LIFETIME PENSION SCHEME (the "Scheme")

Internal Dispute Resolution Procedure ("IDRP")

As required by the Pensions Act 1995, the Trustees have established an internal procedure for resolving any disputes which may arise in relation to the Scheme.

Overview of the procedure

This internal procedure is broadly as follows:

- To start the process, you need to address your complaint to The Trustees of the Lifetime Pension Scheme, C/O Post Handling Team, Aptia Group Ltd, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP who will forward it to the Trustees.

- The Trustees will then consider the issues raised. In normal circumstances, the Trustees will reach a decision on your complaint within four months, and will then notify you of that decision in writing within three weeks after the decision has been made.

If you are still unhappy following the Trustees' response to your complaint, you may at that stage refer your complaint to the Pensions Ombudsman. The Trustees may also agree, at their discretion, to reconsider the matter afresh in some circumstances.

Who can use this procedure?

You may use this procedure if you are (or have been at any time in the last six months) one or more of the following:

- an existing member of the Scheme – in other words, a former member with an entitlement to deferred benefits, a member who is entitled to benefits under the Scheme as a result of a pension sharing order, or a member in receipt of a pension; or

- a widow, widower, surviving civil partner or dependant of a deceased member, or someone who is otherwise entitled to receive benefits under the Scheme in respect of a deceased member.

If you believe that you fall within any of the above categories but there is any uncertainty or dispute over whether you qualify, you may also use this procedure as a means of resolving that dispute.

If you wish, you may nominate a representative to make a complaint on your behalf. A complaint may also be brought or continued by personal representatives where the member to whom the complaint relates has died, or by a family member or other appropriate person where the complainant is a child, or is otherwise incapable of acting for him/herself.

What complaints can be dealt with under this procedure?

This procedure is only intended to cover disputes:

- about matters relating to the Scheme; and
- which involve the Trustees.

It cannot be used to resolve disputes which relate solely to other matters or other parties (for instance, if your complaint is about another aspect of your remuneration package, or about a decision made purely by your employer).

You will not be able to use this procedure if the matter about which you are complaining is already the subject of an investigation by the Pensions Ombudsman, or of court or tribunal proceedings. Similarly, if you bring a complaint under this procedure, and any investigation / proceedings subsequently commence before this procedure has been completed, the resolution of your complaint under this procedure will cease immediately.

The Trustees may also refuse to investigate your complaint under this procedure if you do not raise it within twelve months from the date on which you first became aware of the matter to which your complaint relates.

In addition, this procedure may be used to raise complaints relating to the handling of personal data by or on behalf of the Scheme. Use of this procedure does not affect an individual's statutory right to raise concerns or lodge a complaint with the Information Commissioner's Office.

How to make a complaint

If you wish to make a complaint, you need to submit it in writing, ideally on the attached **Complaint Form** (Appendix A or B as appropriate). Please note, the complaint form in Appendix B should only be used to raise complaints relating to the handling of personal data.

If you choose not to use the attached form when submitting your complaint, please ensure that you still provide all relevant information which is specified on the form.

Assistance from The Money and Pensions Service and from the Pensions Ombudsman

The Money and Pensions Service (MAPS) is a not-for-profit advice service which is available to provide members and beneficiaries of the Scheme with guidance and information relating to their benefits under the Scheme, and the steps which can be taken to resolve any concerns. MAPS can be contacted at:

The Money and Pensions Service
Bedford Borough Hall
138 Cauldwell Street
Bedford
MK42 9AB
Tel: 01159 659570
Website: https://maps.org.uk/en

The Pensions Ombudsman also has an "Early Resolution" team which is available to assist members and beneficiaries of the Scheme in connection with any dispute relating to the Scheme, including in relation to the making of a complaint under this procedure. The Early Resolution team can be contacted at:

The Pensions Ombudsman
10 South Colonnade
Canary Wharf
London
E14 4PU
Tel: 0800 917 4487 (select the option to discuss a potential complaint)
Email: enquiries@pensions-ombudsman.org.uk
Website: www.pensions-ombudsman.org.uk

A reminder of this information will also be provided to you by the Trustees on receipt of any complaint.

What happens after a complaint is made?

The Trustees will acknowledge receipt of your complaint, and will proceed to consider it carefully.

Following that consideration, the Trustees will reach a decision as to whether your complaint is valid, and (if so) what action, if any, should be taken by the Trustees in relation to the matter. In reaching that decision, the Trustees may:

- Investigate the complaint as they see fit.
- Obtain advice from the Scheme actuary, the Scheme's legal advisers and/or any other appropriate professional.
- Ask you (or any other relevant person) for any additional information which they consider is relevant to the complaint or any proposed resolution of the complaint.

- Consider the Trustees' previous practice in relation to similar complaints (but the Trustees are not bound by that past practice).

The Trustees will aim to make a decision as soon as is reasonably possible after receipt of your complaint, and in any event within four months of the date when it is received.

If the Trustees cannot make a decision within that time-frame, they will notify you (or your representative), explaining the reason(s) for the delay and when they expect to be able to reach a decision.

The Trustees will notify you in writing of the final decision no later than three weeks after that decision is reached. That notice will usually contain a summary of the reasons for that decision, together with any supporting information which the Trustees believe is necessary to explain the decision reached.

In some cases, your complaint may be considered by a sub-committee of the Trustees, who will have full authority to reach a decision on behalf of the Trustees as a whole. Where this is the case, the sub-committee's decision will be reported back to the full Trustee board at the next Trustee meeting.

If you are still unhappy following the Trustees' response to your complaint, you may at that stage refer your complaint to the Pensions Ombudsman. The Trustees may also agree, at their discretion, to reconsider the matter afresh (for instance, if fresh evidence has subsequently come to light).

Referring a complaint to the Pensions Ombudsman

At the end of this procedure, if you are not satisfied with the decision reached by the Trustees, you will have the right to refer your complaint to the Pensions Ombudsman, free of charge.

The Pensions Ombudsman deals with complaints and disputes which concern the administration and/or management of occupational and personal pension schemes.

Contact with the Pensions Ombudsman about a complaint needs to be made within three years of when the event(s) you are complaining about happened, or (if later) within three years of when you first knew about it / them. There is discretion for those time limits to be extended.

The Pensions Ombudsman can be contacted at:

10 South Colonnade
Canary Wharf
London
E14 4PU
Tel: 0800 917 4487
Email: enquiries@pensions-ombudsman.org.uk
Website: www.pensions-ombudsman.org.uk

You can also submit a complaint form to the Pensions Ombudsman online:
www.pensions-ombudsman.org.uk/form/per-occ-pensions-complaint-form

Data protection

Whether or not you use the attached form to make your complaint, it is very likely that the information you provide in connection with your complaint will amount to "personal data" for the purposes of data protection law. In some cases, the information provided may be "sensitive" (or "special categories") data – for instance, if it relates to your state of health.

As with all personal data which is held by the Trustees, this data will be stored securely and processed only in accordance with the Scheme's data protection policy and applicable legal requirements. For more information on how and why the Trustees will process any personal data provided in connection with your complaint, and your legal rights in relation to that processing, please see the Scheme's detailed privacy notice which has been issued to you. If you would like a copy, please request one from the Trustees (details above).

APPENDIX A

Lifetime Pension Scheme (the "Scheme")

Internal Dispute Resolution Procedure

COMPLAINT FORM

__Privacy notice:__ *All personal information provided on / with this form will be stored securely and processed only in accordance with the Scheme's data protection policy and applicable legal requirements. For more information on how and why the Trustees will process your information, and your legal rights in relation to that processing, please see the Scheme's detailed privacy notice which has been issued to you. If you would like a copy, please request one from the Trustees (details below).*

Details of Scheme member

Full name:			
Address: **Postcode:**			
Tel:			
Email:			
Date of birth:		**National Insurance no:**	

Details of person making the complaint

To be completed only if the person making the complaint is the spouse, civil partner, dependant or other beneficiary of a deceased member

Full name:	
Address: **Postcode:**	
Tel:	
Email:	
Relationship to member:	

Details of representative acting on behalf of complainant (if any)

Full name:	
Address: **Postcode:**	
Tel:	
Email:	
Address to be used for correspondence? Yes/No (Delete as applicable)	

APPENDIX A

Details of the complaint

Please provide details of your complaint, together with copies of any supporting documents or correspondence. (Continue on a separate piece of paper if necessary.)

Signed: .... **(by or on behalf of the complainant)**	**Date:**

Please return the completed form and any supporting documentation to:

The Trustees of the Lifetime Pension Scheme, C/O Post Handling Team, Aptia Group Ltd, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP

NOTE:

This complaint cannot be dealt with under the Scheme's IDRP if the Pensions Ombudsman has started an investigation into this matter or court or tribunal proceedings have begun. By signing and returning this form, you are confirming that, so far as you are aware, no such investigation or proceedings have commenced.

You may wish to keep a copy of your completed form, in case you need it for future reference (for example, if the Trustees have any questions about what you have written).

APPENDIX B

Data Protection Complaint Form

Lifetime Pension Scheme (the Scheme)

Full name:	
Address:	
Membership information:	**Membership number (if known):** **Date you joined the Scheme:** **Date you left the Scheme (if applicable):**
Status (please tick):	**Member ( ) Spouse ( ) Dependant ( ) Other ( )**
Personal data affected:	

Reason for complaint ***(Please explain the reason for your complaint, the personal data affected by the complaint and any key times/events relevant to your complaint.)***	
Data subject rights exercised (if any) – see Section 21 of this notice.	