

Scottish Widows Complaint: PO-14071

Case Overview

Applicant	
Name	Ian Clive McInnes
Date of Birth	13 September 1955
Country of Residence	Mexico
Email	ian.mcinnes@yahoo.com.mx
Pension Plans	P56879Q & N80803X

Summary

The main issue in this case is that, on an application to encash the above Pension Plans, Scottish Widows imposed and rigidly enforced verification requirements that the above (ICM) was unable to fulfil. They consequently terminated his application, despite ICM having explained in detail his legitimate circumstances, and Scottish Widows having had concrete proof of his identity from the outset. All this was aggravated by their postal responses to his emails, even though ICM had made clear from the beginning that post between the UK and Mexico is not a viable form of communication.

ICM alleges that the onerous "verification" demands that Scottish Widows asserts are "required under UK legislation" are part of a [fraudulent](#) strategy to evade pension encashment, and have no basis in legitimate verification of identity.

ICM applied on 05 April 2016 to encash the above two personal pension plans. To process this, Scottish Widows required a lengthy telephone interview, followed by the provision of at least three certified verification documents. Both these obligations caused ICM considerable difficulty. The telephone interview was unwarranted, and very costly; and with his hearing problems it was also very stressful. After his best efforts, he was ultimately unable to satisfy their requirements for address verification, as of necessity the address they hold is a mailing address, not his residential address. Confusing specifications led to many other uncertainties, both with the verification requirements themselves and manner of the certification. It was also not clear how they must be sent - he was initially led to believe that he could email scanned documents; only later did it become clear that they would only be accepted by post.

After much deliberation, he sent eight documents by email; both certified copies and scans of originals. He sent them this way as with all the uncertainties (especially over the address verification) he feared they were likely to be rejected. Sending by courier (the only viable postal means) would not only waste the substantial cost of this, but would also be likely to result in a postal response that would take months to arrive. By emailing the documents, Scottish Widows could report any issues with them by simply replying to the email; if they were acceptable but must be posted, he would have done this immediately by courier. The very first paragraph of his email pointed out clearly that post is unusable (taking around three months). His email also explained in detail why it was not possible to provide other evidence of address, and also why the certification could not be done in exactly the manner specified by Scottish Widows (for example, English is not an official language of Mexico).

A few weeks later, having received neither payment nor response, he sent a follow-up email. Although he was worried about Scottish Widows' very demanding requirements, he had not expected any problems proving his identity, as the (HSBC, Mexico) bank account to which payment was to be made alone provides excellent proof of this. This was not only in his full name (which must be unique in Mexico), but was already held by Scottish Widows who had used it to transfer a substantial sum just over two years previously (for which only a signed letter was required). These bank account details were also checked during the telephone interview. He had made clear these facts in both the first email and the follow up. He had also sent a certified bank statement from this account, with full details clearly shown.

But instead of taking account of his circumstances and proof of identity, Scottish Widows rejected his documents in a letter (dated 14 April but not received until 16 June). This postal response to his email (which was sent in response to their email) was quite unexpected, and grossly inappropriate; especially bearing in mind both what he stated in its first paragraph, and that Scottish Widows required a reply within 14 days of the date of the letter. Scottish Widows sent several other similar postal "requests for information", even though ICM had made plain that he could not possibly fulfil their requirements. Subsequently (in a letter of 16 June - the same date on which the first letter rejecting his documents was received) they terminated his application. Through Scottish Widows' use of post, ICM had no means of remedying the situation, even if he could have fulfilled the documentation requirements.

On 26 June (after waiting for the outcome of the Brexit Referendum), ICM initiated a complaint (he requested their IDRP). Scottish Widows denied any familiarity with this term in a password-protected PDF document of 27 June. But (apart from the fact that they had now resumed the use of email), it seems that ICM's complaint hint also made his documents become acceptable to Scottish Widows, as he received another such document dated 30 June, acknowledging his emailed documents, and requesting only that they be sent by post.

But to do so now would incur a substantial loss, due to the collapse in the value of his funds since Brexit. He had chosen to encash them when he did as the exchange rate was then favorable (over 25 MXN / GBP), being well aware of the effect of even small fluctuations. He had gone to considerable trouble and done all he could to expedite his application; in contrast, Scottish Widows had shown negligence and cavalier disregard for his efforts. In all these circumstances, it would be grossly unjust if he had to bear these losses.

On 10 July, ICM sent a complaint; this was interim, but detailed. To this he received only an offer of discussion by telephone; this he rejected, and gave a link to his now-completed website. Subsequently, Scottish Widows offered to accept a scan of his verified ID card (alone) if it were emailed by his bank. ICM did not take up this offer; firstly because of the aforementioned financial losses; secondly since he had lost all trust in Scottish Widows; and thirdly as he felt it was important to expose this matter for the benefit of other customers.

On 15 September, he received a follow-up letter to the email of 10 July, plus Scottish Widows' Final Response. The latter addressed only the poor communication, which was blamed on the Mexican postal service. It evaded the main issue that he could not fulfil their invalid verification requirements; in fact it reasserted them. Whilst Scottish Widows states that these are "*required under UK legislation*", ICM is now of the view that this is grossly deceitful, and that they can only be designed to reduce customer pension encashment.

Claim

Had Scottish Widows handled the application in an acceptable manner, payment would have been received well before the end of April 2016. But as the above makes clear, ICM still had no prospect of being able to encash his policies well after Brexit.

ICM seeks compensation for the following:

- Financial losses due to collapse in the value of the pound sterling since the application. The average daily exchange rate during the last two weeks of April 2016 (the period during which ICM could reasonably have expected payment) was 25.11 MXN / GBP. ICM seeks compensation as the difference of the amount in Mexican Pesos that would have been received at 25.11 MXN / GBP, and that based on the exchange rate applicable at the time of the payment. Thus, if **P** is the amount of the payment due in pounds sterling, and **Er** is the applicable exchange rate (Mexican Pesos per pound sterling), the compensation due is **P * (25.11 - Er)** in Mexican Pesos.
- An additional sum to compensate for other adverse factors such as the unnecessary work and cost in providing verification documents, prolonged stress and anxiety, difficulties due to the extended period without payment, and the considerable work in pursuing this case.

In the interests of justice, ICM also seeks a satisfactory [General Resolution](#).

Narrative

Background

My initial reason for encashment of these policies was failure to receive an army pension plus lump sum, due to me on 13 September 2015 (my 60th birthday), and a resultant shortage of funds. For details, see my unfinished [website](#) (I abandoned the case on receiving my pension). I decided to fully encash two of the three personal pension policies I hold with Scottish Widows. After I had made the initial application, completely out of the blue I received notification that my lump sum and pension were after all going to be paid. But I nonetheless decided to proceed with the encashment, due to the favourable exchange rate (over 25 MXN / GBP) that existed at that time. I am always aware that even small fluctuations can make a substantial difference, and the current rate was significantly higher than the historical average over the last few years.

Note on Post between the UK and Mexico

It should be noted at the outset that the postal service between the UK and Mexico is very slow and unreliable. Most items have taken over two months to arrive, some well over three months, and at least one crucial item has not arrived at all. Since post is simply not a practical form of communication, I have made all efforts to avoid it, including always pointing out this problem in my correspondence. When it has been necessary to send paper documents to the UK, with the exception of two sent by registered post (one of which appears to have not arrived), I have always used courier. Unfortunately this is very expensive, and provides no solution to receiving documents from the UK. So email should be used if at all possible.

Another issue with the use of post is that I cannot receive mail at my residential address as it is somewhat remote, and the ordinary postal service will not deliver to it (conditions here are not the same as in the UK). I therefore use the address of a trusted friend to receive any mail necessary. This and other issues (such as security and privacy concerns with the possibility of it being mislaid or stolen) are additional reasons why I have endeavoured to avoid the use of post. For these reasons, I long ago arranged to not have paper bank statements, pension statements, and other such documents sent through the post. *These circumstances resulted in my inability to satisfy Scottish Widows' invalid requirements for verification of Address.*

It follows from the above that I had sought a means of encashment that would avoid the use of post. There is a webpage "Take it in cash" that (with surprising alacrity) invites full encashment of a policy, but supports only UK bank accounts. So I sent Scottish widows a [fax](#) on [15 March](#) asking for a reply by email (the only practical medium in my case). On [18 March](#) I received their [response](#), which stated that their current encashment procedure is "paperless", and involves a telephone interview. I was somewhat worried about this as, due to a hearing impairment, I have considerable difficulty understanding speech over the telephone. Nonetheless I was gratified to see the word "paperless", and thought it would be preferable to a postal method.

Intractable Requirements compounded by Confusing and Erroneous Documentation

The interview of [05 April](#) took about an hour and a half, most of which comprised questions and "advice" that were clearly aimed at dissuading me from encashment. I found this very stressful; and with the high cost of calling the UK from Mexico, it was also costly. I was told I would have to send documents to verify my identity, and after asking had the clear impression that they could be emailed. During the interview, I received an [email](#) with an attached [PDF document](#) specifying verification requirements, giving an email address to which documents can be sent.

The requirements were confusing and replete with inconsistencies, and it was initially unclear what documents needed to be certified. At first sight, there appeared to be flexible options for sending documents, the email content stating that they could be emailed, posted, or faxed. Later, one sees (only after studying the list of acceptable means of verifying Name and Address in the attached document) that they must all be certified; and later that certified documents must be posted. But there can be no other cases; it should have been spelled out at the top of the email that all documents must be both certified and posted. So why this obfuscation? *My considered answer is that it serves two purposes: 1) to create extra difficulties for the customer; 2) to give the initial appearance of being reasonable and compliant, when the reality is quite the opposite.*

I was very anxious about these very onerous requirements, with one that I was ultimately unable to fulfil completely (verification of the address they hold).

Difficulties in Verification of my Address

This was the biggest problem of all, and the basis for my documents being rejected. The issues derive from the circumstances described above in **Note on Post between the UK and Mexico**. The fact that the address held by Scottish Widows is not my residential address precludes its verification through documents such as utility bills. The only option available to me was a Bank Statement; but for the reasons I described, the last bank statement I had is dated 2007. Furthermore, whilst this statement contains the address held by Scottish Widows, I cannot request from my bank a recent paper statement with this same address. This is since around two years ago on a review of my bank details, I made some changes in favour of my partner, which included changing the account address to that of her house in the city centre. I now use this address for any new contacts as it is somewhat more convenient; however changing address details of existing contacts would be a pointless exercise, as it would merely be to change one mailing address to another. *Note that the government requires verification to be done on **residential** address, but Scottish Widows never asked for this; their documents throughout specify only plain address. Clearly, I must supply them with an address to which they can send all their paper. **So their requirements for evidence of Address are based on the wrong criterion, and this alone invalidates them as verification of identity.***

In these circumstances, I supplied my last bank statement dated April 2007, considering it to be better than providing nothing at all (especially as it is for the account to which payment was to be made). This is the best I can do without resorting to ridiculous measures such as changing the address back again, or bribing bank staff - and I should not be required to go to those lengths just to jump through Scottish Widows' warped hoops. I thus justify my statements that I am unable to fulfil their verification requirements.

Apart from difficulties with provision of the verification documents themselves, there were significant problems with Scottish Widows' very specific certification requirements. For one thing, they insist that the words "original seen" appear in the certification; however, English is not an official language in Mexico, and I was consequently unable to fulfil this requirement. And the certified photocopies that I was supplied with may not have fulfilled their requirements that they be "clear and legible" (especially my ID card, which does not give good photocopies).

I was worried that however I sent the documents, they would likely be rejected; but sending by courier (apart from the cost of around £50) would tend to invite a postal response that would not be received for months. With all this uncertainty, on [11 April](#) I sent an [email with eight PDF attachments](#), including both certified photocopies and high-quality scans of the originals (to compensate for the poor certified photocopies). If anything were amiss, it would be easy for Scottish Widows to reply to the email with a few lines of explanation. If they confirmed that the documents were acceptable but must be posted, I would have done this immediately by courier.

The very first paragraph of content of my email explained the following two points:

- 1) that the only means I had of verifying my address was an old bank statement
- 2) that post was by all means to be avoided (I mentioned that it takes around three months)

The remainder of this email explained in detail my circumstances, and in particular why I could not completely fulfil the address requirement. It also made the important point that the bank account to which the funds were to be transferred (and which was used for verification of my Address) was already held by Scottish Widows, who had about two years earlier made a much more substantial payment to it on encashment of an investment policy. I would have certainly hoped that this would be more than sufficient to remove any doubts as to my identity.

Having received neither payment nor response by well after the expected time, on [21 May](#) I sent a [follow-up email](#), to which I also received no reply. *It only later transpired that this was because Scottish Widows' policy is to reply to emails only by ordinary post, claiming that this suits the majority of their customers; furthermore, that they cannot be held responsible for delays caused by a foreign postal service.* My follow-up email reiterated the point that verification should not in any case be an issue, given my bank account details. The account to which the money is to be paid is clearly the most fundamental verification criterion of all. Even given this evidence alone, there could be no reasonable grounds to question my identity.

Six Further Postal Requests for Verification Documents with Changed Requirements

The very next day after emailing their verification requirements (06 April), Scottish Widows sent two letters with (badly-paginated) forms requesting documents (one for [P56879Q](#), one for [N80803X](#), both received on [06 July](#)). As they had just emailed this form as a PDF, these paper ones were superfluous, and could only create more difficulties. Apart from it now seeming necessary to deal with the two policy numbers separately, these (and all other) letters/forms require a postal response within 14 days of the date of the letter, not the 30 days stated in the email. Further aggravation is caused by the paper forms being quite different from that [emailed](#) only a day earlier; and specifications of the documents that I had supplied for verification of both Name and Address had now changed. For Name, my certified ID card was no longer allowed, being replaced by specifications only applicable to Europe. For Address (amongst other blatant errors), it now declared that "statements printed of(sic) the internet are acceptable".

But on [16 June](#), before receipt of the above shoddy and unwanted forms, I received the same form with a letter dated [14 April](#) rejecting my documents. More letters and forms were sent on [24 May](#) (for [P56879Q](#), received 06 July), [26 May](#) (also for [P56879Q](#), received 10 October), and [01 June](#) (for [N80803X](#), received 06 July). The last of these referred to my follow up, and contained a form quite different to the other paper ones, being similar to (but still different from) the PDF document. And they endorsed the sending of all these forms in their [Final Response](#), in which yet another was to be enclosed "for my convenience".

Neglectful and Rigid Response compounded by Egregious Use of Post

In their [rejection letter of 14 April](#) (received [16 June](#)) I learned that my documents had indeed been declined, apparently on the grounds of the 2007 bank statement that was the only means I had of verifying my address. There was no clear explanation of what was found lacking, only some innuendo about being "*unable to accept any documentation that has fall(sic) out of the required timescales*". It seemed that no attention had been paid to my email, beyond the first sentence calling out my inability to completely fulfil the address requirement. I was outraged to be required to supply further documents after having carefully explained why my circumstances precluded this. The disregard shown by Scottish Widows in their peremptory rejection of my documents stands in sharp contrast to the trouble that I had gone to in providing them.

It was also outrageous that this response was sent by post (the delivery time of over two months being par for the course), given what I stated in the very first paragraph of my email. Moreover, they required a reply within 14 days of the date of the letter! I never would have expected this, when it was only necessary to reply to the email with a few lines of explanation.

On the same day that I received the above rejection (16 June), they sent a [letter terminating my application](#) (received [04 August](#)), as I had not supplied adequate documents, nor responded to their "requests for information". They had totally disregarded my explanations of why I could not satisfy their requirements. And as they closed my application on the very day I received the initial rejection, with the first of these requests being received three weeks later, I would have needed a time machine to prevent this termination, even if I could meet their requirements. Moreover, their statement "we must assume that you do not wish to proceed with this claim" can have no credibility, especially since I sent a follow up, to which they referred in their letter of 01 June. And even if I were in the UK, I would hardly have had their 14 days to respond to this.

Dishonest and Evasive Handling of my Complaint

After receiving the rejection letter on 16 June, I was unsure how best to deal with the matter. My attempts to deal with Equiniti Paymaster's refusal to pay my army pension indicated that before TPO would handle my complaint, I would have to complete an onerous [internal complaints procedure](#), no doubt involving stonewalling and the use of post. Not only was this likely to prove insurmountable, but without a direct and provable financial loss there would probably be nothing to gain. But it was also clear that the impending Brexit referendum of 23 June could significantly affect my case, as the resultant devaluation of the pound would substantially reduce the value of my lump sum. I therefore waited to see if there would be such a financial claim.

After Brexit, I decided that I must attempt to complete the dispute resolution processes, in the hope that I might eventually receive compensation for the financial losses that I had incurred. So I sent an [email](#) to Scottish Widows on [26 June](#), requesting a copy of their Internal Dispute Resolution Procedure (not realising then that this applies only to occupational pension schemes).

On [01 July](#) I received **by email** two password-protected PDF documents with secure reply:

1. ([dated 27 June](#)) astonishingly denied any familiarity with the term "Internal Dispute Resolution Procedure" (*and Scottish Widows also handles occupational pensions*).
2. ([dated 30 June](#)) requested me to send the documents by post; it appears that now a complaint was brewing, they had become acceptable. *They stated that they emailed this only after trying several times to telephone me; it was then also posted (received 04 August)*.

I then made an online enquiry to TPAS, to which I received a very helpful [reply](#) on 06 July.

On [10 July](#) I sent an interim but detailed [formal complaint](#) by email, to serve while I developed my website. This explained that I could not satisfy their verification requirements. I told them that I was investigating government anti-money laundering regulations, and had already formed the view that these require only verification of either Address or Date of Birth, not both. I also made clear that due to a hearing impairment, I found it difficult to use the telephone.

On [13 July](#) I received an [email response](#) to my complaint, offering only discussion by telephone (*ignoring my hearing difficulties*). They deterred the use of email with risible concerns over my security, and signified that for this reason they were unable to deal with my complaint by email (*despite having been able to email me password-protected PDFs with secure reply on 01 July*).

On 15 July they sent this email again. *The same department also sent a letter containing [Complaint Information](#) (which I received on [10 October](#)); this referred me to the **Financial Ombudsman** on both pages, but there was no mention of either TPAS or TPO.*

I rejected the offer of discussion by telephone in an [email](#) of [17 July](#). Apart from my difficulties with this, it would provide no record for TPO to review; anyway, this case is far too serious to be resolved over the telephone. *And it had become apparent that Scottish Widows chooses this medium in preference to post for communications that they want to keep off the record.* I had by now reached my present view that Scottish Widows' verification requirements have no valid basis. I gave a link to my website, now complete (as a first draft); this included the current Verification Issues page that explains the reasoning behind my rejection of their requirements.

On [01 August](#) I received an [email](#) from another source in Scottish Widows, offering to accept a scan of my certified ID Card (alone) as proof of identity, provided it were emailed by my bank. There were some other stipulations that appear to have been invented on the spur of the moment. *And my certified ID card was disallowed in their Mk I paper form, and might also be rejected as not "clear and legible".* This email was said to be in response to my email of 10 July, and dealt with its verification question, in that proof of Address was no longer required. But I had by now totally rejected their verification requirements on my website (perhaps they did not look at this).

Lacking credibility and not addressing the serious issues I raised, the above email did not seem to require a reply, and I did not see fit to respond to it. *But they sent a [follow-up letter](#) dated 22 August (which I received on 15 September); this introduced yet more changes in requirements.*

Note on the "Concessions" of 30 June and 01 August

Whilst these might have enabled encashment of my pension plans, I did not take up either of these "offers" for the following reasons:

1. Following Brexit my lump sum now has a value of the equivalent of several thousand pounds less than it did at the time that payment should have been made. In all these circumstances, I think it would be grossly unjust if it were I who had to bear these losses.
2. I could no longer trust the statements of Scottish Widows, and was therefore no longer willing to comply with their changing and invalid requirements. These "concessions" were not consistent with Scottish Widows' insistence that all these verification documents are "*required under UK legislation*". And after investigation, their deceit became plain, and I could no longer accept that Scottish Widows should have required any verification documents whatever.
3. I am incensed by the injustices and shabby treatment revealed by this case. I hope that by exposing this matter, I can prevent other pensioners from being victims of Scottish Widows. Their draconian policies and cavalier disregard for my circumstances have caused me considerable trouble and stress, and I am sure that I am not alone. To accept their reduced demands in order to get funds for the moment would be morally wrong, and undermine my fight for justice.

On [04 August](#) I received the letters of 16 and 30 June, closing and unclosing my application.

On [15 September](#) I received both the email follow up of 22 August, and the Final Response.

Intransigent Final Response and My Conclusion

Scottish Widows' [Final Response](#) is dated 24 August, and arrived less slowly than any other post over this period, so fortunately I did not have to wait for long before approaching TPO.

It reaffirms their obdurate stance before the complaint, and evades the main issue. This is that Scottish Widows rejected and then closed my application as I could not fulfil their verification requirements, even though from the beginning they had clear proof of my identity. It ignores their "concessions", only reasserts the original requirements with yet another form (*although no form was actually enclosed*). These, it states, must be satisfied "*prior to the settlement of these types of pension policies*", and again "*are required under UK legislation*". These statements pretty much acknowledge that their requirements are an end in themselves, not a means of verifying identity. And once again I am illegitimately denied encashment of my pension plans.

Instead of referring me to TPAS and TPO, I am again referred to the Financial Ombudsman, which I understand is appropriate only for complaints relating to the sales and marketing of pensions. And again, the only medium offered for any follow up is telephone.

They acknowledge that I am unhappy with their requirements documentation, seemingly confident that they cannot be called to account for this, no matter how much trouble it causes the customer. But the emphasis is on the delays, which they assert are due entirely to the Mexican postal service (and of course have nothing to do with their forcing the use of it). A paragraph is devoted to stating that they had always responded in a timely manner (this is perhaps the only positive thing that could possibly be said of their conduct, and was not one of my complaints).

They also complain that I had sent them documents via email, whilst they are insisting that I send them by post. This is immaterial; had I sent them by courier, the outcome would have been just the same, except that the documents would have arrived a few days later, and I would have wasted a significant sum of money in sending them. I have already explained why I sent them by email, and this vindicates my decision. Anyway, they had no good reason to require these verification documents; but even if they were appropriate, scans should have been acceptable.

I find particularly extraordinary the following justifications for their postal responses:

- "*Scottish Widows is a UK based company and our processes are set to suit the majority of our customers*"
- "*We cannot be held responsible for any mail you have not received in a timely manner due to the Mexican postal service*"

I would certainly agree that their "*processes are set*". But I can hardly believe that the majority of their customers in the UK use only post, or would want only postal responses to their emails. And Scottish Widows should consider that it has a responsibility not only to those using pen and paper in the UK, but also to others who have invested with them, including those who are living overseas. Far from being an imposition, the use of efficient communications media should save Scottish Widows money; and the vast reduction in paper consumption and transport usage would certainly help to save the environment. I cannot imagine ever seeing these antiquated and Fawltiesque attitudes here in Mexico.

Scottish Widows' unreasonableness in their use of post is evinced by the fact that they require postal replies within 14 days of the date of their letters (and their letter of 16 June closing my application indicates that this period includes post both ways). As they send by ordinary post, this would make compliance impossible for many others living overseas (especially considering also the difficulties in fulfilling their "verification" demands). *My TPO application took 5 days to reach the UK by the fastest means available (DHL Express Letter), at a cost of around £50.* However, Scottish Widows **will** use email when it suits **them**, as exemplified in their resuming its use in their attempts to firstly nip a complaint in the bud, and subsequently to firefight it.

But despite the serious failings of Scottish Widows' communication (both in its fixed and inappropriate medium, and in the considerable deficiencies of its content), I must emphasise that the main issue is that of their "verification" demands. These are applied inflexibly as an end in themselves; as a result, they illegitimately refused to encash my pension. It is patently wrong to reject an application on verification grounds when there is clear proof of identity. That Scottish Widows did this indicates that their demands have nothing to do with legitimate verification of identity, and that their claims that they are "*required under UK legislation*" are grossly deceitful.

It appears that Scottish Widows' "verification" measures are applied only to pensions: firstly, they were not required for my much more substantial encashment of investment and mortgage plans; secondly, Scottish Widows indicated this themselves in their Final Response (referring to "*these types of pension policies*"). But government anti-money laundering regulations are not pension-specific. And they appear to have designed their requirements to cause the customer as much difficulty as possible, without being manifestly impossible to fulfil. But my circumstances make their address verification requirements both unachievable (without devious subterfuge) and invalid. Yet Scottish Widows will not accept this, still insisting that I satisfy them.

As these "verification" demands can have no legitimate basis in government AML regulations, I can only interpret them as a strategy to make it difficult for pension holders to take advantage of the 25% tax concession provided by the government's Pension Freedom of April 2015. Perhaps being "*required under UK legislation*" is an oblique reference to this? Given Scottish Widows' deceitful implication that it is the UK government that requires these measures, and the fact that Scottish Widows gains financially each time it evades pension encashment, I think that this is a clear case of [fraud](#) that demands a criminal prosecution.

Stop Press

On [29 September](#) I sent Scottish Widows an [email](#) notifying them that the matter is now in the hands of TPO. I attached a list of [Questions](#) to give them an opportunity to clear up my serious concerns, especially over their verification demands. Hopefully, the involvement of TPO would give Scottish Widows some incentive to respond if they have any answers to these questions. The lack of a satisfactory response could only confirm the illegitimacy of their policies.

On [10 November](#) I recorded three voicemail messages from five telephone calls that were made by Scottish Widows on 08/09 November. These could only be about my complaint, and asked me to call them back. But I did not do so, having already explained why I will not discuss this complaint over the telephone. However, after a suggestion by TPO on [23 November](#), I sent them an [email in response to these telephone calls](#), requesting that their reply also be by email. I also reminded them of the unanswered list of questions. Yet the most recent written communication I have received from Scottish Widows remains their Final Response of 24 August.