

Lloyd's Superannuation Fund

Internal Dispute Resolution Procedure

November 2023

1 Introduction

The Pensions Act 1995 requires trustees of occupational pension schemes to establish and operate a procedure for attempting to resolve any complaint or dispute which may arise in relation to the scheme.

The Fund Internal Dispute Resolution Procedure (IDRP) has been set up by LSF Pensions Management Ltd, the Trustee of the Lloyd's Superannuation Fund ('the Trustee'). The Procedure should be followed by any member, beneficiary or potential beneficiary who wishes to make a complaint, or who has any dispute in relation to the Fund (including any of the individual Schemes within it).

Anyone who has a complaint or dispute in relation to the Fund is encouraged to follow the IDRP, which will ensure that the matter is considered by the proper person and, if necessary, that it is considered by the Trustee. It should be noted that any complaint or dispute which has not been subject to the IDRP is likely to be excluded from the Pensions Ombudsman's jurisdiction.

1.1 *Complaints/disputes outside the Internal Dispute solution Procedure*

Any complaint or dispute where court or tribunal proceedings have already begun or which the Pensions Ombudsman has already started to investigate cannot also be pursued under the IDRP. In addition, the Procedure does not extend to disagreements between an employee and his or her employer regarding their terms and conditions of employment: disputes of this nature are subject to the grievance procedure established by the employer.

2 Who may use the Internal Dispute Resolution Procedure?

You may use the Fund IDRP if you have a complaint or dispute relating to the Fund which has not been resolved to your satisfaction, and you are:

- a deferred member
- a pensioner
- any other person in receipt of any benefits from the Fund (for example, a widow, widower or surviving dependant of a deceased member)
- a potential beneficiary
- any person claiming to be, or claiming to be entitled to become, one of the above.

If the complaint relates to someone who has died, his personal representatives may use the Procedure.

If the complaint relates to someone who is a minor or is incapable of acting for himself, a member of his family or another person who is a suitable representative may use the Procedure.

If you are a former member who has transferred all of your benefits out of the Fund, you may only make a complaint using the IDRP within six months after the date of that transfer.

You may want another person to represent you and make the complaint on your behalf. If so, the appointment of such a representative must be in writing (except where the complainant is a minor or is incapable of acting) and sent to the Pensions Manager of the Fund with details of the complaint (see Stage 1 - how to complain).

3 Stage 1 – How to complain

Your complaint will be considered first by the Pensions Manager and a Trustee Director. You should complete the Complaint Form at the back of this Procedure - and send it to:-

The Pensions Manager
Lloyd's Superannuation Fund
c/o Muse Advisory
Suite 10, KD Tower
The Cotterells
Hemel Hempstead
HP1 1FW

A copy of your Complaint Form will be returned to you with an acknowledgement of safe receipt within five working days. Please keep this copy safe as it may be required later.

The Pensions Manager and Trustee Director will carefully consider your complaint and if possible will provide a written response to you (and, where applicable, your representative) within two months or otherwise, at the latest, within four months of receiving the Complaint Form. The response will be sent to you by Royal Mail 'signed for' delivery and by email, where details have been provided. The response will contain, among other things, the following information:-

- a statement of the Stage 1 decision
- the proposed remedy, if the complaint is upheld
- your right to ask the Trustee Board to consider the complaint, if you are dissatisfied with the Stage 1 decision.

If, exceptionally, it is not possible for a response to be provided within two months, an interim reply will be sent to you explaining the reasons for the delay and the date by which a Stage 1 decision will be issued.

If you are satisfied with the Stage 1 decision and (if applicable) any remedy proposed, you should confirm in writing your acceptance of the decision to the Pensions Manager by signing the duplicate copy of the Stage 1 decision where indicated and returning it in the envelope provided within one month of the date of the decision. Any remedy which has been proposed cannot be implemented until your acceptance has been received.

4 Stage 2 – Referral to the Trustee

If you are dissatisfied with the Stage 1 decision, or if you do not accept any remedy proposed, you may, within six months of the date of that decision, ask the Trustee of the Fund to consider the matter. Your complaint will then be considered by the Trustee Board. The Trustee may either confirm or change the Stage 1 decision.

If you wish to use Stage 2 of the Complaints Procedure, you should complete the Referral Form at the back of this Procedure and send it to:-

The Trustee, Lloyd's Superannuation Fund
c/o The Pensions Manager, Muse Advisory
Suite 10, KD Tower
The Cotterells
Hemel Hempstead
HP1 1FW

On the Referral Form attached, you should explain why you are dissatisfied with the Stage 1 decision. A copy of the Referral Form will be returned to you to acknowledge its safe receipt. Please keep this copy safe.

The Trustee will be provided with a copy of your original Complaint Form, a copy of the statement of the Stage 1 decision on your complaint, and the Referral Form.

The Trustee will carefully consider the complaint and the reasons why you are dissatisfied with the Stage 1 decision. The Trustee will normally provide a written response to you and, where applicable, your representative within two months or otherwise, at the latest, within four months of their receipt of the Referral Form. The response will be sent to you by Royal Mail 'signed for' delivery and by email, where details have been provided. The response will contain the following details:-

- a statement of the Trustee's decision, including whether it confirms or replaces the Stage 1 decision, and references to any part of the Fund documentation and legislation which formed the basis of that decision
- if the Trustee exercised a discretion in reaching the decision, the part of the Fund documentation which allows for this discretion to be exercised
- information about how the services of MaPS (the Money & Pensions Service) and the Pensions Ombudsman may assist.

If, exceptionally, it is not possible for the Trustee to respond within four months, an interim reply will be sent to you explaining the reasons for the delay and the date by which they expect a full reply to be issued.

If you accept the Stage 2 decision, you should sign the duplicate copy of the Stage 2 response where indicated and return it in the envelope provided.

5 Stage 3 – Referral to the Pensions Ombudsman

In the event that you feel that a complaint or dispute has not been satisfactorily resolved through the Fund IDR, you may refer the matter to the Pensions Ombudsman. The Pensions Ombudsman is an independent organisation set up by law to investigate complaints or disputes about pension schemes.

The Early Resolution Team within the Pensions Ombudsman provide an informal and streamlined dispute resolution service if the case is referred to them within three months of the case closing. You may also refer the complaint or dispute directly for resolution by the Pensions Ombudsman.

Contact information for the Pensions Ombudsman is as follows:

Email: enquiries@pensions-ombudsman.org.uk
Telephone: 0800 917 4487

1. Lloyd's Superannuation Fund Fund Internal Dispute Resolution Procedure Stage 1: Complaints Form

PLEASE COMPLETE THIS FORM FULLY, USING BLOCK CAPITALS.

A. COMPLAINANT'S DETAILS:

A.1 Full Name: Mr/Mrs/Miss/Ms ("the complainant")

A.2 Home address:

A.3 Telephone number
Home:
Work:

A.4 Email address:

A.5 Date of birth:

B. COMPLAINANT'S REPRESENTATIVE:

If the complainant is represented by a third party, please complete the following:

(a) representative's name: Mr/Mrs/Miss/Ms

(b) representative's address:

(c) representative's relationship to complainant (if any):

WHERE THE COMPLAINANT IS A MINOR OR IS INCAPABLE OF ACTING, PLEASE ENCLOSE A COPY OF THE COMPLAINANT'S LETTER OR OTHER WRITTEN DOCUMENT APPOINTING THE REPRESENTATIVE.

C. MEMBERSHIP DETAILS:

C.1 If this complaint relates to the complainant's own membership of the Fund please provide the following information:

(a) Member's National Insurance number:

(b) Member's payroll number (if available):

(c) Name of Member's Scheme:

C.2 If this complaint relates to membership of someone other than the complainant please complete the following:

(a) Member's name: Mr/Mrs/Miss/Ms

(b) Member's last known address:

(c) Member's date of birth:

(d) The complainant's relationship to the member (e.g. widow, dependant, personal representative etc):

D. ADDRESS FOR CORRESPONDENCE ABOUT THE COMPLAINT:

Note that where the complainant is represented by a third party, the decision on the complaint will be sent in any event to both the complainant and the representative.

E. DETAILS OF THE COMPLAINT:

In order for the complaint to receive proper consideration, please provide full details, including, where appropriate: the date(s) on which events giving rise to the claim occurred; who is/was involved; the subject matter of the complaint; and the remedy sought.

(Please continue on a separate sheet as necessary, signing and dating the bottom of each sheet.)

Signed:
For or on behalf of the complainant

Name in print:

Date:

Are you: the complainant/the complainant's authorised representative? (Please delete as appropriate)

THIS FORM SHOULD BE SENT TO:

LSF, c/o Muse Advisory, Suite 10, KD Tower, The Cotterells, Hemel Hempstead HP1 1FW

Data Protection Information

The Trustee holds personal data which you have provided to them. It needs this to be able to administer the benefits under the Lloyd's Superannuation Fund.

The Trustee (as "data controller" for data protection purposes) is required to look after personal data in accordance with legal requirements. You can view our privacy notice on the LSF's website at www.lsf.org.uk/privacy-notice. Alternatively, if you prefer to receive a hard copy of the notice, please contact the LSF administration team.

**2. Lloyd's Superannuation Fund
Fund Internal Dispute Resolution Procedure
Stage 2: Referral To The Trustee**

Complainant's Name

Date of Stage 1 Decision.....

I am dissatisfied with the decision reached at Stage 1 of the Fund Internal Dispute Resolution Procedure. I request that the Trustee should consider the matter, under Stage 2 of the Fund Internal Dispute Resolution Procedure.

The reasons why I am dissatisfied with the decision are:-

(Please continue on a separate sheet as necessary, signing and dating the bottom of each sheet.)

Signed:
For or on behalf of the complainant

Name in print:

Date:

Are you: the complainant/the complainant's authorised representative? (Please delete as appropriate)

THIS FORM SHOULD BE SENT TO:

LSF, c/o Muse Advisory, Suite 10, KD Tower, The Cotterells, Hemel Hempstead HP1 1FW

3. Lloyd's Superannuation Fund Fund Internal Dispute Resolution Procedure Notice Of Stage 1 Decision

This Notice sets out the decision reached in response to the complaint lodged by you, the Complainant, under the Fund Internal Dispute Resolution Procedure.

Complainant's name

Name of Member to
whom complaint relates

Date complaint received
by the Pensions Manager

If you accept this decision and any remedy proposed by it, you should complete the Acceptance Form at the end of this Notice and return it to the Pensions Manager in the enclosed envelope within one month of the date of this Notice. You should be aware that any remedy proposed in this Notice cannot be implemented until your acceptance has been received by the Pensions Manager.

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SIGNED
Pensions Manager

DATE

Notes:

- (i) The Pensions Ombudsman is an independent organisation set up by law to investigate complaints or disputes about pension schemes.
- (ii) The Pensions Ombudsman may be contacted at:
Email: enquiries@pensions-ombudsman.org.uk
Telephone: 0800 917 4487

RIGHT TO REFERRAL TO TRUSTEE

If you are dissatisfied with this decision or any remedy proposed, you may ask the Trustee to reconsider the matter. If you wish to do this, you must lodge an application within six months of the date of this Notice.

A form is included at the back of the Fund Internal Dispute Resolution Procedure or is available from the Pensions Manager should you wish to make such an application.

ACCEPTANCE FORM

I have read and understand the above decision and confirm my acceptance of it and, where applicable, to the proposed remedy.

Signed

Name

Date

Data Protection Information

The Trustee holds personal data which you have provided to them. It needs this to be able to administer the benefits under the Lloyd's Superannuation Fund.

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4. Lloyd's Superannuation Fund
Fund Internal Dispute Resolution Procedure
Notice Of Stage 2 Decision

This Notice sets out the decision reached by the Trustee in response to the complaint lodged by you, the Complainant, under the Fund Internal Dispute Resolution Procedure. If you accept this decision and any remedy proposed by it, you should complete the Acceptance Form at the end of this Notice and return it to the Trustee in the enclosed envelope. You should be aware that any remedy proposed in this Notice may be implemented by the Trustee without further notice to you.

Complainant's name

Date of Stage 1 Decision

Name of Member to
whom complaint relates

Date of receipt by Trustee
of request for reconsideration

DECISION

The decision has been based on the following considerations:

Consideration 1:

Consideration 2:

SIGNED

On behalf of the Trustee

DATE

Notes:

(i) MaPS (the Money & Pensions Service) is available to assist members and beneficiaries of any occupational pension scheme in relation to disputes or complaints. MaPS may be contact at:

Holborn Centre
120 Holborn
London
EC1N 2TD

(ii) The Pensions Ombudsman may also investigate and determine certain complaints, or disputes of fact or law in relation to an occupational pension scheme. The Pensions Ombudsman may be contacted at:

11 Belgrave Road
London
SW1V 1RB

ACCEPTANCE FORM

I have read and understand the above decision and confirm my acceptance of it and, where applicable, to the proposed remedy.

Signed

Name

Date

Data Protection Information

The Trustee holds personal data which you have provided to them. It needs this to be able to administer the benefits under the Lloyd's Superannuation Fund.

The Trustee (as "data controller" for data protection purposes) is required to look after personal data in accordance with legal requirements. You can view our privacy notice on the LSF's website at www.lsf.org.uk/privacy-notice. Alternatively, if you prefer to receive a hard copy of the notice, please contact the LSF administration team.