

## The complaint

Ms P complains that Wise Payments Limited will not reimburse the funds she lost to a scam.

## What happened

Ms P received a message on WhatsApp offering a remote job role. The role required Ms P to complete a set of tasks for which she would receive commission. Ms P was asked to set up an account on the company's platform and to make cryptocurrency payments when the account would enter a negative balance or to access tasks that gained higher commission. And in March 2025 she made payments totalling £24,841 to a cryptocurrency exchange before sending the funds on to the scammers. Ms P later realised it had been a scam and reported the matter to Wise but it did not reimburse the money she lost or uphold her complaint.

Our investigator thought the complaint should be upheld. She said Wise ought to have intervened when Ms P made a fifth payment to the cryptocurrency exchange, and had it done so, it could have uncovered the scam and prevented the loss.

Wise does not accept our Investigator's view. It says the payments could not be identified as cryptocurrency related transactions. It says the payments were to an account in Ms P's name and there appeared to be no legitimate reason to hold the payments and question her further. It thinks Ms P should complain to the businesses the funds were sent to.

Our Investigator did not change her opinion on the matter and as agreement could not be reached the complaint has been passed to me to make a final decision. I issued my provisional decision on 29 January 2026 in which I said the following:

*"I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.*

*I understand that Ms P has been the victim of a very cruel and sophisticated scam and I'm sorry she has lost out because of it. However, I must put aside my feelings and consider the complaint impartially. Having done so, I do not intend to uphold this complaint. I know this will come as a disappointment to Ms P, but I will explain my reasons for this decision.*

*In broad terms, the starting position in law is that an electronic money institution such as Wise is expected to process payments and withdrawals that a customer authorises it to make. There is no dispute here that Ms P authorised the payments. And in accordance with the Payment Services Regulations (2017) and the terms and conditions of the account, Ms P is responsible for the loss.*

*However, taking into consideration the relevant regulatory rules and guidance, codes of practice and good industry practice, and what I consider to have been good industry practice at the time, I consider it fair and reasonable that Wise should:*

- *have been monitoring accounts and any payments made or received to counter various risks, including preventing fraud and scams;*

- *have had systems in place to look out for unusual transactions or other signs that might indicate that its customers were at risk of fraud. This is particularly so given the increase in sophisticated fraud and scams in recent years, which firms are generally more familiar with than the average customer;*
- *have acted to avoid causing foreseeable harm to customers, for example by maintaining adequate systems to detect and prevent scams and by ensuring all aspects of its products, including the contractual terms, enabled it to do so;*
- *in some circumstances, irrespective of the payment channel used, have taken additional steps, or made additional checks, or provided additional warnings, before processing a payment;*
- *have been mindful of – among other things – common scam scenarios, how fraudulent practices are evolving (including for example the common use of multi-stage fraud by scammers, including the use of payments to cryptocurrency accounts as a step to defraud consumers) and the different risks these can present to consumers, when deciding whether to intervene.*

*I'm satisfied that Wise ought reasonably to have known from the sort code that the payments were being made to a well-known cryptocurrency provider. Although Wise has said that only a small proportion of payments relating to this sort code were reported as fraudulent in the year before the scam, it would have likely seen numerous payments and fraud claims in the years prior to that. Additionally the sort code is public information which I would expect Wise to be up to date with when considering the controls expected of it by the Consumer Duty. And I don't think that the fact the payments in this case were going to an account held in Ms P's own name should have led Wise to believe there wasn't a risk of fraud.*

*I find the initial payments were in keeping with Ms P's usual spending, and I do not find they were of such significant value to have raised concerns. However I think the payment of £5,500 on 7 March 2025 ought to have raised concerns. This was highest value payment Ms P had made since opening the account in September 2024. It was also the second payment made on that day, bringing the total used in the purchase cryptocurrency that day to £8,100. Considering this and the known risks associated with cryptocurrency related transactions I think Wise ought to have intervened and queried the purpose and circumstances surrounding the payments.*

*I have thought about whether Wise could have prevented the loss had it intervened as I think it should have done, and I'm not persuaded it could. I find Ms P was determined to make the payments, by this point she had already begun to borrow fund from friends and was heavily influenced by the scammer often being guided by them in order to ensure payments would be processed. The scammer directed Ms P to make lower value payments and then encouraged her to use her Wise account to avoid restrictions by another bank. On 5 March 2025, the scammer advised Ms P to conceal what the money was for when she asked a friend for a loan. On 8 March 2025, Ms P informed the scammer when Wise stopped her payment and they instructed her on what to tell Wise it was for.*

*When other banks intervened, Ms P gave misleading information about the circumstances surrounding the transactions. Ms P was asked to visit the branch where she was given scam warnings and education about commons scams at the time. Ms P informed the scammer several times that her banks had indicated she was being scammed. Despite this she continued to make payments. I appreciate Ms P did not know it was a scam at the time, and although she had shown some concerns initially, I find she was willing to follow the scammer's guidance and to mislead the bank to ensure payments would be processed. While I accept that banks should hold responses to an appropriate level of scrutiny and*

*should not take a customer's answers at face value, I am not persuaded Wise, in this case, would have been able to uncover the scam. I think it is likely that had Wise intervened on 7 March 2025, Ms P would have sought guidance from the scammer and provided misleading information as she later did. When inaccurate information is given during intervention, it can make it difficult and potentially prevent Wise from uncovering a scam or providing the relevant warnings.*

*Ms P made payments from several bank accounts in order to circumvent the restrictions put in place by the different businesses. The discussions with the scammer show Ms P was willing to go as far as to open a new account with another payment service provider to facilitate the transactions. Even if Wise went as far as restrict Ms P's account entirely, on balance, I find it more likely than not she would have found alternative means of paying. Therefore, I am not persuaded Wise could have prevented the loss Ms P experienced.*

*I am also not persuaded Wise could have recovered the funds because the payments were made to an account in Ms P's name before the funds were sent on the scammer. If any funds did remain in the beneficiary account, Ms P would have access to them and could recover the funds herself.*

*I have carefully considered all that has happened here. I understand Ms P has been left out of pocket and is experiencing significant financial difficulty as a result of the scam she fell victim to and I sympathise. However, I could only uphold this complaint and require Wise to reimburse Ms P if I thought any failings on its part made a material difference to the loss, I'm not persuaded that is the case here.*

*Both parties have until the due date set out above to send in any further information, should they wish to do so. All I would add is that any final submissions should be materially new. Neither party needs to repeat what it's said to us before."*

Wise accepted my provisional findings. But to summarise Ms P says that she was not determined to proceed regardless of warnings, rather she was following specific instructions under pressure and fear. Ms P says a clear and direct intervention from Wise would have removed the perceived legitimacy of the transaction and broken the control the scammer had over her.

### **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 have thought about the comments Ms P made but I maintain the outcome I reached provisionally. I appreciate that Ms P was under pressure and may have felt fearful, however she received significant and relevant intervention (in line with what I would have expected of Wise) by other banking institutions which she did not take heed of. So I'm not persuaded a comparable warning from Wise would have made a difference. On the balance of probabilities, I find it is more likely than not Ms P would have reacted in a similar manner to any intervention by Wise. As such, I cannot fairly or reasonably uphold this complaint.

### **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 Ms P to accept or reject my decision before 11 March 2026.

Oluwatobi Balogun  
**Ombudsman**