

# Scottish Widows Complaint: PO-14071

*Involving fraudulent evasion of pension encashment by SW,  
and its brazen cover up by The Pensions Ombudsman*

Complainant: Ian Clive McInnes  
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Website: <https://www.elpobrecorderito.com/PersonalPensionFiasco/>

This document is part of the complete correspondence 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.*

## Document Details

Date Sent / Received	05 April 2016
Sender / Recipient / Medium	Scottish Widows / Ian Clive McInnes / <a href="#">Email Attachment</a>
Description	<p>PDF document specifying the accepted means of verifying name and address, plus other details for the certified "verification" documents that SW (<i>not the UK government</i>) requires in order to encash a pension. The above link is to the email that summarises the requirements, and which should be viewed in conjunction with the document below. The second link above is to the PDF attachment as sent. These two documents to some degree duplicate and conflict with each other.</p> <p>The requirements are very (unduly) specific, and some details relating to the certification are likely to be impossible to meet, especially for those living overseas. This, together with the fact that these two documents conflict, add to the considerable difficulties for the customer.</p> <p>The very next day, a quite different version of this form was sent by post, and several other varying versions later. This can only have been to create still more difficulties for the customer, to what are already draconian and onerous demands that are falsely stated by SW to be "required under UK legislation". <i>This email followed a telephone interview lasting an hour and a half, which was clearly designed to dissuade me from the encashment.</i></p> <p><b>These documents are key to the core issue of my case against SW.</b></p>

	<p>Also note that, whilst the email below appears to offer several means of returning the documents, without clear requirements for their certification, it is apparent (only after studying the form) that they must all be certified and posted. The manner of certification is unduly specific, and is likely to be unachievable for those living in other countries. Furthermore, whilst the email gives 30 days to reply, the letter sent the next day allows only 14 days. As this period includes post both ways, this requirement is also likely to be impossible to fulfil for those living overseas. <i>Yet the Final Response of Scottish Widows lays the blame entirely on a foreign postal service.</i></p>
Website Links to More Info	<p><a href="#">Overview (Conduct SW)</a> / <a href="#">Overview (Intractable Requirements)</a> / <a href="#">Verification Issues</a> / <a href="#">Event Summary</a> / <a href="#">Details (SW)</a></p>

## Individual Identification and Verification Form

Name of Individual(s) to be verified:

Scheme/Policy Number:

Nationality:

Residency:

**A EVIDENCE OF NAME DOCUMENTS – UK RESIDENTS ONLY (Do not send originals we only require certified copies)**

	Please Tick Appropriate Evidence Sent	
	Person 1	Person 2
Current Signed Passport		
(EEA) member state identity card		
Northern Ireland Voter's Card		
Residence permit issued by Home Office to EU Nationals		
Current (EEA) UK photo card driving licence or blue disabled driver's pass		
Current full UK driving licence (old version)		
Benefit book (or original notification letter from the Benefits Agency confirming the right to benefits) – no older than 12 months		
Her Majesty's Revenue and Customs Tax Notification e.g. tax assessment, statement of account, notice of coding (Note : P45's and P60's are not official HMRC documents and are therefore not acceptable) – no older than 12 months		
Current Shotgun or Firearms Certificate		

**B EVIDENCE OF ADDRESS DOCUMENTS – UK RESIDENTS ONLY (Do not send originals we only require certified copies)**

	Please Tick Appropriate Evidence Sent	
	Person 1	Person 2
Utility bill or bank statement - no older than 3 months ( <i>mobile phone bills and credit card statements are not acceptable</i> )		
Local authority tax bill - valid for the current tax year		
Current full UK driving licence (old full licence or new photo card licence) if not used for evidence of name verification (old style provisional licences are not acceptable)		
(EEA) member state identity card or Northern Ireland Voter's Card that contains an address - if not used for evidence of name verification		
Systems-generated or signed documentation from a regulated financial sector firm indicating that an account / investment / insurance relationship exists and which contains your address – for example bank or building society statements – no older than 3 months <b>Statements printed off the Internet are not acceptable.</b>		
Solicitors letter confirming recent house purchase or land registry confirmation		
Local council rent card or tenancy agreement – valid for the current year		
Benefits Book (or original notification letter from the benefits agency confirming the rights to benefits – if not used for evidence of name verification) – no older than 12 months		
Her Majesty's Revenue & Customs (HMRC) correspondence addressed to the applicant at the applicant's address (if not used for evidence of name verification) – no older than 12 months		

**Notes for Completion**

We **MUST** have separate proof of evidence for name and address. **One document cannot cover both.**

All documents provided must be certified. A description of who can certify documents and what is required for this certification to be acceptable is listed on the third page. Please note we **DO NOT** accept photocopied or faxed

forms or supporting evidence. We only require certified copies of your original name and address evidence documents

**A EVIDENCE OF NAME DOCUMENTS – NON UK RESIDENTS**  
**(Do not send originals we only require certified copies)**

	Please Tick Appropriate Evidence Sent	
	Person 1	Person 2
Current Signed Passport		
National identity card		
Photo-card Driving Licence		

**B EVIDENCE OF ADDRESS DOCUMENTS – NON UK RESIDENTS**  
**(Do not send originals we only require certified copies)**

	Please Tick Appropriate Evidence Sent	
	Person 1	Person 2
National Identity Card (if not used to verify name)		
Driving Licence (if not used to verify name)		
Utility or Rates bill (mobile telephone bills and credit card statements are not acceptable) – no older than 3 months		
Bank Account Statements – provided these are not Internet generated statements – no older than 3 months		

**Notes for Completion**

We **MUST** have separate proof of evidence for name and address. **One document cannot cover both.**

All documents provided must be certified by an independent party who has authenticated the documentation you are using for Anti Money Laundering purposes.

A description of who can certify documents and what is required for this certification to be acceptable is listed on the following page.

Please be aware that your documentation can be certified by a member of staff at a branch of the Lloyds Banking Group. **In order for the bank to know you are a Scottish Widows Policy Holder we would ask that you take the covering headed page from this letter with you when requesting your documents to be certified.** The following information **must** be given by the certifier at the branch:

- ◆ Staff name, position and signature
- ◆ Date of certification
- ◆ Documentation signed as a certified true copy
- ◆ An official branch stamp

**C SOURCE OF WEALTH DECLARATION – UK RESIDENTS & NON UK RESIDENTS**

**Source of Wealth – Please indicate where the money for this investment has come from:**

	Please Tick	
	Person 1	Person 2
Income from Employment		
House Sale		
Company Sale		
Inheritance		
Gift		
Divorce Settlement		
Other (please specify)		

Person 1

Person 2

Scottish Widows reserves the right to request further documentary evidence of source of wealth should it be considered necessary. Please note that missing information may delay the processing of the application or settlement monies.

## **Certified Documents**

Please follow these guidelines for who can certify your documentation dependent on your nationality and residency

### **UK residents who are UK nationals**

- UK solicitor
- UK employee of a bank or other regulated financial institution (including an employee of Scottish Widows)
- Financial Conduct Authority (FCA) regulated financial advisor or broker and any of the intermediaries employees
- Certified or Chartered Accountant

### **UK residents who are non UK nationals**

- Financial Conduct Authority (FCA) regulated financial advisor or broker and any of the Intermediary's employees

UK employee of a bank or other regulated financial institution (including an employee of Scottish Widows)

- A Solicitor, lawyer or attorney of either the UK or the country of issue
- A Manager within Lloyds Banking Group
- An embassy, consulate or high commission official of the country of issue

### **UK nationals who are not UK resident**

Employee of a UK registered bank or other UK registered and regulated financial institution, including an employee of Scottish Widows.

Financial Adviser or Broker regulated in the customer's country of residence by the country's primary financial regulator

Lawyer/Attorney or Notary Public (either UK based or in the country of residence of the customer)

- Certified or Chartered Accountant (either UK based or in the country of residence of the customer)
- In relation to members of the British Armed Forces based abroad only, an officer in the forces.

### **Non UK nationals who are not UK resident**

- A lawyer, attorney or Notary Public (either UK based or in the country of residence of the customer)
- A Manager within Lloyds Banking Group
- An embassy, consulate or high commission official of the country of issue

Financial Adviser or Broker regulated in the customer's country of residence by the country's primary financial regulator

In order for certification to be accepted and the certifier capable of being contacted if necessary the following must be present and clear on the documents: -

	Requirement	Present?
1	Full name and address of the person certifying the documentation	
2	The position or status of the person certifying the documentation	
3	Dated and signed by the person certifying the documentation	
4	Marked as 'original seen'	
5	All documentation and certification details MUST be clear and legible	
6	Applicants are not be permitted to certify their own evidence	
7	In situations where a good photographic evidence of identity cannot be achieved, the copy should be certified as providing a good likeness of the applicant.	