

DTS DEDICATED TRUSTEE SERVICES DAC
INTERNAL DISPUTES RESOLUTION PROCEDURE

If during the course of the provision of services by DTS Dedicated Trustee Services DAC ("DTS") we are made aware that a member / beneficiary is unhappy or dissatisfied (rightly or wrongly) with the service being provided to their Pension Scheme ("the Scheme") then every effort will be made by DTS to resolve the issue or issues leading to the complaint and to ensure that the member / beneficiary is fully informed of the efforts being made to resolve any issues of concern. **In particular, where a member / beneficiary believes that they have suffered a financial loss as a result of poor trusteeship of the Scheme, or if there is a dispute of fact or law, they should contact DTS first.** Complaints should be addressed to:-

Customer Complaints
DTS Dedicated Trustee Services DAC
PO Box 129
Killarney
Co. Kerry
info@dtstrustees.ie

In all cases, the following Internal Disputes Resolution Procedure in accordance with the provisions of the Pensions Ombudsman Regulations, 2003 (S.I. number 397 of 2003) is adopted by DTS:-

1. If the contact person in DTS who has charge of the matter is not able to satisfy the member's / beneficiary's concerns, then:-
 - a director of DTS will immediately be informed of the situation;
 - a member / beneficiary dissatisfaction report form will be completed; and
 - details of the complaint will be registered on the member / beneficiary complaints register.
2. Either the contact person in DTS or a director of DTS, as appropriate, will acknowledge receipt of the complaint in writing within 7 working days of receipt of the complaint, and may ask for further information or suggest a meeting.
3. The complaint is entered in the member / beneficiary complaints register which is kept by the Directors of DTS.

4. If a meeting takes place, the contact person in DTS or a director of DTS, as appropriate, will write to the member / beneficiary to summarise what was discussed and agreed, including the setting out any agreed actions to be taken by any parties. This will issue within five working days of the meeting taking place.
5. If the meeting followed by written summary of actions at No. 4 above does not resolve the matter to the member's / beneficiary's reasonable satisfaction, then the matter will be placed into the hands of the Managing Director of DTS who will investigate the complaint by reviewing the Scheme, the Scheme's internal trustee minutes prepared by DTS from time to time, speak to both the member / beneficiary and the contact person in DTS concerned and any relevant director of DTS. The Managing Director may make a proposal or suggest a course of action to the member / beneficiary in order to resolve the complaint.
6. The Managing Director may (but is not obliged to) seek professional advice (legal, actuarial, administration, etc. as appropriate) and get a third party opinion on the matter at hand.
7. Based on the Managing Director's investigation and any independent advice or opinion (where deemed appropriate), the Managing Director will do one of two things: -
 - (i) suggest a meeting with both the member / beneficiary and the contact person in DTS, and director, if appropriate, to try to resolve the complaint, within a target time of 21 days. Within 5 working days of the meeting, the Managing Director will write to the member / beneficiary to summarise what was discussed and agreed at the meeting, including the setting out any solutions arrived at or redress agreed. In appropriate circumstances, redress could include an apology and an explanation, a review of DTS systems and procedures, a review of relevant 3rd party provider systems and procedures, and identify the cause of the complaint in order to ensure that the error should not occur again or any other redress as DTS deem in its absolute discretion appropriate in the circumstances; or
 - (ii) write to the member / beneficiary setting out a detailed response to the complaint and suggesting one or more ways forward.
8. If the member / beneficiary is still not satisfied with the position, DTS may invite the member / beneficiary to take part in a mediation process with DTS, chaired by an independent mediator

either agreed by both parties, or in the absence of agreement, recommended by the Pensions Authority or the Law Society of Ireland.

9. If such a mediation process fails and/or the matter is still not resolved to the member's / beneficiary's reasonable satisfaction at this stage, the Managing Director will give the member / beneficiary a statement of DTS' final position in relation to the complaint and an explanation as to why. The member / beneficiary will be advised that he/she can write to: -

Office of the Pensions Ombudsman
36 Upper Mount Street
Dublin 2

Phone: +353 1 647 1650
Facsimile: +353 1 676 9577
e_mail: info@pensionsombudsman.ie
website: www.pensionsombudsman.ie

10. The Pensions Ombudsman will make his own determination of the matter and DTS will provide all requested information to the Pensions Ombudsman in a timely and courteous manner. Either the member / beneficiary or DTS shall be entitled to appeal any finding of the Pensions Ombudsman to the High Court for further determination.
11. The member / beneficiary may also at any time address any complaints to the Pensions Authority at: -

Complaints Department
Pensions Authority
Verschoyle House
28/30 Lower Mount Street
Dublin 2

Phone: + 353 1 613 1900
Fax: + 353 1 631 8602

12. The procedures and timescales set out above may need to be varied as circumstances require but DTS will endeavour to follow these procedures and timescales as closely as possible.

13. It is the policy of DTS to endeavour to resolve complaints in an expeditious, courteous and efficient manner to the satisfaction of all parties.

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