

Lloyd's Superannuation Fund
Internal Dispute Resolution Procedure
June 2026

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. In addition, the Data Protection Act and the Data (Use and Access) Act 2025 requires trustees, as Data Controller, to have a process in place for data protection complaints.

This 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), including in relation to:

- The administration of the Fund; and/ or
- The processing of personal data and data protection complaints.

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.

2. Complaints/disputes outside the Internal Dispute Resolution 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.

3. 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) An active member, deferred member, pensioner or pension credit member of the Fund;
- (b) A widow, widower, surviving civil partner, surviving partner of a same-sex marriage, or surviving dependant of a deceased member (child or adult);
- (c) A surviving non-dependant beneficiary of a member;
- (d) Any person who has been in one of the above categories in the six months before the complaint is made; or
- (e) You believe that you are one of the above categories of person and your dispute is about that fact.

For data protection complaints, you may use the Fund IDRP if you fall into categories (a) to (e) above, and

- (f) Any other individual for whom the Fund holds personal data

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

If the complaint relates to someone who is a minor or is incapable of acting for themselves, a member of their 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 relating to administration of the Fund using the IDRPs within six months after the date of that transfer.

There is no strict deadline or time limit for you to submit a data complaint to us after an incident occurs, however you are encouraged to raise any concerns as soon as possible so that the Trustee can investigate effectively.

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).

4. 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 of Lloyd's Superannuation Fund
c/o Independent Governance Group
4th Floor Cannon Place
78 Cannon Street
London
EC4N 6HL

You may also Email your complaint to the Pensions Manager at:
LSFTeam@weareigg.com

The Pensions Manager will acknowledge receipt of your Complaint Form within five working days. If your complaint relates both to administration matters and data protection matters, the Pensions Manager will note this in their acknowledgement and may respond separately to each.

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/or 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
- the legislation and/or Fund Rules which have been relied upon in reaching a decision, including how they have been applied to your complaint
- 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. Any remedy which has been proposed cannot be implemented until your acceptance has been received.

5. 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 of Lloyd's Superannuation Fund
c/o Independent Governance Group
4th Floor Cannon Place
78 Cannon Street
London
EC4N 6HL

You may also Email the form to the Pensions Manager at:
LSFTeam@weareigg.com

On the Referral Form attached, you should explain why you are dissatisfied with the Stage 1 decision. Receipt of your Referral Form will be acknowledged within five working days.

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 as well as any other relevant documentation or evidence.

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/or 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 MoneyHelper 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 provide written confirmation of this.

6. Referral to the Pensions Ombudsman or Information Commissioners Office

For complaints about the administration for the Fund:

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

Information related to referring a complaint to The Pensions Ombudsman can be found on their website (www.pensions-ombudsman.org.uk) or by using the link below:

[Can I complain? | The Pensions Ombudsman](#)

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 (or ought to have known about it). There is discretion for those time limits to be extended. The Pensions Ombudsman can be

contacted at:

The Office of the Pensions Ombudsman
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 online:
<https://www.pensions-ombudsman.org.uk/submit-complaint>

For complaints about processing of personal data or data protection

If you are not satisfied with the outcome of your data protection complaint, you have the right to refer your complaint to the Information Commissioners Office (ICO) free of charge. The ICO deals with complaints and disputes which concern the way in which your personal information (or the personal information of someone you are representing) has been handled.

Instructions on complaining to the ICO about the use of your personal data can be found on the ICO website (ico.org.uk) or using the link below. Whilst there is technically no legal deadline for general data protection complaints, the ICO strongly recommends escalating issues promptly.

[Make a complaint about how an organisation has used your personal information | ICO](#)

7. Helpful resources

If you have general requests for information or guidance concerning your pension arrangements, you can contact MoneyHelper.

MoneyHelper

Tel: 0800 011 3797

Webchat: <https://www.moneyhelper.org.uk/PensionsChat/>

Online enquiry form: <https://www.moneyhelper.org.uk/en/contact-us/pensions-guidance/pensions-guidance-enquiry-form>

Website: [Pensions and retirement | Help with pensions and retirement | MoneyHelper](#)

Please note that they are unable to deal with incoming postal enquiries or send replies by post. A postal contact address is therefore not supplied.

Internal dispute resolution procedure (Stage 1)

Complaint Form

This form is to be completed by persons who wish to make a formal complaint against the Trustee of the Lloyds Superannuation Fund.

This form must be completed by either you or your representative.

Submission of this complaint form starts the process intended to resolve your dispute. Your application form will be considered by the Pensions Manager in accordance with the Stage 1 IDR (refer to above) who will respond with their decision within two months from the date on which your complaint is received.

Alternatively, if it is not possible to respond within that time, the Pensions Manager will inform you explaining the reason for the delay and the date on which the decision may be expected.

Please complete this complaint form (BLOCK CAPITALS ONLY) and return to the address shown at the end of this form.

Section A – to be completed by all applicants

| | |
|---|--|
| Full name | |
| Address | |
| | |
| | |
| | |
| Date of Birth | |
| National Insurance No | |
| Member/Policy reference (if known or applicable) | |

Section B

To be completed only if you are one of the following persons:

- (a) a widow of a deceased member;
- (b) a widower of a deceased member;
- (c) a surviving dependant, civil partner, surviving partner of a same-sex marriage or ex-spouse of a deceased member;
- (d) pension credit member;
- (e) surviving non-dependent beneficiary of a member;
- (f) a person claiming to be one of the above.

| | |
|--|--|
| Your relationship to the deceased member | |
| Full name of deceased member | |
| Date of Birth of deceased member | |
| Last address of the deceased member | |
| | |
| | |
| | |
| National Insurance no of the deceased member | |
| Member / Policy number of the deceased member (if known) | |

Section C

To be completed only if you have a representative acting on your behalf

| | |
|-----------------------------|--|
| Full name of representative | |
| Address | |
| | |
| | |
| | |

Is this address to be used for service of documents in relation to this procedure: Yes No

Written evidence of the representative's authority to act on behalf of the member must be provided and be acceptable to the Trustee. If the member is unable to sign a letter of authority, evidence that the representative can act on their behalf (for example a power of attorney document) will be required.

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 IGG, 4th Cannon Place, 78 Cannon Street, London, EC4N 6HL; or by email to:
LSFTeam@weareigg.com