

## **The complaint**

Ms M complains that Scottish Widows Limited didn't process her change of address requests correctly. She says she didn't receive acknowledgements. The impact of this is she didn't receive her annual statements for 2024. She's also unhappy that Scottish Widows won't send her everything by email. And that when they do email her its encrypted and she cannot respond to them. She's also said it has issued correspondence to an old address.

## **What happened**

The investigator set out the background to the complaint in his recommendation letter, for ease of reference I have included this below with amendments:

Ms M has had two pension policies with Scottish Widows since 2009. Ms M has lived abroad for a number of years and Scottish Widows send her statements via post to her address in South Africa.

On 14 June 2024, Ms M emailed Scottish Widows to change her address. Ms M stated that this was a matter of urgency as she was expecting annual statements for her policies and didn't want them going to her old address.

Scottish Widows issued a letter to Ms M's new address, confirming the change of address. This letter confirmed that Ms M's old address would also receive a letter as a security precaution. The address on this letter didn't contain Ms M's postcode.

Ms M sent in an email on 17 June 2024 asking Scottish Widows to confirm the change of address. Ms M sent follow up emails on 18 and 19 June 2024 asking Scottish Widows to confirm that the change of address had taken place or she would escalate matters.

On 19 June 2024, a letter and an email were sent to Ms M confirming the change of address for both policies respectively – this was addressed correctly. Shortly afterwards Scottish Widows issued policy information for the policies to the updated address. Ms M says she didn't receive this.

On 8 July 2024 Ms M emailed Scottish Widows asking them to change her address, which was the same but for the last four numbers (SA postcode). On 22 July 2024, Scottish Widows resent the statement but it seems they hadn't realised the postcode had now changed and so it had the old postcode (but all the rest of the address correct).

On 21 August 2024, Ms M contacted Scottish Widows to confirm if the change of address had taken place. She called again on 27 August 2024 to confirm if the change of address requested in July 2024 was being actioned. It was at this point that Ms M was told that the annual statement would also be emailed to her.

Scottish Widows responded the same day to email the statement and issued a letter confirming the change of the address with the updated postcode now showing.

On 28 August it also posted the statement again but unfortunately this had the old postcode

on it.

On 2 October 2024, Ms M emailed Scottish Widows to change her address to another new address but still in South Africa. She said she had tried to do the change online but it hadn't worked due to its website not working properly. Ms M also asked that nothing be posted to her old address, as there is no mail redirection service in South Africa.

In the following days there were multiple emails between Scottish Widows and Ms M regarding using the website to make address changes. Ms M attached a completed change of address form that Scottish Widows had sent Ms M.

Scottish Widows issued a letter on 4 October 2024 confirming the change of address. The format of the address wasn't correct.

Ms M emailed back on 7 October 2024 explaining that they had amended the address incorrectly, and that Ms M wanted to raise an official complaint about what had happened.

On 8 October Scottish Widows issued a confirmation of change of address with a corrected format although the postcode came before South Africa. Whereas Ms M said had instructed it to be on the last line.

Ms M emailed back on 9 and 10 October 2024 chasing why her address information hadn't been updated and for the complaint reference number, she said she thought Scottish Widows had been deliberately recording the address incorrectly. Ms M informed Scottish Widows that she would be approaching our service, as a result of their actions up to that point.

On the 23 October 2024, Scottish Widows called Ms M regarding her complaint, they then issued their final response letter and said that this would be emailed also. They acknowledged:

- There had been issues that had come up whilst the changes of address' were being processed.
- That they had mistakenly asked Ms M for more information, when it wasn't required.
- Ms M had issues accessing encrypted emails.
- Scottish Widows confirmed that Ms M's address had been updated on all their systems and that the annual statement would be issued again to this address.
- As a result of the experience Ms M had, they offered to send her £100 by cheque.

Ms M came to our service on 10 November 2024, as Ms M hadn't received any annual statement via post or email, Ms M hadn't received their final response letter nor the cheque for £100 and wanted us to consider her complaint further.

Our investigator looked into matters but felt the £100 offered was fair and reasonable in the circumstances. He said that he could see that Scottish Widows had sent letters of confirmation and the statement to Ms M and suggested it could be an issue with the postal services as to why Ms M wasn't receiving these.

He said Scottish Widows had explained their system didn't easily allow for the postal address format in South Africa to be added to their systems. But that it had found a manual work around.

In relation to the encrypted emails, he said it was for Scottish Widows to decide what they felt needed to be encrypted. It had confirmed Ms M should be able to reply to these and he suggested Ms M call Scottish Widows and talk them through the issues she was having with the encryption and whether they could come up with a solution.

The investigator emailed Ms M the two statements from 2024 that she says hadn't been received.

Ms M disagreed with the investigator. She wanted more compensation for Scottish Widow's errors. She didn't think the non-receipt of these letters could be blamed on the postal services. Ms M also remained unhappy that she had not received the £100 compensation which she'd been told would be paid by bank transfer but instead had been sent a cheque. The investigator confirmed he would provide the business her bank details for the payment to be made once a final decision had been issued.

### **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.

And having done so I agree with the investigator's outcome and for broadly the same reasons.

I'm sorry to hear of Ms M's health and financial issues. I hope things improve for her soon.

Scottish Widows did make some mistakes and Ms M has asked where her compensation is for each mistake. But not all mistakes require compensation and in taking a view of all the circumstances as a whole, I think the £100 is fair and reasonable to compensate Ms M for what boils down to some issues with getting her address amended and receiving her annual statement.

I appreciate it must have been frustrating for Ms M not to receive her statement and the confirmation of address changes but the evidence does suggest documents were sent and to the correct address on most occasions. I don't think it was unreasonable of the investigator to point out that the issue could be with the postal services with Ms M being in South Africa. Scottish Widows also had system issues with the formatting of the address which I understand has now been overcome. But I do agree with the investigator here that post can sometimes still reach its destination even if the format or postcode isn't correct. Ultimately I'm not sure why the post didn't reach Ms M but it seems even with the correct format and postcode Ms M didn't receive it.

Ms M is concerned about potential data security issues and that post was going to her old addresses. But it's difficult for me to comment on this as Ms M says the post isn't being received even when correctly addressed and as far as I'm aware there has been no ill effect in relation to post going to the wrong address. I can see that Ms M has recently sent us in evidence of post going to her old UK address, however I am unable to consider that as part of this complaint as this occurred after she referred the complaint to our service. Ms M will need to complain first to Scottish Widows about this and give it an opportunity to resolve the complaint.

Ms M is also frustrated at receiving encrypted emails, which she says she cannot reply to, but I agree with the investigator it is for Scottish Widows to decide what it feels is required to be encrypted. And Scottish Widows has said she should be able to reply to these. I am not sure why Ms M is having this problem but as the investigator suggested, the only way to resolve this would be to liaise with Scottish Widows, so it can understand from her end what

is happening. Scottish Widows has also confirmed its systems regarding sending annual statements cannot be run through email, I suspect its automated each year to the address held on file. But it can suppress the sending of the statement by post but this will require Ms M to manually request her statement by email each year. I appreciate this isn't ideal but it may solve the issue Ms M is having with post not reaching her.

Ms M does now have her annual statements and the address held on system is correct. It did update her address as requested and sent the requested information but there were some problems along the way for which I think the £100 already offered is fair and reasonable compensation and in line with our approach to these awards.

### **My final decision**

For the reasons explained, I think the offer already made by Scottish Widows Limited is fair and reasonable.

Upon Ms M's acceptance of this decision, Scottish Widows Limited needs to make payment of the £100 to Ms M. Our investigator will liaise with both parties to achieve this.

Under the rules of the Financial Ombudsman Service, I'm required to ask Ms M to accept or reject my decision before 17 July 2025.

Simon Hollingshead  
**Ombudsman**