owing to the elevated fraud risk. So, by the time these payments took place, NatWest should have recognised that payments to cryptocurrency carried a higher risk of being associated with fraud.

Having considered what NatWest knew about the earlier payments at the time, including that the amounts involved were relatively low and they weren't made in rapid succession, I'm not persuaded that a pattern consistent with many known scams had begun to emerge and I don't think it ought to have been particularly concerned. So I can't reasonably say it was at fault for processing them in line with Mr M's instructions. But as the sequence of payments progressed, and certainly by payment 9, I think the cumulative amount and their frequency should have alerted NatWest to suspect he may be at risk of harm from fraud.

Having thought carefully about the risks the payments presented, I think a proportionate response to that risk would have been for NatWest to ask Mr M about their purpose and to provide a written warning tailored to the type of scam that was most likely taking place.

NatWest has told us that it did ask Mr M to provide the reason for each payment from payment 3 onwards. While it's unable to confirm the answers he gave, it has provided copies of the warnings that would have been shown if he'd correctly answered that he was investing and I'm satisfied these set out some of the key features of investment scams that should have resonated with him.

In the circumstances, it's my view that NatWest took action that was appropriate to the risk the payments presented and that no further intervention was required.

Mr M's representative appears to believe NatWest should have called him to discuss the payments but I don't think this level of intervention was warranted in this case. But even if that had happened, it's not clear Mr M would have provided accurate information about the payments or heeded any warnings provided. We know he wasn't honest with the lender about the reason for the loan he took and it's likely the scammer would also have encouraged him to hide the reason for the payments from the bank if he'd been asked about them. And given the romance element of the scam that led him to believe he had a romantic relationship with the scammer, it's far from certain that any warnings NatWest could have provided even if he had answered its questions accurately would have been successful in opening his eyes to what was really going on.

Finally, I have reviewed the information provided in connection with Mr M's vulnerabilities. I can see he's been through a very difficult time and I wish him the very best as he continues to deal with that situation. But NatWest has confirmed it wasn't aware of his circumstances at the time the payments were made so it can't reasonably be expected to have taken them into account in deciding whether or not to process these payments as requested.

I want to be clear that it's not my intention to suggest Mr M is to blame for what happened in any way. He fell victim to a sophisticated scam that was carefully designed to deceive and manipulate its victims. I can understand why he acted in the way he did. But my role is to consider the actions of NatWest and, having done so, I'm not persuaded these were the cause of his losses.

Recovery of funds

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

I understand Mr M didn't tell NatWest about the scam until a number of months after the last payment. It's a common feature of this type of scam that the fraudster will move money very quickly to other accounts once received to frustrate any attempted recovery and I don't think anything that NatWest could have done differently would likely have led to this money being recovered successfully after this period of time.

In any event, Mr M appears to have transferred funds to legitimate cryptocurrency accounts in his own name, from where he purchased cryptocurrency and moved it onto a wallet address of his choosing (albeit on the scammers' instructions). NatWest could only try to recover the funds from his account and it appears the money had already been moved on. If not, anything that was left would still have been available for him to access.

In conclusion

I recognise Mr M has been the victim of a cruel scam and I'm sorry he lost this money. I realise the outcome of this complaint will come as a great disappointment but, for the reasons I've explained, I think NatWest acted fairly and reasonably in its dealings with him and I won't be telling it to make any refund.

My final decision

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr M to accept or

reject my decision before 11 November 2025.

James Biles
Ombudsman