

## The complaint

Mr V complains that ReAssure Limited failed to respond to his queries about a pension plan that the firm had taken over from another regulated firm.

## What happened

I issued a provisional decision on this complaint earlier this month. In that decision I explained why I thought the complaint should be upheld and what ReAssure needed to do to put things right. Both parties have received a copy of the provisional decision but, for completeness, I include some extracts from it below. In my decision I said;

*Mr V holds pension savings with ReAssure. Those pension savings arose from a pension plan that Mr V originally held with Barclays Life. That business was bought by AdminRe UK in November 2008. In November 2011 the High Court gave approval for all the Barclays Life policies to be transferred to Windsor Life, that was owned by AdminRe. In December 2011 Windsor Life changed its name to ReAssure. So, it is ReAssure that is now responsible for Mr V's pension savings, and for dealing with this complaint.*

*In 2022 ReAssure wrote to Mr V to explain that it had lost touch with him but had identified a new address for him through a tracing agency. It asked Mr V to get in touch to update his address. Mr V returned that information to ReAssure but it now appears his address was not correctly updated.*

*The following year Mr V says that he tried to get in touch with ReAssure via phone on a number of occasions to request additional information about his pension savings. He says that he then sent the firm a letter. But when he received no response he complained to us about what had happened.*

*At first ReAssure didn't provide the information we had requested on the complaint. So, our investigator issued his assessment. He said that ReAssure's lack of response to Mr V's initial queries would have caused him some distress and inconvenience. So, he asked ReAssure to now answer Mr V's questions, and pay Mr V £100 for the inconvenience he'd been caused.*

*Following that assessment ReAssure wrote to Mr V to apologise for the problems he'd faced in getting in contact. It sent him a cheque for £100 for his inconvenience. But Mr V told us that he still hadn't received the information he'd asked for so he asked that we continue to look at his complaint. As the complaint hadn't been resolved informally, it was passed to me, an ombudsman, to decide.*

*Unlike the Courts, I am not limited to looking only at the issues a consumer has focused on in their complaint. Our approach is "inquisitorial" - rather than the "adversarial" procedures of the courts, where the lawyers for the two sides "fight it out". By law, I am required to resolve complaints fairly. This means I decide what questions to ask to get to the bottom of things. And it means I can concentrate on the relevant facts of the case, rather than the complaint as presented.*

*Mr V's initial complaint was that ReAssure had failed to respond to reasonable requests that he had made for information on his pension savings. ReAssure told us that it had sent that information to Mr V. So as part of my investigations, and to ensure Mr V held all the information that he required, I asked ReAssure to send both us and Mr V further copies of the responses that it sent. For reasons that aren't entirely clear that has taken far longer than I might expect.*

*But the information that was ultimately sent to Mr V and us has shown the reason Mr V did not receive the information. The address that ReAssure held for him was incorrect. So I think that is at the root of this complaint, and I will now set out my findings on why Mr V's address was incorrect.*

*As I have said, Mr V's pension savings arose from a pension plan that he originally held with Barclays Life. That business was bought by AdminRe UK in November 2008. In November 2011 the High Court gave approval for all the Barclays Life policies to be transferred to Windsor Life, that was owned by AdminRe. In December 2011 Windsor Life changed its name to ReAssure. It appears that, during all those changes, ReAssure lost touch with Mr V. I have seen that for an extended period of time the statements it produced on his pension savings were marked as "address unknown".*

*In 2022 ReAssure undertook an exercise to attempt to locate Mr V's correct address. Using a tracing agency, it wrote to Mr V's current address and asked him to send some further details to confirm his identity. ReAssure tells us that it received that information from Mr V on 19 October 2022 and was satisfied that it had his correct address details. So, ReAssure made an update to its systems on the following day.*

*But the update that ReAssure made was incorrect. It added a new address for Mr V that shared some similarities with his correct address but was located around 0.1 miles away. ReAssure says that its systems will have made a suggestion of the address to be used as it was being input and its member of staff incorrectly accepted that suggestion. It appears that, as part of dealing with the complaint, ReAssure corrected Mr V's address in February 2025.*

*That meant that all the correspondence that was sent to Mr V between October 2022 and February 2025 was sent to an incorrect address. I've looked at the information ReAssure has sent and it included not only Mr V's name, but his date of birth, his pension policy number, and its value. But fortunately, it doesn't appear ReAssure held Mr V's national insurance number so that wasn't included in the letters it sent.*

*ReAssure has recently told us that it accepts full responsibility for the error it made in updating Mr V's address in 2022. It has said it has registered a data protection breach and will resend any correspondence to Mr V that was sent to the wrong address. It has also suggested that it would be willing to pay Mr V £750 for the distress and inconvenience he has been caused.*

*There is little doubt how concerning it will have been for Mr V to discover that his personal details have been sent to an incorrect address for an extended period of time. And I think that distress will have been compounded by the fact that the incorrect address was so close to where he lived. And given the current prevalence of identity fraud I can understand why Mr V asked ReAssure to urgently investigate what had happened.*

*Fortunately, it doesn't appear that the information ReAssure sent to the wrong address has been used for fraudulent purposes. But I would expect ReAssure to place appropriate warnings against Mr V's pension plan to assist with the early identification of any attempted fraudulent activities in the future. And I would also expect ReAssure to provide every reasonable assistance to Mr V if any identity fraud does become apparent in the future.*

*I have noted that ReAssure has already paid £100 to Mr V for the initial inconvenience he was caused when he unsuccessfully requested information about his pension plan. But I think the problems that have now come to light – that his address has been incorrectly recorded for over two years, and that is the reason the information he had requested was not received – warrant a far higher compensation payment.*

*As I have said, ReAssure has indicated that it would be willing to make a further payment of £750. I've thought carefully about that offer, and think it is fair and reasonable in the light of the circumstances we are currently aware of. But I want to be clear that, should any problems relating to identity fraud or the like come to light in the future, any compensation for that would need to be assessed separately and potentially via a new complaint.*

*I hope that my decision has helped Mr V to understand why the information he reasonably requested in 2023 was not received by him. But it has highlighted a more fundamental issue with ReAssure's records that will have no doubt caused him great distress and inconvenience.*

I invited both parties to provide us with any further comments or evidence in response to my provisional decision. ReAssure has accepted my provisional findings. It has also noted that Mr V's original retirement age on the policy was in November 2023 – so it said it could consider any further issues should the address discrepancy have meant Mr V was unable to take his pension benefits at that time. Mr V also accepts my provisional findings. But he has made us aware that he didn't encash the cheque for the original £100 compensation that ReAssure sent to him. And he has said that some of the information he has recently received from ReAssure suggests that Barclays Life also held an incorrect address for him.

### **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.

As I set out in my provisional decision, in deciding this complaint I've taken into account the law, any relevant regulatory rules and good industry practice at the time. I have also carefully considered the submissions that have been made by Mr V and by ReAssure. Where the evidence is unclear, or there are conflicts, I have made my decision based on the balance of probabilities. In other words I have looked at what evidence we do have, and the surrounding circumstances, to help me decide what I think is more likely to, or should, have happened.

And I repeat my reflections on the role of this service. This service isn't intended to regulate or punish businesses for their conduct – that is the role of the Financial Conduct Authority. Instead this service looks to resolve individual complaints between a consumer and a business. Should we decide that something has gone wrong we would ask the business to put things right by placing the consumer, as far as is possible, in the position they would have been if the problem hadn't occurred.

Given that both parties have accepted my provisional findings I see no reason to alter the decision that I reached. But I would like to make some further comments on the additional matters each party raised. Although above I have only summarised the main points of their responses I would like to stress that I have read, and carefully considered, all that has been said.

When Mr V made his complaint to us he indicated that he was interested in potentially adding to his retirement savings. So I'm not persuaded that it is likely the problems with his address have delayed any plans to take his retirement benefits. The retirement age on the policy was likely set when the plan was first taken out in 1987. I'm not persuaded it reflected any current intentions of Mr V.

Whilst the complaint was ongoing Mr V indicated to us that he no longer wished to contribute to this pension plan as he had lost faith in the ability of ReAssure to administer his pension savings. I accept that statement was made before Mr V understood why he hadn't received any responses to his queries and so might no longer reflect his full views. But I am satisfied that Mr V hasn't lost the opportunity to make additional contributions if they had been allowable when he first made his enquiry. Those contributions could be made now if appropriate.

I can understand why Mr V is disappointed to see that a previous address on his pension plan was also incorrect. But that address would have been added some time before ReAssure became responsible for the administration of the plan. I don't therefore think it appropriate to deal with what happened in regard to that address in this decision.

I have noted that Mr V said he didn't cash the original cheque for £100 that ReAssure had sent to him when it first looked at his complaint. He said that he was concerned that accepting the payment might have closed his complaint. So I will ask ReAssure to check its records and if appropriate increase the compensation it is now paying to Mr V to reflect that additional payment.

### **Putting things right**

ReAssure should pay Mr V £750 for the distress and inconvenience he has been caused by the incorrect update to his address.

ReAssure should also confirm whether the cheque it sent to Mr V in June 2024 for the original compensation payment of £100 has been cashed. If that cheque remains outstanding (and is therefore no longer valid) then ReAssure should increase the compensation noted above to £850 so to include the original compensation it offered.

### **My final decision**

My final decision is that I uphold Mr V's complaint and direct ReAssure Limited to put things right as detailed above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr V to accept or reject my decision before 26 August 2025.

Paul Reilly  
**Ombudsman**