

COMPASS GROUP PENSION PLAN

DISPUTE RESOLUTION PROCEDURE AND DATA PROTECTION COMPLAINTS PROCEDURE

The first part of this note summarises the dispute resolution procedure, which the Trustee has established for the Compass Group Pension Plan (the 'Plan'). It meets the requirements of the Pensions Act 1995. See below for the separate data protection complaints procedure.

It is important to use our data protection complaints procedure if your concern is about data protection law and how your personal information has been used by the Trustee.

Scope

This procedure is intended to resolve difficulties encountered by the Plan members and other beneficiaries. It may be used for all complaints involving the Plan, which are not already being investigated elsewhere, for example, by the Pensions Ombudsman. It is not suitable for dealing with employment problems or data protection complaints (please refer to the separate data protection complaints procedure in this document). All pensions issues relating to the Plan and the Trustee should be raised first through this procedure.

Eligibility

The procedure is available to all Plan members, including those who have retired or who no longer work for the company. It is also available to the dependants of deceased members and other potential beneficiaries on the death of a member and also to those who are not yet Plan members but who are, or will become, eligible to join. Former members who have transferred their benefits out of the Plan can also use this procedure up to six months after the date of transfer.

You will not be able to use this procedure if the matter about which you are complaining is already the subject of an investigation by the Pensions Ombudsman, or of court or tribunal proceedings. Similarly, if you bring a complaint under this procedure, and any investigation / proceedings subsequently commence before this procedure has been completed, the resolution of your complaint under this procedure will cease immediately.

Making a complaint

This dispute resolution procedure is a two-stage process.

Stage One:

All complaints should be made in writing to the Pensions & Benefits Manager, Jenny Haines, at:

Parklands Court
24 Parklands
Birmingham
B45 9PZ

Your letter must include:

- Your full name, address, date of birth, staff number and National Insurance number;

- A full explanation of the complaint;
- If a representative is complaining on your behalf, then please also include the address for correspondence; and
- If you are a dependant of a deceased member then, in addition to the information above relating to the member, please include your full name, address, date of birth and relationship to the member.

Receipt of your complaint will be acknowledged as soon as reasonably practicable and you will be advised of the contact details of Money Helper (part of the Money and Pensions Service) who can assist you in your complaint.

How complaints are resolved

You will receive a written decision within two months of making your complaint, and no later than 15 working days after a decision has been made. It will include the following information:

- An explanation of the decision;
- A reference to the documentation and/or legislation relied on;
- An explanation of your right to have the complaint referred to the Trustee for its consideration; and
- Information about the possibility of referring a complaint, or a point of fact or law, to the Pensions Ombudsman.

If it is not possible to arrive at a decision within two months, you will be notified of this and told when you may expect to receive the decision.

It is very likely that the information you provide in connection with your complaint under this procedure will amount to "personal data" for the purposes of data protection law. In some cases, the information provided may be "sensitive" (or special categories) data – for instance, if it relates to your state of health.

As with all personal data which is held by the Trustee, this data will be stored securely and processed only in accordance with the Plan's data protection policy and applicable legal requirements. For more information on how and why the Trustee will process any personal data provided in connection with your complaint under this procedure, and your legal rights in relation to that processing, please see the Plan's detailed privacy notice, which is available here: [Plan Privacy Notice](#).

If you are still unhappy

Stage Two:

If you are not willing to accept the decision, you may refer the matter to the Chairman of the Trustee, who will raise the matter with the Trustee. You must do this within six months and, as well as the information you gave with your original complaint, you must explain why you are still unhappy. The Trustee will normally give its decision within two months but no later than 15 working days after a decision has been made. If you are still dissatisfied, you may refer the matter to the Pensions Ombudsman for a decision.

In some cases, the Trustee may decide, at its discretion, to shorten or stop the usual procedure at Stage two in order to enable a speedier resolution of your complaint (for instance, where the Trustee's initial review of the matter reveals no grounds on which the Trustee would consider it appropriate to take action in relation to the subject matter of your complaint). Ending the procedure early in this way will allow you to refer the matter to the Pensions Ombudsman sooner than would normally be the case.

The Pension Ombudsman

In cases where a complaint or dispute cannot be resolved after following this dispute resolution procedure, an application can be made to the Pensions Ombudsman for an adjudication free of charge. The Ombudsman has the power to investigate and determine any complaint or dispute of fact or law or mismanagement involving occupational and personal pension schemes. The services of the Ombudsman are available to all members, beneficiaries and prospective members of the Plan.

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 relevant address is:

The Pensions Ombudsman
10 South Colonnade
Canary Wharf
London
E14 4PU

Tel: 0800 917 4487
Opening hours 10am – 2pm Monday to Friday

Website: www.pensions-ombudsman.org.uk

The Pensions Ombudsman can also be contacted by email at centralsupportmailbox@pensions-ombudsman.org.uk or enquiries@pension-ombudsman.org.uk.

You can also submit a complaint form to the Pensions Ombudsman online: www.pensions-ombudsman.org.uk/making-complaint

Assistance from Moneyhelper

Moneyhelper (provided by the Money and Pensions Service (MaPS)) is a not-for-profit advice service which is available to provide members and beneficiaries of the Plan with guidance and information relating to their benefits under the Plan, and the steps which can be taken to resolve any concerns. Moneyhelper can be contacted as follows:

Tel: 0800 011 3797
Website: www.moneyhelper.org.uk

(The website offers contact options of live webchat, enquiry form and social media channels.)

The MaPS postal address is Borough Hall, Cauldwell Street, Bedford, MK42 9AB.

DATA PROTECTION COMPLAINTS PROCEDURE

This procedure sets out how we will deal with any data protection complaints you may have. This may include concerns with how we have collected, used, shared or stored your data, or how we have dealt with your data rights request. We will listen, investigate and put things right where we can.

How to raise a complaint

Members (or beneficiaries) who wish to make a complaint about how their personal data is used or handled by or for the Trustee can send an email to:

- the Plan Trustee: pensions@compass-group.co.uk; or
- the Plan administrator:

compassadminteam@xpsgroup.com for members of the Compass Group Pension Plan; or

mymoney.questions@aviva.com for members of the CRISP Section

What to include in your complaint

Please tell us:

- Your name and contact details
- What happened and why you feel it is wrong
- Key dates, like when the issue started and what happened along the way
- Any supporting information you can provide
- What outcome you want (for example, an correction, an explanation, or a change in how we use your data)

We will tell you if we need more detail.

If someone complains for you

You can ask someone to act for you. We may need proof they can do this, to protect your privacy. We may also need proof of their identity to be sure of who they are. Proof we might ask for includes an assigned letter of authority from you or a power of attorney.

If someone does complain on your behalf, please note we cannot investigate until we have authority and proof of their identity.

ID checks

We may sometimes need to ask you to confirm your identity. We will only ask you for what we need. This is to ensure we can protect you and your information.

What we do when we receive your complaint

Step 1 – Acknowledgment

You should expect to receive an acknowledgement email from us within 30 working days from receipt of email. This acknowledgment will tell you if we need any more documents from the person representing you, if relevant, or if we need any more details from you in order to deal with your request.

Step 2 – Find out if anything went wrong

We will look at the facts of your complaint carefully and gather any information we need to understand your concern. We may ask you follow up questions if we need to. We will then take steps to deal with your complaint without undue delay.

Step 3 – Tell you the outcome

We will respond to your complaint without undue delay and will explain to you what we found, what we did about it (if any action is needed) and what happens next.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office (soon to be renamed the Information Commission).

The address for the ICO is as follows:

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

The ICO's helpline: 0303 123 1113

You can also contact the ICO through its website: <https://ico.org.uk>

For more information specifically about making a complaint see: [Make a complaint | ICO](#).