

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

[Introduction](#)

[General \(mirrors of web pages\)](#)

[Correspondence \(Scottish Widows\)](#)

[Verification](#)

[Correspondence \(TPO\)](#)

[Correspondence \(Other\)](#)

[Reference](#)

Scottish Widows Complaint: PO-14071 (Content)

Document List

This contains a complete categorised list of PDF documents, mainly paginated for A4 paper. These include mirrors of the main pages of the website (which are kept in tandem with the web pages for better printouts), and the entire and unedited^s text of all relevant correspondence *§with the sole exception that my National Insurance Number has been hidden for security reasons.*

Nearly all PDF documents are prefixed by a header that contains firstly a summary of the case, and secondly a description of the following content. The content is **graphical** in the case of scans (postal items, verification documents), otherwise textual (emails, attachments, online forms, and web page mirrors). With emails and web pages, the PDF target preserves any hyperlinks in the source email or document. *I hold all original paper correspondence as evidence.*

For emails, the content is generated from Yahoo Mail by copying and pasting into a Word document, then converting to an optimized PDF. I have not modified the textual content in any way (all typos are faithfully preserved), but have found it necessary to improve the formatting (particularly to remove inappropriate blank lines). However, in each case there is a link to the email alone as rendered by Yahoo Mail (much larger, but more authentic); I have provided such links to all emails involved in my case, including wrappers. *Also, all my emails are retained on the Yahoo Mail server, and for the purpose of verifying them as evidence, I would issue a temporary password to some appropriate individual to enable direct access to my account.*

The first column of each table gives the filename of the document (without .pdf extension), with a hyperlink for download. Any date prefix is that on which I sent or received the document. The description is only intended to be sufficient to help identification; the Events document gives fuller descriptions and backgrounds to the documents it references.

General

These mirror the ten main HTML documents of this website.

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|-------------------------------|---|
| Key Facts | Key points of case in the form of numbered paragraphs. |
| Overview | Case Summary and Overview. |
| Verification | Issues with Scottish Widows' verification requirements. |
| Events | Summary lists of events with links, in two chronological sequences. |
| DetailsSW | Detailed chronology of correspondence with Scottish Widows. |
| DetailsTPO | Detailed chronology of correspondence with TPO. |
| Determination | Analysis of the TPO Final Determination. |
| Epilogue | Summary and Analysis of case issues, and a Satisfactory Resolution. |
| Questions | Introduction and exact list of questions sent to Scottish Widows. |
| Documents | Complete list of PDF documents (this document). |

Correspondence (Scottish Widows)

This gives individual documents that correspond those given on the Details (SW) page of the website. Paper documents not directly relevant to this case are excluded. *The web page includes these peripheral documents (as images only), and supports popup images for more rapid navigation than opening PDF documents.*

In each case, the date given is that which appears on the document; however, the list is in chronological order of the date on which I sent or received them. This order is not always the same as that of the document dates. For example, the rejection of my documents dated 14 April arrived over two months later on 16 June; and whilst the first postal request for documents was sent over a week earlier than this on 6 April, it was not received until 6 July.

Those documents I consider crucial to the case, I have described in **bold**. All dates are in 2016. The originator of each document is given as follows:

ICM Ian Clive McInnes

SW Scottish Widows

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|---|--------|-----|---|
| 20160315EncashmentEnquiry | 15 Mar | ICM | Fax to enquire on pension encashment. |
| 20160318EncashmentInfo | 18 Mar | SW | Email Response to fax enquiry. |
| 20160405DocRequirements | 5 Apr | SW | Content of Information Requested email, specifying verification requirements. |
| Individual Identification and Verification Form | 5 Apr | SW | Attachment of above email, with further requirements, and specifying verification options for Name and Address. |
| 20160411EmailDocuments | 11 Apr | ICM | Email with 8 attached document scans (see following section), with clear and detailed explanation of my circumstances. |
| 20160521FollowUp | 21 May | ICM | Email follow up, sent after I had received neither reply nor payment. |
| 20160616ConfirmationP56879Q | 5 Apr | SW | Confirmation of interview for P56879Q. |
| 20160616ReplyEmail0414 | 14 Apr | SW | Postal reply to my email of 11 April, rejecting my documents. |
| 20160626IDRP-Query | 26 Jun | ICM | Email request for Scottish Widows IDRP. |
| 20160627WotsAnIDRP | 27 Jun | SW | First email response to above (as a password-protected PDF), denying knowledge of the term IDRP. |
| 20160630RequestPostDocs | 30 Jun | SW | Second email response to above (also as a password-protected PDF), requesting me to send the (now acceptable) documents. |
| 20160706ConfirmationN80803X | 5 Apr | SW | Confirmation of interview for N80803X. |
| 20160706cReqDocsN80803X | 6 Apr | SW | The first of four requests for documents received on 6 July. |
| 20160706dReqDocsP56879Q | 6 Apr | SW | The second of four requests for documents. |
| 20160706eReqDocsP56879Q | 24 May | SW | The third of four requests for documents. |
| 20160706fReqDocsN80803X | 1 Jun | SW | The last of four requests for documents, this time with a different letter and form. |
| 20160710EmailComplaint | 10 Jul | ICM | (Interim) email complaint to Scottish Widows, outlining my main concerns. |

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| 20160713ComplaintResponse | 13 Jul | SW | Response to the above email, offering only discussion by telephone. |
| 20160717WebsiteRef | 17 Jul | ICM | My reply, rejecting telephone discussion and containing a link to my website. |
| 20160801ReplyEmail0710 | 1 Aug | SW | Email in response to my interim complaint, offering to accept a scan of my certified ID card (alone) as verification. |
| 20160804ClaimClosed0616 | 16 Jun | SW | Letter terminating my application. |
| 20160804SendDocs0630 | 30 Jun | SW | Paper version of the document I received by email on 1 July, unclosing my application. |
| 20160915FollowUp0822 | 22 Aug | SW | Follow-up letter to the email of 1 August. |
| 20160915Final0824 | 24 Aug | SW | Final Response. |
| 20160929QuestionsForSW | 29 Sep | ICM | Request for answers to my list of questions. |
| 20160929OutOfOffice | 29 Sep | SW | "Out of Office" notification from above. |
| 20161010ReqDocs0526 | 26 May | SW | Request for documents #6. |
| 20161010ComplaintInfo0715 | 15 Jul | SW | Complaint information. |
| 20161123ReplyVoicemails | 23 Nov | ICM | Email sent to Scottish Widows in response to their voicemails, at the suggestion of TPO. |

Verification

This section contains the exact 8 PDF documents I sent as attachments to my email of 11 April; they include scans of both the original and certified documents.

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| OriginalID | Original ID card (front and back), showing all details clearly. |
| OriginalBankStatement | Original bank statement. |
| OriginalBirthCertificate | Original birth certificate. |
| CertifiedID | Certified ID card (as with all photocopies of it, not too clear). |
| CertifiedBankStatement | Certified bank statement. |
| CertifiedBirthCertificateFront | Certified copy of the front of my birth certificate. |
| CertifiedBirthCertificateBack | Certified copy of the back of my birth certificate. |
| Notario | Business card of the notario público. |

Correspondence (TPO)

This is my correspondence with The Pensions Ombudsman.

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| 20160828ToTPO | Enquiry to TPO, not knowing what they would need to proceed. |
| 20160830FromTPO | Reply from CM, stating that they need a Final Response from SW. |
| 20160924AppITPO | Application Form with Covering Letter. |
| 20160929ToTPO | Follow up to my application to TPO (that they had just received), stating that I had sent a list of questions to Scottish Widows. |
| 20160930FromTPO | Acknowledgement from TPO (from an Investigation Assistant). |
| 20161004FromTPO | A further acknowledgement (from Assistant Adjudicator CM). |
| 20161030ToTPO | Email to TPO, asking whether I should chase up on the list of questions I sent to Scottish Widows a month ago. |
| 20161031FromTPO | Reply from CM, suggesting that I wait another month. |
| 20161110ToTPO | Email to TPO, reporting the telephone calls from Scottish Widows. |
| 20161123FromTPO | Reply from CM, suggesting that if I did not want to return their calls, I should email them requesting a written response. |

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| 20161123ToTPO | Notification to TPO that I had sent the above email to SW. |
| 20161202FromTPO1 | Email from TPO advising me of email encryption. |
| 20161202FromTPO2-Wrapper 20161202FromTPO2-Content | Email with password-protected PDF requesting me to resend the link in my email of 23 November, as their system denied access to it. |
| 20161203ToTPO-Wrapper 20161203ToTPO | Email to TPO sent by the secure service with a PDF document both as a link and as an attachment. |
| 20161204ToTPO | Follow up to the above, using the normal service. |
| 20161212FromTPO | Acknowledgement of my emails of 3/4 December. |
| 20170118FromTPO1 | Request from another department for Customer Survey participation, stating that my case had been closed. |
| 20170118FromTPO2 | Correction, but only to say that they had sent the wrong form. |
| 20170118ToTPO | Response to the above, reflecting my concern. |
| 20170120FromTPO | Apology from CM for error (survey was sent to the wrong people). |
| 20170215FromTPO | Another request for Customer Survey participation. |
| 20170405ToTPO | Email I sent after having received nothing further on my case. |
| 20170407FromTPO | Reply from CM to say that my email had been forwarded to the Senior Adjudicator BB handling my case. |
| 20170514ToTPO | Email I sent after again having heard nothing further. |
| 20170515FromTPO | Initial email from BB (now Deputy Casework Manager). |
| 20170517ToTPO | My response to the above. |
| 20170522FromTPO | Another, more informative, response from BB. |
| 20170524ToTPO | My reply, stating that I had reported my case to Action Fraud. |
| 20170526FromTPO | Response, stating that he would be in touch when he had been able to review the website. |
| 20170610ToTPO 20170610ToTPO2 | Replacement of email originally enclosing a ZIP file of most of my website, which was rejected by their delivery system. The second was intended to send several loose files to complete the website. |
| 20170613FromTPO | Indication that denial of access to my website was long term. |
| 20170614ToTPO | Acknowledgement of his willingness to use another connection. |
| 20170615FromTPO | Note to say that he would review my website early next week. |
| 20170712ToTPO | Again nothing heard, so another chase up, this time blunter. |
| 20170714FromTPO | Response denying skulduggery, but with no new information. |
| 20170806ToTPO | Enquiry to the survey department to find out if my case was closed. |
| 20170807FromTPO | Response to above, forwarding my email to the adjudicator. |
| 20170830ToTPO | Detailed follow up to my email of 6 August. |
| 20170831FromTPO | Reply to the above from the Casework Manager. |
| 20170903ToTPO | Email to the Casework Director. |
| 20170904FromTPO | Acknowledgement from the Casework Director. |
| 20170909ToTPO | Follow up to my email of 3 September, to clarify a few points. |
| Complaint Response20170915 20170915FromTPO | First and Final response to my complaint from the Casework Director with covering email. |
| 20171003FromTPO | Attempt by Mr Berkengoff to force me into a deal with Scottish Widows. |
| 20171004ToTPO | My response to the above, copied to the Casework Director and the Pensions Ombudsman. |
| 20171008ToTPO | Follow up to clarify the above, for the Pensions Ombudsman only. |

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| 20171031FromTPO | Another attempt by Mr Berkengoff to push me into dealing with Scottish Widows, or withdraw my case. |
| 20171101ToTPO | Rather than reply to the above, I forwarded it to the Pensions Ombudsman, asking whether he was in agreement with this position. |
| 20180110ToTPO | Summary of issues with SW and TPO to the TPO Legal Director. |
| 20181105FromTPO | Extraordinary email from the Casework Manager, following up the Adjudicator's request of over a year ago for a Mexican passport. |
| 20181111ToTPO | My response to the above, making my position plain. |
| McInnes Opinion 20190115FromTPO | Unexpected Opinion from the Casework Manager, with covering letter. |
| 20190124FromTPO | Reminder that I must respond by 30 January, or the Opinion will become the final resolution. |
| 20190127OpinionRejection PO-14071 20190127ToTPO | My rejection of their Opinion of 15 January 2019 with a covering letter, sent to the Casework Manager and a new Adjudicator. |
| 20190127FromTPO | Out-of-office notification from the Casework Manager. |
| 20190128FromTPO | An acknowledgement of my rejection of their Opinion. |
| 20190322FromTPO-Notification 20190322FromTPO-Mimecast AmendedOpinionPO-14071 | A notification from the Adjudicator that I have received a message via mimecast, the mimecast access page, and the retrieved Amended Opinion. |
| 20190324ToTPO OpinionRejectionPO-14071v2 | My rejection of the Amended Opinion, with covering email. |
| 20190326FromTPO- SecureMessageNA 20190327ToTPO | Another mimecast page with a message that was not accessible (<i>actually the Final Determination below</i>), and my response to it. |
| 20190328FromTPO McInnes FD FD Factsheet | Response to the above from the Adjudicator, attaching the Final Determination, and Information about appeals. |
| DeterminationRejectionPO- 14071 | My rejection of the Final Determination for documentation purposes (<i>this was not sent to TPO</i>). |

Correspondence (Other)

This is my remaining correspondence.

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| 20160706TPASInfo | Helpful response to my online application. |
| 20160717ToTPAS | Email to TPAS, mentioning my complaint to SW and my website. |
| 20160718FromTPAS | Reply to above (they work with documents, and could not help with evidence of identity issues). |
| 20160724ToTPAS | Reply to TPAS, providing link to my newly-created document list. I also stated that I had found SW's "verification" demands to be completely illegitimate. |
| 20160819FromTPAS1 | Notification that my application is to be passed to another advisor. |
| 20160819FromTPAS2 | Another acknowledgement, giving my case number. |
| 20160908FromTPAS | Initial email from my TPAS caseworker. |
| 20160911ToTPAS | My reply to the above, setting out my position more fully. |
| 20160918ToTPAS | Email to notify TPAS that I had received the Final Response, and had prepared a list of questions to put to Scottish Widows. |
| 20160923FromTPAS | Email from TPAS, offering to pursue SW's use of post. |
| 20160925ToTPAS | Reply to TPAS, stating that I had mad an application to TPO. |

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| 20160926FromTPAS | Reply from TPAS, closing my case as I had approached TPO. |
| 20170429WixtedEnquiry | Enquiry sent to Wixted & Co solicitors (no response received). |
| 20170520ToAF | Online report sent to Action Fraud (contents of Other Details box). |
| 20170522FromAF NFRC170501858997 | Acknowledgement (email with attached PDF), although it is not clear whether they will be able to investigate. |
| NFRC170501858997-0622 | Response from ActionFraud stating that they do not have the "leads" needed to pursue my case. |
| 20170625ToAF | My response to the above, urging them to reconsider. |
| 20180117ToTPR | Email to The Pensions Regulator, urging an investigation into TPO. |
| 20180205FromTPR | Reply to the above, referring me to the Work and Pensions Department. |
| 20180228ToCWP | Email to the Commons Select Committee - Work and Pensions (unfortunately bounced as spam). |
| 20180422ToFCA | Email to the Financial Conduct Authority. |
| 20180424FromFCA | Acknowledgement to the above, stating that my email had been forward to the appropriate department. |
| 20180425FromFCA | Further email, with suggestions, but offering no action. |
| 20180505ToCWP | Second email to the Commons Select Committee - Work and Pensions; sent by a contact with access to them (name hidden). <i>Contains web page mirrors that are now outdated.</i> |
| 20180610ToMSE | Post that I attempted to make on Money Saving Expert forum (three tries, each of which was rapidly removed). |
| 20180611FromMSE | Email from MSE, confirming that my posts had been removed on account of "inflammatory language" (e.g. the word "fraudulent"). |
| 20180613ToMSE 20180613FromMSE | My email in response to the above, and an automated reply. |
| 20180614FromMSE | Response to the above, stating that my email had been forwarded to their Editorial team. |
| 20180620ToMP | Tweet to the Metropolitan Police, reporting Misconduct in Public Office by The Pensions Ombudsman. |
| 20180620ToAF | Further update to ActionFraud, challenging them to either rebut my fraud claim or investigate it. I also stated that I had made the above Misconduct in Public Office report. |
| 20180703ToMP0 20180703ToMP1 20180703ToMP2 | Covering letter, report of Misconduct in Public Office against TPO, and report of Fraudulent Misconduct against SW, sent to the Metropolitan Police by registered post (my tweet was ignored). <i>NB: these documents are paginated for Oficio paper (216x340).</i> |
| 20190209ToMP ReportBerkengoff | Tweet to the Metropolitan Police with link to a report. This was raised specifically against Barry Berkengoff, not mentioning TPO. |
| 20190210ToMP | Follow up, suggesting that they might liaise with the Department of Work and Pensions. |
| 20190606ToHMRC | Email to HM Revenue & Customs to resolve the issue of SW's documentation demands. |
| 20190606FromHMRC | Automated response to the above. |
| 20190728ToCWP | First report to the Clerks of the Committee for Work and Pensions. |
| 20190801FromCWP | Unencouraging response to the above. |
| 20190826ToCWP | Follow up to my first report above. |
| 20190829FromCWP | Reply to the above. |

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| 20190902ToTRPL | Email sent to Thomson Reuters Practical Law (via online form). |
| 20190902FromTRPL | Automated response to sending the above. |
| 20190907ToDWP | Report to the Department for Work & Pensions (Online Helpdesk). |
| 20190909FromDWP | Reply suggesting I contact the relevant department (no info given). |
| 20190911FromTRPL | Vacuous reply from Thomson Reuters. |
| 20190915ToDWP | Request to DWP Online Helpdesk for contact details. |
| 20190916FromDWP | Reply giving an irrelevant link to International Pension Centre. |
| 20190916ToTRPL | Follow up to Thomson Reuters, who had not looked at my website. |
| 20190916ToDWP | Email to the International Pension Centre (no reply). |
| 20190923ToDWP | Request to DWP for an email address to report TPO misconduct |
| 20190923FromDWP | under the Freedom of Information Act, and an automated response. |
| 20190924FromDWP | Reply to the above, denying familiarity with 'TPO'. |
| 20190928ToDWP | My reply that TPO is The Pensions Ombudsman that DWP is |
| 20190928FromDWP | supposed to oversee, and another automated response. |
| 20190930FromDWP | Response containing three useless links to web pages. |
| 20200712ToDWP-revised | Revised version of an email sent in response to Tailored Review of the Pensions Ombudsman (see below). |
| 20200720ToCWP | Request to the Committee for Work & Pensions to forward the above email to the author of the review. |
| 20200721FromCWP | Response to the above. |

Reference

These are some documents referred to on this website, but not part of the correspondence.

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| Appointment-PO-2015 | Document from DWP describing the appointment of Anthony Arter (<i>no other candidates appear to have been considered</i>). |
| AML-Guidelines-2007 | HMRC guidelines on the applicable Anti-money laundering regulations. |
| Review-PO-2019 | Tailored Review of the Pensions Ombudsman (external web page). |
| AccessReports-DWP | Access Reports showing that DWP is well aware of TPO corruption. |
| AccessReports-MP | Access Reports showing that the Metropolitan Police do not investigate complaints against TPO, only individuals. |
| TPO-Proposals-Dec2018 | Proposals to widen the jurisdiction of the Pensions Ombudsman; in particular to allow for early resolution, thus avoiding Determination. |
| TPO-Proposals-Aug2019 | Government response to the above proposals. |

There are many other relevant documents, but these should be readily available online. They include the Pension Schemes Act 1993/2017, and documentation relating to the numerous "reforms" introduced by Mr Arter.