

Senior plc Pension Plan

Policy:	MA4 – Internal Dispute Resolution Policy and Procedure
Version number:	1
In-force date:	6 th December 2024
Review date:	Annually
Last Reviewed:	6 th December 2024

1. Introduction

- 1.1 The law requires pension scheme trustees to establish and operate an effective system of governance (**ESOG**) including internal controls.
- 1.2 The General Code of Practice issued by the Pensions Regulator (**tPR**) states that trustees must put formal procedures and processes in place to investigate and decide upon pension scheme disputes quickly and effectively.
- 1.3 Senior Trustee Limited (the **Trustee**) acting as sole trustee of the Senior plc Pension Plan (the **Scheme**) has adopted this procedure in order to meet these requirements.
- 1.4 Trustees must follow the dispute resolution procedure to resolve various matters:
 - (i) Where a person (a **complainant**) with an interest in the scheme is not satisfied with any matter relating to the scheme (for example a decision that affects them), they have the right to ask for a review of the matter.
 - (ii) Where a **complainant** no longer has an interest in the scheme or claims to be such a person, the Trustees must ensure their scheme's procedures allow a reasonable period for that person or their representatives to make their applications. The reasonable period in these circumstances is six months beginning on the date their interest in the scheme stopped.
 - (iii) Trustees can accept an application outside of this timeframe if they believe it is appropriate.

2. The Dispute Resolution Procedure

- 2.1 The Dispute Resolution Procedure is a two-stage process.
 - (i) In the first stage, the **complainant** must address their complaint to the Secretary to the Trustee of the Senior plc Pension Plan. The **complainant** will receive a response within two months of receipt of the stage 1 complaint document (Appendix B).
 - (ii) The second stage is used if the **complainant** is dissatisfied with the response of the first stage of the process. The **complainant** is entitled to refer the complaint to the Trustee within six months of receiving the response to the first stage of the process. The Trustee will reply directly to the **complainant** within two months of receipt of the stage 2 complaint document (Appendix C)
 - (iii) The **complainant** will be notified of any decision no later than 21 days from when it is made.

- (iv) A decision will not be delayed where it is possible to process an application sooner than two months
- (v) If appropriate to do so, it may take longer than two months to reach a decision and the **complainant** will be notified accordingly.
- (vi) The Pensions Advisory Service (TPAS) is available to assist members at any stage in the Internal Dispute Resolution Procedure

3. **Decision-making**

3.1 When reviewing an application, Trustees should:

- a) ensure they have all the appropriate information to make an informed decision.
- b) request further information if required.
- c) be satisfied that the time and action taken to reach a decision and notify the **complainant** are appropriate to the situation and be able to demonstrate this.

4. **Informing members**

4.1 The following should be considered when keeping members informed about the dispute resolution process and when dealing with disputes received:

- a) publishing and making readily available details of the time limits within which someone with an interest in the scheme must make an application.
- b) making this procedure accessible to members and potential applicants by publishing it on a scheme website.
- c) keeping applicants advised of the progress of their dispute and let them know when they are likely to receive an outcome.

5. **Dispute Resolution Procedure Note and Forms for Complainants**

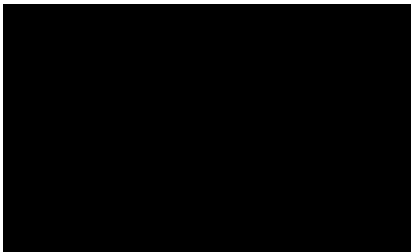
5.1 The Note in Appendix A has been developed to assist an applicant in submitting a dispute under this procedure. Appendix B & C include stage 1 and stage 2 application forms.

6. **Review of this policy**

6.1 The trustee directors shall review this policy annually.

MA4 – Internal Dispute Resolution Policy and Procedure

Approved by the Directors of Senior Trustee Limited

Name DAVID BEST Date: 6/12/2024 Signed: 

Name David Beavan Date: 06/12/2024 Signed: 

Appendix A

Dispute Resolution Procedure Note and Forms for Complainants

Introduction

The Pensions Act requires pension schemes to have procedures for the resolution of disputes arising from the running of the pension scheme. This note summarises the procedure which a Complainant should follow if they wish to make a complaint about the Senior plc Pension Plan (“the Plan”).

The complaint procedure

The complaint procedure is a two-stage process. In the first instance, the Complainant must address their complaint to the Secretary to the Trustee of the Senior plc Pension Plan. In normal circumstances, the Complainant will receive a response within two months. If the Complainant is dissatisfied with the response, they will be entitled to refer the complaint to the Trustee within six months of receiving the response from the Secretary. The Trustee will reply directly to the Complainant, again, where possible, within two months.

The Pensions Advisory Service (TPAS) is available to assist Complainants at any stage in the Internal Dispute Resolution Procedure.

If the Complainant is still unhappy following review by the Trustee, then you may at that stage, but not before, refer their complaint to the Pensions Ombudsman.

A Complainant may nominate a representative to make the complaint on their behalf.

A Complainant will not be able to use this procedure if court or tribunal proceedings have begun or if the Pensions Ombudsman has commenced an investigation independent of the complainant.

Who can use this procedure?

Before completing the attached form, the Complainant should ensure that they are eligible to make a complaint under this procedure. To be eligible you must be in one of the following categories:

- (a) Existing Plan member that is:
 - i. in active service
 - ii. with deferred benefits
 - iii. in receipt of a pension
- (b) Widow(er), surviving civil partner or surviving dependant of a deceased member of the Plan.
- (c) Surviving non-dependant beneficiary of a deceased member of the Plan.
- (d) Prospective Plan member, i.e.
 - i. eligible at your own option to become a member of the Plan
 - ii. eligible to become a member of the Plan subject to the agreement of the Trustee
- (e) Anyone ceasing to fall into any of the above categories (a) to (d) provided that the complaint is made within 6 months of such cessation.
- (f) Anyone claiming to fall into any of the above categories (a) to (e) and the dispute relates to whether he is such a person, provided that a complaint relating to (e) must be made within 6 months of such cessation.

How to make a complaint – first stage

A Complainant must submit the attached form to the Secretary to the Trustee of the Senior plc Pension Plan, 59/61 High Street, Rickmansworth, WD3 1RH.

Response to a complaint received.

A Complainant should hear from the Secretary to the Trustee within two months of submitting their complaint. If the complaint cannot be addressed within this time scale, the Complainant will be told why there is a delay and when they can expect to hear further.

**Senior plc Pension Plan
Internal Dispute Resolution Procedure – Stage 1**

Part 1 - Details of Plan Member / Prospective Plan Member

Full Name	
Address	
Date of Birth	
National Insurance No.	

Part 2 - Details of Person Making the Complaint

To be completed only if the person making the complaint is the spouse or dependant of a deceased member

Full Name	
Address	
Date of Birth	
Relationship to Member	

Part 3 - Details of Representative acting on behalf of complainant (if any)

Full Name	
Address	
Address to be used for correspondence	
Relationship to Member	

Part 4

Details of the Complaint

A statement of the disagreement together with sufficient details to demonstrate why you are aggrieved must be provided in the space below. (Continue on separate piece of paper if necessary.)

Signed		Date	

Appendix C

**Senior plc Pension Plan
Internal Dispute Resolution Procedure – Stage 2**

Part 1 - Details of Plan Member

Full Name	
Address	
Date of Birth	
National Insurance No.	

Part 2 - Statement of Reason for Disagreement with the Decision from Stage 1

To include sufficient details to demonstrate why the complainant is dissatisfied with the response received in Stage 1 in the space below. (Continue on a separate piece of paper if necessary.)

I request the Trustee of the Senior plc Pension Plan to reconsider its decision made in Stage 1 of the Internal Dispute Resolution Procedure.

Signed		Date	
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