

The complaint

Mrs P complains that Scottish Equitable Plc trading as AEGON Scottish Equitable ('Aegon') unreasonably delayed and ultimately refused to transfer her pension to a new provider. She considers their customer service was unacceptable.

What happened

In September 2024 Mrs P decided to transfer her pension. She spoke to the new provider, True Potential, and gave her authority for information to be released from Aegon in October 2024. Aegon provided information to True Potential in early November 2024.

True Potential asked Aegon for updated information in late November 2024 and further information was requested from Mrs P's new provider on 18 December 2024 about charges which was provided the same day.

Aegon eventually received a transfer request on 14 February 2025. On 18 February 2025 Aegon wrote to Mrs P to acknowledge the transfer request and told her that government regulations introduced in November 2021 required certain conditions to be satisfied before they could transfer her pension.

They explained that these safety checks were to help protect her from pension scams and to keep her savings safe. Aegon explained that they had done some initial checks and needed some more information from Mrs P. They sent her a questionnaire to complete as well as a leaflet about pension scams.

True Potential asked for an update from Aegon on 28 February 2025 and chased this on 13 March 2025. They were told on 15 March 2025 that more information had been requested from Mrs P which Aegon was waiting for. This would have been the questionnaire sent to Mrs P with letter of 18 February 2025.

On 20 March 2025 Mrs P called Aegon to ask for an update on her transfer. It's clear from the call that Mrs P had not received the letter of 18 February with the questionnaire. She said she had just received a letter telling her Aegon would be in touch if further information was needed. The call handler emailed Mrs P another copy of the questionnaire for her to fill in and return.

Aegon received the questionnaire back at the end of March 2025. They wrote to Mrs P with letter of 16 April 2025 to ask whether she had received any unsolicited contact or was cold called and whether she had received any advice from True Potential.

Mrs P emailed Aegon on 28 April 2025 to say that she was unwilling to answer any further questions and that she felt she had explained enough. She insisted on the transfer to proceed by 29 April 2025.

Aegon sent a letter the same day to Mrs P informing her that certain conditions needed to be satisfied before they could approve the transfer. And that more information might be needed. It said that if this was the case they would be in touch. According to Mrs P's own notes on

this letter, she received this on 8 May 2025.

Aegon also logged Mrs P's email of 28 April 2025 as a complaint and a letter was sent to Mrs P on 2 May 2025 telling her it would be investigated and they were hoping to respond within 20 working days. Mrs P's notes suggest she received this letter also on 8 May 2025.

Aegon wrote to Mrs P on 6 May 2025 to inform her that as she wasn't willing to provide further information they were unable to proceed with the transfer. They explained that this was in line with The Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021. Aegon informed Mrs P that her funds would stay invested until they heard further from her.

Mrs P called Aegon on 8 May 2025 and insisted to speak to the Customer Service Oversight Director who had signed the various letters to her. She was told this wasn't possible and she had to provide further information. She obviously hadn't yet received the letter of 6 May 2025.

Mrs P was sent a letter on 18 June 2025 to tell her Aegon couldn't respond to her complaint and gave her referral rights to our service. Mrs P brought her complaint to us on 13 July 2025. Aegon issued a final response letter to her complaint on 23 July 2025 apologising for the delay in responding to her. However, they didn't consider they had done anything wrong by asking for more information and ultimately not proceeding with the transfer when this information wasn't provided.

One of our investigators considered Mrs P's complaint and explained that Aegon was required to carry out certain checks on Mrs P's transfer and that it was reasonable to ask for more information. When this wasn't forthcoming, they were entitled to not proceed with the transfer.

He considered that since Aegon had received the transfer request in February 2025, they had sent out information requests within a reasonable timeframe. It was unfortunate Mrs P hadn't received the letter of 18 February 2025 which included the questionnaire. However, there was no reason for Aegon to think this hadn't been received until Mrs P called on 20 March 2025.

The investigator considered the delays since Aegon received the transfer request were due to the 18 February 2025 letter not being received by Mrs P and her subsequent reluctance to provide any further information. He didn't ask Aegon to do anything further.

Mrs P remained unhappy and so the complaint was passed to me for an ombudsman's decision.

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 understand Mrs P simply wants her money to be transferred and is frustrated with the process. However, as previously explained to her, Aegon is required by The Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021 to carry out certain due diligence checks on her transfer. They are required to check whether any indicators are present that Mrs P's pension might be at risk. In order to do this they have to ask for further information which is why they sent Mrs P a questionnaire.

The letter was addressed correctly and so Aegon could reasonably assume that it would be

received. The fact that it wasn't received, wasn't their fault. When Mrs P informed them she hadn't received it in a call of 20 March 2025, she was provided with a new copy immediately.

I recognise that Mrs P felt a questionnaire with 23 questions was over the top, however the regulations do require checks into a wide range of issues. The transfer regulations were introduced in 2021 to reduce the number of customers falling victim to pension scams including being manipulated by unregulated parties to move their pensions into investments which were unregulated or too high risk. The questions asked in the questionnaire were appropriate to identify whether any risk factors were present here.

Mrs P didn't answer all the questions in the questionnaire. For example she had received promotional literature but refused to share it. She said she had heard about True Potential from a friend. She said she had received advice but declined to provide details who provided her with this advice. And she said she hadn't carried out any checks on the new pension scheme.

Based on the answers given, it was reasonable for Aegon to have concerns here. They needed to satisfy themselves that Mrs P wasn't receiving unregulated advice or that she had been contacted unsolicited, for example through a cold call. Either of those are significant warnings signs of a scam and are described as a red flag in the transfer regulations. And Aegon is required to try and protect Mrs P from such risks as much as possible. Mrs P's answers on the questionnaire couldn't reasonably give them comfort these red flags weren't present here. So Aegon was entitled to ask more questions about who had advised her and how she was originally contacted.

If a consumer doesn't answer relevant due diligence questions, this in itself is a red flag in the transfer regulations. When a red flag is present a customer loses their statutory right to transfer and such a transfer must be refused. So Aegon's decision to not proceed with the transfer until Mrs P provided relevant information about her adviser was appropriate here.

If Mrs P still wants to transfer her pension she will have to contact her new provider or her adviser and ask for the transfer to be requested again. Aegon will likely ask her similar questions than they did previously and she will need to answer those for a transfer to proceed.

I acknowledge that Mrs P is unhappy with the service she received from Aegon. She says letters were contradictory to say she didn't need to do anything further and then she was told she needed to provide further information. She also considers Aegon delayed the transfer since she started looking into a transfer in September 2024.

Aegon did provide information to True Potential when requested. They only received a transfer request in February 2025. They then generally sent out communications to Mrs P in a timely manner. They could have responded to an update request from True Potential on 28 February 2025 sooner than they did (it took them 10 working days and they only responded after a chaser from True Potential), however at this point they were still waiting for the questionnaire to be returned from Mrs P and they told True Potential information was outstanding on 15 March 2025. I don't think they could have reasonably known that Mrs P had not received the questionnaire at that point.

Mrs P made it clear in her email of 28 April 2025 that she had received another letter from Aegon asking for more information (this would have been the 16 April letter) and that she refused to answer any more questions. She then was sent a letter dated the same day to say checks were being conducted and she did not have to do anything further. This was correct whilst Aegon was reviewing the information they had. Aegon communicated their decision with letter of 6 May 2025 that until further information was provided they would not

proceed with the transfer.

Mrs P obviously had not received this letter when she spoke to Aegon on 9 May 2025. She was very frustrated at this point. I've listened to the call and she is clearly distressed and feels helpless as what to do next and feels Aegon is putting unnecessary barriers in her way. It's clear that Mrs P didn't understand why Aegon needed yet more information.

I carefully thought about the service provided here by Aegon. The call handler on 8 May did try to give Mrs P an update and was attempting to read out the contents of the letter of 6 May. Mrs P was adamant she wanted to speak to a senior member of staff which wasn't possible and Mrs P eventually ended the call in frustration. However, she did say they should have her number from the call if they wanted to call her back.

The questionnaire did explain that questions were asked to try and protect customers from scams. Mrs P had answered many of the questions and thought that no further information should be required by Aegon to proceed. So her reluctance to provide a couple of answers to some simple questions (was she contacted unsolicited and was she being advised by True Potential) was the reason why the transfer didn't proceed. As I said previously Aegon didn't do anything wrong in this regard and were required to ask these type of questions.

Having said that, I consider there were some service issues. I recognise the call handler on 8 May wanted to help Mrs P, however it should have been clear that Mrs P would benefit speaking to a more senior member of staff being able to explain in more detail what was needed and why and what timelines would be after any outstanding information was required. The call handler wasn't in a position to answer these kind of questions. Speaking to a manager that same day might not have been possible (it was 5pm on a Friday), however even though Mrs P eventually ended the call, a complaints manager or someone from the vetting team should have reasonably contacted her.

I understand Mrs P was originally insistent to speak to a particular member of staff, however she later did ask to speak to the complaints director or a supervisor. I think it's clear that Mrs P simply wanted to speak to someone who was more senior to listen to her concerns and make the transfer happen. A complaint had already been pending for over a week at this point and both her email of 28 April and the call of 8 May showed she was distressed by the transfer not proceeding. The call handler tried to offer a call back which she declined as she wanted the issue to be resolved the same day. However at the end of the call she did say they should have her number from the call.

Despite all of this, other than holding letters, she didn't receive any further contact from Aegon until the final response to her complaint was issued on 23 July 2025 (nearly three months after she complained about a matter that was still ongoing). I think this caused additional frustration and distress.

For this I think it's reasonable for Aegon to pay Mrs P some compensation to recognise the additional distress caused by how they handled her complaint after she raised it in late April 2025. I consider not being able to speak to a more senior member of staff which is clearly what she wanted and not receiving any further material communications for another three months when Mrs P had also raised concerns that she might be financially disadvantaged by remaining invested with Aegon would have had added to her stress and frustration about this situation. I consider an award of £250 is reasonable in the circumstances of this complaint.

Mrs P might feel Aegon caused her a level of stress and frustration which would warrant a higher award. However, as explained, the delays here were mainly due to Mrs P not receiving the questionnaire and her refusing to provide relevant information. So the majority of the frustration Mrs P experienced wasn't caused by Aegon's errors. For this reason I

consider an award of £250 is appropriate here.

My final decision

I uphold Mrs P in part with regards to some service issues following her complaint in April 2025. I require Scottish Equitable Plc trading as AEGON Scottish Equitable to pay Mrs P an award of £250.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mrs P to accept or reject my decision before 24 March 2026.

Nina Walter
Ombudsman