

Manpower Pension Plan

Internal Dispute Resolution Procedure

Introduction

This policy has been prepared by the Trustees of the Manpower Pension Plan ('the Plan') and sets out the formal procedure in place for the resolution of a dispute between members, potential members or beneficiaries of the Plan and the Trustee, in line with the dispute resolution procedures module of The Pensions Regulator's ("TPR's") General Code of Practice.

There have been very few complaints or disputes regarding the Plan. Where they have occurred, they have generally been resolved informally with the Human Resources Department. Any such complaint or dispute would always be treated seriously, and steps would be taken to secure a satisfactory and reasonable outcome.

The Pensions Act 1995 introduced the requirement that there should be a formal procedure in place for the resolution of a dispute between the members and the Plan's Trustees.

The purpose of this policy is to set out:

- (a) the Trustees' formal internal dispute resolution procedure (IDRP), adopted by the Trustees of the Plan in accordance with Sections 50 to 50B of the Pensions Act 1995 (please refer to the main body of this policy); and
- (b) the Trustees' procedure for handling Data Protection Complaints in accordance with Section 164A of the DPA 2018 (please refer to Appendix 1 of this policy).

If you are an active member, a former member, a pensioner or about to become a member, or the spouse or dependant of any of these categories of members, and you have a complaint you should follow the procedure outlined below.

Please note that:

- the complaint may not be dealt with under the Plan's IDPR 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.

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 June 2026. The Trustees reserves the right to alter these procedures to reflect experience and changes of circumstances of law.

How to raise a complaint under the Plan's IDRP

If you are dissatisfied with the response of the Human Resources Department, you may refer the matter, in writing, to the Trustees of the Plan using the contact details below.

The Trustees of the Manpower Pension Plan c/o Hymans Robertson LLP
One London Wall
London, EC2Y 5EA

Your letter should include:

- Your personal details, name, address, date of birth and National Insurance number.
- Details of your complaint.
- If you are the 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.

If you have ceased to be a member, beneficiary or prospective member of the Plan any complaint under this procedure must normally be made within six months of your membership (or eligibility for membership) of the Plan ceasing. Current members must bring their case to the Trustees within 6 months of the incident happening.

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 Plan's Administrator), the Plan Actuary and actuarial team (currently Alec Day and Hymans Robertson LLP), or Squire Patton Boggs (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.

What the Trustees will do

The Trustees will consider your case and may seek advice. You will be sent an acknowledgement within 21 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.

You may be asked to attend a meeting to discuss your dispute with them. The Trustees must reply within two months. The reply will contain a notice of their decision and will explain why and how that decision was reached.

Privacy policy

The Trustees of the Plan are committed to protecting the privacy and security of your personal information, which it holds in order to administer the Plan, including dealing with complaints. The Plan's privacy notice contains important information about how we do this and your rights. A copy has been sent to all members but is available online at <https://mppmembers.co.uk/resources/privacy-policy/> and hard copies are available on request.

Pensions Ombudsman

You also have the right to refer your complaint 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.

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:

10 South Colonnade
Canary Wharf
London
E14 4PU

Telephone: 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/making-complaint>

MaPS - MoneyHelper

The Money and Pensions Service (MaPS), is available to assist members and beneficiaries with any general requests for information or guidance concerning your pension arrangements. MoneyHelper is their consumer-facing service providing free and impartial money and pensions guidance for people all across the UK. MoneyHelper can be contacted at:

Money and Pensions Service
Borough Hall
Cauldwell Street
Bedford
MK42 9AB

Telephone: 01159 659570
Email: contact@maps.org.uk
You can also submit a query or use the webchat online:
Website: <https://www.moneyhelper.org.uk/en/pensions-and-retirement>

If you have a complaint in relation to data protection, we have set out the Trustees’ policy in Appendix 1. A glossary of terms used in the Appendix (and not defined elsewhere) can be found at the end of Appendix 1.

Signed

Date

APPENDIX 1 - DATA PROTECTION COMPLAINTS

1 PROCEDURE FOR HANDLING DATA PROTECTION COMPLAINTS

- 1.1 In accordance with Section 164A of the DPA 2018, individuals have a right to make a Data Protection Complaint to 'controllers'. The Trustees are the controllers of the Personal Data that they hold and process in connection with the Plan. As controllers they are required to facilitate the making of Data Protection Complaints by the data subjects that the Personal Data relates to.
- 1.2 If a Data Protection Complaint meets the criteria to be resolved using the IDRPs as described in the main body of this policy, or a dispute which is being investigated under the IDRPs also includes a Data Protection Complaint addressed to the Trustees, the Trustees will ensure that the procedures described in the main body of this policy and Appendix 1 are run in parallel to each other. In doing so, the Trustees will ensure that the timeframes and deadlines described in paragraphs 1.10, 1.14, 1.15 and 1.16 below are complied with. If the Trustees can provide an outcome to the Data Protection Complaint sooner than they can provide an outcome to the other issues addressed in the IDRPs, they will resolve the Data Protection Complaint separately and without undue delay.
- 1.3 An individual's right to make a Data Protection Complaint to the Trustees (as controllers) is separate to the individual's right to make a Data Protection Complaint to the ICO, in accordance with Section 165 of the DPA 2018, if they consider that there has been an infringement of the UK GDPR or DPA 2018 in connection with their Personal Data.
- 1.4 If the Data Protection Complaint concerns an actual, suspected or potential Personal Data Breach or Cyber Incident, the existence of which the Trustees were not previously aware, the Trustees will consult the Plan's Cyber Security and Incident Response Plan and ensure that the procedures described in that policy are followed and that the relevant requirements of data protection legislation (including the UK GDPR and DPA 2018) are met.
- 1.5 If the Data Protection Complaint raises concerns regarding non-compliance with the Plan's Cyber Security and Incident Response Plan, the Trustees will consider whether any remedial action is required to address areas of non-compliance.

Who can make a Data Protection Complaint to the Trustees?

- 1.6 Any individual whose Personal Data is held or processed by the Trustees (or their processors) can make a Data Protection Complaint to the Trustees.
- 1.7 If an individual has made a Data Protection Complaint to the Trustees but has subsequently died, the Data Protection Complaint may be continued on behalf of the complainant by their personal representative.
- 1.8 A Data Protection Complaint addressed to the Trustees may be made, or continued, on behalf of the complainant by a representative of the complainant who shall be:
 - (a) if the complainant is a minor or is otherwise incapable of acting on their own behalf, a member of the complainant's family, or another person suitable to represent the complainant; or
 - (b) in any other case, a representative nominated by the complainant in writing.
- 1.9 The Trustees reserve the right to request confirmation that a representative, or personal representative, acting on behalf of the complainant has been appropriately appointed.

What is the complaints process?

- 1.10 If a complainant contacts the Trustees directly, or via the Plan's administrators, with a Data Protection Complaint that they wish to raise with the Trustees, the Trustees will acknowledge receipt of the complaint within the period of 30 days of the date that the complaint was received. Where possible, this acknowledgment should be made in writing. Where the Data Protection Complaint meets the criteria to be resolved using the IDRP, any acknowledgement of receipt by the Trustees of a complaint made under the IDRP (in line with the main body of the policy) will also meet this requirement (noting information about the Money and Pensions Service should be sent with that acknowledgment).
- 1.11 When the complainant is provided with the acknowledgment referred to in paragraph 1.10, they should also be asked to provide further details of their Data Protection Complaint by supplying the information referred to in paragraph 1.12 (if the complainant has not already provided that information).
- 1.12 To enable a Data Protection Complaint to be considered by the Trustees, complainants should be asked to provide the following information in writing:
- (a) the complainant's name, address, date of birth, national insurance number (if available), payroll number (if known) and relationship to the Plan e.g. member/beneficiary etc;
 - (b) if a representative is appointed, the representative's name, address and proof of appointment; and
 - (c) full reason(s) for the complaint.
- 1.13 The complainant should be asked to supply the information referred to in paragraph 1.12 to the Trustees via the Plan's administrators, either:
- (a) by post addressed to:
The Trustees of the Manpower Pension Plan c/o Hymans Robertson LLP
One London Wall
London, EC2Y 5EA; or
 - (b) by email addressed to manpower.queries@hymans.co.uk
- 1.14 The Trustees will, without undue delay, investigate and consider the Data Protection Complaint. In doing so, they will conduct such investigations as they see fit to ensure they have all the appropriate information to make an informed decision and may request such further additional information/documentation as they consider necessary.
- 1.15 The Trustees will keep the complainant updated on the progress of the investigation without undue delay.
- 1.16 The Trustees will inform the complainant of the outcome of the Data Protection Complaint in writing, without undue delay. The written notice will:
- (a) explain the decision and set out the reasons for it;
 - (b) explain any actions taken as a consequence of the complaint; and
 - (c) inform the complainant of their right to complain to the ICO and provide the ICO's contact details.

If the Data Protection Complaint met the criteria to be resolved using the IDRP, or formed part of a dispute which is being investigated using the IDRP, and the Trustees are notifying the complainant of the outcome

of the IDRP in the written notice (in line with the main body of the policy) then the written notice will also meet this requirement (noting that information about the complainant's right to refer the matter to The Pensions Ombudsman should be sent with this notice).

- 1.17 The Trustees and the Plan's administrators will keep a record of the following.
- (a) The date the Data Protection Complaint was received.
 - (b) The acknowledgement from the Trustees of receipt of the Data Protection Complaint.
 - (c) Any relevant conversations, evidence gathered and documents.
 - (d) The outcome of the Data Protection Complaint.
 - (e) Communications with the complainant regarding the progress of the investigation and the outcome of the Data Protection Complaint.
 - (f) Any actions taken as a result of the investigation.

These records will be retained for as long as necessary in order to fulfil the purposes as identified in the Privacy Notice. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Plan and for so long afterwards as may be required to deal with any questions, complaints, or claims and then securely deleted.

GLOSSARY OF TERMS USED IN APPENDIX 1

Cyber Incident	An event which has compromised (or seems likely to have compromised) the confidentiality, integrity, security or availability of any information on the IT systems used by and/or relied on by the Trustees (including information on cloud and other systems hosted or utilised by the Trustees' service providers).
Data Protection Complaint	A complaint from an individual as they consider that there has been an infringement of the UK GDPR or DPA 2018 in connection with their Personal Data.
DPA 2018	Data Protection Act 2018
IDRP	Internal Dispute Resolution Procedure, as described in the main body of this policy.
Personal Data	Any information relating to an identified or identifiable natural person which has been provided, created, collected or otherwise Processed in connection with the Plan. For these purposes, an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Personal Data
Breach**

Any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed. This includes breaches that are the result of both accidental and deliberate causes.

UK GDPR

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation), as it forms part of the law of England and Wales, Scotland and Northern Ireland.