

## DE LA RUE PENSION SCHEME (THE "SCHEME")

### Internal Dispute Resolution Procedure (IDRP)

As a member of the De La Rue Pension Scheme ('the Scheme') there may be times when you, your dependants or a non-dependant beneficiary are unhappy with the service you receive. We hope that any grievance can be resolved on an informal basis. If this is not possible, however, this document helps to explain the procedure in place to have it formally investigated.

This Internal Dispute Resolution Procedure also applies to complaints relating to the handling of personal data in connection with the administration and governance of the Scheme, including complaints concerning privacy notices, the use or disclosure of personal data, and the handling of data subject rights.

If at any time you would like to receive free and impartial advice or if you encounter any difficulties in getting your complaint resolved, you may wish to contact MoneyHelper, part of the Money and Pensions Service. They are also able to explain your rights and responsibilities and can be contacted at:

Money and Pensions Service  
120 Holborn  
London, EC1N 2TD  
Tel: 0800 011 3797 (Monday to Friday 9am-5pm)  
Email: [enquiries@pensionsadvisoryservice.org.uk](mailto:enquiries@pensionsadvisoryservice.org.uk)  
Website: [www.pensionsadvisoryservice.org.uk](http://www.pensionsadvisoryservice.org.uk)

### ***Who can apply?***

The procedure is available to the following;

- (a) active, deferred and pensioner members of the Scheme
- (b) widows, widowers, surviving dependant and non-dependant beneficiaries of deceased scheme members
- (c) prospective members of the Scheme
- (d) applications from those who cease to be in the above categories must be made within six months of such cessation

Where a complaint relates to personal data, the individual about whom the data relates (or their authorised representative) may apply under this procedure. Any individual whose personal data is concerned may make a complaint, regardless of whether they fall within categories (a) to (d) above. A data protection complaint may be brought by anyone who considers that the Trustee has infringed data protection legislation in connection with the handling of their personal information.

### ***Must I apply myself?***

If you prefer, somebody else can apply on your behalf. This could be, for example, a member of your family, another employee, a friend, a trade union representative, or a lawyer.



Where you are a minor or otherwise incapable of acting for yourself, an application may be made or continued on your behalf;

- (a) in case of your death by your personal representative
- (b) in any other case by any member of your family or some other person suitable to represent you

This includes complaints relating to the handling of personal data.

### ***Who do I apply to?***

The adjudicator is the Pensions Manager who may be contacted via email or post at the following addresses :

Email: [DeLaRuePensionScheme@dalriadatrustees.co.uk](mailto:DeLaRuePensionScheme@dalriadatrustees.co.uk)  
Post : De La Rue Pension Scheme  
Dalriada Trustees Limited  
46 New Broad Street  
London  
EC2M 1JH

The Trustee has chosen the adjudicator as someone who knows about our scheme and the laws governing it. It is their duty to investigate your problem in confidence and without bias.

Where a complaint involves data-protection matters, the adjudicator may take appropriate legal, professional, or technical advice before reaching a decision.

### ***How do I apply?***

If applying yourself, you must write to the adjudicator giving your full name and address, your date of birth, your national insurance number, the facts you disagree with, why you are aggrieved and your signature.

Where your complaint relates to personal data, you should explain how you believe your data has been handled incorrectly or unfairly, or which data-protection rights you believe have not been met. You do not need to refer to specific legislation.

If you are a widow, widower, dependant, or non-dependant beneficiary of a deceased Scheme member you will need to provide the above details except your national insurance number. You will also need to give the full name, last address, date of birth and national insurance number of the deceased together with your relationship to them.

If you consent to another person representing you, please include their full name, address, profession, and their relationship to you in a letter (signed by yourself and your representative) advising the adjudicator of your intention. Please also state whether you would like correspondence about the matter to be sent to your own address and/or to your representative's address.

If you do not give all these details your application may be returned.

### ***When will the adjudicator reply?***

The adjudicator will look carefully into your case, consulting with anyone else they need to ask. It may take time to unravel the facts but, a decision will normally be made within four months of the

original application being received.

Where a complaint relates to data-protection matters, the Trustee will aim to respond as promptly as possible and, in any event, within the timeframes required under UK data protection law, unless the nature or complexity of the complaint reasonably requires an extension.

The Trustee will acknowledge receipt of the complaint within 30 days. Where a full response can be provided within 30 days, a separate acknowledgment is not required. Where a data-protection complaint is made together with a wider complaint, and the data-protection element can be resolved sooner, the Trustee will respond to the data-protection complaint separately rather than waiting to address all matters together.

### ***How will the adjudicator reply?***

The reply will give you an explanation of the adjudicator's decision, any laws which they have relied on, any parts of the scheme rules which have a bearing and what you can do if you are not happy with the decision.

Where the complaint relates to personal data, the response will also explain any data-protection considerations taken into account and the options available if you remain dissatisfied.

### ***What if I am still not satisfied?***

If the adjudicator has been unable to resolve your complaint you can apply to the Pensions Ombudsman. The Pensions Ombudsman is completely independent and acts as an impartial adjudicator. Their role and powers have been decided by Parliament and there is no charge for using this services. The Ombudsman's decision is final and binding on all the parties, subject to any appeal made to the High Court on a point of law.

Where a complaint relates to data-protection matters, and you remain dissatisfied after completion of this procedure, you also have the right to raise the matter with the Information Commission's Office (ICO). The Trustee will explain the appropriate escalation route in its response.

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### ***The Pensions Ombudsman***

The Pensions Ombudsman provides an independent adjudication service for complaints relating to pension scheme administration and maladministration. The IDRPs are generally expected to have been completed before a complaint is referred.

This service can be contacted at:

10 South Colonnade  
Canary Wharf  
E14 4PU

Telephone: 0800 917 4487, Select the option for a formal application

Email: [enquiries@pensions-ombudsman.org.uk](mailto:enquiries@pensions-ombudsman.org.uk)

Website: [www.pensions-ombudsman.org.uk](http://www.pensions-ombudsman.org.uk)

### **The Information Commission's Office (ICO)**

Where a complaint relates to the handling of personal data, and the individual remains dissatisfied after completion of the Scheme's Internal Dispute Resolution Procedure, they have the right to raise the matter with the Information Commission's Office ("ICO").



The ICO is the independent regulator for data-protection matters in the UK and provides guidance and oversight in relation to the processing of personal data.

The ICO can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

The Trustee encourages individuals to raise concerns through the Scheme's Internal Dispute Resolution Procedure in the first instance, as this often allows issues to be resolved more quickly and effectively.