

The complaint

Ms B complains that Barclays Bank UK PLC won't provide her with a refund when she lost money to a job scam.

What happened

The detailed background to this complaint is well known to both parties. So, I'll only provide a brief overview of some of the key events here.

Ms B was seeking a steady part time remote job to be able to cover her expenditure whilst she cared for her child.

Ms B saw a job with Company F and on 8 January 2025 she started speaking to a recruiter (the scammer) on a cross-platform messaging and calling app. She was offered what she thought was an attractive and flexible commission-based job (earning USD 80-200 for up to 40 minutes work) with the opportunity for the commission to be significantly multiplied. The role was to click on sets of clothing products to indicate she had completed a review task.

She received her first commission of £124.10 on 9 January 2025 (which was credited to her Barclays account) for completing her set of tasks. Although she wasn't looking for higher earnings, Ms B found herself having to pay Company F in order to work high commission tasks.

Ms B was required to pay Company F in crypto, so she transferred funds from her Barclays bank account to a crypto account she already held with Firm C (a crypto exchange) and she then credited Company F's crypto wallet.

Ms B made the following six payments to the scammer, totalling £5,225:

Payment number	Date	Time	Payee	Amount
1	09/01/25	12.01pm	Ms B account with Firm C	£65
2	10/01/25	10.06am	Ms B account with Firm C	£350
3	10/01/25	2.35pm	Ms B account with Firm C	£700
4	10/01/25	3.31pm	Ms B account with Firm C	£1600
5	10/01/25	4.20pm	Ms B account with Firm C	£710
6	10/01/25	6.01pm	Ms B account with Firm C	£1,800

Ms B realised she had been scammed when the scammer continuously made excuses for not releasing the commission she thought she had earned.

Ms B contacted Barclays seeking a refund, however they referred her to Firm C.

Ms B escalated her complaint to our service. However, our investigator didn't think Barclays were at fault for processing the payments in accordance with her instructions. He said that if she'd provided accurate responses to Barclays' questions and informed them that there was

a third party involved for a job that she was doing, it would've presented an opportunity for Barclays to have probed further and potentially prevented her loss.

Ms B remains dissatisfied, and she included the following points in her response to our investigator's view:

- *'While I appreciate that Barclays gave warnings, these were generic and did not fully address or uncover the manipulative nature of what I was experiencing.'*
- *'I was not coached to deceive the bank'.*
- *'I did not act recklessly'.*
- *'At no point did I knowingly lie or hide information from Barclays; I answered their questions to the best of my understanding at the time'.*
- She believes more could and should have been done.

So, her complaint has been referred to me to look at.

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 very sorry that Ms B has been the victim of this cruel job scam and lost a significant amount of money here. Although I don't underestimate the severe impact this scam has had on her, I'm not upholding this complaint, and I'll explain why.

I should first say:

- I'm satisfied that the APP Scam Reimbursement Rules, introduced by the Payment Systems Regulator in October 2024, for customers who have fallen victim to an APP scam, don't apply here. This is because Ms B made the payments to the scammer from another account under her control.
- I don't think Barclays could've been expected to recover the funds as they'd already been removed from Ms B's account, after payment by the crypto exchange. So, there wouldn't be any funds left to recover when the scam was reported to them.
- I fully considered the Payment Services Regulations 2017 (PSR).

Under the PSR and in accordance with general banking terms and conditions, banks should execute an authorised payment instruction without undue delay.

The starting position is that liability for an authorised payment rests with the payer, even where they are duped into making that payment. There's no dispute that Ms B made the payments here, so they are considered authorised.

However, in accordance with the law, regulations and good industry practice, a bank should be on the look-out for and protect its customers against the risk of fraud and scams so far as is reasonably possible. If it fails to act on information which ought reasonably to alert a prudent banker to potential fraud or financial crime, it might be liable for losses incurred by its customer as a result.

Banks do have to strike a balance between the extent to which they intervene in payments to try and prevent fraud and/or financial harm, against the risk of unnecessarily inconveniencing or delaying legitimate transactions.

So, I consider Barclays should fairly and reasonably:

- Have been monitoring accounts and any payments made or received to counter various risks such as anti-money laundering and preventing fraud and scams.

- Have systems in place to look 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 banks and building societies 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 declined to make a payment altogether, to help protect customers from the possibility of financial harm from fraud.

Barclays systems flagged a risk that Ms B was potentially at risk of financial harm upon payments 4, 5 and 6. So, with the above mentioned PSR in mind, I considered whether the human interventions (by Barclays' fraud and scam agents) that they put in place at these three payment points should've been put in place sooner and if they were effective.

I'm satisfied Barclays' action to block payment 4 (for £1,600) and set up the first intervention call was at the right point. This is because:

- A. Although cryptocurrency transactions appeared new to Ms B and cryptocurrency does carry a higher risk and isn't a regulated activity, it isn't unusual for consumers to use or invest in cryptocurrency and it is common for them to use crypto exchange companies. So, I wouldn't expect a financial firm to intervene for small payments where they've identified they are going to a cryptocurrency account / firm.
- B. Payments for low amounts to another bank / cryptocurrency company that would likely provide warnings to account holders about the risk and have a fuller picture of the payments, would also lower the risk factor.
- C. Barclays process thousands of payments each day and, as mentioned above, they have to strike a balance between the extent to which they intervene in payments to try and prevent fraud and/or financial harm.
- D. Payment 1 for £65 (on 9 January 2025), payment 2 for £350 and payment 3 for £700 (both on 10 January 2025) were relatively low amounts and in line with Ms B's spending pattern. Although there had been a credit for £124.10 (on 9 January 2025) and a pattern of three increasing payments over two days, I think it was at the point of payment 4 (for £1,600) which was high spend for Ms B and the third payment in under six hours that Barclays should've become suspicious and put in place an intervention to ask Ms B probing questions about her cryptocurrency transactions. And they did this for each of the next three payments before releasing them.

Having listened carefully to Barclays intervention calls I found that job scams weren't specifically referred to when their agents all asked probing questions to understand the reasons Ms B was sending payments to Company C.

Regarding the agent's probing questions, Ms B says she wasn't coached. Due to this and there not being any evidence of coaching (to prevent payments being blocked) in the dialogue with the scammer, I would've expected her to have told the agents that she was paying Firm F as they were employing her for commission-based review work.

However, instead Ms B made the following comments to Barclays:

- She confirmed the payments were for a crypto investment.
- She confirmed that once she transferred the funds to Firm C they would just be staying in her crypto wallet and said:
 - She was '*just looking into a few coins*' and when the agent probed this, she said she was '*not 100% sure of which ones, I'm just looking into them*' but she '*just wanted funds available in the wallet*'.

- She wouldn't be paying any high amounts.
- She repeated that she was *'trying to invest in a few coins so just looking into that and wanted money in my wallet'* and when asked how long she had been investing in crypto she said for a few years.
- When Ms B was asked if anyone else was involved in the payments she said *'no just myself'*. She also said *'no'* when asked if any third parties were influencing her to make the payments.

It's unclear why Ms B gave these answers when she thought she was paying for her genuine job tasks, but these answers prevented Barclays from helping her and unravelling the scam and telling her that a legitimate job would offer a contract and wouldn't ask for payment upfront and in cryptocurrency.

If Ms B was coached, Barclays agents repeatedly told her that if she was asked to deceive them it would definitely be a scam.

Although the focus was on investment scams, due to her above answers, if Ms B was worried about the payments being blocked and being unable to access her commission, she was warned about scammers contacting her on social media and offering unreasonable quick returns that, considering she was undertaking very basic tasks clicking on products, was relevant to the job scam. In addition, she was warned that scammers encouraged people to set up crypto accounts which applied to this job scam. Furthermore, she was told that if she was moving her money to a wallet that wasn't under her control, which she was doing here, it would always be a scam, and she would lose her money.

So, having considered the above, I'm not persuaded that Barclays interventions were ineffective and that they were at fault for processing the payments in accordance with Ms B's instructions.

In conclusion, I recognise Ms B has been the victim of a cruel and sophisticated scam and I'm very sorry she's 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 Barclays acted fairly and reasonably in its dealings with her, so I won't be asking them to make any refund.

My final decision

My final decision is that I'm not upholding this complaint against Barclays Bank UK PLC.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms B to accept or reject my decision before 18 September 2025.

Paul Douglas
Ombudsman