

The complaint

Mrs R complains that Wise Payments Limited won't refund money she lost when she was a victim of several linked scams.

What happened

The background to this complaint is well known to both parties and so I'll only refer to some key events here.

Mrs R fell victim to several linked scams – including job, investment and recovery. As part of these scams, Mrs R purchased crypto and forwarded it to wallet addresses provided by the scammer. To do this, I understand Mrs R made over 60 transactions to various payees for the purchase of crypto on the peer-to-peer market. Mrs R also made several payments to two legitimate crypto providers. These transactions happened between January 2023 and April 2024 - totalling about £30,000 and ranged between £2 and £2,500 in value.

Mrs R has explained she realised she'd been scammed when withdrawals were repeatedly denied, new fees and audits emerged, and the communication became evasive or abruptly ended. She raised a complaint with Wise, which they rejected.

The complaint was referred to the Financial Ombudsman. Our Investigator didn't think Wise were responsible for Mrs R's loss. This was because she wouldn't have expected Wise to have intervened before processing the payments to the crypto providers due to their low value. But Wise did carry out additional checks before processing some of peer-to-peer transactions and Mrs R provided an inaccurate payment purpose – selecting 'sending money to friends and family'. Wise provided Mrs R warnings that they could be being made as part of a scam. But despite this, Mrs R continued anyway. Our Investigator thought Wise's interventions were proportionate in the circumstances, and so she wouldn't have expected them to have gone further – such as a human intervention. But even if they had, she wasn't persuaded this would've made a difference as Mrs R was being instructed by the scammer to mislead Wise – and her other banking provider(s) - on the purpose of the payments. Our Investigator also didn't think Wise could've done anything more to recover Mrs R's funds.

Mrs R requested for an Ombudsman to review her complaint. So, the matter 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.

I'm sorry Mrs R has been the victim of a scam. I understand it is a lot of money she has lost and so I understand why she would do everything she can to try and recover it. But I must consider if Wise are responsible for her loss. Having done so, and while I know this won't be the outcome Mrs R is hoping for, I don't think they are. I therefore don't think Wise have acted unfairly by not refunding the payments.

Before I explain why, I want to reassure Mrs R that I've considered everything she has submitted in support of her complaint. And so, while I've summarised this complaint in far less detail than what has been provided, I want to stress that no discourtesy is intended by this. If there is a submission I've not addressed, it isn't because I have ignored the point. It's simply because my findings focus on what I consider to be the central issue in this complaint – that being whether Wise are responsible for any loss Mrs R suffered because of the scam.

It isn't disputed that Mrs R authorised the payments from her Wise account. Generally, consumers are liable for payments they authorise and Wise are also expected to process authorised payment instructions without undue delay. However, taking into account the regulatory rules and guidance, relevant codes of practice and good industry practice, including the Consumer Duty, there are circumstances where it might be appropriate for Wise to take additional steps or make additional checks before processing a payment to help protect customers from the possibility of financial harm from fraud.

I've therefore considered whether the payment instructions given by Mrs R to Wise (either individually or collectively) were unusual enough to have expected additional checks to be carried out before the payments were processed.

When considering this, I've kept in mind that Wise processes high volumes of transactions each day. And that there is a balance for Wise to find between allowing customers to be able to use their account and questioning transactions to confirm they're legitimate – as it wouldn't be practical for Wise to carry out additional checks before processing every payment.

Mrs R opened her Wise account in March 2021. And prior to the payments being disputed here, Mrs R did make payments of similar values to various payees that were often close together. So, I don't think the transactions Mrs R made as part of the scam would've been seen as particularly out of character for her – as I don't think there was a significant departure from her typical account usage. And although some of the payments were made to crypto providers, which carries a known fraud risk, these were low value transactions (between £20 and £500). So, I don't think these [payments would've presented a heightened risk of financial harm from fraud – thereby warranting additional checks to be carried out by Wise before processing them.

That said, I'm aware that Wise did carry out some additional checks before processing 25 of the peer-to-peer transactions. As part of these checks, Wise warned that *"This could be a scam. Tell us what this transfer's for, and we can give you advice"*. But despite there being the option of selecting *"Making an investment"* or *"Paying to earn money by working online"*, Mrs R selected *"Sending money to friends and family"*. Consequently, this prompted further questions and warnings being provided that weren't relevant to Mrs R's situation – as they were tailored towards impersonation scams.

I think Wise took reasonable steps to understand the surrounding circumstances of the payments to establish if Mrs R was at risk of financial harm. Unfortunately, Mrs R didn't provide an accurate payment purpose for the transactions – despite Wise warning that they thought it could be a scam. Because of this, Wise were prevented from knowing the true purpose of the payments and the risks associated with them.

Some of the further questioning however should've given Wise reason to be concerned. This is because, for some of the payments, Mrs R confirmed that she hadn't met the payee in person and that she had been messaged unexpectedly asking for money. So, although Wise did provide written warnings advising Mrs R against making the payments (*"Stop – this sounds like a scam"*) and explaining that it's hard to get the money back once sent, Wise

arguably should've taken further steps before processing these payments. But even if they had done this, I'm not persuaded – on balance – it would've made a difference.

Mrs R has said that she was guided by the scammer to provided inaccurate information to Wise – *“If your bank calls you, you should tell them you are sending money to your friend and not buying cryptocurrency”*. And that she was *“instructed step-by-step on how to transfer funds”*. The correspondence Mrs R has provided between her and the scammer also appears to support that she was being guided by them.

I appreciate Mrs R was being manipulated by the scammer and followed their instructions as she fully believed they were genuine. While I sympathise with Mrs R, I can't fairly hold Wise responsible for that. They were reliant on Mrs R providing accurate information and engaging positively with their fraud prevention checks. And so, even if Wise had carried out further checks, I don't think this would've uncovered the scam or deterred Mrs R from making the payments. Instead, I think Mrs R would've likely continued to have followed the scammer's instructions and provided inaccurate information to Wise in response to any further questioning.

It follows that, while I think Wise could've done more before processing some of these payments, I don't think they could reasonably have uncovered the scam through a proportionate intervention. Ultimately, from what I've seen, I consider Mrs R put a lot of trust in the scammer and was being heavily influenced by them. And here, in these circumstances, I'm not satisfied that further intervention from Wise would've broken the 'spell' Mrs R was under.

I sympathise with Mrs R's situation as I understand she is the innocent victim of several linked scams. But sadly, due to Mrs R not disclosing the true purpose of the payments she was making, Wise weren't aware of the actual risk associated with them and weren't able to uncover the scams. It follows that I don't think Wise are responsible for Mrs R's loss.

I've also considered whether, on being alerted to the scam, Wise could have done anything to recover Mrs R's losses, but I don't think they could. This is because the peer-to-peer transactions were for the legitimate purchase of crypto, which Mrs R subsequently sent to the scammer. I also haven't seen anything to show these payees were associated with the scam – but instead, it seems they were genuine crypto sellers. Further to this, given the time that had passed between the payments and the scam being reported, it's unlikely that any funds would've remained. In respect of the debit card payments to the crypto providers, the only option of recovery would've been via chargeback claims. This however had no reasonable prospect of success as the service had been provided by crypto providers to Mrs R – that being the sale of crypto which she forwarded to the scammer.

I know Mrs R will be disappointed by this outcome. I realise she is the innocent victim of these linked scams and I'm not trying to place any blame on her for what's happened. But it would only be fair for me to direct Wise to refund her loss if I thought they were responsible – and I'm not persuaded that this was the case. For the above reasons, I think Wise has acted fairly and so I'm not going to tell them to do anything further.

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 Mrs R to accept or reject my decision before 22 April 2026.

Daniel O'Dell
Ombudsman