

The complaint

Mrs S has complained about the length of time it took Phoenix Life Limited trading as Standard Life to successfully complete a transfer of her pension plan to a different pension provider.

What happened

Mrs S held a personal pension plan with Phoenix Life Limited trading as Standard Life (Standard Life). Mrs S contacted Standard Life in November 2018 to ask about drawing benefits from her pension plan. However, Mrs S held other pension benefits through an occupational pension scheme, so decided not to take any action on her Standard Life personal pension plan at that time.

Mrs S lives outside the UK and was told by Standard Life that it was unable to set up an annuity for her. In May 2023 Mrs S contacted the provider of her occupational pension scheme and was told that it could set up an annuity for her despite her not living in the UK, and told her that it would accept a transfer from her Standard Life pension. I will refer to the provider of Mrs S' occupational pension scheme as Firm A.

Standard Life has said that Mrs S contacted it on 12 February 2024 with a transfer value information sheet from Firm A and asked for information on her pension plan to pass on to Firm A. Standard Life say that it wrote back to Mrs S on 21 February 2024 with the information that Mrs S had asked for. Mrs S then raised a complaint with Standard Life by telephone on 22 February 2024 about delays in completing the transfer of her pension plan to Firm A. Standard Life say it spoke with Mrs S about her complaint and identified that there was some confusion over the information that Mrs S had asked for. As a result, Mrs S said that she would contact Firm A to discuss her transfer.

In March 2024 Mrs S emailed Standard Life to say that she was trying to transfer her pension plan to Firm A but was having difficulty in getting any information on what Standard Life needed to complete the transfer. Standard Life told Mrs S that she needed to speak with Firm A, as it hadn't received any paperwork or request for the pension transfer from Firm A. Standard Life also sent Mrs S a Transfer Out Application form and Pension Scams booklet.

On 28 March 2024 Mrs S contacted Standard Life again to ask it to send her a retirement summary, which Standard Life sent to her by post and via a secure online message. On 5 April 2024 Mrs S then sent Standard Life photos of her completed Transfer Out Application form. On 16 April, Standard Life replied to Mrs S to ask her for documents to verify her identity and address and to say that it also needed information about the occupational pension scheme that Mrs S wanted to transfer her pension to.

On 18 April 2024 Mrs S re-sent Standard Life her completed Transfer Out Application form, together with documents to verify her identity and address. On 25 April 2024 Standard Life told Mrs S that it still needed details of her earnings and employment to proceed with her pension transfer. Standard Life also contacted Firm A to say to proceed with Mrs S' pension transfer it needed its Transfer Out Application form completed by both Firm A and Mrs S, and an HMRC screenshot showing her occupational pension scheme's status.

On 1 May 2024 Standard Life wrote to Mrs S again to chase for information on her earnings and employment. Standard Life said that to proceed with the transfer it needed the following from Mrs S:

- A letter from Mrs S' employer confirming that she was a member of its occupational pension scheme.
- Confirmation that Mrs S was employed by the employer, and if so from what date.
- Three months' payslips from Mrs S for her employment with the employer of the occupational pension scheme

Mrs S replied to Standard Life on 7 May 2024 to say that she hadn't worked at the employer connected to her Firm A occupational pension scheme since 2002 and had no payslips or records of her employment there. Mrs S asked Standard Life to contact Firm A for the outstanding information it needed to complete her transfer. Standard Life contacted Firm A on 8 May 2024 to ask it for the information it needed.

Standard Life then sent a further request to Firm A for the information it needed to complete the transfer on 29 May 2024 and then asked Firm A again for this information in July 2024.

Mrs S complained to Standard Life about the time it was taking to complete her pension transfer to Firm A. On 9 July 2024 Standard Life responded to Mrs S' complaint to say that because it had asked her for information about her earnings and employment, when she hadn't worked at the employer linked to the occupational pension scheme since 2002, it upheld her complaint. But Standard Life went on to explain that as Mrs S had asked to transfer her pension to an occupational pension scheme, it couldn't complete her transfer until it received the information it needed from Firm A. Standard Life went on to explain that it had first asked Firm A for this information on 7 May 2024 and then chased Firm A on 29 May 2024 and 1 July 2024, by both post and email, but still hadn't received any reply.

Mrs S replied to say that Firm A had already given Standard Life the information it needed to complete her transfer. Standard Life then wrote to Firm A on 15 July 2024 to ask it to re-send the information it needed. Standard Life has said that it didn't get a reply from Firm A so asked it for this information again on 16 August 2024.

As Mrs S' pension transfer hadn't been completed she referred her complaint to the Financial Ombudsman Service. One of our Investigators reviewed her complaint. Their view was that Mrs S' pension transfer hadn't completed because Firm A hadn't sent Standard Life the information it needed.

Mrs S didn't agree with our Investigator's view so asked for her complaint to be referred to an Ombudsman.

Standard Life also responded to our Investigator's view. It said that on 26 September 2024 it had contacted Firm A again to give it Standard Life's email address and to ask Firm A to send the information needed to complete the transfer to Mrs S, so that she could then forward this information onto Standard Life by secure message. Standard Life went on to say that Mrs S did forward a letter and email she received from Firm A, but the information that it had asked for wasn't included.

Standard Life also said that it had telephoned Firm A and explained what information it needed to complete Mrs S' pension transfer. Standard Life had also sent an email to Firm A with details of the information it needed and gave Firm A a direct contact telephone number to call if it had any further questions about the information needed.

Mrs S has subsequently told this service that her pension transfer from Standard Life to Firm A was successfully completed in October 2024.

What I've decided – and why

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

Mrs S has told this Service that she first contacted Standard Life about setting up an annuity from her pension plan in November 2018 but decided to wait until her Firm A pension reached her nominated retirement date to then see if she could combine her pension funds together. Mrs S has gone on to say that she was sent a retirement pack from Firm A in July 2023, to allow time for her to combine her pension funds on her nominated retirement date in November 2023.

Mrs S has added that she completed pension transfer paperwork and sent this to Firm A in November 2023. However, it wasn't until 12 February 2024 that Standard Life received a message from Mrs S to say that she wanted to transfer her pension plan to Firm A, together with a Firm A pension transfer information form. Standard Life has said that it didn't receive any correspondence from Mrs S about transferring her pension plan to Firm A before 2024. I therefore think it's reasonable to conclude that Standard Life became aware that Mrs S wanted to transfer her pension to Firm A on 12 February 2024 when it received the above message from Mrs S.

Standard Life received its transfer form completed by Mrs S on 5 April 2024. Once it had checked what information was needed to complete Mrs S' pension transfer, Standard Life then wrote to Firm A on 25 April 2024. I therefore don't think Standard Life had unreasonably delayed Mrs S' pension transfer when it wrote to Firm A to ask for outstanding information it needed to complete her pension transfer. I also think it's reasonable that Standard Life wouldn't have been able to identify what information it needed to complete Mrs S's pension transfer until it received her completed transfer form on 5 April 2024.

I also think that as Mrs S wanted to transfer her Standard Life pension plan into an occupational pension scheme then it wasn't unreasonable that Standard Life needed further information from Firm A before it was able to complete her pension transfer. But Standard Life has said that it didn't get the information it needed from Firm A until October 2024.

Standard Life has explained that when it spoke with Firm A by telephone in September 2024, it gave Firm A two email addresses that it could use to contact Standard Life, one of which was the personal email address of the employee at Standard Life who had taken ownership of trying to complete Mrs S' pension transfer. Standard Life has also said that it can't locate any response from Firm A to its earlier correspondence on its systems.

On 9 October 2024 Firm A sent an email to Standard Life, using the personal email address of the employee at Standard Life who had taken ownership of trying to complete Mrs S' pension transfer, with the documents that Standard Life had been waiting for. Standard Life has added that once it had completed its due diligence process it successfully completed Mrs S' pension transfer on 18 October 2024.

I therefore think that once Standard Life received the information it needed from Firm A it completed the transfer of Mrs S's pension within a reasonable timescale. I also think it's reasonable to conclude that the reason why Standard Life didn't complete Mrs S' pension transfer before October 2024 was because it wasn't in receipt of the information it needed from Firm A.

I've seen copies of letters that Standard Life sent to Firm A on the following dates: 25 April 2024, 29 May 2024, 1 July 2024 and 15 July 2024. I've also seen the letter that Standard Life sent to the employer of Mrs S' occupational pension scheme on 8 May 2024, using Firm A's address, to try and obtain the information it needed to complete the pension transfer. I think that this meant that Standard Life was chasing Firm A on a regular basis for the information it needed.

The information that Standard Life asked Firm A for, and which Firm A provided in October 2024, was as follows:

1. A letter, on Firm A company headed paper, confirming acceptance to the Scheme
2. A HMRC screenshot showing PSTR number and Scheme Administrator Name
3. Copy of Trust Deeds and Scheme Rules
4. Transfer application

Mrs S completed and signed Standard Life's pension transfer form on 5 April 2024. On this form Mrs S entered the postal and email address that Standard Life needed to use to contact Firm A. Having seen the correspondence that Standard Life sent to Firm A, I can see that each time Standard Life used the Firm A contact details it had been given by Mrs S. I therefore think that Standard Life used the correct contact details, provided by Mrs S, when it contacted Firm A to ask for the information it needed to complete Mrs S' pension transfer.

Standard Life has said that it didn't receive any reply from Firm A to its requests for information before 9 October 2024. Standard Life has also said that on 11 October 2024 Mrs S sent it a copy of an email addressed to Standard Life from Firm A dated 2 October 2024. The original email had been sent to Standard Life through its main "*claims*" email address. Standard Life has said that whilst Mrs S' name is on the email, with her Firm A plan number, there is no Standard Life plan number or any other personal information that would have allowed Standard Life to identify Mrs S as its customer on the email.

Standard Life has said that without Mrs S' plan number, or any other personal information, it wouldn't have been able to match Firm A's correspondence with Mrs S' pension records. Standard Life has said that this is because all email and postal correspondence it receives is scanned and that its systems will scan correspondence for a plan number so that it can identify its customer, and then log that item of correspondence to that customer's records.

Standard Life has added that when an individual customer cannot be identified from an item of correspondence, a team will then try and trace that customer manually. But if there is not enough information within the correspondence to identify the customer that it refers to, then Standard Life will return the correspondence to the sender to say there isn't enough information to enable Standard Life to identify its customer.

The correspondence that Standard Life sent to Firm A that I've detailed above quoted Mrs S' Standard Life pension plan number. Mrs S' plan number is quoted in the header of each letter I've seen, together with Mrs S' name. Standard Life has also said that when it spoke with Firm A in September 2024, it was told by Firm A that it had received correspondence from Standard Life.

Mrs S has told this Service that Firm A did respond to Standard Life with the information it had asked for to complete her pension transfer. I therefore think it's reasonable to conclude that Firm A did receive correspondence from Standard Life, when Standard Life had set out what information it needed from Firm A. But I also think it's reasonable that to conclude if Firm A didn't quote Mrs S' Standard Life pension policy number in its correspondence when it replied, Standard Life wouldn't have been able to match Firm A's correspondence with Mrs S' Standard Life pension plan or her pension transfer request.

As Standard life had quoted Mrs S' pension plan number to Firm A in its correspondence I think it would have been reasonable for Firm A to also quote this plan number when it replied to Standard Life, so that Standard Life could then be able to match its correspondence with Mrs S' pension plan. But from the evidence I've seen, it appears that Firm A didn't do this. Standard Life has said that this meant that the correspondence Firm A sent to it would've been returned.

My conclusion is that as Standard Life had written to Firm A on several occasions, detailing what information it needed to complete Mrs S' pension transfer, and had quoted Mrs S' pension plan number in its correspondence, it wouldn't be reasonable or fair for Standard Life to be responsible for the delay in completing Mrs S' pension transfer. I also don't think it was unreasonable that Standard Life couldn't complete the pension transfer until it received the information it needed from Firm A.

I therefore think that, on balance, the delay in the completion of Mrs S' pension transfer wasn't due to any fault in Standard Life and as a result I'm unable to uphold Mrs S' complaint.

My final decision

My final decision is that I don't uphold Mrs S' complaint against Phoenix Life Limited trading as Standard Life.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs S to accept or reject my decision before 11 March 2025.

Ian Barton
Ombudsman