

Scottish Widows Complaint: PO-14071 (Preface)

Complainant: Ian Clive McInnes
Email: ian.mcinnnes@yahoo.com.mx
Website: <https://www.elpobrecorderito.com/PersonalPensionFiasco/>

This document mirrors one of the main web pages on the above website. This contains proof of criminal misconduct by two organisations that one would expect to act with the highest standards of probity. Their contempt for the law amounts to a gross breach of the trust the public must place in them.

Scottish Widows is guilty of fraudulent evasion of personal pension encashment (amongst numerous other instances of [cavalier customer treatment](#)). In particular, the assertion that their onerous (and in my case, impossible to satisfy) "verification" demands "are required under UK legislation" is a blatant false pretence. In fact, the government requires no verification whatever when there is an ongoing business arrangement, let alone the draconian, changing, and dreadfully documented demands of Scottish Widows.

The Pensions Ombudsman is guilty of criminal protection of Scottish Widows in its refusal (after a year of quite deliberate inaction and prevarication) to investigate and determine the above, as is required under the Pension Schemes Act 1993/2017. Instead, it has forced an [illegal "pragmatic solution" with SW](#).

Both the above organisations are also guilty of lies, deceit, and evasiveness. And if I were mistaken about SW's fraudulent verification requirements, the numerous statements on the matter that I have made to SW, TPO, and also TPAS would have been rebutted; instead they have met only with silence.

If my comprehensive website is accessible via the above link, please review this instead. This document nonetheless contains active links (underlined) to [web pages](#) in blue and [PDF documents](#) in crimson. It is also more suited to printing than the corresponding web page.

Links to Main Web Pages

Key Facts	Key Facts of the case in numbered paragraph format.
Case Overview	Case summary and narratives for SW and TPO.
Verification Issues	Analysis of the "verification" requirements imposed by SW.
Event Summary	Chronological lists of events (two separate timelines).
Details (SW)	Detailed chronology with correspondence involving SW.
Details (TPO)	Detailed chronology with correspondence involving TPO.
Determination	Analysis of the TPO Final Determination.
Epilogue	Analysis of the pensions 'industry' and its protection by TPO & DWP.
Questions for SW	Questions sent to SW to probe their "verification" measures.
Document List	Complete list of documents (including this one).

Links to Main Sections within This Document


<u>15 Mar 2016</u>	Fax to enquire on pension encashment
<u>18 Mar 2016</u>	Welcome response by email
<u>5 Apr 2016</u>	Start of application: telephone interview and requirements documentation
<u>11 Apr 2016</u>	Sent documents after efforts to satisfy the requirements
<u>21 May 2016</u>	Follow up to the above, having heard and received nothing
<u>16 Jun 2016</u>	Received four postal items, including rejection of my documents
<u>26 Jun 2016</u>	Request for Scottish Widows' IDRPs
<u>1 Jul 2016</u>	Received two emails - one claiming ignorance of the term IDRPs, the other requesting me to post the (now-acceptable) documents
<u>06 Jul 2016</u>	Received seven more unwanted postal items, including three requests for documents
<u>10 Jul 2016</u>	Interim but detailed complaint to Scottish Widows
<u>13 Jul 2016</u>	Complaint response, deterring the use of email, and offering only telephone as a medium for complaint resolution
<u>17 Jul 2016</u>	My reply, rejecting the use of telephone (for several clear reasons)
<u>1 Aug 2016</u>	Email offering to accept a scan of my certified ID card as verification (provided it is emailed by my bank)
<u>4 Aug 2016</u>	Received two postal items: a letter rejecting my application, and a letter requesting me to post the (now acceptable) documents
<u>15 Sep 2016</u>	Received four postal items, including the intransigent Final Response
<u>29 Sep 2016</u>	Sent email with my list of Questions, stating that the matter had been referred to TPO
<u>10 Oct 2016</u>	Received three more postal items, including complaint information and yet another request for documents
<u>10 Nov 2016</u>	Five telephone calls, including three voicemail messages requesting me to call back
<u>23 Nov 2016</u>	Email to SW over the voicemails, requesting a written reply (sent in accordance with a belated suggestion from TPO). Also resent the list of questions

Scottish Widows Complaint: PO-14071 (Content)


Details (Scottish Widows)

This document chronicles my attempts to obtain a lump sum from Scottish Widows Personal Pension Plans P56879Q & N80803X. Complete correspondence with Scottish Widows over this period is represented by thumbnail images, and that relevant to the case also with links to documents located on my website.

15 March 2016


	<p><u>20160315EncashmentEnquiry</u></p> <p>I sent a fax to enquire about taking a lump sum from any of the three Scottish Widows pension plans I hold. I requested a response by email, and advised them of the problems of sending by post. I had previously investigated their website "Take it in Cash" which apparently allows full encashment of a policy, but it was no good to me as it was specific to the UK (in particular, it only supported UK bank details).</p>
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18 March 2016

	<p><u>20160318EncashmentInfo</u></p> <p>I was pleased to receive this email response mentioning a "paperless" procedure. It was supplied as a Word document; I do not present the email itself here, as it is merely a wrapper with no relevant information.</p> <p>I was rather worried about the prospect of a telephone interview as, due to a hearing impairment, I find it hard to understand over the telephone. Nonetheless, this seemed to be the only practical option. <i>In fact, this email indicates that telephone interview is the only option offered.</i> It did mention the verification that they stated was "<i>required under UK legislation</i>", but I had no reason then to believe that this would be so onerous (and it would no doubt be applied regardless of the means of encashment).</p>
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5 April 2016

I completed the telephone procedure, which I found to be not only extremely stressful, but an almost complete waste of time (about an hour and a half). Most of it appeared to be efforts to persuade me to withdraw my claim, in the guise of offering cautionary advice. I was told about having to send some verification documents - I asked about this and am quite clear that I was told I could send them as email attachments. I was also told that another telephone appointment was needed - this was arranged for 14 April. I thought this was strange, since more than enough appeared to have been covered in this one. During this interview, I received two emails:

	<p>This is the first part of the email I received to confirm the further appointment (this turned out to be unnecessary, as it relates to another policy 7410049 that I thought I had made plain that I wanted to remain).</p>
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20160405DocRequirements

This is information on the document requirements, reformatted to be more compact and readable than the original email. There was also an attached form detailing the requirements. These to some degree duplicated each other, and I found the information generally confusing and incongruous. The first page of the email states that separate documents are required for proof of Name, Age, and Address; and that they would also require a copy of my Birth Certificate. This would rather unreasonably require four documents; I hoped that my Birth Certificate would also be considered to confirm age.

The specifications for certification state that it must include the words "original seen"; I thought that this might not be appropriate in my case, the official language in Mexico being Spanish. I was also uncertain as to whether photocopies (as would be used for certified documents) would be "clear and legible" - especially of my ID card.

The second page under the heading "Returning a Completed Form?" gives options for sending forms, with an email address to which documents may be sent. *But these apparently flexible options dissemble the fact that Scottish Widows forces the use of post.* The reference to "scanned PDF document" led me to supply my scanned images as PDF documents.

The attached Individual Identification and Verification Form contains verification options for Name and Address, plus additional certification and other requirements.

These requirements and the confusing specifications caused me considerable trouble. A few days later (on 8 April) I learned that my Army Pension with lump sum was after all going to be paid. On account of this, I briefly considered pulling out of the encashment (these onerous requirements would give me good reason). I decided to press ahead, since the exchange rate was very favourable at that time (over 25 MXN / GBP) in comparison to historical rates (often around 21-22). Having made numerous transfers in the past, I am very well aware that even small fluctuations make a substantial difference, and it seemed that exchange rates were only likely to deteriorate (although I cannot claim to have foretold Brexit).

11 April 2016

Having spent some time investigating and analysing, it seemed clear that my national ID card would serve as evidence of Name, and I hoped my birth certificate would be accepted as evidence of age as well as date of birth. But I was somewhat worried that they appeared to require four documents; the birth certificate being in addition to proof of age.

I was more worried that I could not completely satisfy Scottish Widows' requirements on Address verification (for legitimate reasons that I endeavoured to explain fully) - the best I could manage was an old bank statement. *But as this was for the account to which payment was to be made, it should have nonetheless provided compelling verification evidence.*

I had all three documents certified by a *notario público* (here in Mexico an experienced government-appointed lawyer). But there were also at least two issues from Scottish Widows' very specific certification requirements. Firstly, I could not prevail upon the *notario público* to mark the certified documents with the words "original seen" (although much better than that was stated in Spanish). Secondly, the certification did not contain the address (but I supplied the business card separately).

I was originally told that the documents could be emailed, and the supply of an email address seemed to confirm this. Only later did I notice a statement saying that certified documents could not be accepted by email. But if all documents must be certified (as closer examination indicated was the case), then why state that they could be sent by email and provide an email address for that purpose? After much consideration, I decided that the only sensible way to send the documents (at least for the moment) was as email attachments.

I was reluctant to send the documents initially by courier as, apart from the fact that it is very expensive, all the above uncertainties led me to be concerned that they might well be rejected. Also this would invite a postal response, which as I continually emphasise would take months to arrive. And apart from the onerous verification requirements, I was also concerned about the mediocre quality of the certified documents, and especially that of my ID card, which might not meet their requirements that they be "clear and legible".

I therefore sent good-quality scans of both certified and original documents as email attachments (in the form of PDF documents, as the instructions seemed to require). Those of original documents give much better quality than the certified documents on paper. If there were any issues, Scottish Widows could easily reply to the email with a few lines of explanation. If they told me that they were acceptable but must be sent by post, I would of course have done so immediately by courier.

20160411EmailDocuments

This is the email that I sent with the documents. As you can see, my circumstances are explained very fully. Of particular note is the very first paragraph, which both explains the nature of the post, and states that I could not completely satisfy their requirements for verification of address (these two points are closely related).

The second paragraph explains that the bank statement contains not only my address, but also my bank account details; and that this is the account to which payment was requested. Furthermore, that these details were already held by Scottish Widows, and that they had previously transferred a substantial sum to this account (this important point is reiterated in the final paragraph).

The remainder of the email explains in detail my circumstances, and why it is not possible for me to completely satisfy their (invalid) address verification requirements. This derives from the fact that there is no delivery of mail to my residential address as it is somewhat secluded, so the address that Scottish Widows holds is of necessity only an address at which I can receive their mail. However, the government specifies that verification is to be done on **residential** address, whilst Scottish Widows documents refer only to plain address. So even if I could have satisfied this requirement, it would have been an invalid verification criterion for government anti-money laundering purposes. *But Scottish Widows' reasons for these requirements have nothing to do with AML.*

I also note concerns with the very specific manner in which Scottish Widows requires the documents to be certified, and to which I cannot conform here in Mexico.



The following are scans of the original documents, which provide much better quality than the certified photocopies.



OriginalID

These are scans of the front and back of my ID card as Permanent Resident. I have held this since December 2014, and it is my principal means of identity here in Mexico.



OriginalBankStatement

This is a scan of a bank statement used for verification of Address, the last before I chose to no longer receive paper statements. Although old, it clearly shows the same account details that Scottish Widows holds and had recently used to make a large transfer (and Lloyds Bank on many occasions previously). These details include the account name, account number, CLABE (used for funds transfers), and the address held by Scottish Widows. This in itself should resolve any identity issues, especially since my bank details were checked during the telephone interview.



OriginalBirthCertificate





This is a scan of my birth certificate. My scanner cannot handle the full length of this document, but all the important details are present.

The following are the certified documents, plus the business card of the *notario público*.




CertifiedID

This is my certified ID card. I was particularly concerned here about the poor reproduction that seems inevitable with photocopies, and this induced me to supply good-quality original scans as email attachments.






	<p><u>Certified Bank Statement</u> This is my certified bank statement.</p>
 	<p><u>Certified Birth Certificate Front</u> This is the front of my certified birth certificate.</p> <p><u>Certified Birth Certificate Back</u> This is the back of my certified birth certificate. The main stamp and signature appear only on this side.</p>
	<p><u>Notario</u> I also included evidence of address of the <i>notario público</i>. Scottish Widows requires this on the certification, but I had to accept the certification as it is done here in Mexico; this (more sensibly) gives the identification code of the <i>notario público</i> rather than the address.</p> <p>Another thing I could not comply with is to mark the documents with the words "original seen" (I did ask about this). The certification stamp states (in Spanish) rather more than just "original seen": that the photocopy/ies is/are a faithful reproduction of the original(s) currently held in view.</p> <p>Scottish Widows ought to understand that the certification will be done in the manner and language of the relevant country.</p>

21 May 2016

	<p><u>20160521 Follow Up</u> Having received neither response nor payment, I sent a follow-up email. I had checked my bank account on numerous occasions, but waited some time since overseas payments can take a little while to arrive to my account.</p> <p>I again explained that they already held and had made a transaction to the bank account to which payment is to be made (and had also checked it by telephone); this by itself ought to satisfy Scottish Widows of my identity.</p>
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16 June 2016

I received four items from Scottish Widows through the post. All items had a local postmark of 8 June, except for the earliest item, which had the later postmark of 14 June.

	<p>This is the first page of an unwanted pension statement for another policy 7410049 plus a booklet, dated 29 March 2016. I can only assume this has arisen from my recent communications with Scottish Widows - I stated a number of years ago that I did not wish to receive these.</p>
	<p>This is the envelope in which the above pension statement was received (postmarked 14 June 2016).</p>
	<p>This is another pension statement for the same policy as above with another (identical) booklet, dated 3 May.</p>
	<p><u>20160616ConfirmationP56879Q</u> This is a confirmation of the telephone interview for policy P56879Q, dated 5 April, which I WAS expecting. When told about it during the telephone interview, I mentioned the issues with the post, but was told that this document was unimportant, and only for the record.</p>
	<p><u>20160616ReplyEmail0414</u> This is the reply to my email of 11 April, dated 14 April, containing a letter and a changed verification requirements form.</p> <p>The remainder of this section deals with this utterly inappropriate response, both in terms of its content, and the means by which it was sent.</p> <p>Under any normal circumstances, it would be ridiculous to answer my email by post, when replying to the email with a few lines of explanation would be vastly more efficient. Given my clear statements about the serious problems with post to Mexico, it is outrageous. There were clearly none of the (overstated) "security" and "privacy" issues here (and post to Mexico is considerably more risky). I had received items from Scottish Widows by email, had responded to them in that way, and could not have anticipated that they would start using communications technology that represents little advancement on quill, parchment, and penny black. Even if Scottish Widows had allowed my application to be resolved at this point, they would still be responsible for considerable delay. <i>And yet they later sustained this, having the gall to blame the Mexican postal service.</i></p>

We are writing to you as a reply to your email dated 11/06/2016.

As part of the processing of your request, Scottish Widows requires you to provide evidence to verify your identification. To enable us to do this please supply the copies of documents for the purposes to be verified against below. These documents are not to be sent to us by email but by post to the address below. Please ensure you provide the correct type of evidence.

Please return the original form, together with the evidence, within 14 days from the date of this letter. If we do not receive the information we may not be able to process your request and it is likely to delay future payments.

All documentation must be certified by way of the partner listed on the contact form.

While we do understand that it can be difficult to acquire these documents, we do need them as a requirement to process your pension claim. I apologise as we are unable to accept any documentation that has not met one of the required categories. We are also unable to accept those through post.

This is the content of the reply to my email as above, apparently rejecting my application on the basis of my verification of address. There was no clear explanation of what was found to be amiss; but the innuendo about being "*unable to accept any documentation that has fall(sic) out of the required timescales*" must refer to what I had called out in the very first sentence that I could not fulfil, with full explanation of this following in the remainder of my email.

Nonetheless, they "*do understand that it can be difficult to acquire these documents*". ***I contend that this is the reason Scottish Widows imposes these requirements, not through any need to verify identity.***

It is clear that my application had been treated with utter disregard; this is in sharp contrast to the considerable trouble that I had taken in preparing it. It seems that the recipient had read only the first sentence:

"The best Evidence of Address document that I can provide is a bank statement of 2007." and had not taken heed of even the remainder of the paragraph:

"I have no more recent statement, since at that time I chose to no longer receive bank statements through the post. One should understand that post here is not the same as that in the UK. And post from the UK to Mexico is extremely slow (around 3 months) and of questionable reliability. For this reason, I have always strived to avoid the use of post."

... never mind the second paragraph (which explains that payment is to be made to the same bank account that Scottish Widows already holds and had previously made a substantial payment to); or to the following detailed explanation of my circumstances that should have demonstrated clearly why I could not provide any other evidence of address.

Another Scottish Widows requirement that I could not satisfy was to reply within 14 days of the date of the letter, since I do not have access to a time machine. *And as you will see, by the time I received this rejection, my application had already been terminated due to my lack of response.*

This is the relevant part of the emailed verification details form (on which my documents were based). Both this form and that sent by post below only include Name and Address; in the email, Scottish Widows also requires provision of a Birth Certificate (plus some separate proof of age). Bank Account statements are allowed as evidence of address, provided they are neither internet generated, nor older than 3 months.

This is the relevant part of the paper verification details form sent with the rejection letter of 14 April. ***This form is quite different from that sent by email - and both specifications affecting me have changed.*** Now the certified ID card I supplied as verification of Name is no longer a valid option (even though as a Permanent Resident, this is my definitive proof of identity here in Mexico). For Bank Account statements, it now says "*statements printed of(sic) the internet are acceptable*". This contradicts the specification in the PDF version of the form, and must surely be erroneous.

In total, six copies of the form requesting documents were sent by post, even though it ought to have been clear that no number of such forms will enable me to satisfy Scottish Widows' invalid requirements. This can only be to feign willingness to encash and justify their subsequent termination.

26 June 2016

20160626IDRP-Query

Immediately after receiving the abomination of 16 June, I started to prepare a detailed complaint. But on realising that the impending Brexit Referendum could fundamentally change its content, I held back.

But by now it was clear that, even if the matter were resolved to enable encashment of the policies, I would suffer substantial financial losses due to the very weak pound. I emailed this to Scottish Widows, not realising at that time that the Internal Dispute Resolution Procedure only applies to occupational pension schemes.

1 July 2016

I received two items by email from Scottish Widows (both in the form of password-protected PDF documents). I present here PDF documents created from the exported content. I do not include the emails themselves, as they are merely wrappers containing nothing of relevance. *It seemed strange to password protect such documents - perhaps they thought that (as in their later imposition of the use of telephone) this would prevent them from being used as evidence...*

Although the emails were both received on 1 July, the documents were dated 27 June and 30 June respectively. They are clearly in response to my above request for their IDRP (at which point they obviously knew that I was in the process of making a complaint).

20160627WotsAnIDRP

This stunning response professes ignorance of the term "Internal Dispute Resolution Procedure" (especially extraordinary as Scottish Widows also handles occupational pensions).

I don't think they wanted to tell me that I don't have to follow any such procedure...

20160630RequestPostDocs



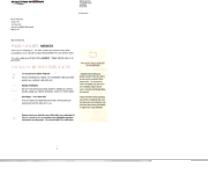




This is either requesting me to post documents that they had determined were invalid, or that (after the hint that I was making a complaint) my documents have become acceptable. My interpretation is the latter - in which case, it's a pity I didn't receive this two and a half months earlier... *The later date of this document, plus their statement that they had tried several times to telephone me to discuss the matter also suggest that they didn't want to put this "concession" on the record. And now they seem to understand that they had imposed requirements that I could not satisfy (when before this complaint hint they mindlessly sent a series of postal requests for documents that they should have known that I was unable to provide - see below).*

And at last (after the complaint hint) they have responded by email. *To this date, Scottish Widows has sent eleven further items by post. On 6 July, I received seven items, including four requests for documents, the last of which was a postal response to my follow-up email (requiring original documents to be sent in addition to certification). On 4 August, I received two items: a letter terminating my application (as I had not responded to their postal requests for documents several weeks **before** I received them), plus a copy of the above email of 30 June (unterminating my application). On 10 October, I received yet another request for documents.*

But in treating me like an idiot, they have scored two momentous own goals...

6 July 2016

I received seven more items from Scottish Widows through the post. I am not sure whether they were all delivered at the same time, but they were certainly all delivered since the last batch.

	<p>This is a notification of amendment of address, dated 25 March. I am not sure why I received this, since the address they hold remains unchanged.</p>
	<p>This is another notification of amendment of address, similar but not identical to the above and with the same date. It is not clear whether or not the two relate to the two policies, since no policy number is given on either.</p>
	<p><u>20160706ConfirmationN80803X</u> This is another confirmation of the telephone interview, this time for policy N80803X, dated 5 April (I was NOT expecting to receive a separate document for each policy).</p>
	<p><u>20160706cReqDocsN80803X</u> This is a request for documents for policy N80803X, dated 6 April (the day after the telephone interview). It contains the same (changed) form as that sent in the rejection letter of 14 April. <i>So Scottish Widows had at the time of the telephone interview two versions of this form - that emailed as a PDF document, and that sent by post the next day. The latter invalidates my certified ID card, leaving me no means of verifying my name!</i></p>
	<p><u>20160706dReqDocsP56879Q</u> This is another request for documents for policy P56879Q, also dated 6 April with another copy of the form. <i>So not only do I have to cope with two different verification forms, but it appears that I am required to complete a separate form for each policy number.</i></p>
	<p><u>20160706eReqDocsP56879Q</u> This is another request for documents for policy P56879Q, dated 24 May with another copy of the form. <i>Another request identical to this and for the same policy, but with different pagination, was sent only two days later.</i></p>
	<p><u>20160706fReqDocsN80803X</u> This is another request for documents for policy N80803X, dated 1 June with another copy of the form. But the content of this is a little different; the thanks for my getting in contact must relate to my follow-up email of 21 May. And they now appear to require that in addition to certification, the original documents must be sent (even though they indicated on their form that they require certified copies only). But I can take the originals to a branch of Lloyds Bank for certification...</p> <p>Another thing that is different is the enclosed form. The first four paper forms (that of the original rejection of 14 April, those dated 6 April, and those of 24/26 May) were substantially different from the PDF version, and contained blatant errors. This one is similar (but not identical) to the PDF form that I originally received. Yet another version of this form...</p>

I have now received four more requests for documents that I had made plain with clear and detailed explanation that I could not supply.

And they have also paid no heed whatever to repeated comments I have made about the problems with post to Mexico. Apart from the nonsensical content of their last, they have again answered an email by post - even though this follow-up email can only have confirmed the comments I made in my first email that post is simply not a viable medium.

10 July 2016



20160710EmailComplaint

Having already spent some time preparing my case, I was concerned that further delay might have a negative effect on it. So I sent this interim complaint to Scottish Widows by email, outlining my concerns.

At this stage, I assumed that their verification requirements were merely flawed, not a total sham (this became clear only later). Nonetheless, my email indicated that I was looking into government anti-money laundering regulations and guidelines, and that the information I had read indicated that Scottish Widows had no business to require verification of both Address and Date of Birth. I also stated that I had a hearing impairment, and consequently found it difficult to understand over the telephone.

I spent the next week developing a web site to expound my case more fully, especially having investigated government AML regulations further.

13 July 2016



20160713ComplaintResponse

I received this response to my interim complaint (footer cropped). An identical email was received two days later. Despite having spelt out my difficulties in using the telephone, discussion over the telephone is the only method offered for complaint resolution. *It seems clear that Scottish Widows forces the use of this medium to avoid leaving a record for review by TPO (this is also the case for any follow up in their Final Response).*

They deter the use of email with risible concerns over my security and privacy, and specifically indicate that they are unable to deal with my complaint by email for these reasons. *This is despite being able to email me password-protected PDF documents with secure reply on 1 July. And their privacy and security concerns are ludicrous in consideration of the wads of sensitive material they send through ordinary post.*


17 July 2016



20160717WebsiteRef


In my reply, I explained with clear reasons that I was not prepared to deal with this case over the telephone, and provided a link to the website that I had by then completed (at least as a first draft). *I might also have stated that I do not care to be treated like a retarded schoolkid.*


1 August 2016

	<p>20160801ReplyEmail0710</p> <p>I received an email, apparently in response to my interim complaint of 10 July. Now they will accept a scan of my certified ID card (by itself) as verification, provided it is emailed by my bank (with some more absurd and ad-hoc specifications). <i>My ID card was disallowed as a means of verification in the Mk I paper version of their form.</i> I did not take up this "offer", which lacks credibility and does not address the main issues.</p>
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4 August 2016

I received two items through the post. The first stated that my claim had been terminated, as my documentation was **unacceptable**. The second (sent two weeks later, **after I had enquired about their IDR**) indicated that my documents were **now acceptable**. *Both were received on this date, with local postmarks of 27 and 30 July (this is much faster delivery than usual).*

	<p>20160804ClaimClosed0616</p> <p>This letter (dated 16 June) closes my application on the grounds that I had supplied insufficient documentation, and had not responded to their requests for additional information.</p> <ul style="list-style-type: none">• My application was rejected as I could not provide up-to-date verification of the address they hold, even though I had explained why I could do no better, and they had clear proof of my identity.• I received the first "requests for additional information" only on 6 July (three weeks after the date of this letter). So again, I could not possibly have responded in time to avoid termination of my claim. In any case, I would have had no means of remedying the situation.• Their statement "<i>we must assume that you do not wish to proceed with this claim</i>" lacks credibility, as I had recently sent a follow up, to which they sent another request for documents on 1 June. And even by their criteria and with the UK postal service, I was hardly given enough time to reply to this. I wonder how many others have had their applications summarily terminated in this way?
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	<p>20160804SendDocs0630</p> <p>This letter (the same as the email of that date that I received on 1 July) indicates that my documents have become acceptable, and I just need to post them (and it would appear that my claim has been unclosed).</p>
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It is clear that, without the hint that I was making a complaint, I would have been denied the funds I entrusted to Scottish Widows. My claim was rejected not through Scottish Widows' legitimate compliance with UK government AML regulations, but on the illegitimate basis that despite my best efforts I could not satisfy the "verification" they require "under UK legislation".

This is underlined by the fact that Scottish Widows completely disregarded the most important verification consideration of all - the bank account to which the funds were to be paid. This is in my name, with full details given in a verified bank statement I sent. Furthermore, they had previously paid a much more substantial sum into this account, on encashment of an investment plan about two years earlier and in exactly the same circumstances; then, only a signed letter was required without any supporting documents. I have repeatedly pointed out these facts to Scottish Widows. Why should taking a lump sum from a pension plan be any different?

15 September 2016

I received four postal items from Scottish Widows (exceptionally quickly by the standards I have experienced with post over the last year). *But even at this rate (at best just over 3 weeks) I could not fulfil Scottish Widows' requirement to reply within 14 days of the date of their letters.*



This is an announcement regarding Accidental Death Benefit, dated only August 2016, for policy 7410048 (which I do not own).



This is another announcement regarding Accidental Death Benefit, identical to the above but for the correct policy 7410049 (the only one that would remain after fulfilment of my encashment request).



20160915FollowUp0822

This is a follow-up to the email sent by Scottish Widows on 1 August offering to accept my ID card, dated 22 August.

Again, there are confusing and changing requirements. I had already had my ID card certified, yet it appears that they now require this to be done by my bank (they require the bank name and address). The certification requirements are different to those I was given previously (these changes are in addition to the substantially-reduced verification requirements, and the recent acceptance of scanned documents).

All this has contributed to my complete loss of trust in Scottish Widows, which is one reason why I will no longer comply with their demands.



20160915Final0824

This letter dated 24 August is their Final Response, inappropriately referring me to and enclosing a leaflet from the **Financial** Ombudsman Service. It is completely unapologetic, and does not address the issues.

The main issue is that Scottish Widows imposed and enforced verification requirements that I had explained that I could not fulfil, and consequently terminated my application; even though they had solid proof of my identity from the outset. This was aggravated by postal responses to my emails, even though I had made clear that this medium is not viable.

Their "justification" for their use of post is that they are a UK-based company and as such "*our processes are set to suit the majority of our customers*". If their processes involve answering an email by post, even after the customer has made plain the unviability of that medium, then their processes need to change. There were no "security", "privacy" or other reasons for not using email (and sending paper through ordinary post is far less secure). I think that few in the UK would want or expect their emails to be answered only by post. And Scottish Widows should consider that it has a responsibility not only to those in the UK, but also to people like myself who have placed funds with them and moved overseas; it is not good enough to simply blame a foreign postal service. *It was only on the hint of a complaint that Scottish Widows returned to using email.*



29 September 2016

20160929QuestionsForSW

Scottish Widows' Final Response reasserted their original requirements, thus again denying me the means to encash my pension. After some further consultation with TPAS, on 24 September I sent an Application by courier to The Pensions Ombudsman (which they received today).

Today I sent an email to Scottish Widows attaching my list of Questions, hoping that they would feel under some pressure to respond now that the matter has been referred to TPO. I sent to both the general email address to which I sent the verification documents, and the "Specialist Complaints" from which I had received the offer of discussion by telephone. *The question list I sent is exactly the same as that presented on my website; as it forms part of the correspondence, I have made no changes to it since.*

20160929OutOfOffice

Received a notification from the second recipient that he was out of the office until 10 October. Still, it will be several weeks before TPO begins to investigate my case.

10 October 2016

I unexpectedly received three more items by post, when I thought I had received the last of the paper from Scottish Widows (at least for the moment).

A yearly pension statement for policies P56879Q and N80803X; undated, but for the year ending 6 April 2016. *Assuming it was sent around that time, this must be the slowest delivery to date.* Thankfully, I stopped making contributions soon after the policies were created - I was never comfortable with the idea of being on the end of a drip feed (*and certainly not one operated by Scottish Widows*).

20161010ReqDocs0526

Yet another request for documents for policy P56879Q, dated 26 May 2016, and containing the same conspicuously-erroneous form as that sent with the first four such requests (the last of which was also for policy P56879Q, and dated only two days earlier on 24 May). The only difference with this form is that it is paginated rather better.

20161010ComplaintInfo0715

Complaint information referencing both policies P56879Q and N80803X, dated 15 July. It is clearly connected to the email offering discussion by telephone, sent on both 13 July and 15 July.

As with their Final Response, this letter refers me (on both pages) to the **Financial** Ombudsman Service, but there is no reference to either TPAS or TPO. I understand from both TPO (in their leaflet) and the Financial Ombudsman Service (on their website) that the remit of FOS within pensions is their sales and marketing, which Scottish Widows ought to know is not applicable to my case.

10 November 2016

20161110Voicemails

On 8/9 November, Scottish Widows made five telephone calls including three voicemail messages to my partner's house (this is where the interview of 5 April took place, as there is no landline at my house). All times are local time (GMT-6). On 8 November, they called at 0512 and 0545 in the morning, and at 1845 in the evening; they left voicemails on the first and third calls. *The obtuse disregard shown by the first two calls is characteristic, but I had to check that the third really was at 0045 UK time.* On 9 November, they called at 0657 and 0826, with a voicemail on the first call only.

My partner was not present when any of these calls were made. She does not speak English and understood little of what was said in the messages. But I suspected when she told me on 8 November about the first two calls that it was likely to be from Scottish Widows, given the inappropriate hour and that it was in English. So, after having been told about a further three calls and two messages, I went to her house in the city today to record these messages and put them on the record for The Pensions Ombudsman. I also sent an [email](#) to notify TPO of this (*foolishly believing at that time that TPO was the impartial and law-abiding organisation that it claims to be*).

No doubt due to my hearing problems, I could not discern parts of these messages; however it appears that they want me to call them back. But they should have understood from both my complaint of 10 July and my email of 17 July why it is not reasonable to expect me to discuss this complaint by telephone. I had also notified them by email on 29 September that, having issued their Final Response, this complaint is now in the hands of The Pensions Ombudsman.

I subsequently put some effort into determining what was said in these voicemail messages, including using digital signal processing to reduce the speed and change the pitch. The key phrase given as the reason for making the calls (repeated in two messages) was "some ?paperments? that you have". There is no word at all like "paperment" in my Oxford English dictionary, nor did it sound anything like any other word I am familiar with (e.g. "payment", or even "peppermint").

SW's record of deceitful conduct leads me to believe that this is a bogus phrase contrived to obfuscate their reason for making these calls (to increase the likelihood of a response and avoid leaving evidence). But if anyone can explain to me what was said, I'll stand corrected.

And although they seemed desperate to contact me, I received no follow up or explanation of any kind, even though I pursued the matter. With hindsight, I am practically certain that these calls were made in response to contact by TPO, with the aim of avoiding having to pay TPO a substantial sum to bury my case. But, as I did not respond, they did the lucrative (for TPO) deal shortly before 23 November 2016 - see [here](#).

23 November 2016

20161123ReplyVoicemails

I received an email from TPO today (*a late response to my email of 10 November*), suggesting that I email Scottish Widows in response to the voicemails and request a written reply. So in accordance with their suggestion, I sent this email and notified TPO. I also took the opportunity to remind Scottish Widows of the questions that I sent on 29 September.



This is the end of my correspondence with Scottish Widows. The last two emails I sent to Scottish Widows remain unanswered, despite their having responded promptly (although inappropriately) to all my previous emails. And to be surer of a response, I sent both these emails to two addresses: their general portal and "Specialist Complaints".

That I have still received no response to my list of questions of 29 September, despite their serious implications, indicates that Scottish Widows cannot answer them to their advantage.

The lack of response to my email of 23 November indicates that they are not willing to put in writing any of what they were going to say over the telephone, or even offer any explanation of why they found it necessary to make these calls. But perhaps this was not surprising in any case, as it seems that they by then had the protection of TPO...