Sackers

Internal Dispute Resolution Procedure

The Arts Council Retirement Plan (1994) (the "**Plan**")

Background

The aim of the Trustees of the Plan ("Trustees") is to run the Plan in such a way that does not give members any cause for complaint. However, pension law requires that there is a formal procedure for resolving disputes arising from the running of the Plan. This note summarises the arrangements you can use if you wish to make such a complaint, including situations where you have first tried to resolve your complaint on an informal basis. This procedure complies with pension law, and may be updated from time to time to reflect any policy changes or changes in the law.

This procedure has two parts.

Part One is for data protection complaints only.

Part Two is for any other disputes arising between you and the Trustees of the Plan relating to your pension benefits in the Plan.

Part One: Data Protection Complaints Process

1 Introduction

From 19 June 2026, the Data (Use and Access) Act 2025 requires the Trustees, as the data controller, to have in place a process for handling complaints relating to the infringement of UK data protection legislation. The information below outlines the procedure which may be used to raise complaints relating to the handling of personal data by or on behalf of the Plan. Use of this procedure does not affect an individual's statutory right to raise concerns or lodge a complaint with the Information Commissioner's Office.

If you have any concerns in relation to the way your personal data has been handled or consider that there has been a breach of the Data Protection Legislation in respect of your personal data, you can raise a complaint with the Trustees. This might include, for example, a complaint that your personal data has been processed without a lawful basis, that your data has been shared inappropriately or that the Trustees have failed to respond to a data subject access request within the required timescales. To raise such a complaint, please complete the enclosed form and return it to the Plan Administrators by post or email, using the details on the form.

2 Applicants

Any individual may use the Data Protection Complaints Process if they are concerned that the Trustees have infringed Data Protection Legislation in the handling of their personal data.

3 Complaints covered

The Data Protection Complaints Process applies specifically to complaints relating to data protection matters concerning the Plan.

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4 How do I make a complaint?

If you have any concerns about our use of your personal information, you can raise a raise a complaint with the Plan Administrators by completing the enclosed form and returning it to the Plan Administrators by post or email.

The Plan Administrators will acknowledge your complaint within 30 working days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay. If the Plan Administrators require further information in order to consider or respond to your complaint, you will be informed as soon as possible, but this may increase the timeframes for the Plan Administrators' response.

If you are not happy with the outcome, you have the right to raise a complaint with the UK supervisory authority for data protection, the Information Commissioner's Office (ICO). You can contact the ICO at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

You can also contact them online, by accessing their website at www.ico.org.uk or by phone.

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Part Two: Internal Dispute Resolution Procedure

1 Introduction

Please note that this is a formal one stage process. This means that if you are unhappy with a decision made under this IDRP the next course of action would be to refer your complaint to the Pensions Ombudsman.

Further explanation as to how the IDRP works is set out below.

2 Complaints covered

You can use this procedure for any disputes you have with the Trustees of the Plan about any pension-related matters.

However, if the dispute is not with the Trustees (for instance, the dispute is with your employer or it does not relate to the Plan) then the procedure is not available for that process.

You should note that, unless the Trustees determine otherwise, the Trustees' obligations under this IDRP are to be no greater than is required to comply with pension law on this matter and the provisions of this document will be construed accordingly.

3 Applicants

You may make an application under the IDRP if you are:

- a member of the Plan
- the widow, widower, surviving civil partner or surviving dependant of a deceased member
- a surviving non-dependant beneficiary of a deceased member (someone who, on the death of a member, is entitled to the payment of benefits under the Plan)
- a prospective member of the Plan (someone who, under the terms of their contract of service or the rules of the Plan, can become a member by choice, after a specified period, automatically unless they elect otherwise, or with employer consent)
- any person who has ceased to be within any of the above categories in the previous six months, or
- any person who claims to be in one of the above categories.

4 Representatives

An application may also be made, or continued on behalf of a person in one of the above categories:

- where the person dies, by their personal representatives

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- where the person is a minor, or is otherwise incapable of acting on their own behalf, by a member of their family or by some other suitable person, or

- in any other case, by a representative nominated by them.

5 How do I make a complaint under the IDRP?

If you wish to make a complaint, you must complete the attached Form IDR1. This includes all the details that the Trustees are required to ask for under legislation. You may appoint a representative to act on your behalf. They do not need to be connected to the Plan.

A complaint must normally be made within six months of the date of the decision or event which is the subject of the complaint. An application outside of this period may still be accepted by the Trustees if considered appropriate.

The Trustees will write to you to acknowledge receipt of your application.

6 How is a decision made?

The Trustees will give full consideration to your complaint. A decision will normally be reached, having considered all relevant evidence, within four months of the receipt of your properly completed application form. If it will not be possible to decide your case within this timeframe, the Trustees will contact you.

Please note this this is a one stage process so the Trustees decision will be final.

The Trustees will be mindful of any actual or potential conflicts when considering your complaint and has a conflicts procedure in place to manage any such conflicts.

7 How will I be informed of the outcome?

You will be informed of the Trustees' decision no later than 21 days after the decision has been made.

The Trustees will issue a written notice of that decision to you (and, if applicable, to your representative). This will include:

- a statement of the decision, and
- an explanation of any relevant legislation or section of the Plan rules that apply to your complaint.

8 What if I am unhappy with the decision?

You can 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
The Pensions Ombudsman
10 South Colonnade
Canary Wharf
E14 4PU
Tel: 0800 917 4487

Website: www.pensions-ombudsman.org.uk

Email: enquiries@pensions-ombudsman.org.uk

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

If you have general requests for information or guidance concerning your pension arrangements, contact:

The Money and Pensions Service (MaPS)
The Pensions Advisory Service
Borough Hall
Cauldwell Street
Bedford
MK42 9AB

Operated through MoneyHelper:www.moneyhelper.org.uk

9 Exceptions to the IDRP

If proceedings have been started in any Court or Tribunal in respect of the dispute, or if the Pensions Ombudsman has commenced an investigation, this IDRP will no longer apply unless the other body so requires.

Nothing contained in this IDRP restricts any person's ability or right to refer a dispute to another body (e.g. a Court or Tribunal).

10 Data Protection

The Trustees are a “controller” for the purposes of the Data Protection Act 2018 and the UK General Data Protection Regulation (Retained Regulation (EU) 2016/679) and, as such, is subject to statutory requirements to protect your personal data.

The Trustees have a legal obligation to and legitimate interest in processing personal data relating to you in administering the Plan (this may include providing personal data to third parties). A copy of the Trustees’ data protection privacy notices is available at https://artscouncilplan.co.uk/resources/privacy-notice/

Issued by the Trustees of the Arts Council Retirement Plan (1994)

June 2026

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THE ARTS COUNCIL RETIREMENT PLAN (1994)
FORM IDR1

NOTIFICATION OF INTERNAL DISPUTE

<table>
<tr><td colspan="11">Applicant</td></tr>
<tr><td>Surname</td><td colspan="7"></td><td colspan="3">Mr/Mrs/Ms/Miss/other</td></tr>
<tr><td>Forenames</td><td colspan="10"></td></tr>
<tr><td>Status</td><td>Active Member</td><td>Prospective Member</td><td colspan="2">Deferred Pensioner</td><td colspan="3">Pensioner</td><td colspan="3">*Other Beneficiary</td></tr>
<tr><td>Date of Birth</td><td></td><td colspan="2">National Insurance No. (*Other Beneficiaries need not complete)</td><td></td><td></td><td></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td colspan="3">*If "Other Beneficiary" please state Member's name, date of birth, NI number (if known) and relationship to you</td><td colspan="8"></td></tr>
</table>

<table>
<tr><td colspan="3">Representative of Applicant, if any</td></tr>
<tr><td>Surname and initials</td><td></td><td>Mr/Mrs/Ms/Miss/other</td></tr>
</table>

Address for correspondence	

<table>
<tr><td rowspan="2">Please tick the relevant box to confirm whether your complaint is a data protection complaint or a complaint relating to Plan benefits. If your complaint relates to both, please tick both boxes.</td><td></td><td>Data protection complaint</td></tr>
<tr><td></td><td>Complaint relating to Plan benefits</td></tr>
</table>

Statement of Complaint

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(continue on reverse and/or separate sheet)

Request for extension of "reasonable period" for making an application	*Complete if applicable*

Signature of Applicant or Representative		**Date**

Send this form with any attachments to the Plan Administrators:	Arts Council Retirement Plan Administrators Hymans Robertson 20 Waterloo Street Glasgow G2 6DB Email: artscouncil@hymans.co.uk	**Number of pages**