

The complaint

Mr M complains that Monzo Bank Ltd ('Monzo') won't refund him the money he lost after he fell victim to an Authorised Push Payment ('APP') scam.

In bringing his complaint to this service Mr M is represented.

What happened

I issued a provisional decision for this complaint on 21 November 2025. In it I set out the background and my proposed findings. I've included a copy of the provisional decision at the end of this final decision, in italics. I won't then repeat all of what was said here.

Both parties have now had an opportunity to respond to the provisional decision. Monzo responded and accepted the outcome.

Through his representatives, Mr M also responded, but didn't accept the outcome. In summary, he argued that had Monzo intervened he would have grown increasingly concerned further in the payment journey. Alongside this, Mr M said that he was 65 years of age at the time of the payments and so he should, when considering Financial Conduct Authority guidance, be treated as a potentially vulnerable customer. He doesn't believe these vulnerabilities have been accounted for. As well as this, while he accepts he was under the spell of the scammer, he stressed that banks are expected to be on notice that a scam victim may be coached.

As all parties have now had the opportunity to respond, I'm going on 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.

I've considered Mr M's further comments, but these don't change my outcome here. Mr M has argued, in summary, that it is unfair to reach a conclusion that had Monzo intervened it wouldn't have made a difference. He's said Monzo hasn't taken into consideration his age and that it ought to have been aware that victims of frauds may be coached.

As I said in my provisional decision, I can't know for sure what would have happened, had Monzo intervened, so I have to base my findings on the balance of probabilities – that is, what I think is more likely than not to have happened, taking into account what I know.

It's not in dispute, indeed Mr M's representatives have pointed out, and the evidence supports, that Mr M was under the spell of the fraudster. I agree that Monzo ought to be on alert to the possibility that a customer may be coached. Mr M's representatives have provided a list of suggested questions that it said Monzo should have asked. Having listened to the calls Monzo had with Mr M, when it *did* intervene, I've heard that it asked all of these

questions and more. Going as far as to ask Mr M to supply it with evidence to support that the recipient account was his.

Sadly, in the circumstances of this case and as explained in my provisional decision, such was the extent of Mr M's belief in the fraudsters, that I'm not persuaded that I can reasonably conclude that it's more likely than not, that any further proportionate interventions would have made a difference.

I'm satisfied that the evidence supports that it is more likely than not that Mr M would have moved passed any further warnings, under the guidance of the fraudsters, and it wouldn't have made a difference. The weight of evidence here simply doesn't support that Mr M would, on balance, have heeded any further warnings from Monzo.

Mr M's submissions have also included that he was vulnerable at the times relevant to this complaint. This was due to his age (which was 65 at the time of the payments). I've considered this and agree that banks should take extra care with vulnerable consumers. And also, that scammers commonly target older people. But that being said, in all the calls I've listened to, Mr M came across as a confident and assured individual. And other than his age (which Monzo would have known about), I can't see that it would have known (or reasonably ought to have ascertained) that Mr M was vulnerable at the times he made his payments. And in line with what I've set out above, Monzo did take the time to provide multiple warnings on numerous occasions, pointing out the common features of scams. And I don't think there is more it ought to have done, even taking into account Mr M's age at the time.

I am sorry that Mr M has lost money in this way, and he does have my sympathy. But based on the evidence I've seen, it wouldn't be fair or reasonable for me to ask Monzo to refund him the money he has sadly lost.

My final decision

For the reasons I've given above and in my provisional decision, I don't 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 7 January 2026.

Provisional Decision

I've considered the relevant information about this complaint.

I intend to reach a different outcome to that of the Investigator. And in doing so, I wanted to give both parties an opportunity to respond with any further points before issuing my final decision.

The deadline for both parties to provide any further comments or evidence for me to consider is 5 December 2025. Unless the information changes my mind, my final decision is likely to be along the following lines.

If I don't hear from Mr M, or if they tell me they accept my provisional decision, I may arrange for the complaint to be closed as resolved without a final decision.

The complaint

Mr M complains that Monzo Ltd ('Monzo') won't refund him the money he lost after he fell victim to a scam.

In bringing his complaint to this service Mr M is represented, but for ease of reading I will refer to Mr M, throughout this decision.

What happened

The background to this complaint is well known to both parties and has been laid out in detail by our Investigator in their view, so I won't repeat it all in detail here. But in summary, I understand it to be as follows.

In or around July 2024, Mr M saw an advert, on a well-known social media platform, for an investment opportunity, through a company I'll refer to as 'T'. Mr M registered his interest and was subsequently contacted by and began communicating with a representative of T, who I'll refer to as 'L'. Believing everything to be genuine, Mr M proceeded with the investment, but unknown to him at the time, he had been contacted by fraudsters.

To facilitate the payments, Mr M sent funds, via card payment, from his Monzo account to a cryptocurrency account in his own name. As well as this, he sent payments to an account he held with another payment service provider (who I'll refer to as 'C') by way of faster payments. All of the payments were subsequently then moved to accounts the fraudsters controlled.

A breakdown of the payments Mr M made is detailed below:

	Time	Date	Method	Payment to	Amount
1	16:45	15/07/2024	Card Payment	Cryptocurrency Platform	9,500.00
2	13:19	29/07/2024	Card Payment	Cryptocurrency Platform	7,950.00
3	15:30	01/08/2024	Card Payment	Cryptocurrency Platform	6,950.00
4	15:13	11/09/2024	Card Payment	Cryptocurrency Platform	7,500.00
5	11:15	13/09/2024	Card Payment	Cryptocurrency Platform	7,450.00
6	09:27	18/09/2024	Card Payment	Cryptocurrency Platform	9,000.00
7	11:14	19/09/2024	Card Payment	Cryptocurrency Platform	6,000.00
8	15:33	19/09/2024	Faster Payment	C	25.00
9	15:49	19/09/2024	Card Payment	Cryptocurrency Platform	3,800.00
10	15:52	19/09/2024	Faster Payment	C	9,900.00
11	08:55	20/09/2024	Faster Payment	C	9,850.00
12	11:25	21/09/2024	Faster Payment	C	9,800.00
13	13:05	23/09/2024	Faster Payment	C	9,900.00
14	10:41	25/09/2024	Faster Payment	C	9,900.00
15	09:37	27/09/2024	Faster Payment	C	9,950.00
16	11:13	27/09/2024	Faster Payment	C	4,950.00

Monzo's fraud detection systems picked up a number of payments Mr M attempted. It blocked his account and had conversations with him on 13, 18 and 19 September 2025. Following the conversations, Mr M's account was unblocked, and he was able to continue with his payments.

Monzo contacted Mr M again on 22 September 2025. During this call Mr M told Monzo that he assumed he had been the victim of a scam. He explained to Monzo what had happened and told it that he hadn't been honest with them on previous calls, telling Monzo that he

thought it was interfering. Mr M explained to Monzo what had happened, with Monzo telling him that he shouldn't assume he'd been scammed, rather this was 100% a scam.

However, following the call with Monzo, Mr M relayed what had happened back to L and they persuaded him to make some further payments. Shortly after making these payments, the fraudsters became uncontactable, and the access Mr M had to a trading platform disappeared. It was at this point Mr M understood that he had been the victim of a scam.

Mr M raised the matter with Monzo, but it didn't uphold his complaint. In summary, it didn't think it was at fault for processing the transfers that Mr M authorised.

Unhappy with Monzo's response, Mr M brought his complaint to this service. One of our Investigators looked into things and thought the complaint should be upheld in part. In summary, it was our Investigator's view that Monzo ought to have intervened at the point Mr M was making his first payment and that it should have contacted him by way of human intervention. Our Investigator also thought Monzo had missed red flags during its later interventions. Our Investigator concluded that had Monzo intervened on payment one, as this was the start of the scam, Mr M would more likely than not have been forthcoming with Monzo about what was happening and Monzo could have warned him, and this would have made a difference.

So, our Investigator thought Monzo was at least in part liable for Mr M's loss. But our Investigator also thought Mr M should bear some responsibility for his loss. In summary, this was because she thought there was enough going on that ought to have led him to have concerns about the legitimacy of what was being offered.

Mr M agreed with our Investigator's view, but Monzo disagreed. As agreement couldn't be reached, the complaint has been passed to me for a final decision.

What I've provisionally 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 aware that I've summarised this complaint briefly, in less detail than has been provided, and in my own words. No discourtesy is intended by this. Instead, I've focussed on what I think is the heart of the matter here. If there's something I've not mentioned, it isn't because I've ignored it. I haven't. 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. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts.

Having thought about everything carefully, I'm minded to say that I don't think Monzo is responsible for refunding the money Mr M sadly lost. I'm sorry to hear that Mr M has been the victim of what was a cruel scam. I know he feels strongly about this complaint, and this will come as a disappointment to him, so I'll explain why.

I'm satisfied Mr M 'authorised' the payments for the purposes of the Payment Services Regulations 2017 ('the Regulations'), in force at the time. So, although he didn't intend the money to go to scammers, under the Regulations, and under the terms and conditions of his account, Mr M is presumed liable for the loss in the first instance.

However, that isn't the end of the story. Good industry practice required that Monzo be on the lookout for payments that were out of character or unusual to the extent that they might

have indicated a fraud risk. On spotting such a payment, I'd expect it to intervene in a manner proportionate to the risk identified.

In this case, I need to decide whether Monzo acted fairly and reasonably in its dealings with Mr M when it processed the payments, or whether it should have done more than it did.

Firms, such as Monzo, process a high volume of transfers and transactions each day. And a balance has to be struck as to when it should possibly intervene on a payment(s) against not holding up or delaying its customer's requests.

I have seen that Monzo did have its own suspicions and intervened on a number of the payments that Mr M made, blocking his account until it had spoken to him, before then unblocking his account. It was our Investigator's view that Monzo's intervention didn't go far enough. She thought the intervention should have come sooner, that Monzo had missed opportunities to pick up on red flags and that a more robust intervention on the first payment would have made a difference.

Having thought about this carefully, I think this is finely balanced, but I'm minded to say that Monzo's intervention should indeed have happened at payment one. When compared to the typical activity on Mr M's account in the months leading up to the scam, I don't think the value of the payment, in and of itself, would have caused Monzo cause for concern. I say that as there are other large value transactions. However, alongside this being a payment for a large sum of money, it was identifiably being made to a cryptocurrency provider, which can sometimes, but of course not always be indicative of a financial risk.

Overall, I think the large value, coupled with the payment being to a new payee which was identifiably related to cryptocurrency was enough to have made Monzo aware of the potential risk of financial harm.

But this in and of itself, isn't enough for me to say that Monzo should refund Mr M the money he lost. Although it's arguable that Monzo could have done more than it did, I also need to be persuaded, and this is ultimately the crux of this complaint, that any further proportionate intervention/questioning would have made a difference and prevented the payments from being made. Of course I can't know for sure what would have happened, so I have to base my findings on the balance of probabilities – that is, what I think is more likely than not to have happened, taking into account what I know.

Had Monzo intervened at the point the first payment was being made, I think a proportionate response to the risk would have been for Monzo to have attempted to establish the circumstances surrounding the payment before allowing it to debit Mr M's account. I think it should have done this by contacting Mr M (as it went on to do for later payments) to discuss the payment further. But I'm not persuaded, in the individual circumstances of this case, that such an intervention would have made a difference and stopped Mr M from proceeding with the payments.

I say that because I have listened to calls Mr M had with Monzo, when it did intervene on later payments, due to the concerns it had. During these calls it seems clear to me that Mr M is intent on making the payments and he completely believes what he was doing was legitimate. The evidence from Mr M also indicates that he was somewhat frustrated with Monzo's interventions – at the time he told Monzo it was tedious and later said that he thought Monzo was interfering.

It is also clear that Mr M was intentionally providing answers that were misleading when Monzo were questioning him about payments. In a call with Monzo on 22 September 2024 Mr M admitted to Monzo that he hadn't been honest with it during earlier conversations. This

is evident with Mr M telling Monzo that he hadn't downloaded any software to allow others access (which he had done). He also told Monzo that he wasn't communicating with anybody through social media and that he didn't have anybody telling him what payments to make, which again wasn't true. Furthermore, both during and after calls, Monzo did give some context to Mr M around how investment scams typically play out – this included detailing key hallmarks of what was happening with Mr M's own situation, such as; finding out about an investment through social media, being offered high returns, being asked to download remote access software and communicating through messaging services. But Mr M confirmed to Monzo that none of that rang true with him. In answering as he did, it essentially hindered Monzo's ability to uncover the scam.

Importantly here, these interventions/calls didn't come until later payments, so I must also consider whether it would have made a difference if such interventions had taken place sooner (i.e. when the first payment was being made). But I don't think they would. I say that as the evidence I've seen supports that Mr M was more likely than not under the spell of L very soon after contact had been made. Unfortunately, Mr M deleted early messages he had with L, he said he did this because he was embarrassed by how much personal detail he'd shared with them. This suggests to me that even very early in the scam a relationship of trust had been built with L, such that Mr M would have been comfortable to share personal details. Which I think is further evidenced in some of the messages with L that are available, where Mr M tells L that he trusted her 100% and that from day one, he had the feeling that L could be trusted.

The messages with L also show that Mr M is relaying back to them any issues that he is having, with things such as payments, and asking for their guidance on how to overcome these and proceed. The weight of evidence here persuades me that, on the balance of probabilities, even if intervention had come sooner, Mr M would have sought advice from L and would have been guided by them to provide answers that would have been clearly designed to allay any suspicions that the payments could be linked to a scam.

I think the determination Mr M had to make these payments is also supported by him opening new accounts with different financial firms, seemingly due to him running into difficulties and having payments blocked and frozen, when he was trying to make payments from firms, such as Monzo. Indeed, Mr M has said that L suggested that he open an account with C, as Monzo weren't in line with how he wanted to invest.

Sadly, his belief in L and his dedication to make the payments was such, that even if further intervention had gone as far as preventing him from making payments and blocking his account, he'd have simply found other accounts from which to facilitate the payments. Which I'm satisfied is evident and supported by what he done in the circumstances of this case and what I've referred to above, where, when he had tried to make payments and experienced difficulty, he moved to seeking to making payments from elsewhere, including opening other accounts to help to facilitate the payments.

Mr M has told us, and the evidence I've seen, show that he had been subject to social engineering and was being coached extensively by the scammer. This coaching included how he should answer questions and conveying with the fraudsters while making the payments. From what I've seen, Mr M followed the fraudsters directions and indeed, Mr M himself has said that he trusted L completely. So much so, that L was, on more than one occasion, able to persuade Mr M to move past his own doubts, as well as move past the warnings of others. This is evident with what happened here, when Monzo told him he was being scammed, he went back to L who then persuaded him to make further payments.

Overall, based on the evidence I've seen it's clear that Mr M was completely under the spell of the fraudsters. Given the individual circumstances of this case, I'm not persuaded that it

would be fair or reasonable for me to conclude that it's more likely than not that any further proportionate interventions by Monzo could have broken that spell nor prevented Mr M from making the payments.

I've thought about whether Monzo did all it could to recover Mr M's money once he had reported the scam to it. But given Mr M sent money to other accounts he held, before then exchanging it into cryptocurrency and then moving it on to accounts controlled by the fraudsters, there was little prospect of Monzo being able to recover any of the money.

I'm mindful that Mr M has said he was vulnerable at the time the payments were made. He has shared with us some details of his personal circumstances, which I imagine was hard to do and I thank him for this. I don't mean to in any way diminish the difficult personal circumstances Mr M has been faced with, but I can't see Monzo was aware or notified of any vulnerabilities he had prior to the scam, so there was no reason for it to think he might be at higher risk of financial harm from fraud, such that it could have put other reasonable adjustments in place to protect him.

I don't intend any comments or findings I've made in this decision to downplay the impact this scam has had on Mr M. I have a great deal of sympathy for him being the victim of what was clearly a cruel and callous scam. But I can only compel Monzo to refund Mr M if it is responsible for the loss incurred. For the reasons explained, having carefully considered the circumstances of this complaint, I can see no basis on which I can fairly say that Monzo should be held liable for the loss Mr M has sadly suffered.

My provisional decision

My provisional decision is that I don't uphold this complaint.

Stephen Wise
Ombudsman