Conservative Agents' Superannuation Fund Internal Disputes Resolution Procedure ("IDRP")

Introduction

This policy has been prepared by the Trustees of the Conservative Agents' Superannuation Fund ("the Fund") and sets out the formal procedure in place for the resolution of a dispute between members, potential members or beneficiaries of the Fund and the Trustees, in line with <u>dispute resolution procedures module</u> of The Pensions Regulator's ("TPR's") General Code of Practice.

This policy is not intended to be exhaustive and define every possible circumstance which may arise, but it does set out the underlying principles of the Trustees.

This policy sets out the approach members, potential members or beneficiaries ("you", "your") should follow if they have a complaint relating to the operation of the Fund.

Please note that:

- the complaint may not be dealt with under the Fund's IDRP if the Pensions Ombudsman has started investigating the complaint or court or tribunal proceedings have begun.
- any disagreements or disputes with the employer are outside the scope of this complaint process but the Trustees will pass on any such complaints received to them.
- normally complaints made more than six months after you (or the person you are representing) ceased to be eligible or potentially eligible for benefits from the Fund will be judged to be "out of time", unless the law requires otherwise.

This policy is reviewed by the Trustees at least every three years, and more frequently should there be a material change in circumstances. The policy was last reviewed in February 2023. The Trustees reserve the right to alter these procedures to reflect experience and changes of circumstances of law.

Stage 1

What you need to do

To begin with, you should put your case in writing to the Trustees of the Fund. Contact details are as follows:

Hannah Marshall, Secretary to the Trustees, Conservative & Unionist Agents' Superannuation Fund, c/o Hymans Robertson, One London Wall, London EC2Y 5EA, email: casf@hymans.co.uk

Your letter should in include:

- your personal details including your name, address, date of birth and National Insurance number;
- details of your complaint; and
- in the case of dispute concerning the benefits of a spouse or dependant of a deceased member, you should also provide their personal details.

If you wish, you may ask someone to act as your personal representative. If you do this, you must make sure that you make this clear in your letter, and also provide the full name and address of your representative and whether that address should be used for the service of legal documents. A complaint can also be raised by a suitable personal representative if the complainant can't act for themselves.

In order for the Trustees to process your complaint, you will need to provide us with relevant evidence and information. This is likely to include personal data, which will be processed in accordance with the privacy notice (see further detail below). We may pass information you provide in relation to this dispute on to Hymans Robertson LLP (as the Fund's Administrator), the Scheme Actuary and actuarial team (currently Samer Hafiz and

Hymans Robertson LLP), Conservative Central Office (as the Fund's Principal Employer), or Mayer Brown LLP (as the Trustees' legal advisers).

We may need to process special categories of sensitive personal data for the purpose of considering and deciding your complaint. This includes data concerning racial or ethnic origin, religious beliefs, health or sexual orientation. We may process your dispute (including this sensitive information) where it is necessary in order to comply with our legal obligations or to defend a claim.

You may be asked to attend a meeting to discuss your dispute.

What the Trustees will do

You will be sent an acknowledgement within 10 business days. If you have not provided sufficient information to allow your complaint to be considered the acknowledgement will make clear what additional information is required.

The Trustees will investigate your complaint and consider it. The Trustees aim to address complaints and respond within two months. If we can't, we'll let you know the reason for the delay and when we expect to be able to respond. Once a decision is made, the Trustees will notify you of the outcome within 21 days of the decision been made. The reply will contain a notice of the decision and will explain why and how that decision was reached. The reply will refer to any relevant legislation or Fund rules and explain your right to have the matter reconsidered.

Stage 2

What you need to do

If you do not agree with the decision you should write to or email the Trustees of the Fund directly, asking them to reconsider the position and include additional evidence to support your view. You must do this within six months of the decision and you must send a copy of the decision, along with your name, address, date of birth and National Insurance number, stating your reasons for disagreeing with it and that you want the decision to be reconsidered.

What the Trustees will do

You will be sent an acknowledgement within 10 business days. If you have not provided sufficient information to allow your complaint to be considered the acknowledgement will make clear what additional information is required.

After reconsidering your disagreement, the Trustees must either confirm the original decision or make a new decision in its place. This will be done within two months of receiving the full notification of your disagreement. If the Trustees can't respond within four months, we will let you know the reasons for the delay and when we expect to be able to respond.

Once a decision is made, the Trustees will notify you of the outcome within 21 days of the decision been made. The reply will contain a notice of the decision and will explain why and how that decision was reached. The reply will refer to any relevant legislation or Fund rules and explain your right to have the matter reconsidered, including providing details of your right to take up your complaint with the Pensions Ombudsman.

Privacy policy

The Trustees of the Fund are committed to protecting the privacy and security of your personal information, which it holds in order to administer the Fund including dealing with complaints. The Fund's privacy notice contains important information about how we do this and your rights. A copy is available online at www.casf.uk and hard copies are available on request.

The Money and Pensions Service

If you have a general request for information or need some guidance about your pension arrangements contact the Money and Pensions Service ("MaPS"). MaPS brings together three government-backed financial guidance providers who are all free to use: the Money Advice Service, the Pensions Advisory Service and Pension Wise. MaPS is available to assist members and beneficiaries of the Fund in connection with issues which they have failed to resolve with the Trustees, and to answer general queries. TPAS services are free to members of the public.

MaPS may be contacted in one of the following ways:

Write: 120 Holborn, London, EC1N 2TD

Email: complaints@maps.org.uk

Tel: 0800 138 777 and 0800 011 3797

Website: www.moneyhelper.org.uk/en and www.moneyandpensionsservice.org.uk

The Pensions Ombudsman

You can refer your complaint to the Pension Ombudsman ("TPO") for investigation free of charge. Usually you need to do this within three years of the event you're complaining about or, if later, within three years of when you first knew about it (or ought to have known about it). However, TPO can waive that requirement if he thinks it appropriate.

TPO has the power to investigate and determine any complaint or dispute of fact or law in relation a scheme. Before accepting any matter for investigation, TPO usually insists that the matter has previously been raised through the IDRP and still remains unresolved. If your case is referred to TPO then you will then hear from it directly.

The services of TPO are available to all members, beneficiaries and prospective members of the Fund. TPO can be contacted in one of the following ways:

Write: 10 South Colonnade, Canary Wharf, London, E14 4PU

Email: enquiries@pensions-ombudsman.org.uk

Tel: 0800 917 4487

Website: www.pensions-ombudsman.org.uk

You can also submit a complaint form online at: https://www.pensions-ombudsman.org.uk/making-complaint

First Stage Application Form

1	Complainant's personal details		
	Full Name:		
	Address:		
	Post code:		
	Date of birth:		
	National Insurance number:		
2	Eligibility		
	The complainant is:		Please tick one box:
	In pensionable service		Please go to Section 4
	A deferred pensioner		Please go to Section 4
	A pensioner		Please go to Section 4
	A prospective member of the Fund		Please go to Section 4
	In one of the above within the last six months		Please go to Section 4
	The widow/widower* of a Fund member/pensioner		Please go to Section 3
	A surviving dependant of a Fund member/pensioner		Please go to Section 3
3	Member's personal details		
	If you are the widow, widower or surviving dependant of a member/pensioner please complete this section		
	Full name:		
	Address:		
	Postcode:		
	Date of birth:		

^{*} Please delete as appropriate

	4	Representative's details			
		You are entitled to act on your own behalf, but if you have asked someone to represent you (or if you the applicant's/complainant's personal representative) please complete this section:			
		Full nam	e of representative:		
		Address:	:		
		Postcode:			
		Do you want correspondence to be sent directly to the representative?			
		You will be sent a copy of the Trustees' decision in any event.			
	5	5 Facts of the case			
Please provide the facts of the case in sufficient detail to show why you have a dispute. Please use another sheet of paper if necessary.					
	Signa	ature:		Complainant/Representati	ve*
	Date	d:			

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^{*} Please delete as appropriate

Reference to the Trustees

Please use this form only if you have received a decision from the Secretary to the Trustees under the first stage of the dispute resolution procedure and you want the Trustees to reconsider the decision.

1	Complainant's personal details			
	Full Name:			
	Address:			
	Postcode:			
	Date of birth:			
	Relationship with the pension scheme:			
	(e.g. member, pensioner, spouse of member etc)			
-	you are a Fund member (active, deferred or pensioner member) or an employee who may be able to become a ember, state your National Insurance number:			
2	Member's personal details			
	If you (the complainant who has completed 1 above) are a widow(er) of a member or a surviving dependant of a member please complete this section:			
	Full name of member:			
	Address of member:			
	Postcode:			
	Member's date of birth:			
	Member's National Insurance number:			
	Your relationship with member:			
3	Representative's details			
	If you have asked someone to represent you (or if you are the complainant's personal representative) please complete this section:			
	Full name of the representative:			
	Address:			
	Postcode:			
	Do you want correspondence to be sent directly to the representative?			
	You will be sent a copy of the Trustees' decision in any event.			
4	Nature of disagreement			

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	Please use another sheet of paper if necessary.		
5	First decision		
	I attach a	a copy of the decision by the Secretary to	the Trustees.
6	Reason for the reference to the Trustees		
	Please give your reasons for being dissatisfied with the first stage decision. Please use another shee paper if necessary.		th the first stage decision. Please use another sheet of
I wish the Trustees to reconsider the decision of the Secretary to the Trustees			
Signa	ature:		Complainant/Representative*
Date	d:		

Please provide sufficient detail to show why you are aggrieved.

^{*} Please delete as appropriate