



## Local Pension Board

**Date** Thursday 14 June 2018  
**Time** 2.00 pm  
**Venue** Council Chamber - County Hall, Durham

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### Business

#### Part A

1. Election of Chair
2. Apologies for Absence
3. Declarations of Interest (if any)
4. The Minutes of the Meeting held on 7 December 2017 (Pages 3 - 8)
5. Local Pension Board Recommendation - Meeting Arrangements (Pages 9 - 10)  
Pension Fund Committee Response to Local Pension Board Recommendation - attached
6. Observations from Pension Fund Committee held on 14 June 2018
7. Training
8. Work Plan (Pages 11 - 12)
  - a) Communications Review (Pages 13 - 18)
  - b) Internal Dispute Cases, and Pensions Ombudsman Cases (Pages 19 - 24)
9. Date of Next Meeting
10. Any Other Business

**Helen Lynch**  
Head of Legal and Democratic Services

County Hall  
Durham  
6 June 2018

To: **The Members of the Local Pension Board**

**Scheme Employer Representatives**

Councillors A Hopgood and F Tinsley

**Scheme Member Representatives**

IR Densham, N Hancock and G Sykes

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**Contact: Jill Errington**

**Email: 03000 269703**

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**DURHAM COUNTY COUNCIL**

At a Meeting of **Local Pension Board** held in Committee Room 2, County Hall, Durham on **Thursday 7 December 2017 at 2.00 pm**

**Present:**

**Councillor Hancock (Chairman)**

**Scheme Employer Representative**

Councillor A Hopgood

**Scheme Member Representatives**

Ian R Densham and Geoff Sykes

**Officers:**

Bryan Smith – Legal Manager - Litigation

Nick Orton – Pensions Manager

Beverley White – Finance Manager – Pensions and Technical

**1 Apologies for Absence**

There were no apologies for absence.

**2 Declarations of Interest**

There were no declarations of interest.

**3 Minutes**

The Minutes of the meeting held on 7 September 2017 were agreed as a correct record and were signed by the Chairman.

**Matters Arising from the Minutes**

**Training**

Councillor Hopgood provided feedback from the two day BCPP training event in York. The Member advised that the event was excellent and very useful and should be considered for all Pension Fund Committee Members, noting that only two had attended.

A general discussion ensued on member training given the technical knowledge required, and members were advised that the Board had previously recommended that group leaders should have this in mind when allocating seats to the Committee, and to encourage members to take part in the training offered. Given this, it was suggested that Officers check that all Pension Fund Committee members had

received the training sessions offered following the elections as part of member induction.

Geoff Sykes advised that legal liability of Local Pension Boards had been discussed at the BCPP event and felt that this needed clarification. Nick Orton understood that as the Local Pension Board made recommendations to the Committee and did not make decisions, it would have no legal liability in the event that the Committee or the Administering Authority acted illegally. The Terms of Reference set out the Board's obligations in the event of a breach of Regulations.

**AGREED** that the information given be noted.

#### **4 Observations from Pension Fund Committee held on 7 December 2017**

Ian Densham, Councillor Hopgood and Neville Hancock were in attendance at the Pension Fund Committee and provided observations from the meeting.

Ian Densham referred to the report which agreed a process for filling the vacant positions on the Committee with two pensioner representatives. The member noted that active scheme members were prevented from serving on the Committee. He considered that both pensioners and active members benefitted from the scheme and there was no conflict of interest. Nick Orton advised that employees were not permitted to sit on any Committee of the Council.

Neville Hancock advised that UNISON held contact details for all pensioners in the scheme and offered to assist with notification of the vacancies.

Ian Densham observed the discrepancies in the graphs presented by the Independent Adviser and was informed that this was a software issue and would be addressed.

Members noted that the attendance of Councillors at the Committee had been poor and the Board agreed to monitor the situation over the next couple of meetings. The suggestion was made that attendance details be included in the Pension Fund Annual Report in future.

Councillor Hopgood expressed concern about the length of time the Investment Managers had for their presentation to the Committee due the volume of business to be conducted in the time available. The Board had made the recommendation previously that the Committee should plan and allow for sufficient time for questioning of the Managers and if necessary start the meeting earlier or invite the Managers following a lunch break. The Committee had decided that as there were a number of new Members, and as reporting practices would change with the implementation of pooling, it would be premature to consider changing existing arrangements.

Notwithstanding this the Board felt that a further recommendation should be made to the Committee asking it to revisit the arrangements during the transition period towards pooling, emphasising that this was not a criticism of how the meeting was conducted but due to the volume of work and time available.

**AGREED** that the information be noted and a letter of recommendation be sent to the Chairman asking the Committee to examine the arrangements for the meetings during the transition period, in view of the Board's concerns about the length of time Investment Managers were given to deliver their presentations. The letter should emphasise that this was not a criticism of how the meeting was conducted but due to the volume of work and the time available.

## **5 Training**

Members were informed that a gap analysis of training needs of both the Local Pension Board and the Pension Fund Committee was being carried out and Members had been asked to complete a self-assessment questionnaire.

The Board had also been invited to attend a training session at the Special Pension Fund Committee on 5 October which covered investment in private markets and equity protection as part of the Investment Strategy Review. Councillor Hopgood had attended.

**AGREED** that the information given be noted and Board members complete and return the self-assessment questionnaire if they had not already done so.

## **6 Work Plan - Pensions Regulator - Code of Practice for Public Service Pension Schemes - Gap Analysis**

In accordance with the Work Plan the Board considered a report of the Corporate Director of Resources which provided an update of the Council's level of compliance with the Pensions Regulator's Code of Practice on the governance and administration of public service pension schemes (for copy see file of Minutes).

Following a comment from Ian Densham about the risk register and the BCPP, Nick Orton explained that the pool would appoint a Transition Manager who would oversee the transition of assets. Whilst there was a risk associated with this, asset transition was a process that Investment Managers were used to undertaking. In terms of the risk associated with compliance with procedures, Regulations had not changed and scheme administration would continue to be carried out by the Council.

Nick Orton provided an update for members on those areas that were not compliant with the Code:-

- Need to regularly formally assess the effectiveness of investment-related decision making – the CEM benchmarking report would provide quantitative analysis and would be reported to Pension Fund Committee on receipt.
- More regular review of data completeness and quality – the data quality analysis report would be reported to the March meeting of the Pension Fund Committee. Members were informed that mortality screening was now undertaken by the Council.

- Formal 'breaches policy' to be put in place – Nick Orton had drafted a Policy which had been examined by Internal Audit and would be circulated to the Committee and the Board.

Councillor Hopgood asked that an update on progress of those areas that were not compliant be given at each meeting.

**AGREED** that the information given be noted.

## **7 Date of Next Meeting**

**AGREED** that the next meeting be held at 2.00pm on Thursday 15 March 2018, following the Pension Fund Committee.

## **8 Any Other Business**

### **a) Data Protection – General Data Protection Regulations GDPR**

Councillor Hopgood asked if the Board would need to consider the proposed changes to the data protection legislation. Nick Orton advised that Officers would review current practices to ensure compliance and report to the Committee if necessary. Bryan Smith added that there were no issues for the Board in terms of the collection and retention of data that would not be addressed by the Council's update of policies and procedures.

### **b) 50/50 Option – Local Government Pension Scheme**

Neville Hancock reported that there was national concern that take-up of the 50/50 option had not reached Government expectations. The member asked about the position in Durham, and how the option was publicised. Nick Orton advised that publicity had been given when the 50/50 option was first introduced, and was now offered to those employees considering opting out of the scheme. The Actuary had revised the position in the latest valuation with an assumption that there would be no take-up.

### **c) Policies and Procedures**

Ian Densham noted that one of the Committee's functions was to monitor matters such as policy changes, and procedural and back-office issues, and suggested that an item be included on the Agenda for each meeting to reflect this. The member was informed that major changes to policies which affected the Pension Fund were reported to the Committee for consideration and back-office administration was delegated to the Corporate Director of Resources. These arrangements were monitored by Internal Audit and in addition External Audit conducted an in-depth examination of systems at the year end.

### **d) Visit by Pensions Regulator**

Nick Orton advised that arrangements had been made for the Pensions Regulator to visit the Local Pension Boards of Durham, South Tyneside,

Teesside and Northumberland. Matters to be discussed included GDPR, Cyber Security and legal liability. The meeting was to be held on Thursday 21 December 2017 between 2 and 4pm in County Hall and all members of the Board were invited to attend. Feedback would be provided at the next meeting.

**AGREED** that the information given be noted.

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### Response to Local Pension Board Recommendation

After the initial meeting of the new Pensions Committee in June 2017 I was approached by several members who were unhappy with the relevance and length of the presentation given by the Investment Managers.

Following this discussions were held with DCC Pensions staff, the committee advisors and Director of Resources to make the most of the opportunity for the committee to gain knowledge from the managers.

We put the following into place;

- 1) Managers were sent a template of relevant information the committee need
- 2) Managers were asked to keep their presentation relevant to the fund and be concise
- 3) Our advisors were asked to produce a brief overview of each visiting manager and suggest some questions which members may wish to ask.

Initial feedback from members at the September meeting was positive and the situation is ongoing and will be reviewed after the June meeting. As always the needs of the Pension Fund, members of the fund and the committee are our primary concern. Whether the meetings are helpful or a useful way to spend time for the Investment Managers is not our concern.

Cllr M Davinson  
Chair, Pension Fund Committee

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**LOCAL PENSION BOARD WORK PLAN  
JUNE 2018**

<b>Meeting/Target Date</b>	<b>Topics to be considered</b>	<b>Comments</b>
Ongoing	Pensions Regulator Code of Practice	Consider Gap analysis against Code of Practice
March 2017	Member and employer communications	Completed
	Internal disputes cases, Pensions Ombudsman cases	Completed
June 2017	Review performance statistics – review Key Performance Indicators	Information not available as CIPFA benchmarking not being undertaken at present
	Review training approach	Ongoing - Consider Board members, Committee members and officers involved in scheme administration
	Review final valuation report outcome	Completed
September 2017	Review (draft) accounts and annual report	
	Assist in development and review of asset voting and engagement processes	Consider compliance with UK Stewardship Code
December 2017	Pensions Regulator Code of Practice	Review and update gap analysis
March 2018	Member and employer communications	Review standard communications and communication strategy
	Internal disputes cases, Pensions Ombudsman cases	Review and consider any lessons learned
June 2018	Review performance statistics – review Key Performance Indicators	
September 2018	Employer and Administering Authority discretions	Review approach and application

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## Local Pension Board

14 June 2018



## Communications Review

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**John Hewitt, Corporate Director of Resources**

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### Purpose of Report

1. To provide Board Members with details of how different stakeholder groups receive communication from the Pension Fund, and to explain current plans to develop the communication strategy.

### Background

2. Under the Local Government Pension Scheme (LGPS) Regulations 2013, a Pension Fund Administering Authority is required to publish a written statement setting out its policy concerning communications with members, representatives of members, prospective members and Scheme employers.
3. Specifically, the statement must set out the Administering Authority's policy on
  - a) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;
  - b) the format, frequency and method of distributing such information or publicity; and
  - c) the promotion of the Scheme to prospective members and their employers.

### Communications Policy Statement

4. The Council's Pension Fund Communications Policy Statement is attached as Appendix A. This Statement includes the Council's policy on the issues set out in paragraph 3 above. The Statement is published each year as part of the Pension Fund Annual Report and is available on the Council's website.
5. Key points to note include the following:
  - Newsletters for all categories of member are currently only produced as required. Typically, for active members this means newsletters are produced whenever there is a change to regulations or legislation that affects the benefits an active member is entitled to, or the choices they have. The last actives newsletter was sent out in June 2016 to inform scheme members of the end of contracting-out. Other topics were covered as well, including the Border to Coast Pensions Partnership, the lifetime allowance and annual allowance and options around paying more (or less) into the LGPS. The changes introduced by the Local Government Pension Scheme (Amendment) Regulations 2018 will require

communication with deferred members – as many will now have the option to access their pension (with reductions) at an earlier date.

- All active members and deferred members receive an annual benefit statement. For actives this is issued by the end of August each year and for deferred members it is issued in April or May, shortly after the annual pension increase has been applied.
- Scheme employers are communicated with by email. Actives' newsletters are also sent by email where we have an individual's email address on record.

### **Future developments**

6. The Pensions Team is currently working with Civica, its pensions administration software provider, to introduce develop a web-based communication platform for scheme employers. Two employers are currently piloting the system, which allows employers to securely exchange information with the Pensions Team, replacing many paper forms currently in use. It also allows employers to run some benefit estimates with the functionality to allow employers to (for example) see the cost of allowing an employee to access pension benefits early on redundancy or business efficiency grounds.
7. The pensions administration system also has a scheme member web facility that can potentially allow a range of on-line services to scheme members, including accessing estimate information about their prospective benefits. This is likely to be developed after the scheme employer web is fully operational.

### **Recommendation**

8. The Board is asked note this report.

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**Contact: Nick Orton      Tel: 03000 269798**

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## **COMMUNICATIONS POLICY STATEMENT**

Durham County Council is the administering authority for the Durham County Council Pension Fund. This Communication Policy Statement has been drawn up to comply with regulation 106B of the Local Government Pension Scheme Regulations 1997 (as amended) and to ensure the Council offers clear communication to stakeholders of the Local Government Pension Scheme.

### ***WHO WE COMMUNICATE WITH***

- Scheme members (active members, pensioners and deferred members);
- Representatives of scheme members;
- Prospective scheme members;
- Employers participating in the scheme;
- Advisers (for example actuaries, investment advisers, Local Government Pensions Committee);
- Other bodies (for example prospective employing authorities and their representatives).

### ***KEY OBJECTIVES***

- To ensure communication is clear, factual and concise;
- To ensure communication is designed and delivered in a manner appropriate to its audience;
- To ensure that the correct information reaches the right people at the right time.

## **COMMUNICATING WITH SCHEME MEMBERS**

Scheme members need access to detailed information about the scheme and their own benefits to allow them to make informed choices about their own pension benefits. The Council provides:

- Scheme literature  
The pension section produces a summary guide to benefits in the scheme along with specific guides for certain circumstances, such as how divorce can affect scheme benefits or on the internal dispute resolution procedure.
- Annual benefit statements  
All active members are sent a benefit statement each year setting out the benefits they have earned in the scheme up to 31 March that year.

All deferred members are sent a benefit statement each year setting out the current value of their deferred benefits payable at the earliest date on or after age 60 that unreduced benefits can be paid to them. The statement also sets out the effect of pension increases on their benefits since they left service.

- Newsletters

All active members and pensioners are sent a copy of each issue of the relevant newsletter.

- Telephone helpline

All newsletters contain contact telephone numbers for general enquiries.

Active members, pensioners and deferred members can contact the Pension Administration Team by telephone between 8:30am and 4:30pm on weekdays. The newsletters also contain the email address where general enquires can be submitted.

## **COMMUNICATING WITH EMPLOYERS PARTICIPATING IN THE SCHEME**

Employers need to be kept up to date with developments in the scheme and need to be informed of consultation exercises that could influence the future of the scheme.

Employers are sent written information on scheme developments as and when changes are proposed to the scheme. Employers are often sent copies of circulars provided by the Employers' Organisation or are directed to copies of these circulars via web-links.

Meetings with individual employers are arranged as necessary or as requested to deal with any significant pension issues that arise. Support is provided to employers who want to provide further pension information to their employees - this includes pre-retirement seminars and mid-life seminars.

All employers are invited to attend the Annual Meeting of the Pension Fund Committee. Copies of the annual report and accounts for the Pension Fund are distributed at this meeting and are also sent to all employers in the scheme.

## **COMMUNICATING WITH PROSPECTIVE MEMBERS**

The Pension Administration Team issues pension packs to prospective members. These contain a summary of the benefits of scheme membership, information comparing the scheme with other pension options, a nomination form, an opt-out form and an authorisation form for investigating potential pension transfers into the scheme.

## **COMMUNICATING WITH REPRESENTATIVES OF SCHEME MEMBERS**

The Pension Administration Team produces a summary guide to benefits in the scheme along with specific guides for certain circumstances, such as how divorce can affect scheme benefits or on the internal dispute resolution procedure. This information is available to representatives of scheme members.

The Pension Administration Team telephone helpline is also available between 8:30am and 4:30pm on weekdays for any queries representatives of scheme members may have.

The main local government unions are represented on the Pension Fund Committee. This means they are sent agenda items and minutes from the meetings as well as being able to attend the meetings (albeit in a non-voting capacity).

## FUND PUBLICATIONS

COMMUNICATION DOCUMENT	AVAILABLE TO	WHEN PUBLISHED
Starter Packs	Prospective members	When required
Summary scheme guide	Prospective members Active members	When required
Newsletter: Pensions News	Active members	When required
Annual benefit statement	Active members Deferred members	Once per year
Newsletter: Years Ahead	Pensioners	When required
Payslips	Pensioners	Once a year or upon a change to net pension of more than £5
P60s	Pensioners	Once per year
Pension Increase Information	Pensioners	Once per year
Update letter on changes to regulations and other issues	Employers	When required
Valuation report	Employers	Every three years
Report and accounts	All stakeholders	Once per year – distributed to all employers and available on the DCC website and on request to all

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**Local Pension Board****14 June 2018****Internal disputes cases, and Pensions  
Ombudsman cases**


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**John Hewitt, Corporate Director of Resources**


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**Purpose of Report**

1. To provide Board Members with a summary of the outcomes of any internal dispute cases or Pensions Ombudsman cases the Pension Fund has been involved in since April 2015.

**Background**

2. Scheme members with an unresolved complaint about their pension benefits are able to make use of the Pension Fund's two stage internal dispute resolution procedure. Whenever a scheme member initially receives a benefit from the scheme they are made aware of this procedure – a copy of the information sent to scheme members about the procedure is enclosed as Appendix A.

**Review of internal disputes cases**

3. The first stage of the process is an application to the adjudicator. Over the three years from 1 April 2015 to 31 March 2018 there a total of 47 applications to the adjudicator (15 in the first two years and 17 in 2017/18). Of these, all except seven related to complaints about an individual not being awarded an ill-health pension. The other seven complaints related to the following:
  - An inaccurate benefit estimate being supplied prior to retirement (two instances of this)
  - A request that the individual should be able to have their benefits without early retirement reductions applied
  - A decision regarding the beneficiary of a death grant
  - An appeal from the family of a deceased member that the member should have been treated as dying in service not from deferred status
  - A dispute that a refund was paid
  - A dispute over the recovery of overpaid pension paid to a deceased pensioner
4. Of the 47 applications in 37 cases the adjudicator upheld the Council's decision. In one case (the dispute over the recovery of overpaid pension) the adjudicator recommended the Council reverse its decision (which it did). The remaining 9 (all relating to ill-health retirement applications) were referred back by the adjudicator to the scheme employer to obtain additional information and make a further decision on the ill-health retirement application.

5. The reasons the adjudicator gave in these cases related to ensuring up to date information was available from all the health professionals involved in the case and obtaining more information on the likelihood of success of any untried treatments.
6. The Council's Occupational Health Team is responsible for submitting ill health retirement application cases to an independent doctor for review where the individual worked (or formerly worked) for the Council. As the Council represents around two thirds of the active membership of the Pension Fund and a higher proportion of non-active members, most of the ill health retirement applications are initially processed by the Council's Occupational Health Team. The Council's Occupational Health Team has revised the instructions it gives to the independent doctors that provide opinions in respect of ill health retirement applicants, partly as a consequence of the comments made by the adjudicator. For example, the instructions now make it clear that independent doctors need to be clear about the probability of success of any untried treatments if they are going to make reference to any such treatments in their report. There has been a reduction in cases being referred back to Council by the adjudicator – in the last two years only 3 ill-health appeal cases out of 27 were referred back (around 11%), compared with 5 out of 13 (around 38%) in the previous year.
7. The number of stage two appeals has increased over the last three years. In 2015/16 there were 2, in 2016/17 there were 5 and in 2017/18 there were 9. Of these stage two cases that have been completed, two were referred back to the original employer to reconsider their decision, in the other cases the original decision was upheld.

### **Pensions Ombudsman Cases**

8. Since 1 April 2015 there have been no Pensions Ombudsman rulings made in respect of the Pension Fund or its employers.

### **Recommendation**

9. The Board is asked note this report.

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**Contact: Nick Orton      Tel: 03000 269798**

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## Appendix A – Internal Dispute Resolution Procedure information

### The Local Government Pension Scheme Internal Dispute Resolution Procedure

#### A. Introduction

1. Decisions regarding your membership of the LGPS will initially be made by your employing authority in respect of such matters as the amount of your pensionable earnings, date of scheme entry etc.
2. Other matters regarding your membership will then be determined by Durham County Council in its role as administrator of the LGPS, e.g. the amount service transferred into the scheme from a previous employment.

**Note:** in the case of Durham County Council employees, both items (1) and (2) will be determined by the same authority. It will however be the responsibility of the employing service to determine issues under (1) and the Pensions Group to determine items in (2).

#### B. What should you do if you are unhappy with any aspect of your pension scheme membership?

1. Initially you should contact the Durham County Council Pensions Team by telephoning 03000 264322, or by email at [pensions@durham.gov.uk](mailto:pensions@durham.gov.uk). They will be able to explain any questions you have about scheme membership and service, and, if necessary, direct you to the contact person within your employing authority.
2. If you are still unhappy with the explanation you have been given, or if you have not been provided with an explanation, you may refer the matter to the adjudicator.
3. You must apply to the adjudicator within 6 months of being notified of the decision which is the cause of your complaint.

#### C. Who is the adjudicator?

1. The adjudicator for Durham County Council Pension Fund is:

Mr Yunus Gajra  
Development Manager (Strategic)  
West Yorkshire Pension Fund  
PO Box 67  
Bradford  
BD1 1UP

2. When referring your complaint to the adjudicator, you must send a signed letter and include the following information:
  - (a) Your full name, address, date of birth, National Insurance number, the name of your employer and your job title.

- (b) If your complaint is on behalf of another person, you must submit all of the above details in respect of that person and explain your relationship to them.
- (c) A statement setting out the details of the disagreement, enclosing any relevant letters or documentation.

#### **D. What happens next?**

1. Within two months of receiving your complaint the adjudicator must reach a decision and confirm his decision in writing to you, your employer and Durham County Council Pension Fund
2. If he is not able to reach a decision within two months he must write to you to tell you why this is the case and give you an estimate of when he is likely to be able to reach a decision (the expected decision date).

#### **E. What should I do if I am not satisfied with the findings of the adjudicator?**

1. If you are not satisfied with the findings of the adjudicator you may refer the matter to the administering authority at the following address:

Pensions Group  
Resources  
County Hall  
Durham  
DH1 5UE

2. When referring your complaint to the Administering Authority you must send a signed letter which includes the information in section C2 and a statement that you wish the decision to be reconsidered by the Administering Authority.
3. Your application must be made by the relevant date as follows:
  - a. Within six months of the adjudicator's decision was received.
  - b. If the adjudicator was unable to reach a decision within two months, and he wrote to give you an expected decision date, you must submit your application within seven months from the expected decision date.
  - c. If the adjudicator did not make a decision and did not provide an expected decision date, you must submit your application within nine months from the date on which your application was made to the adjudicator.

**Note:** You may also refer your complaint to the Administering Authority should the adjudicator fail to reply to you within the timescales detailed in Section (D).

#### **F. What happens next?**

Within two months of receiving your complaint, the Administering Authority must confirm its decision in writing to you and to your employer. If it is not possible to reach a decision within two months it must write to you to tell you why this is the case and to give you an estimate of when a decision is likely to be made.

## **G. Is there anything else I can do after referring my complaint to the Administering Authority?**

When the Administering Authority gives you its decision it will also advise you about the services provided by TPAS and the Pensions Ombudsman.

## **H. What is TPAS?**

The Pensions Advisory Service (**TPAS**) is an independent non-profit organisation that provides free information, advice and guidance on all types of pension schemes. You can contact TPAS through your local Citizens Advice Bureau or in writing to:

11 Belgrave Road  
London  
SW1 1RB

Or by telephone on 0300 123 1047

Or online by visiting their website [www.pensionsadvisoryservice.org.uk](http://www.pensionsadvisoryservice.org.uk)

**Note:** If you want the Pensions Ombudsman to consider your complaint, you should normally contact TPAS first. If TPAS is unable to resolve your complaint and believes that maladministration has occurred, or that a decision made by the Administering Authority is incorrect, they will recommend that you refer your complaint to the Ombudsman.

You can ask TPAS for help at any time if you are having difficulties in resolving your complaint under the dispute procedure.

## **I. What is the role of the Pensions Ombudsman?**

The Pensions Ombudsman can investigate complaints of maladministration or disputes of fact or law relating to decisions made about your pension. Unless your complaint relates only to maladministration, you must follow the procedure set out in this leaflet before referring your complaint to the Ombudsman. This means that you must refer your complaint to the adjudicator and then to the Administering Authority before the Pensions Ombudsman will commence an investigation.

If, however, your complaint is about maladministration, i.e the way your case has been handled by either the adjudicator or the Administering Authority, you do not need to wait until the Internal Disputes Resolution Procedure has been completed.

You can contact the Pensions Ombudsman in writing at:

11 Belgrave Road  
London  
SW1 1RB

By telephone on 020 7630 2200

By emailing: [enquiries@pensions-ombudsman.org.uk](mailto:enquiries@pensions-ombudsman.org.uk)

You can find out more about the Pensions Ombudsman by visiting their web site at:  
[www.pensions-ombudsman.gov.uk](http://www.pensions-ombudsman.gov.uk)