

## The complaint

Mrs W complains that NATIONAL WESTMINSTER BANK PUBLIC LIMITED COMPANY (NatWest) is refusing to refund her the amount she lost as the result of a scam.

Mrs W is being represented by a third party. To keep things simple, I will refer to Mrs W throughout my decision.

## What happened

The background of this complaint is well known to all parties, so I won't repeat what happened in detail.

In summary, Mrs W says she found an investment opportunity with a company I will call "X" via social media, and having made a small payment in relation to online trading using a different payment method she started to make payments in relation to X's online trading account.

Mrs W says she made payments to an account X said it had opened on her behalf that she didn't have access to, and that it then appeared to use the account to credit X's online platform.

X later explained to Mrs W that her trader had moved abroad and that her account would need to be closed. Mrs W was required to pay a fee to have her funds released from her trading account.

Mrs W made the requested payment, but her funds never arrived, and she realised she had fallen victim to a scam.

Mrs W has disputed the following payments made in relation to the scam from her NatWest account:

Payment	Date	Payee	Payment Method	Amount
1	1 October 2024	Mrs W	International Transfer	£2,000
2	4 October 2024	Mrs W	International Transfer	£8,000
3	13 November 2024	Mrs W	International Transfer	£7,335
4	14 November 2024	Mrs W	International Transfer	£7,335

Our Investigator considered Mrs W's complaint and didn't think it should be upheld. Mrs W disagreed, so this complaint has been passed to me to decide.

## 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.

It has not been disputed that Mrs W has fallen victim to a cruel scam. The evidence provided by both Mrs W and NatWest sets out what happened. What is in dispute is whether NatWest should refund the money Mrs W lost due to the scam.

The payments Mrs W made in relation to the scam were sent by international transfer. When payments are made via this method NatWest has limited options available to it to seek recovery. NatWest could have contacted the operator of the receiving account to request a refund of any funds that remained, however I think it's most likely the funds were moved on from the account Mrs W made the payments to soon after they were received, so no funds would remain to be recovered.

With the above in mind, I don't think NatWest had any reasonable options available to it to recover the payments Mrs W has disputed.

I have considered if Mrs W should have received a refund under the Contingent Reimbursement Model (CRM) code. But the CRM code only applies when domestic payments (as the result of a scam) are sent to another person. The payments made in relation to this scam were international. I'm satisfied the CRM Code wouldn't apply in this scenario.

*Should NatWest have reasonably prevented the payments Mrs W made?*

It has been accepted that Mrs W authorised the payments that were made from her account with NatWest, albeit on X's instruction. So, the starting point here is that Mrs W is responsible.

However, banks and other Payment Services Providers (PSPs) do have a duty to protect against the risk of financial loss due to fraud and/or to undertake due diligence on large transactions to guard against money laundering.

The question here is whether NatWest should have been aware of the scam and intervened when the payments were being made. And if it had intervened, would it have been able to prevent the scam taking place.

The first payment Mrs W made in relation to the scam was not of such a high value that I think NatWest should have been concerned. However, payment 2 was for a much higher value. I think this payment should have caused NatWest to have concerns and it should have intervened.

I think that considering the risk associated with payment 2, a proportionate intervention would have been for NatWest to discuss the payment with Mrs W with the intention of finding the circumstances leading to the payment so that it could provide an appropriate warning.

NatWest did intervene when Mrs W made payment 2 and a call between Mrs W and NatWest took place. I have listened to a recording of the call.

During the call Mrs W confirmed she was making the payment to another account in her own name and that she had made a previous payment to the same account. As far as she knew she was the only person with access to the account, and she had setup the account herself.

When Mrs W was asked the purpose of the payment, she said she was making the payment to the foreign account as she was a foreign national from that country. Mrs W confirmed she had not been contacted by anyone claiming to be the bank or a third party asking her to move money to a new, or safe account.

Before making payments from her NatWest account Mrs W also made payments in relation to the scam from an account she held with another provider. The other provider intervened several times when these payments were made via phone call and It's in-app chat facility.

I have listened to recordings of the calls that took place with the other provider and can see that Mrs W was not honest during the calls. Mrs W explained she was making payments to a friend she had met in person.

The evidence Mrs W has shown of her communications with X show that Mrs W was following X's guidance when answering the questions posed by Mrs W's other account provider.

Mrs W has also confirmed that she was called by the police to discuss the payments. While I cannot be sure what was said during the discussion with the police, I can see that Mrs W gave feedback to X confirming the discussion appeared to have gone well.

Considering the scam Mrs W experienced was relatively common with attributes I would expect the police to be aware of, I think it's most likely that Mrs W was also not forthcoming with the police when this conversation took place.

While Mrs W's representatives say NatWest should have done more, overall, I think it's clear that Mrs W was aware of the payments being made from her account with NatWest and was willing to follow X's guidance to have payments processed, even though this meant giving false information.

Providing false information would and did make it difficult for NatWest to uncover the scam. With everything considered I don't have enough to say that even if NatWest did intervene further, that Mrs W would not have continued to follow X's guidance. So, I don't think NatWest missed an opportunity to uncover the scam and it is not responsible for Mrs W's loss.

### **My final decision**

I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs W to accept or reject my decision before 20 February 2026.

Terry Woodham  
**Ombudsman**