

## **CAMBRIDGE UNIVERSITY PRESS SENIOR STAFF PENSION SCHEME ("Scheme")**

### **Internal Dispute Resolution Procedure**

Press SSPS Limited (the **Trustee**) has adopted the internal dispute resolution procedure below for dealing with any complaints which may arise in relation to the Scheme.

#### **Overview of the procedure**

This internal procedure is a two-stage process:

- At **Stage 1**, you need to address your complaint to the Head of Group Pensions, University of Cambridge, being the nominated person to consider complaints under section 50(4A) of the PA 1995 (**nominated person**). In normal circumstances, the nominated person will reach a decision on the complaint within three months and will then notify you of that decision in writing no later than 15 working days after the decision has been made.
- If you are dissatisfied with the Stage 1 response, at **Stage 2** you will be entitled to refer the matter to the Trustee directly by way of appeal against the response. Any appeal must be made within six months from the date of the notice of the Stage 1 decision. The Trustee will consider the appeal and may either confirm or replace the Stage 1 decision. In normal circumstances, the Trustee will reach a decision on the appeal within two months and will then notify you of that decision in writing no later than 15 working days after the decision has been made.

If you are still unhappy following the Trustee's response to your appeal, you may at that stage refer your complaint to the Pensions Ombudsman.

#### **Who may use this procedure to make a complaint?**

Any person listed below may make a complaint under this procedure:

- a member of the Scheme;
- a widow, widower (including a same-sex spouse), surviving civil partner or surviving dependant of a deceased member of the Scheme;
- a surviving, non-dependant beneficiary of a deceased member of the Scheme. This is someone who, on the death of the member, is entitled to the payment of benefits under the Scheme;
- a person who has ceased to be in one of the above categories; and
- a person who believes they are in one of the above categories and the dispute relates to whether he or she is such a person.

The person making the complaint may nominate a representative to make or continue the complaint on their behalf if he/she is a minor, is incapable of acting, or otherwise wishes to nominate one. This could be a relative, friend, solicitor or other adviser. If the person making the complaint wishes to appoint someone to act on their behalf they must provide a letter of authority showing the name and address of the person to be appointed.

If the member to whom the complaint relates has died, or dies after raising a complaint, his or her personal representatives may make or continue the complaint.

### **Nature of the complaint**

A complaint under this procedure must be:

- about matters relating to the Scheme; and
- relate to the Trustee and its responsibilities under the Scheme.

If your complaint is against your employer or former employer, it does not fall within this procedure.

A complaint may also not be dealt with under this procedure if the Pensions Ombudsman has started investigating it, or court or tribunal proceedings in respect of it have already begun. If, after a complaint has been made under this procedure, the Pensions Ombudsman then starts investigating it, or court or tribunal proceedings commence in respect of it, the processes for resolution of the dispute under this procedure will stop.

### **Time for making the complaint**

A complaint must normally be made within six months of the date of the decision or event which is the subject of the complaint.

If the complaint relates to a person who had an interest in the Scheme (or claims to have had an interest) but has ceased to do so (i.e. by ceasing to be entitled or otherwise eligible to receive benefits under the Scheme) then the latest time a complaint may be made is six months after the date on which the person ceased to be, or claims they ceased to be, a person with an interest in the Scheme.

The Trustee may agree to accept an application for a dispute received outside the above periods, but only where the complainant could not have reasonably known about the matter in dispute within the six months, or if the Trustee considers there to be any other exceptional circumstances which would mean it is appropriate to do so.

### **How to make a complaint**

Complaints must be made in writing, ideally using the form attached to this procedure at Appendix 1, and set out full details about your complaint and enclose copies of any supporting documentation. This should be sent to:

Head of Group Pensions  
Pensions Administration Section  
Greenwich House  
Madingley Rise  
Madingley Road  
Cambridge  
CB3 0TX

Alternatively you can email the completed form to: [cuppensionsonline@admin.cam.ac.uk](mailto:cuppensionsonline@admin.cam.ac.uk)

If you do not wish or feel able to use the form, your complaint must:

- be made in writing;
- confirm it is a complaint being made under the Scheme's Internal Dispute Resolution Procedure; and
- include the same details for you and your representative (if applicable) as are listed in the form, together with full details about your complaint and copies of any supporting documentation.

### **The Stage 1 Decision process**

The nominated person will acknowledge receipt of a complaint as soon as reasonably practicable and within ten working days of the date they receive it, including a statement that the Money and Pensions Service (MAPS) is available to assist members and beneficiaries with any difficulty with the Scheme (and providing the MAPS's contact details).

The nominated person will deal with the complaint and subsequently reach a decision as to whether the complaint is valid and what action, if any, should be taken by the Trustee in relation to the matter. In reaching the decision at Stage 1, the nominated person may:

- obtain advice from the Scheme's actuary, the Scheme's legal advisers and / or any other appropriate professional;
- consider the Trustee's usual practice in relation to similar complaints (but the nominated person is not bound by the Trustee's usual practice);
- ask the person making the complaint (or any other relevant person) for any additional information that they consider appropriate in order to deal with the complaint; and/or
- make such investigations as they see fit.

The nominated person will endeavour to make a decision as soon as is reasonably possible after receipt of the complaint and within three months of receiving the complaint. The nominated person may decide, at their discretion, to curtail the procedure at Stage 1 and instead refer the matter directly to the Trustee for the Trustee to investigate and make a decision. In that scenario, the Stage 2 "Appeal" section of this procedure will apply except that:

- you will not be required to submit an appeal notice to the Trustee; and
- the timeframes for decision making set out in Stage 2 will apply from the point at which the nominated person refers the complaint to the Trustee.

If the nominated person cannot make a decision within three months, or if they consider it appropriate to curtail the procedure at Stage 1 and to refer your complaint to the Trustee, they will notify the person making the complaint or their representative (as appropriate) in writing, explaining the reason for the delay and / or referral to the Trustee and when they or the Trustee expects to be able to make a decision.

The nominated person will notify the person making the complaint of their decision in writing no later than 15 working days after the decision was made. A copy of the decision will also be provided to the Trustee.

## **Appeals**

If you are not satisfied with the response received and wish to appeal to the Trustee you must do so within six months from the date of the notice of the Stage 1 decision. If a notice of an appeal is received after this date the Trustee may, in its absolute discretion, decide whether or not to accept the appeal.

Appeals must be submitted in writing, ideally using the form attached to this procedure at Appendix 2. If you choose not to use the attached form when submitting an appeal, please ensure that you still provide all of the relevant information which is specified on that form.

The appeal must be sent to:

Press SSPS Limited  
c/o Fiona Kelly  
University Printing House  
Shaftesbury Road  
Cambridge  
CB2 8BS

Alternatively you can email your appeal to: [fkelly@cambridge.org](mailto:fkelly@cambridge.org)

The Trustee will acknowledge receipt of the appeal as soon as reasonably practicable and within ten working days of the date it receives it.

The Trustee will investigate the appeal and issue a decision. In reaching that decision the Trustee may:

- obtain advice from the Scheme actuary, the Scheme's legal advisers or any other appropriate professional;
- ask the person making the appeal (or any other relevant person) for any additional information they that they consider appropriate in order to deal with the appeal; and / or
- make such investigations as the Trustee sees fit.

The Trustee will endeavour to make a decision as soon as possible after receipt of the appeal and within two months of receiving the appeal.

If the Trustee cannot make a decision within two months they will notify the person making the appeal or their representative (as appropriate) in writing of the reasons for the delay and when they expect to make a decision on the appeal.

The Trustee directors may delegate the investigation and determination of the appeal to a sub-committee of the trustee directors which will have full authority to reach a decision on behalf of the Trustee. The sub-committee may also include the Scheme Secretary.

The Trustee will notify the person making the appeal of its decision in writing no later than 15 working days after the decision was made. If you are not satisfied with the decision reached by the Trustee, you 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 Trustee's decision notice will include a statement that the Pensions Ombudsman may investigate and determine any complaint or dispute of fact or law in relation to a scheme made, or referred to, under the Pension Schemes Act 1993, and the Pensions Ombudsman's contact details.

The Money and Pensions Service (MAPS) (also known as MoneyHelper) is available to assist members and beneficiaries with general information or guidance about pension arrangements. You may involve MAPS / MoneyHelper at any time.

You can contact MAPs by telephone on 0800 138 7777 or by submitting an enquiry online via the website: <https://www.moneyadviceservice.org.uk>

### **Data Protection**

The Trustee is a 'data controller' under data protection legislation and has to inform you of certain matters in relation to the information you provide (some of which may be sensitive in nature, for example if you provide information about your health) whether or not you use the attached forms to make your complaint or to appeal against a stage 1 decision.

The information you provide may be held by the:

- University of Cambridge Pensions Office which is responsible for the day to day administration of the Scheme on behalf of the Trustee; and
- The Syndicate of the Press of the University of Cambridge (**The Press**) which provides secretarial services to the Trustee in order to assist in the management of the Scheme.

It will be used by the nominated person and the Trustee in order to deal with your complaint / appeal (or the complaint / appeal of the person you are representing). It may also be shared with relevant third parties, for example the Trustee's professional advisers.

It is necessary for the Trustee to hold and process this data to comply with the legal obligations the Trustee is subject to and in order for it to comply with its obligations under the trust deed and rules governing the Scheme.

If you would like further information regarding how and why the Trustee will process any personal data provided in connection with your complaint / appeal, a fuller version of this notice, including further details about matters such as how long the information is held, your rights as a 'data subject' and how to complain to the Information Commissioner's Office is available here:

[https://www.pensions.admin.cam.ac.uk/files/cup\\_fair\\_processing\\_notice.pdf](https://www.pensions.admin.cam.ac.uk/files/cup_fair_processing_notice.pdf)

Alternatively, a hard copy of the Scheme's detailed Fair Processing Notice can be obtained from the University of Cambridge Pensions Office using the following address: Pensions Administration Section, Greenwich House, Madingley Rise, Madingley Road, Cambridge CB3 0TX.

**Appendix 1:**  
**CAMBRIDGE UNIVERSITY PRESS SENIOR STAFF PENSION SCHEME ("Scheme")**  
**Internal Dispute Resolution Procedure: Application Form for use at STAGE 1**

*Please complete all relevant sections*

**YOUR DETAILS**

Name	
Address	
Telephone number(s)	
Email address	
Date of birth	
National Insurance Number	

**DETAILS OF REPRESENTATIVE ACTING ON BEHALF OF COMPLAINANT (IF ANY)**

Name	
Address	

Telephone number(s)	
Email address	
Address to be used for serving the decision or any requests for additional information?	Yes / No ( <i>Delete as applicable</i> )

Does your complaint relate to your membership of the scheme? Yes/No (*Delete as applicable*)

If yes, please provide details of your membership – for example, whether you are an active, deferred, pensioner or pension credit member, and the date you joined the Scheme.

Type of member	
Date joined Scheme	
Any other details	

Does your complaint relate to another person who is a Scheme member? Yes/No (*Delete as applicable*)

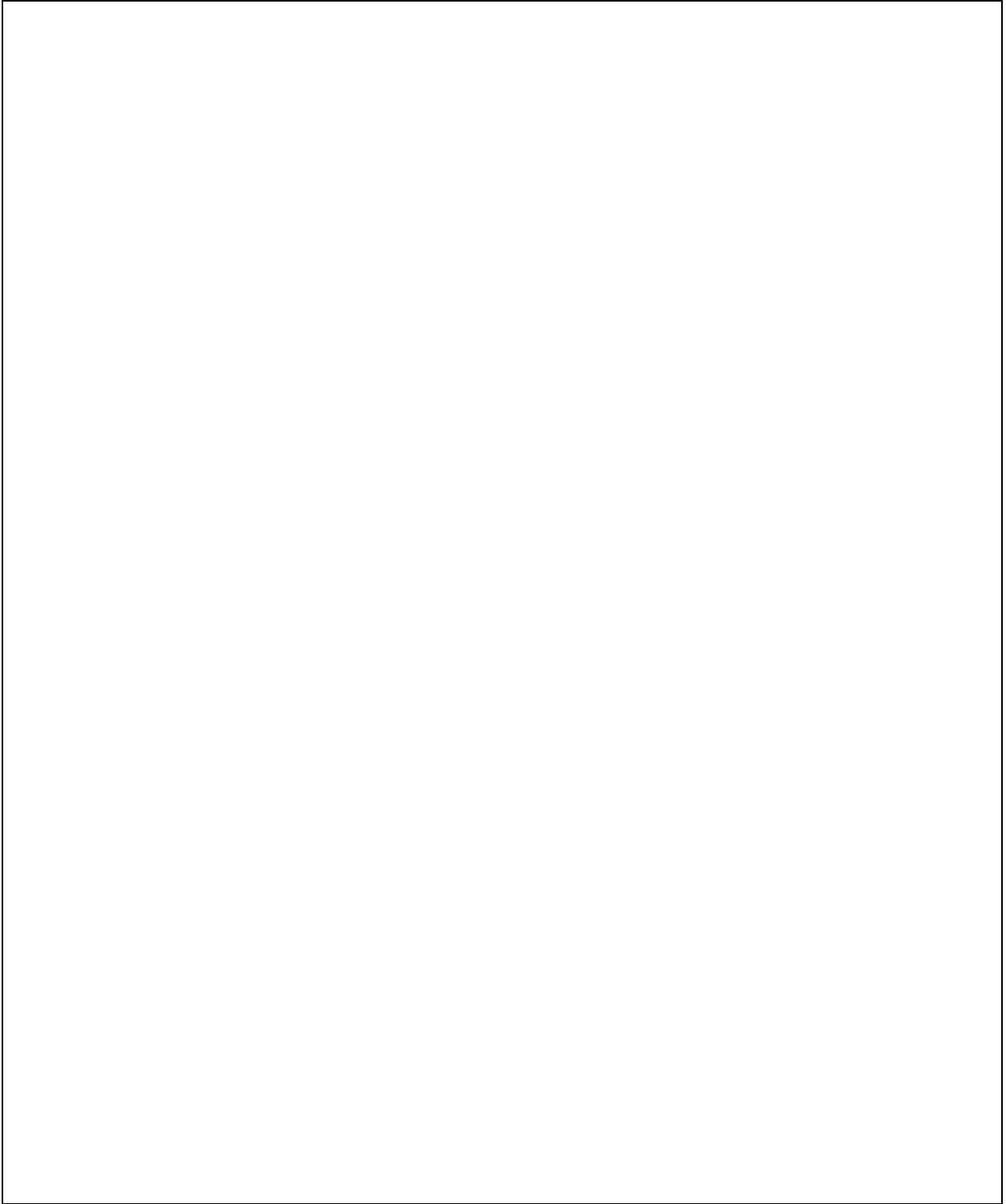


If the answer is yes, please provide the following details relating to the member:

Name	
Address	
Telephone number(s)	
Email address	
Date of birth	
Date of death (if applicable)	
National Insurance Number	
Your relationship to the member	

Please provide full details of your complaint, with any copies of any supporting documents or correspondence. Continue on a separate sheet, if necessary.

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Signed: .....	Date: .....
(by or on behalf of the complainant)	
Name: .....	

IMPORTANT NOTES:

If you are a representative signing on behalf of the person making the complaint, please enclose a separate letter of authority which authorises you to act on their behalf.

Please send this application to:

Head of Group Pensions

Pensions Administration Section

Greenwich House

Madingley Rise

Madingley Road

Cambridge

CB3 0TX

Or, alternatively you can email the application to: [cuppensionsonline@admin.cam.ac.uk](mailto:cuppensionsonline@admin.cam.ac.uk)

You may wish to keep a copy of your completed application form, in case you need it for future reference.

You should receive an acknowledgement of your complaint within ten working days of receipt. Please refer to the Scheme's Internal Dispute Resolution Procedure for more information about what happens next. This complaint may not be dealt with under the Scheme's Internal Dispute Resolution Procedure if the Pensions Ombudsman has started investigating this complaint or court or tribunal proceedings have begun. By signing and returning this form, you are confirming that no such investigation or proceedings have commenced

DATA PROTECTION:

All personal information provided on / with this form will be stored securely and processed only in accordance with the Scheme's Information and Cyber-security Policy and applicable legal requirements. For more information on how and why the Trustee will process your information, and your legal rights in relation to that information, please refer to the Scheme's Internal Dispute Resolution Procedure and to the Scheme's detailed Fair Processing Notice, which is available here: [APPROPRIATE LINK TO BE ADDED]

Alternatively, a hard copy of the Scheme's Fair Processing Notice can be obtained from the University of Cambridge Pensions Office using the following address: Pensions Administration Section, Greenwich House, Madingley Rise, Madingley Road, Cambridge CB3 0TX

**Appendix 2:**

**CAMBRIDGE UNIVERSITY PRESS SENIOR STAFF PENSION SCHEME ("Scheme")**

**Internal Dispute Resolution Procedure: Appeal Form – for use at STAGE 2**

*Please complete all relevant sections*

**YOUR DETAILS**

Name	
Address	
Telephone number(s)	
Email address	
Date of birth	
National Insurance Number	

**DETAILS OF REPRESENTATIVE ACTING ON BEHALF OF COMPLAINANT (IF ANY)**

Name	
Qualification (if any)	
Address	

Telephone number(s)	
Email address	
Address to be used for serving the decision or any requests for additional information?	Yes / No ( <i>Delete as applicable</i> )

Does your appeal relate to your membership of the scheme? Yes/No (*Delete as applicable*)

If yes, please provide details of your membership – for example, whether you are an active, deferred, pensioner or pension credit member, and the date you joined the Scheme.

Type of member	
Date joined Scheme	
Any other details	

Does your appeal relate to another person who is a Scheme member? Yes/No (*Delete as applicable*)

If the answer is yes, please provide the following details relating to the member:

Name	
Address	
Telephone number(s)	
Email address	
Date of birth	
Date of death (if applicable)	
National Insurance Number	
Your relationship to the member	

#### **REASONS FOR DISSATISFACTION WITH ORIGINAL DECISION**

Please provide details of the reason(s) why you are dissatisfied with the decision made and notified to you at Stage 1 of this procedure. Continue on a separate sheet, if necessary.

I want the Trustee to reconsider the decision of the nominated person made at Stage 1 of this procedure.

Signed: .....

Date: .....



(by or on behalf of the complainant)

Name: .....

#### IMPORTANT NOTES

Please send this appeal to:

Press SSPS Limited

C/O Fiona Kelly

University Printing House

Shaftesbury Road

Cambridge CB2 8BS

Or, alternatively you can email the application to: [fkelly@cambridge.org](mailto:fkelly@cambridge.org)

You may wish to keep a copy of your completed appeal form, in case you need it for future reference.

You should receive an acknowledgement of your appeal within ten working days of receipt. Please refer to the Scheme's Internal Dispute Resolution Procedure for more information about what happens next.

#### DATA PROTECTION:

All personal information provided on / with this form will be stored securely and processed only in accordance with the Scheme's Information and Cyber-security Policy and applicable legal requirements. For more information on how and why the Trustee will process your information, and your legal rights in relation to that information, please refer to the Scheme's Internal Dispute Resolution Procedure and to the Scheme's detailed Fair Processing Notice, which is available here: [APPROPRIATE LINK TO BE ADDED]

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