Internal Dispute Resolution Procedure

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Worthington Employee Pension Top-Up Scheme

1. Introduction

The Trustee of the Scheme (the **Trustee**) aims to run the Scheme efficiently and fairly. However, disagreements or complaints may sometimes arise.

This Procedure explains how Scheme members and other eligible individuals can raise formal complaints about the administration or operation of the Scheme, as well as how concerns relating to the handling of personal data by or on behalf of the Trustee will be considered.

Most queries or concerns can be resolved informally, and members are encouraged, in the first instance, to raise any issues with Sean Browes.

If a matter cannot be resolved informally, this **Internal Dispute Resolution Procedure** (**IDRP**) provides a formal process for raising a complaint. This Procedure is established in accordance with the requirements of the Pensions Act 1995 and The Occupational Pension Schemes (Internal Dispute Resolution Procedures Consequential and Miscellaneous Amendments) Regulations 2008 and the Data Protection Act 2018.

2. Who can use the IDRP?

2.1 Scheme-related complaints

You may use this Procedure if the complaint relates to the Scheme and you are an eligible person. You are an eligible person if you are:

- a member of the scheme;
- a widow, widower, surviving civil partner or a surviving dependant of a deceased member of the scheme;
- a surviving non-dependant beneficiary of a deceased member of the scheme;
- a person who has previously been within one of the above three categories;
- a prospective member, in other words
    - you can become a member of the scheme if you so choose, or
    - you will be able to do so if you continue in the same employment for a sufficiently long period, or
    - you will be admitted to the scheme automatically unless you make an election not to do so, or
    - you may be admitted to the scheme if your employer consents,;
- there is a disagreement which relates to a question about whether you should be in one of the above groups
- you have ceased to be any of the above within the six months immediately before you make a complaint using this procedure

You can also use this procedure if you are:

- The personal representative of a deceased eligible person

- Acting on behalf of an eligible person who is a minor or someone otherwise incapable of acting for themselves, or
- You have been nominated by an eligible person.

2.2 Data protection complaints

This Procedure may also be used by you, whether or not you are a member of the Scheme, where the complaint relates to the handling of your personal data by or on behalf of the Trustee.

3. What does this IDRP apply to?

3.1 Scheme disputes

This Procedure applies to disagreements between anyone listed above and the Trustee about matters relating to the Scheme.

It does not apply to:

- disagreements solely between members and employers;
- matters where proceedings have been commenced in any court or tribunal; or
- matters already being investigated by the Pensions Ombudsman.

If proceedings commence in any court or tribunal or the Pension Ombudsman starts investigating after you have started using this procedure then the complaint will no longer be considered under this procedure.

3.2 Data protection complaints

A data protection complaint is any concern because you consider that your personal data has been processed in a way that does not comply with data protection law. This may include (for example):

- how your personal data has been collected, used, stored or shared;
- delays or issues in responding to your subject access request (SAR);
- the security measures used to store your information; or
- concerns about accuracy, retention or security of your personal data.

You do not need to describe your concern as a "data protection complaint" for it to be treated as one.

4. Representation and assistance

You may make a complaint yourself or ask a representative (such as a family member, adviser or friend) to act for you. Where you appoint a representative to act on your behalf, the Trustee will require written confirmation of the appointment. This may be provided by signed letter, email confirmation from your usual email address, or a formal power of attorney.

If you are under 18 or unable to act for yourself, a suitable person may apply on your behalf.

If you die before the matter is resolved, a complaint may be started or continued by your personal representative.

5. How to submit a formal complaint

5.1 Form of application

You must set out the nature of the complaint clearly and include enough information to allow it to be investigated.

Your complaint may be submitted:

- in writing by post;
- by email; or
- by any other reasonable written method made available by the Trustee.

A complaint form is appended to this Policy. Its use is strongly encouraged, as it helps ensure that all relevant information is provided to allow the Trustee to investigate your concern fully. Use of the form is not compulsory, and complaints in relation to scheme disputes will be accepted in any written format that provides sufficient detail. Although written data protection complaints are preferred, this is not compulsory.

5.2 Information to include

Where the complaint relates to your own Scheme membership, you should include (where available):

- full name and address;
- date of birth;
- National Insurance number;
- Scheme reference number;
- a clear explanation of the complaint, supporting evidence where available and what outcome you are seeking.

Where the complaint relates to another person, you should also explain your relationship to that individual and provide relevant identifying information

5.3 Acknowledgment and investigation

The Trustee will

- aim to acknowledge receipt of the complaint within ten working days but will acknowledge receipt no later than 30 calendar days after it is received;
- investigate the complaint without undue delay and will liaise with any relevant third parties to obtain the information needed to fully consider your complaint. This may include the Scheme employer, the Scheme administrator, you and any other party involved in the running or operation of the Scheme. The Trustee will also keep you reasonably informed of progress where appropriate.

All complaints will be handled sensitively and in confidence. Information will only be shared where necessary to investigate the complaint or where required by law.

Unless you request otherwise, the Trustee will normally communicate with you using the same method by which the complaint was submitted. Alternative formats can be provided on request.

6. Decision and response

Once the investigation is complete, the Trustee (or their delegate) will issue a written decision.

Where practicable, the Trustee aims to provide a substantive outcome within four months of receipt of the complaint and sooner if possible. If additional time is required, the reasons for the delay will be explained and an updated expected timeframe will be provided. If your complaint covers both Scheme related complaints and Data Protection complaints, the Trustee may reply to these separately.

The decision will include, as appropriate:

- the outcome and reasons for the decision;
- references to relevant legislation, statutory guidance or the governing documents relating to the Scheme;
- details of any discretion exercised; and
- information about further escalation options.

7. What if you are not satisfied?

7.1 Scheme complaints

If you are not satisfied with the outcome of your complaint, you may refer it to the **Pensions Ombudsman**, who has the power to investigate and determine complaints or disputes of fact or law relating to pension schemes.

A complaint must generally be made to the Pensions Ombudsman:

- Within 3 years of the act or omission complained about, or
- Within 3 years of when the individual knew (or ought reasonably to have known) about it

The Pensions Ombudsman does have some discretion to waive these time limits.

7.2 Data protection complaints

If your complaint relates to the handling of personal data you may raise the matter with the **Information Commissioner's Office** (**ICO**) at any point.

8. Contact details

If you need assistance during the complaints process, the following contacts may be able to help. Each has a different role in relation to the Scheme and its administration.

Scheme contact

This is your primary point of contact for Scheme-related queries and for submitting a complaint under this Procedure. They can help clarify Scheme benefits, processes, and any information needed to progress your complaint.

Sean Browes (Trustee)

Email: dalriadaadmin@dalriadatrustees.co.uk

Postal Address:
Dalriada Trustees Limited
Linen Loft
27 – 37 Adelaide Street
Belfast
BT2 8FE

Telephone number: 028 9041 2018

Data protection contact

This contact handles concerns relating to the use of personal data by or on behalf of the Trustee. They can assist with data subject rights requests, data protection complaints, and questions about how your information is processed.

Sean Browes (Trustee)

Email: dalriadaadmin@dalriadatrustees.co.uk

Telephone number: 028 9041 2018

The Pensions Ombudsman

The Pensions Ombudsman investigates and determines complaints and disputes about the administration and management of pension schemes. You may refer your complaint to the Ombudsman if you remain dissatisfied after completing this Procedure.

10 South Colonnade, Canary Wharf, London E14 4PU

Telephone: 0800 917 4487

Website: www.pensions-ombudsman.org.uk

MoneyHelper

MoneyHelper is a free, impartial service backed by the UK Government. It provides guidance on pensions, retirement options, and general money matters. MoneyHelper cannot investigate complaints but can help you understand your pension arrangements and the options available to you.

Telephone: 0800 011 3797

Website: www.moneyhelper.org.uk

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The Information Commissioner's Office

The ICO is the UK regulator for data protection. If your complaint relates to the handling of personal data you may raise the matter with the ICO at any point.

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

June 2026

Internal Dispute Resolution Procedure Application Form

Worthington Employee Pension Top-Up Scheme (the **Scheme**)

Internal dispute resolution procedure (IDRP) application form for complaints relating to the Scheme

Before completing this form, please refer to the accompanying IDRP, which explains the Trustee's approach to formal complaints, who is eligible to submit a complaint and the process that applies.

Please complete all relevant sections in block capitals. Where an answer is not applicable, please indicate 'N/A'.

1. Member's details

Information Required	Details
Name	
Address	
Postcode	
Email / Telephone Number	
Date of Birth	
National Insurance Number	
Membership Status	Active, deferred or pensioner member, or other beneficiary (please state member details above)
Scheme Reference Number (if known)	

Details of person making the complaint if not the Member
To be completed only if the person making the complaint is the spouse or dependant of a deceased member

Information Required	Details
Name	
Address	
Postcode	

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Information Required	Details
Email / Telephone Number	
Date of Birth	
Relationship to the member	

2. Representative's details

2.1 Is a representative acting on your behalf? If so, please give their details.

Information Required	Details
Name	
Address	
Postcode	
Email / Telephone Number	

2.60 Please provide evidence of the representative's authority to act on your behalf.

2.61 Should the above address be used for correspondence regarding the decision and any requests for further information?

Yes ☐ No ☐

3. Method of communication

Do you want us to respond in the same manner as you raised the complaint?	Yes / No
If No, how do you want us to respond?	Email / By post

Internal Dispute Resolution Procedure Application Form

4. Details of your complaint

Please give details of your complaint below. Please supply copies of any documents that support your complaint.

Please continue on a separate sheet if the space below is insufficient.

5. Court proceedings

The complaint cannot be dealt with under the Scheme's IDRP process if:

- court or tribunal proceedings have begun; or
- the Pensions Ombudsman has commenced an investigation into the complaint.

Internal Dispute Resolution Procedure Application Form

6. Data protection

The information you provide in this form will be used by the Trustee and its appointed administrators to investigate and respond to your complaint under the Scheme's Internal Dispute Resolution Procedure. Your information will be handled securely and only shared where necessary for this purpose or where required by law.

Further information about how the Trustee processes personal data, including your rights under data protection law, is available in the Scheme's Privacy Notice, which can be provided on request.

7. Submission of this form

This application may be submitted by email or by post. **Submission by email is preferred**, as it enables the Trustee to begin reviewing your complaint more quickly.

Please return the completed form and any supporting documents to:

Sean Browes

Email address: dalriadaadmin@dalriadatrustees.co.uk

Postal Address: Dalriada Trustees Limited, Linen Loft, 27 – 37 Adelaide Street, Belfast, BT2 8FE

By completing and submitting this form, you agree that:

- **all information you have provided is complete and accurate to the best of your knowledge;**
- **unless the complaint is in relation to data protection, no court or tribunal proceedings, and no investigation by the Pensions Ombudsman, are ongoing in relation to your complaint; and**
- **the Trustee may share the information you provide with any third party whose involvement is necessary to consider your complaint. This may include the Trustee's professional advisers, the Scheme administrator, the Scheme employer, or any other party involved in the administration or operation of the Scheme.**

Signed:.....

Name (block capitals):.....

Dated:.....

WE RECOMMEND THAT YOU KEEP A COPY OF YOUR COMPLETED FORM FOR YOUR OWN RECORDS