



Unite Pension Scheme

Expression of Wish Form

For completion by employee

To: The Trustee of the Unite Pension Scheme (the Scheme)

In the event of my death I wish the Trustee to consider my request for any lump sum death benefit payable from the Scheme to be paid to the following individual(s) in the proportions shown.
This form replaces any similar form, which I have previously completed

Name & Address	Relationship	Proportion of Benefits (%)
		100%

To: The Trustee of the Unite Pension Scheme (the Scheme)

In the event of my death I wish to nominate the person named below to receive the dependant's pension payable by the Scheme. This supersedes any similar form, which I have previously completed.

Name	
Date of Birth	
Address	
Date	

Please complete the form overleaf.



Unite Pension Scheme

Expression of Wish Form

I appreciate that this form is in no way binding on the Trustee who has the discretion to apply the benefit as it sees fit.

Print Name	
National Insurance Number	
Signed	
Date	

In the event of any change in circumstances, it is your responsibility to see that any alteration in your wishes is made known to the Trustee by submitting a further form. Further forms can be obtained from the Trustee at the address below.

This completed form should be sealed in an envelope to be opened in the event of your death. The outside of the envelope should be marked clearly with:

- 'Expression of Wish Form'
- Your name
- Your National Insurance Number
- Your Date of Birth
- Date the form was signed

Please return this form signed, dated and completed, marked 'Strictly Private and Confidential', to Alex Ryan, Pensions Manager, Unite Pension Scheme, Unite the Union, Unite House, 128 Theobald's Road, Holborn, London WC1X 8TN.

Data Protection

As part of its ongoing monitoring of General Data Protection Regulation (GDPR) compliance the Trustee considered the following issues:

Expression of wishes forms

The Trustee noted that these forms are completed by members of the scheme and contain information about their beneficiaries. This information is likely to amount to personal data for the purpose of the GDPR. The beneficiaries named on the forms may not be aware that their personal data is held by the Trustee and will not be provided with a privacy notice by the Trustee. The Trustee noted that holding personal data in this way is regarded as 'invisible processing' and that this usually requires a data protection impact assessment (DPIA) to be carried out – however guidance issued by the Information Commissioner's Office states that it does not expect a new DPIA for existing processing where the relevant risks and safeguards have already been considered (including as part of a formal or informal risk-assessment process) unless the nature, scope, context or purposes of the processing has changed significantly since that previous assessment.

The Trustee noted that it (and its predecessors) has held expression of wishes forms in this way for many years and that the risks and safeguards have been considered. The Trustee wished to record these and details of the processing as follows:

Processing that could give rise to a DPIA

This is the invisible processing outlined above. This arises because members are asked to complete an expression of wishes form to provide guidance to the Trustee as to how they would like certain benefits to be distributed following their death.

Nature, scope, context and purpose of processing

The personal data is normally collected on a standard form, which is completed by the member and held by the Scheme Administrator, First Actuarial. The personal data on the form is not used (other than being stored) until the member dies and it is then considered by the Trustee and, where appropriate, its advisers. The standard form asks for details of beneficiaries' names and addresses and the proportion of benefit that the member would like to be paid to them. However, it is open for members to provide additional information if they wish. The beneficiaries named on the form could include children or other vulnerable individuals. The information could also indicate sexual orientation.

Forms are kept at least until the member's death.

Members are encouraged to keep their forms up to date, but not all will do so.

Holding expression of wishes forms in this way is a well-established practice, reflecting the fact that benefits are paid under the Trustee's discretion. It provides the Trustee with guidance as to whom benefits could be distributed and allows benefits to be distributed more quickly, which is to the advantage of those named on the forms. It helps the Trustee comply with its duties to consider all relevant beneficiaries.

Following a member's death, privacy notices are sent to those from whom the Trustee collects personal data.

The Trustee does not contact those named on the forms prior to death, as the forms are held on a confidential basis, and in sealed envelopes. This encourages members to complete the form and allows them to change their mind as they wish. If the forms were not confidential this could deter members from completing the forms, which would undermine their purpose.

Necessity and proportionality

The Trustee processes personal data in this way to comply with its legal obligations in administering the scheme, including its trust law duties to consider all relevant beneficiaries. The processing achieves the desired outcome and there is no other practical way of achieving this. The personal data held in this way is usually relatively limited and it is not used for any other purpose.

Risk assessment

The main risk is that the forms are accessed inappropriately. The likelihood of this is considered to be low as there are instructions on the form advising the members to place their completed form within a sealed envelope marked with their name, NI number, date of birth, and date that they signed the form before returning them. These sealed envelopes are provided by the member to the relevant contact at Unite the Union marked Private and Confidential. They are then sent by 1st class signed for mail to First Actuarial where they are then held in a secure manner. First Actuarial uploads the forms onto each member's electronic record before the original forms are then destroyed.

On the rare occasion that these forms are received by Unite the Union unsealed, the forms are promptly sealed in an envelope before being securely transferred to First Actuarial.

When the forms are considered following a member's death they are transmitted in a secure manner. In the event of inappropriate access any harm is expected to be minimal, due to the limited personal data included on the forms. The overall risk of processing personal data in this way is therefore considered to be low.