

# Don't let a scammer enjoy your members' retirement



## Scheme transfer checklist

If a member is asking to transfer their pension entitlements, you can use this checklist to find out more about the receiving scheme and how the member came to make the request.

You should also read [Combating Pension Scams](#), the code of good practice for trustees and administrators by the Pension Scams Industry Group.

Answering YES to any of these questions individually does not necessarily indicate a pension scam, but if several features are present there may be cause for concern.



Trustees and administrators should take care to make sure they have the exact name of the scheme correct when carrying out any due diligence – in some instances, schemes used as part of a pension scam have been set up with names that are almost identical to legitimate schemes.

### The nature/status of a scheme

Is the scheme to which the member wishes to transfer:	How to establish:
<ul style="list-style-type: none"><li>newly or not registered for tax purposes with HMRC, whether it is an occupational or personal scheme (including SIPPs)?</li></ul>	<p>Check the scheme is registered with HMRC for tax purposes: ask the pension scheme in question for documentary evidence of their registration</p> <p>You can also write to HMRC for confirmation</p>
<ul style="list-style-type: none"><li>a personal pension (eg a SIPP) where the scheme operator is not authorised by the Financial Conduct Authority (FCA)?</li></ul>	<p>Check the scheme operator is authorised with the FCA</p> <p><a href="http://www.fca.org.uk/register">www.fca.org.uk/register</a></p>
<ul style="list-style-type: none"><li>a recently set up small self-administered scheme (SSAS), where the member is a trustee?</li></ul>	<p>Ask the member</p>
<ul style="list-style-type: none"><li>sponsored by a newly registered employer?</li><li>sponsored by a dormant employer?</li><li>sponsored by an employer that is geographically distant from the member?</li></ul>	<p>Obtain employer information from the scheme in question</p> <p>Check with Companies House for details of the employer status</p> <p><a href="http://www.companieshouse.gov.uk">www.companieshouse.gov.uk</a></p>
<ul style="list-style-type: none"><li>connected to an unregulated investment company?</li></ul>	<p>Ask the receiving scheme for details of their investment service providers</p> <p>Check these providers with the FCA</p> <p><a href="http://www.fca.org.uk/register">www.fca.org.uk/register</a></p>

## The scheme member

Has the member:	How to establish:
<ul style="list-style-type: none"> <li>• been contacted by an 'introducer'?</li> <li>• been advised by a non-regulated adviser, or one that doesn't have the right permissions?</li> <li>• taken no advice?</li> <li>• decided to transfer after receiving cold calls, unsolicited emails or text messages, often from someone claiming to be from the government?</li> </ul>	<p>Ask the member about how he/she became aware of the receiving scheme</p> <p>Check whether the advisers are approved by the FCA at <a href="http://www.fca.org.uk/register">www.fca.org.uk/register</a></p> <p>Does the adviser have the right permissions to give pension transfer advice? The adviser could be authorised to give other financial advice, but not for pension transfers</p> <p>Find out where the adviser is located geographically – often big distances indicate something unusual</p> <p>Pension cold calling is illegal and offers from people you've not dealt with before are probably a scam</p>
<ul style="list-style-type: none"> <li>• pressured the trustees/administrators to carry out the transfer as quickly as possible?</li> <li>• mentioned that your pension scheme has transferred funds to this arrangement before?</li> </ul>	<p>Check whether the member has contacted trustees/administrators to hurry along the transfer since first submitting the request</p> <p>Check recent transfer activity for signs of any pattern</p>
<ul style="list-style-type: none"> <li>• not received documentation from the new scheme?</li> </ul>	<p>Check whether the member has received documents, and if only one copy was received – scammers don't like to give extra copies that the member can check later</p>
<ul style="list-style-type: none"> <li>• been told they can access their pension before age 55?</li> <li>• been left unaware of the potential tax consequences?</li> </ul>	<p>Review promotional material for the receiving scheme</p>
<ul style="list-style-type: none"> <li>• been advised that there will be no contributions paid by themselves or their employer?</li> </ul>	<p>Ask what the member has been told about contributions - depending on the circumstances, answering yes or no here could give concern</p>
<ul style="list-style-type: none"> <li>• been told that they will be entering into a contract of employment not linked to an actual job?</li> </ul>	<p>Ask the member</p>

Go to [www.tpr.gov.uk/trustees/pension-scams-trustees](http://www.tpr.gov.uk/trustees/pension-scams-trustees) for more information on how to protect your members.

## Description/promotion of the scheme

Do descriptions, promotional material or adverts:	How to establish:
<ul style="list-style-type: none"><li>• include the words 'loan', 'savings advance', 'cash incentive', 'bonus', 'loophole', 'preference shares', 'one-off investment opportunities', 'free pension reviews' or 'government endorsement'?</li><li>• allude to overseas investments?</li><li>• hint at unusual, creative or new investment techniques?</li></ul>	<p>Ask the member for copies of promotional materials, emails or letters about the scheme</p> <p>Ask the member about the way the receiving scheme has been described to them over email/text/phone</p>

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