London Luton Airport Pension Scheme (‘Scheme’)

Internal Dispute Resolution Procedure (‘IDRP’ or ‘Procedure’)

Version 2.0 (June 2026)

Introduction

The Pensions Act 1995, as amended, requires trustees of pension schemes to put procedures in place for resolving internal disputes about matters relating to the Scheme. This document describes the single-stage IDRP for the Scheme.

The Trustees hope that any queries or complaints can be resolved informally with the Scheme’s administrators. However, if a complaint cannot be resolved informally, this Procedure may be used where the complainant would like the matter to be treated as a formal complaint.

This Procedure covers two distinct types of complaint:

1. member or benefit-related complaints concerning the administration of the Scheme or decisions made by the Trustees; and
2. data protection-related complaints concerning the handling or processing of personal data.

These two types of complaint are dealt with under the same overall complaints framework, but data protection-related complaints are subject to specific statutory requirements and timelines. These include acknowledging receipt of the complaint within 30 days and taking steps to resolve the complaint without undue delay.

Where a data protection-related complaint also concerns a decision of the Trustees or the administration of Scheme benefits, it may fall within the scope of this IDRP. In such cases, the Trustees will determine whether to deal with the matter through the IDRP in parallel with, or following, the data protection complaints process, to ensure compliance with both pensions and data protection requirements.

This Procedure only applies to disagreements with the Trustees. If a disagreement is with the employer or ex-employer, the Trustees will refer the matter to the employer and formally notify the complainant that they have done so.

What sort of dispute does the Procedure cover?

The Trustees recognise that queries and issues may occasionally arise in relation to the Scheme. They have therefore established this Procedure to discuss and resolve these issues if they arise.

Normally, it would be the Trustees’ expectation that any queries and issues could be dealt with through the Scheme’s administrators in the usual way without invoking the formal Procedure. However, the Procedure can be used to settle any dispute or disagreement you may have with the Trustees or administrators. There is no restriction on the type of dispute or disagreement to which the Procedure applies, provided the dispute is one which may properly be considered by the Trustees.

The Procedure is not available in respect of any issue in relation to which legal proceedings have been commenced in any court or tribunal, or where the issue has been referred to the Pensions Ombudsman and the Pensions Ombudsman has commenced an investigation. In all such cases, the processing of applications already made under this Procedure will cease.

The Procedure is also not available where the dispute is not with the Trustees of the Scheme, for example where the dispute is solely with an employer or former employer.

Who may use the Procedure?

You may use this Procedure if you fall into one of the categories of people described below:

1. A member of the Scheme.
2. A widow, widower, surviving civil partner or surviving dependant of a deceased member of the Scheme.
3. Any other person who, on the death of a member, is entitled to payment of benefits under the Scheme, being a "surviving non-dependant beneficiary".
4. A potential member or a person who will be eligible to become a member.
5. In relation to a data protection-related complaint, a person whose personal data is processed by or on behalf of the Trustees, or a person acting on their behalf.

If you no longer have an interest in the Scheme, for example because your interest ceased due to a transfer out of the Scheme, refund, commutation, discharge on wind-up or any other reason, you may still apply to use this Procedure within six months of the date your interest ceased. The Trustees may, at their discretion, accept an application outside this timeframe where they consider it appropriate.

Representation

A complaint may be made or continued on a person's behalf by a representative nominated by the complainant.

If the complainant dies after making a complaint, their complaint can be continued by their personal representative.

If the complainant is a minor or is otherwise unable to act, their complaint can be made or continued by one of the complainant's family members or another suitable representative.

Where a data protection-related complaint is made by a representative, the Trustees may ask for evidence that the representative has authority to act on behalf of the complainant.

Single-stage IDRP

Your application

Your application should be in writing and include full details of the problem, including details of why you feel dissatisfied. Your application must include your full name, address, date of birth and National Insurance number.

If your application relates to a Scheme member who has died, your application must also include details of your relationship to the member and the member's full name, address, date of birth and National Insurance number.

Where a representative is acting on your behalf, their full name and address should be provided, as well as confirmation of whether correspondence should be sent to your home address or to that of your representative. Where possible, a representative should also provide written authority from you and the complaint should be signed by you.

You should include copies of any letters, emails or other documents which you would like the Trustees to take into account.

If your complaint is, or may be, a data protection-related complaint, please make this clear in your application and provide as much detail as possible about the personal data concerned and the issue complained about.

Your written application should be sent to the Trustees care of the Scheme's administrators:

Either by post:

London Luton Airport Pension Scheme
Capita Pensions Solutions Limited
Hartshead House
2 Cutlers Gate
Sheffield
S4 7TL

Or electronically, by emailing: Colin.argyle@capita.com

Consideration of your complaint

Your complaint will be considered by the Trustee Board.

In considering your complaint and reaching a decision, the Trustee Board may investigate the complaint, obtain advice from professional advisers, and/or ask the complainant or their representative for any additional information considered appropriate in order to deal with the complaint.

Any trustee who has a conflict of interest, or who has been materially involved in the matter giving rise to the complaint, may be excluded from the decision-making process where the Trustee Board considers this appropriate. Where necessary, the Trustees may make alternative arrangements to ensure that the complaint is considered fairly and properly.

The decision

A decision will be made by the Trustee Board within four months of the date that your written application is received.

Once a decision has been made on your application, you will receive a written response from the Trustee Board within 15 working days.

In most cases, this response will set out the decision of the Trustee Board in relation to your problem. The response will refer to any legislation and/or to any specific Scheme rules upon which the Trustee Board relied.

If the Trustee Board cannot make a decision within four months, you will still receive a written response within four months. In these cases, this response will explain why there is a delay and will inform you of the date on which a decision is expected.

The Trustee Board's decision under this single-stage Procedure is final under the Scheme's internal procedure. This does not affect any right you may have to refer the matter to the Pensions Ombudsman or, in relation to data protection-related complaints, to the Information Commissioner's Office.

<u>Data protection-related complaints</u>

What is a data protection-related complaint?

Under the Data (Use and Access) Act 2025, individuals have a statutory right to complain directly to the Trustees, in their role as data controller, about the handling or processing of their personal data.

A data protection-related complaint is a complaint raised by an individual who believes that the Trustees, in their role as data controller, have infringed their rights under UK data protection law.

This may include concerns about:

- how personal data has been collected, used or shared;
- delays or issues in responding to a Subject Access Request or other privacy rights request;
- the accuracy of personal data held;
- inappropriate retention of personal data;
- the security of personal data; or
- any issue arising from a potential or actual personal data breach.

A complainant does not need to refer to specific legislation or use legal terminology for a complaint to be treated as a data protection-related complaint.

How to raise a data protection-related complaint

Data protection-related complaints should be sent to the Trustees using the same contact details as for complaints under this Procedure. No specific format is required, but the complainant should provide as much detail as possible to help the Trustees understand and investigate the issue.

A data protection-related complaint should, where possible, include:

- confirmation that the complaint relates to the handling or processing of personal data;
- details of the personal data concerned, where known;
- details of the action, omission, response or incident complained about;
- any relevant dates, correspondence or reference numbers;
- details of any previous related request, such as a Subject Access Request or other privacy rights request; and
- the outcome the complainant is seeking.

What happens next?

The Trustees or the Scheme's administrators will acknowledge receipt of a data protection-related complaint within 30 days of receipt.

The acknowledgement may ask the complainant for further information if this is reasonably required in order to understand or investigate the complaint.

The Trustees will investigate and respond to data protection-related complaints without undue delay. This means as soon as reasonably possible and without unjustifiable, excessive or unnecessary delay.

This will include making appropriate enquiries into the subject matter of the complaint, keeping the complainant informed of progress where appropriate, and providing an outcome as soon as reasonably practicable after the investigation is complete.

Where a data protection-related complaint also concerns a decision of the Trustees or the administration of Scheme benefits, the Trustees will determine whether to deal with the matter through the IDRP in parallel with, or following, the data protection complaints process, to ensure compliance with both pensions and data protection requirements.

If the complainant is not satisfied with the outcome of a data protection-related complaint, they may have the right to refer it to the Information Commissioner's Office. The Information Commissioner is the UK's independent regulator for data protection and information rights.

Further information

The Pensions Ombudsman

If you are unhappy with the Trustee Board's decision in relation to a pensions dispute, you may refer your complaint to the Pensions Ombudsman.

The Pensions Ombudsman appointed under section 145(2) of the Pension Schemes Act 1993 may investigate and determine any complaint or dispute of fact or law in relation to a scheme, made or referred to the Pensions Ombudsman in accordance with that Act.

The Pensions Ombudsman expects complainants to have followed the Scheme's IDRP before referring a complaint. Determinations are final and binding on all parties to the dispute, subject only to appeal on a point of law.

Contact with the Pensions Ombudsman about a complaint should normally be made within three years of the event complained of, or within three years of when you first knew about it or ought to have known about it. The Pensions Ombudsman has discretion to extend this time limit.

The Pensions Ombudsman can be contacted at:

Website: www.pensions-ombudsman.org.uk
Online complaint form: www.pensions-ombudsman.org.uk/making-complaint
Email: enquiries@pensions-ombudsman.org.uk
Telephone: 0800 917 4487

Address:
The Pensions Ombudsman
10 South Colonnade
Canary Wharf
E14 4PU

The Information Commissioner's Office

If your complaint is a data protection-related complaint and you remain dissatisfied with the Trustees' response, you may have the right to raise the matter with the Information Commissioner's Office.

The Information Commissioner's Office can consider complaints about the handling of personal data and compliance with data protection legislation.

The Information Commissioner's Office can be contacted at:

Website: https://ico.org.uk/
Webchat: Available at: https://ico.org.uk/global/contact-us/contact-us-public/public-advice/
Telephone: 0303 123 1113

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

Record-keeping and related processes

The Trustees will ensure that data protection-related complaints are suitably recorded. Records may include the date the complaint was received, the nature of the complaint, acknowledgement and response dates, the outcome, and any escalation to the Information Commissioner's Office.

The Trustees will also keep under review whether any updates are required to related documents and processes, including the Scheme's privacy notice, data protection policies, processes for dealing with Subject Access Requests or other privacy rights requests, and any administrator procedures that support compliance with the requirements for data protection-related complaints.

The Trustees will work with the Scheme's administrators to ensure that administrative processes support compliance with this Procedure, including the acknowledgement, investigation, record-keeping and signposting requirements for data protection-related complaints.

Future changes

The Trustees reserve the right to alter the Procedure described above to reflect experience and changes in either the Scheme's circumstances or the law.