



Mr N Graham  
The Old Post House  
Burford Road  
Black Bourton  
Bampton  
Oxfordshire  
OX18 2PF

06 March 2015

Dear Mr Graham

### **Your pension transfer request**

We have received letters from Pension Practitioner.com and Jan Investment Marketing in relation to a request to transfer your pension benefits.

We understand from these letters you would like us to reconsider our decision not to proceed with the transfer to the Joe Bloggs Property Services Limited SSAS, administered by Pension Practitioner.com.

We will be happy to do so but would first like to give you some more information about how we came to our decision. We'll also need some more information from you, and newly completed discharge forms, in order to review your request.

### **Our concerns**

We have been asked by The Pensions Regulator (TPR) and other agencies to ensure we check all pension transfer requests for signs that a customer may be at risk of falling victim to a Pension Scam.

We've previously given you a copy of the guidance TPR asks us to provide to our customers but have enclosed another with this letter.

When we first received your request, we checked the circumstances and information on our records against these indicators and found enough similarities to cause us potential concern.

We would encourage you to do a similar comparison before taking any further action.

### **Any questions?**

You can contact us on

**Tel: 0114 208 8703**

**Fax: 0845 304 1122**

We are open 9am to 5pm  
Monday to Friday

We may record or monitor your call

Policy number

**TL94037719**

Policyholder

**N W Graham**

Some examples of our concerns include:

Signs and checks in TPR's guidance	Indicator on your case
Has the member <ul style="list-style-type: none"> <li>• Been contacted by an introducer?</li> <li>• Been advised by a non-regulated adviser?</li> <li>• Taken no advice?</li> </ul>	You approached us directly for a transfer pack. It is the forms provided in reply to this which were used to request your transfer.  There is no evidence on our records of any information being provided to an authorised, regulated, adviser in relation to this transfer request.
Victims are approached out of the blue over the phone, via text messages or in person door-to-door	It is our understanding that the company which asked us to transfer your pension benefits have used introducers who "cold-call" customers in previous cases
Is the scheme to which the member wants to transfer newly or not registered for tax purposes with HMRC	The Joe Bloggs Property Services Limited SSAS was registered on 10 July 2014 and we received your transfer request on 24 July 2014
Is the scheme to which the member wants to transfer sponsored by a newly registered employer?	Joe Bloggs Property Ltd was established on 11 December 2013 and the scheme was registered on 10 July 2014

### Reviewing your transfer request

Whilst we remain concerned about these similarities, and other circumstances, we will re-examine your request if that is what you wish.

We must also consider the Pension Ombudsman's comment in a recent determination that an ***"individual's right to make what might be a life-changing mistake must take supremacy over [a provider's] obligation to help them not to."***

We've enclosed a questionnaire and new transfer discharge forms which will need to be fully completed and returned with all supporting documentation in the enclosed reply-paid envelope. Without this information, we are unable re-consider your request.

Alternatively, if you do not wish us to re-visit your transfer request, please tick the appropriate box on the questionnaire and return to us.

If we do not hear from you within thirty days from the date of this letter we will assume you have changed your mind and do not wish us to re-consider.

**Your transfer value**

We've also made another scheme registration status enquiry with HMRC, as we did not receive a reply to our letter of 5 September 2014.

We're unable to review your transfer request any further until we have received a full response to these information requests.

In the meantime, your policy will remain invested in your chosen funds. The value of units can fluctuate with changes in the market value of the fund's holdings and is not guaranteed. You may wish to consider whether these funds are suitable for your current position.

The effective date of your transfer, if we are able to proceed, will be the date we received all of our requirements as detailed above and this will determine the value of your pension transfer.

We look forward to hearing from you.

**We're here to help**

If you have any questions, please call us on **0114 208 8703**.

Alternatively you may find it beneficial to speak to The Pension Advisory Service on **0300 123 1047**.

Yours sincerely

***Aviva Customer Team***

## Transfer payment instruction

Please return to:

Our Reference:

**Name: N Graham**  
**Plan Number: TL94037719**

**Please make sure that this form is fully completed in BLOCK CAPITALS before returning it to Aviva, to avoid any delay in paying the transfer value.**

Payments will be made directly to your chosen pension provider.

Payee:  
(this must be a pension provider)

Department:

Address:

Postcode

Contact Name (if known)

New policy number (if known)

1001


Please pay the transfer value in respect of the above mentioned plan.

I understand that:

- the amount actually payable may differ from that shown in the illustration for the reasons explained in the transfer section
- once payment has been made for the whole of the plan, Aviva is no longer responsible for the plan
- once payment has been made for part of the plan, Aviva will only be responsible for the rest of the plan
- where any benefits remain with Aviva, liability for these will remain with them

**Please make sure this form is fully completed and signed in the box below. This will help us pay your benefits as quickly as possible.**

Signature of Planholder:



Date:

11 '03 '15

## Transfer out warranty

Please return to:

Our Reference:

**Your Pension Select @ Aviva - TL94037719**

**Member name: Neil Graham**

## Transferring Scheme Details

Transferring Scheme: Individual Personal Pension

Plan number: TL94037719

**Please make sure that this document is fully completed in black ink and BLOCK CAPITALS before returning it to Aviva, to avoid any delay in settling the benefits.**

**To be completed by the Trustees/Administrator of the receiving scheme/contract.**

---

## Receiving Scheme details

Always complete

Receiving scheme / contract  
name

Receiving scheme / contract  
number (if known)

Name of bank:

Name in which account is held:

Account number:

--	--	--	--	--	--	--	--	--	--

Sort  
code:

--	--

--	--

--	--

BACS payment ref:



---

## Type of scheme

Please tick only one

☐

Insured registered scheme **(Now complete Section 1)**

A scheme registered (or deemed registered) under Part 4 of the Finance Act 2004.

☐

Self administered registered scheme **(Now complete Section 2)**

A registered scheme where the assets are invested, other than wholly by payment of insurance premiums, by the trustees, an in house investment manager or an external investment manager.

☐

Buy out e.g. S32 or replacement contract **(Now complete Section 3)**

The purchase by trustees of a registered scheme of an insurance policy in the name of the member or other beneficiary, in lieu of entitlement to benefit from the scheme, following termination of the member's Pensionable Service.

☐

Overseas scheme **(Now complete Section 4)**

Further information will be needed. Details will be supplied.

☐

Retirement Annuity Contract (RAC) **(Now complete Section 4)**

☐

Other **(Now complete Section 4)**

☐

Statutory scheme **(Now complete Section 5)**

A scheme (usually in the public sector) established by an Act of Parliament.

---

**Section 1 - Complete for an insured registered scheme underwritten by a Life Office.**

Receiving scheme HM Revenue & Customs (HMRC) registration / approval reference number

The normal retirement age under the scheme is

Name of the receiving Life Office

Address

Is a copy of the HMRC registration/approval e-mail or letter attached?

Yes

☐

No

☐

**Now complete Section 5.**

---



## Section 2 - Complete for a self administered registered scheme

Receiving scheme HM Revenue & Customs (HMRC) registration / approval reference number

The normal retirement age under the scheme is

Is a copy of the HMRC registration/approval e-mail or letter attached?

Yes

☐

No

☐

**Payment will only be made to you as Scheme Administrator of the Receiving Scheme.**

**Now complete Section 5.**

---

## Section 3 - Complete for a Buy out

Please send a letter confirming:

- After receiving a transfer payment from this policy, you will issue a policy for the benefit of Mr Graham and/or his dependants.
- The policy that will be issued meets the requirements of section 153(8) of the Finance Act 2004. It will also be an appropriate annuity contract under section 19(4) of the Pension Schemes Act 1993.

**Now complete Section 5.**

---

## Section 4 - Complete for an overseas scheme, RAC or Other

Receiving scheme approved by (tax authority)

Tax authority reference number

The normal retirement age under the scheme is

**Now complete Section 5.**

---

## Section 5 - Declaration on behalf of the receiving scheme

I confirm that the above statements are true. On receipt and acceptance of the transfer, it will be applied to provide benefits for or in respect of the member under the receiving scheme in accordance with the appropriate regulations made under the Pension Schemes Act 1993.

Signed

Position

Aviva Life & Pensions UK Limited. Registered in England No 3253947. 2 Rougier Street, York, YO90 1UU.  
 Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.  
 Firm Reference Number 185896.

For and on behalf of the Trustees/Administrators of


Date

## Customer declaration & questionnaire.

To be completed and returned



**Do you require Aviva to review the decision made not to proceed with your transfer request? (Please tick and sign below)**

No. I am happy with Aviva's decision and I do not want to continue with the request.	
Yes. I would like you to review your decision and am providing Aviva with the information requested.	✓
I understand Aviva may require more information in order to reconsider my request.	✓
<b>Signature</b> 	<b>Print name</b> NEIL GRAHAM
	<b>Date</b> 11/03/2015.

### Initial contact

How did you first become aware of the Scheme?
Did the receiving scheme/adviser make the first contact ?
By what method were you contacted (for example by an unsolicited letter or cold call) ?
What type of pension is the receiving scheme?

**Financial Advice**

Have you received financial advice in connection with your transfer request?

If yes, please give details of who has provided this advice (full name of individual, company and address). Where possible please also provide their Firm reference number

Have you checked this adviser is regulated and authorised to provide advice on pensions on the Financial Services Register?

Would you be happy for us to talk with this advice provider?

**Reason for transfer**

Have you been offered cash payments to transfer or loans from the Scheme?

What do you want to achieve through this transfer which cannot be achieved through your Aviva plan?

Have you been told you can access any part of your pension fund before age 55 other than through ill health?

Have you been led to believe that in the event of your death under your current pension, you or your relatives would lose entitlement to your pension fund? (If you were, then you should be aware that this is untrue. You should therefore question whether anything else you were told might have been untrue).

**The transfer process**

What documentation have you received from the Scheme and its Administrator? Please provide copies

Were you encouraged to make a decision about the transfer quickly or without having time to make reasonable checks on the parties involved?

Has the receiving scheme (or their administrator) arranged document delivery or collection by courier?

Were you given time to read any of the documentation you have signed?

**Details of the Receiving Scheme**

Have you received promotional material or information about the Scheme or the investments available within it? If yes please provide copies.
Please give details of the investments you have been offered under the Scheme.
What checks have you made into the full range of investments available under your Aviva plan before making the transfer request?
Have you been promised a particular rate of return on your investments under the Scheme. If so, what return have you been promised?
Has the rate of return been guaranteed? If so, how is it guaranteed?
Have you been told you will incur fees if you cancel your transfer?
Please provide details of all charges applicable to your pension fund on transfer. Please include details of any commission payments to be made to an adviser (if one is involved)
Please provide detail of all ongoing charges to be applied to your pension fund under the proposed Scheme

Please provide details of all additional charges which will be applied dependent on your investment choice
We have been asked to pay to two different bank accounts. Please explain why this is.
Please confirm the correct bank details for the Scheme

**Your employment**

Who is/are your current employer(s)? Please provide evidence of this/these employments e.g. payslips
What is the address of your usual place of work?
What is the business, service or trade provided by your employer(s)?
Is your employer an active or dormant company?

**If the Scheme is a SSAS**

Are you the director of the sponsoring employer of the Scheme? Please provide the latest accounts.

What previous experience do you have of running a pension scheme? Please give details.

**The Pension Regulator**

Have you read The Pension Regulator's leaflet on Pension Scams?



# investments

Neil Graham  
The Old Post House  
Burford Road  
Black Bourton  
Bampton  
Oxfordshire  
OX18 2PF

Tel: 0845 606 6586  
Fax: 0844 800 7235  
E-mail: pensiontransfers@cfs.coop  
Opening Times: 8.30am to 5.00pm  
Monday to Friday  
Your ref:  
Our ref: PPC/Transfers/1493036  
Date: 5 February 2015

Dear Mr Graham

## **Request to transfer your CIS Pension**

**Policyholder: Neil Graham**

**Policy Number: 8952311**

Thank you for your recent request to transfer your Pension plan.

A transfer pack has been sent to your Independent Financial Adviser so that the transfer process can be started.

Enclosed is a document that contains important information you will need to know before proceeding with your transfer. This includes details of any benefits or guarantees you will lose if you transfer your Pension. This information has also been sent with the transfer pack issued to your Independent Financial Adviser.

Also enclosed is a product guide that will give you more information about your policy. If you have any questions after reading this information, please contact us, quoting the above policy number.

Your Independent Financial Adviser will be dealing with your transfer and will be able to answer any questions you may have about the transfer process.

Yours sincerely



Richard Morris  
Customer Support Centre, Life and Savings

Enclosed: - Important information you need to know before proceeding with your request to transfer your pension.  
- Product Guide.