

The complaint

Miss N has complained to Casterbridge Wealth Limited (Casterbridge) that she's been unable to obtain performance information or a valuation of her self-invested personal pension (SIPP) since IBP Markets Ltd, the custodian for her investments, was placed into special administration in October 2023.

Miss N is also unhappy that she's still been charged by Casterbridge, despite not being able to see how her investments have performed, and feels she's suffered a loss of investment potential on the funds that can't be transferred away to another provider.

Miss N has further said that she didn't receive information on fund performance before the change of custodian in October 2022.

What happened

Miss N holds a SIPP, and the investments are managed on a discretionary basis by Casterbridge.

When Miss N first became a client of Casterbridge it used a different principal custodian for safeguarding and administering investments. In 2022, Casterbridge made the decision to change the custodian to hold its clients' assets and their cash funds to IBP.

On 15 September 2023, the FCA issued a First Supervisory Notice and placed restrictions on IBP's activities.

On 12 October 2023, IBP was placed into Special Administration and Teneo Financial Advisory Limited were appointed as Joint Special Administrators (JSA's).

Miss N contacted Casterbridge on 8 November 2024 and said that she was considering transferring her investments to another provider. She asked for information about the value that would be available to be transferred, raised concerns about the charges and asked for information about the performance of her investments.

Casterbridge responded on 18 November 2024 and said that, as Miss N had raised her dissatisfaction in the letter, it would treat it as a complaint.

On 9 January 2025, Casterbridge responded to Miss N's queries. In response, on 20 January 2025, Miss N sent an email with follow up questions and comments.

Casterbridge responded on 7 February 2025 to acknowledge Miss N's email and said that it would respond by 10 February 2025. A further email was sent on 10 February 2025 and confirmed Miss N would receive a response by 14 February 2025.

Miss N sent a chaser on 25 February 2025. On 28 February 2025 Casterbridge sent an email to Miss N with a letter to confirm all of the points she'd raised.

On 4 March 2025, Miss N responded to Casterbridge to confirm the points she'd made and raised her dissatisfaction about the time it had taken to respond to her enquiries. Miss N sent a chaser on 12 March 2025 and received a revised letter clarifying the points she'd raised on 13 March 2025.

But dissatisfied with the responses from Casterbridge, Miss N then raised her complaint with our service on 15 May 2025.

Miss N has said that she's unhappy that she'd been unable to obtain performance information or valuations of her investment since Casterbridge changed custodians.

She also said she'd continued to be charged, despite not being able to see how her investment has performed.

Miss N feels that she has suffered potential loss of investment performance on the funds that had yet to be reconciled from IBP, and she is unable to access the funds that had been reconciled.

She also said that she didn't feel Casterbridge had carried out due diligence when selecting IBP as their custodian.

Having considered the matter, our investigator set out her assessment of the case as follows:

- She could understand that IBP entering into administration and having limited access and information about her investments must be a very worrying situation for Miss N. However, when investigating the complaint, she needed to consider whether Casterbridge had done anything wrong or treated Miss N unfairly.
- It wasn't the remit of our service to comment on commercial decisions made by a business or dictate how the business should operate. However, Casterbridge had provided information about the due diligence checks it carried out when making a decision to use IBP as custodian and the investigator said she was satisfied that Casterbridge did carry out due diligence when making the decision to change custodian.
- Since the appointment of the JSAs, all corporate clients of IBP, including Casterbridge, had been proscribed from issuing valuations and by extension performance data on the underlying client's investments until the reconciliation process had been completed.
- This would understandably be extremely frustrating for Miss N and not knowing what her investment was worth, or how it had performed, would have caused her distress and inconvenience. However, it couldn't reasonably be said that this was the fault of Casterbridge. It was following the instructions of the JSAs.
- Casterbridge had said that it was working closely with the JSAs and other parties to produce valuations for the purposes of allowing clients to access tax free cash, and to provide some assurance to clients that their investments, although partially inaccessible, were complete.
- The reason performance data hadn't been available to share with clients was due to the ongoing reconciliation being conducted by the JSAs. Casterbridge said that it

remained committed to supporting the JSAs throughout the process to ensure clients' assets and accompanying records would be available as soon as was practicable.

- Casterbridge had sent regular updates to its clients throughout the process. Between the period 13 October 2023, when IBP entered special administration, to 16 January 2025, it sent 48 client updates to keep its clients informed on the process.
- She couldn't ask Casterbridge to refund the fees during the period as it was continuing to carry out services for Miss N and it was entitled to take charges as part of its terms. In its update dated 17 July 2024, Casterbridge said the following:

"There will be some activity on your portfolio in the coming days and weeks as we rebalance your portfolio to reflect our current market thinking. It's worth noting that while we have been unable to make day-to-day changes to portfolios, we are not short-term share traders but longer-term thematic investors. The investment work we carry out in the normal course of our business (economic, geopolitical, company research, etc.) has continued as one would expect, and we are pleased to report that all our client portfolios remained suitable throughout the Special Administration process. We may make changes to client portfolios however, aligning them with our current investment views, while also reinvesting profits on some investments that have performed strongly in recent months."

Although we will charge fees throughout the Special Administration period, the fees we apply will be discounted by 15%, and this discounted rate will be in effect for at least 12 months, from October 2023 to September 2024. In addition, since January 2024, we have changed our charging structure to be more tax-efficient, thereby saving you a proportion of the VAT that has historically been payable on our fees. The fees we collect will be clearly visible and detailed through your client portal and on your statements."

- Casterbridge had also confirmed that clients' assets were managed under a Central Investment Proposition (CIP) adjusted to their risk mandate.
- Casterbridge had continued to manage client portfolios to the extent of its powers during this special administration process.
- All dividends and distributions received on clients' assets after the appointment of the administrators came in the form of cash credits, and therefore constituted what the JSAs called Post Pooling Event (PPE) cash. The JSAs had been distributing these funds on a client level basis to Casterbridge's new provider and custodian and had been managed in line with the CIP. PPE cash continued to be received at the new custodian, now monthly in arrears via the JSAs for the assets still remaining at IBP.
- IBP Markets, under control of the JSAs, held the remaining 20% plus of assets and client money that was held as client money before the JSAs appointment.
- While the special administration process continued, in particular the ongoing work on the cash reconciliation, it wasn't possible to fully assess any claim for the loss of investment performance potential. However, Casterbridge had confirmed that, whilst it couldn't assess any potential loss of investment performance while the reconciliation was ongoing, it would conduct an analysis and checks once the process permitted to ensure that clients weren't impacted by loss of investment potential.

- So it couldn't be reasonably concluded that Casterbridge had done anything wrong by not providing Miss N with valuation or performance information as it wasn't permitted to do so at this time. Casterbridge was also entitled to charge fees during the period in question.
- However, Casterbridge provided a poor service to Miss N when she requested information and it didn't provide her with a response until she raised her concerns to our service. This had caused Miss N distress and inconvenience at a time when she would have already been concerned about the status of her investments.
- In order to put things right, it would therefore be reasonable for Casterbridge to pay Miss N £150 compensation for the distress and inconvenience it caused her by not responding to her request for information for over five months.

In response, Miss N commented as follows:

- She queried as to how it could be right that Casterbridge could charge her fees for an investment that it couldn't access or trade on. It had no ability to take account of market opportunities, regardless of the fact that there were issues with custodians and its business decision to change them, which had caused the resulting extended issues and which prevented her from taking her full tax free cash entitlement and/or income from her pension plan.
- Miss N requested the due diligence which the investigator had said Casterbridge had provided.
- The investigator's assessment didn't address her complaint that, even before the change of the custodian and the resulting issues, Casterbridge had never provided her with any performance data for her investment, saying that it was representative of a model it created. This didn't take specific account of any trades in her pension, dates assets were bought, dividends and dates or when their charges were deducted, which would be required to accurately assess performance and which she understood was industry standard and in line with other discretionary investment managers.

The investigator put Miss N's comments to Casterbridge, and asked for the transaction details. Casterbridge responded as follows:

- It had been unable to provide this from IBP Markets due to the ongoing reconciliation work which it understood was frustrating for all clients wanting access to that data.
- The team continued to engage with the JSAs, FCA and FSCS to keep momentum on the outstanding reconciliation work – until such time as this work was complete, it wasn't appropriate to provide any performance or transaction data for the period the assets were custodied at IBP Markets.
- It confirmed that Miss N's portfolio has been managed in line with its CIP to the extent that it had been able during this period.
- For the sake of clarification, it would provide transaction and performance data post conclusion of the outstanding work the JSAs have identified. There wasn't a firm idea of the timeline in which this work would be completed, but it would hope to share an update on this in the coming weeks.

Casterbridge then provided the summary of transactions before the move to IBP Markets. But it declined to share the due diligence information which Miss N had requested due to its commercially sensitive nature.

The investigator conveyed this to Miss N, who said the following in response:

- The investigator hadn't taken into account or asked Casterbridge for the performance figures for the period before the IBP situation arose, which it was obliged to provide, which left her with no idea or understanding as to how her pension had performed with reference to the charges it had levied, or as a consumer, being able to see what value it had offered.
- She also couldn't see how its total lack of performance detail from inception, taking into account the period post the IBP situation, could be excused or justified under its regulatory requirements and/or under Consumer Duty rules for the whole period, specifically the period before the IBP situation manifested itself.

As agreement couldn't be reached, the investigator confirmed that the matter would be referred to an ombudsman for review.

Mrs N replied to seek confirmation that her request for performance figures from inception up to the issues with the IBP situation would be added to the file. The investigator confirmed that it would.

At my request, the investigator put Mrs N's comments regarding the performance figures to Casterbridge, and it responded as follows:

- In respect of annual review packs for the period before the change of custodian (October 2022), its normal practice for advised clients was that it would send the review documents to a client's financial adviser, who would then conduct the review directly with the client.
- Its records showed that annual review packs were requested and sent to Miss N's adviser on 1 July 2020, 11 November 2021, 25 January 2021 and 22 January 2022.
- In addition to the review packs, it had issued quarterly valuations to the adviser, including those for Miss N since 2017. Clients were initially posted these quarterly valuations, and latterly the valuations were uploaded to the client portal so that advisers and clients could "self-serve".
- It continued to provide hard copies via post where requested. And if any copies of these were required, it would be happy to share them.
- After October 2022, it seemed that Miss N wasn't on the postal list to receive hard copy quarterly valuations, but was notified periodically via email that the latest version was available on the client portal for her to access.

I issued a provisional decision on the matter on 21 November 2025. The following is an extract from that decision.

"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've reached broadly the same conclusions as the investigator, and for the same reasons. There's little in fact which I think I can meaningfully add to what's already been said.

In terms of the fees, I think the case put forward by Casterbridge is reasonable and I note that it has agreed to reduce these for the period concerned. And although Casterbridge is reluctant to share the detail of the due diligence process, having considered what it's said about this process, I'm satisfied that it undertook reasonable steps towards ensuring that IBP was an appropriate custodian. It's provided the rationale for switching custodian, the selection process it went through, the due diligence it performed on IBP, and the formal decision taken to appoint it.

It's added that the entire process of custodian migration took over two years, during which time the FCA was updated about the initial decision and ultimate execution of the project. And I'm further satisfied that, prior to the appointment, it couldn't have foreseen that IBP would suffer the systems and controls problems which had ultimately led to its failure.

I hope it will also be of comfort to Miss N that Casterbridge has confirmed that it continued to meet the obligation of ensuring that her portfolio was suitable, by investing in line with its CIP (adjusted appropriately to Miss N's risk mandate)

But I noted what Miss N has said about the performance information before the issues with IBP, and I've requested this, as set out above. It would seem that Casterbridge sent this to Miss N's adviser, but I've asked the investigator to send the performance information which it has provided directly to Miss N. If Miss N has any further comments on this, then she may submit these in response to this provisional decision.

Putting things right

I agree with the investigator that Casterbridge Wealth Limited could have been more proactive in responding to Miss N's information request. And so I agree that a payment of £150 would be appropriate here."

In response, Casterbridge said that it agreed with my findings. Miss N commented further as follows:

- She strongly objected to the conclusion that Casterbridge's CIP satisfied the terms of the service she signed up for. The advertised and published offering was a bespoke service, not a centrally managed model. She paid for a tailored portfolio, and what has been delivered didn't align with that commitment.
- Performance information was unavailable even before the IBP situation arose. This lack of transparency was entirely inconsistent with the bespoke service promised.
- She didn't agree to a CIP approach, and she expected clarity on why this deviation occurred.
- Miss N enquired as to how Casterbridge could justify calling this a bespoke service when it was clearly a centralized proposition.
- Miss N further enquired as to the performance of the centrally managed proposition compared to the actual performance of her individual portfolio and the assets within that.

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.

I've carefully considered Miss N's further comments, but with regard firstly to those about the performance information prior to the issues with IBP, it's unclear what Miss N means by the information being "unavailable", but as set out above, it was sent to Miss N's adviser for it to then be conveyed to Miss N, and Casterbridge has said that it was also available via the online portal. And so I'm satisfied that performance information about Miss N's portfolio had been available.

And then with regard to the comments about the manner in which her portfolio has been managed, these go beyond the scope of the complaint as submitted to both Casterbridge and this service. Miss N's complaint, as set out above, related to the fees charged and the lack of performance information provided to her. And before we can consider a complaint about the manner or style of her portfolio management, and whether this deviated from the agreed terms, this would in the first instance need to be raised with Casterbridge so that it has the opportunity to respond.

If Miss N does raise this with Casterbridge and she remains dissatisfied with the response, then she may refer that matter to this service.

Putting things right

For the reasons set out above, Casterbridge Wealth Limited should pay Miss N £150.

My final decision

My final decision is that Casterbridge Wealth Limited should pay Miss N £150.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss N to accept or reject my decision before 29 December 2025.

**Philip Miller
Ombudsman**