

The complaint

Mr C complains, via a representative, that Wise Payments Limited (“Wise”) didn’t do enough to protect him when he fell victim to a scam. It has offered a partial reimbursement, but Mr C thinks it should be held liable for the full loss.

What happened

Between September 2022 and October 2022, Mr C made payments totalling over £170,000 from his Wise account. He believed he was making a cryptocurrency investment but has told us that he later discovered he’d fallen victim to a scam. He made a complaint to Wise in 2025 for failing to protect him.

Wise upheld Mr C’s complaint in part. It said that, after investigating, it believed there was potential suspicious activity which could have prompted it to intervene and make further checks from payment four. And it said that further interaction or questions about why Mr C was making the payments could have provided further information to help him to reconsider. But it thought the other financial businesses involved were better placed to prevent the transfers into Mr C’s Wise account. And that Mr C could have done more to protect himself, including researching the investment and providing the correct payment purpose when asked. As a result, it felt the liability should be split between the financial businesses involved and Mr C. So it credited Mr C’s account with around 33% of the loss from payment four onwards.

But Mr C was unhappy with this. He didn’t think the other financial businesses involved should be held liable for the loss. This is because the funds were ultimately lost to cryptocurrency purchases made directly from his Wise account, whereas the other financial businesses were only involved in transferring funds into his own Wise account. So he thinks Wise was positioned to detect the fraudulent transfers and should be liable for the full amount.

Our investigator didn’t uphold the complaint. While she considered that Wise should have intervened by way of a human intervention, she wasn’t persuaded that it would have uncovered the scam. She noted that Wise had provided written warnings for 15 of the payments and that Mr C didn’t choose the correct payment purpose as he’d been advised by the scammer to avoid stating it was for investment purposes, to avoid delays. And she noted that when another financial business had intervened, Mr C hadn’t been upfront about what he was doing. So she didn’t think further warnings or a human intervention by Wise would have made a difference and didn’t think it fair to hold it liable. On that basis, she didn’t think it would be fair to ask Wise to do anything further.

Mr C’s representative disagreed. It raised that the liability split hadn’t been addressed. It also, in essence, didn’t think it was fair to rely on interventions made by another financial business in November and December 2022 to determine what would have happened if Wise had intervened in September and October 2022. And it said Mr C didn’t intend to deceive the other financial business – he had believed he was dealing with a legitimate investment.

The complaint was passed to me. I got in touch with Mr C’s representative informally. I

explained that I was minded to agree with the overall outcome reached by the investigator. And as I, provisionally, didn't think a proportionate intervention from Wise would likely have prevented Mr C's losses, it followed that I didn't need to give further consideration to whether it should have offered more than 33%.

This was because, like the investigator, I acknowledged the incorrect payment purpose given by Mr C on each occasion he was asked. Given that he'd been guided to avoid selecting 'investment' by the scammer, I didn't think it likely that if he had been asked sooner, he would have answered substantially differently. As a result, Mr C hadn't been presented with warnings that were relevant to the situation he was in.

I was also minded to say that there should have been a human intervention. But, again like the investigator suggested, it appeared from the later calls with the financial business that Mr C had concealed the true purpose of the payments in question. I provided additional details of the contents of the calls, which were in November and December 2022, to support this. So, in summary, while I thought Wise should have done more, I wasn't persuaded that doing so would have prevented Mr C's loss - the available evidence demonstrated the trust he had in the scammers and that he was willing to provide misleading answers to prevent any friction with the payments he wanted to make towards the purported investment.

Mr C's representative disagreed. It provided a detailed response but, in summary, the key points were that they felt that the provisional findings didn't account for the likelihood that a timely intervention would have prevented further loss, that the drop-down payment purpose warnings weren't sufficient, and that Wise's own admission of failure hasn't been taken into consideration. They also addressed points raised by our Service which suggest that insufficient evidence had been provided of the funds being lost to the scam.

So, I'm now in a position to issue my final decision.

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'm not upholding this complaint – I'll explain why. Before I do, I should note that I've taken into account the detailed submissions provided. But I'm satisfied I don't need to comment on every individual point or argument to be able to reach what I think is the right outcome.

Having taken into account longstanding regulatory expectations and requirements, and what I consider to be good industry practice, I agree Wise ought to have been on the look-out for the possibility of fraud and made additional checks before processing payments in some circumstances.

I maintain that Wise should have intervened by way of a human intervention and that this should have been around the time of the third payment. It didn't do this and, instead, the interventions were limited to written warnings provided based on the responses Mr C gave to the drop-down list asking for the payment purpose. But, to uphold this complaint, I'd need to be persuaded that proportionate human intervention at the appropriate time would have prevented his loss. And, based on the evidence provided, I'm not.

I say this because of the payment purposes provided and the intervention calls with the other financial business which have been referenced in some depth previously. In terms of the payment purposes, while I acknowledge that this information was provided by way of a drop-down list, as opposed to within a conversation with a human, I've thought carefully about the

surrounding information here. Mr C has told us that he'd chosen the 'paying yourself' and 'family and friends' options because his investment account manager, who he'd believed to have been linked to a legitimate investment opportunity, had instructed him to do so. He'd been told that choosing 'making an investment' would likely cause delays to his payment.

So, regardless of how he was presented with the question and regardless of intent, it remains that he was asked to mislead his financial provider and that he did so, because he trusted the scammer. And I note that this was from September 2022 onwards, and therefore relatively early on in the scam *and* relatively close to the time at which there should have been a human intervention.

I'll move on next to the telephone conversations with the third-party business. I won't detail these, as we've done so previously, but Mr C wasn't forthcoming with information within these calls, and he was willing to mislead in order to ensure payments went ahead. I do think, however, it would be useful to reiterate that Mr C was asked if he'd been told how to answer questions asked by the bank or whether he'd been asked to mislead in any way about the purpose of the payment, to which he clearly responded that he hadn't. And it's evident that this response was inaccurate.

I've thought carefully about the point made by Mr C's representative i.e. that these telephone conversations were some time after the point at which Wise should have intervened, and therefore he had become more entrenched in the scam by this point. Whilst I do appreciate the point being made here, the evidence before me suggests that when Mr C was asked questions, whether in September 2022 or later, and whether in an automated fashion or over the telephone, he wasn't forthcoming with information and was willing to mislead.

As set out above, to uphold the complaint, I'd need to be persuaded that Mr C would have answered proportionate questioning from Wise honestly and accurately. But I've not been provided with sufficient evidence to be able to fairly say that he *more likely than not* would have done so. The available evidence supports that Mr C was willing to conceal and/or mislead when he was asked questions about the payments he was making; there isn't evidence to the contrary that shows occasions where Mr C was forthcoming in providing accurate information. Based on what I've seen, I consider it likely that if Wise had questioned Mr C appropriately, he would have answered questions in such a way as to avoid alerting Wise to what was really happening, as he believed he was involved in a legitimate investment and wanted to make payments without undue delay.

So, for these reasons, I don't think it would be fair to hold Wise liable for the losses as I'm not satisfied that its failings made a material difference to what happened. And it therefore follows that the amount of approximately 33% that has already been paid is above what I would have asked it to pay, so I won't be asking it to do anything further.

I do think it appropriate to address the point around Wise's own admission of failure. I note from its final response that it said, "*there was potential suspicious activity which could have prompted us to intervene... further interaction or questions about why your client was making the payments could have provided further information to help them reconsider*". So it appears from this that its offer was on the basis that it *could* have made a difference. From my understanding, Wise didn't have access to third-party information, such as the intervention calls referenced above. Had this been available, its position *may* have differed. It has exercised its own commercial judgement here, acknowledged a failing and chosen to make an offer as a result. Our Service and this decision, however, acknowledges the failing but has thought about what would have happened if that failing hadn't happened, with consideration to all the available evidence, including that of third parties.

I would also add here that it remains that there's a lack of evidence in terms of the losses to the scam, though I appreciate the explanation provided for this. I haven't addressed this as part of my decision as, due to the reasons given, I'm not upholding the complaint, and the matter therefore falls away.

I'm very sorry that Mr C has been the victim of such a cruel and manipulative scam, and I'm sorry to learn of the impact of this to him and those close to him. But, for the reasons given above, I don't think it would be fair to ask Wise to take any further action.

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 Mr C to accept or reject my decision before 24 February 2026.

Melanie van der Waals
Ombudsman