

Ref	A1	Date entered in register	19 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of joining	Owner	SB/JT
Party which caused the breach	CPF + various employers		
Description and cause of breach	<p>Requirement to send a Notification of Joining the LGPS to a scheme member within 2 months from date of joining (assuming notification received from the employer), or within 1 month of receiving jobholder information where the individual is being automatically enrolled / re-enrolled.</p> <p>Due to a combination of late notification from employers and untimely action by CPF the legal requirement was not met. 20/11/18 - (Q2) Staff turnover in August/September reduced number actioned. 29/1/19 The introduction of I-connect is also producing large backlogs at the point of implementation for each employer. I-connect submission timescales can also leave only a few days for CPF to meet the legal timescale. 14/8/19 General data cleansing including year-end is affecting whether legal timescale is met. Individual on long-term sick impacting this.</p>		
Category affected	Active members		
Numbers affected	<p>2017/18: 2676 cases completed / 76% (2046) were in breach.</p> <p>2018/19:</p> <ul style="list-style-type: none"> - Q1 - 1246 cases completed / 84%(1050) were in breach - Q2 - 551 cases completed / 87% (480) were in breach - Q3 - 1123 cases completed / 50% (563) were in breach - Q4 - 935 cases completed / 49% (458) were in breach <p>2019/20:</p> <ul style="list-style-type: none"> - Q1 - 822 cases completed / 62% (507) were in breach - Q2 - 750 cases completed / 46% (380) were in breach 		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late scheme information sent to member which may result in lack of understanding. - Potential complaints from members. - Potential for impact on CPF reputation. 		

Actions taken to rectify breach	<ul style="list-style-type: none"> - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of new joiners (ongoing). - Set up of Employer Liasion Team (ELT) to monitor and provide joiner details more timelessly. - Training of new team members to raise awareness of importance of time restraint. - Prioritising of task allocation. KPIs shared with team members to further raise awareness of importance of timely completion of task. - 6/6/18 - Updating KPI monitoring to understand employers not sending information in time. 3/6/19 - Review of staff resources now complete and new posts filled. 14/8/19 -Streamlining of aggregation cases with major employers. - Consider feasibility and implications of removing reminders for joining pack (agreed not to change). - Consider feasibility of whether tasks can be prioritised by date of joining (agreed not to change). 14/11/19 - Utilising FCC trainees to assist with this procedure. Joined early September.
Outstanding actions (if any)	<ul style="list-style-type: none"> - Ongoing roll out of i-Connect. - Bedding in of new staff/ training. - Carrying out backlogs of previous joiners (most of which are due to i-Connect roll out). - Contacting employers which are causing delays. 28/1/19: - Introduce process to analyse specific employers causing problems.
Assessment of breach and brief summary of rationale	<p>29/1/19 Large proportion of joining members affected but business case has been put forward to increase resources. In the meantime, temporary resources are being requested to assist.</p> <p>4/6/19 Reassessed - New resource put in place but may take a few months to see full impact.</p> <p>14/11/19 status reassessed and remains amber whilst training of new staff continues</p>
Reported to tPR	No

Ref	A2	Date entered in register	19 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late transfer in estimate	Owner	JT
Party which caused the breach	CPF + various previous schemes		
Description and cause of breach	<p>Requirement to obtain transfer details for transfer in, and calculate and provide quotation to member 2 months from the date of request.</p> <p>Breach due to late receipt of transfer information from previous scheme and late completion of calculation and notification by CPF. Only 2 members of team fully trained to carry out transfer cases due to new team structure and additional training requirements. 29/1/19 National changes to transfer factors meant cases were put on hold/stockpiled end of 2018/early 2019.</p>		

Category affected	Active members
Numbers affected	2017/18: 235 cases completed / 36% (85) were in breach. 2018/19: - Q1 - 60 cases completed / 42% (25) were in breach - Q2 - 66 case completed / 38% (25) were in breach - Q3 - 31 case completed / 32% (10) were in breach - Q4 - 56 cases completed / 62% (35) were in breach 2019/20: - Q1 - 51 cases completed / 59% (30) were in breach - Q2 - 56 cases completed / 29% (16) were in breach
Possible effect and wider implications	- Potential financial implications on some scheme members. - Potential complaints from members/previous schemes. - Potential for impact on CPF reputation.
Actions taken to rectify breach	- Continued training of team members to increase knowledge and expertise to ensure that transfers are dealt with in a more timely manner.
Outstanding actions (if any)	- Completion of training of team members in transfer and aggregation processes. 29/1/19: - If KPIs don't improve, investigate how much of the delay is due to external schemes and look for ways to improve this.
Assessment of breach and brief summary of rationale	29/1/19 Stockpiling will likely make KPIs worse in short term but then longer term additional training will result in improvements. 14/11/19 whilst improvements have been made - this needs to be consistent and numbers reducing further prior to changing to green
Reported to tPR	No

Ref	A4	Date entered in register	19 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of retirement benefits	Owner	SB
Party which caused the breach	CPF + various employers + AVC providers		
Description and cause of breach	Requirement to provide notification of amount of retirement benefits within 1 month from date of retirement if on or after Normal Pension Age or 2 months from date of retirement if before Normal Pension Age. Due to a combination of: - late notification by employer of leaver information - late completion of calculation by CPF - for members who have AVC funds, delays in receipt of AVC fund values from AVC provider		
Category affected	Active members mainly but potentially some deferred members		
Numbers affected	2017/18: 960 cases completed / 39% (375) were in breach. 2018/19: - Q1 - 297 cases completed / 31% (91) were in breach - Q2 - 341 case completed / 26% (89) were in breach - Q3 - 357 case completed / 30% (108) were in breach - Q4 - 348 cases completed / 32% (112) were in breach 2019/20: - Q1 - 315 cases completed / 28% (87) were in breach - Q2 - 411 cases completed / 24% (99) were in breach		

Possible effect and wider implications	<ul style="list-style-type: none"> - Late payment of benefits which may miss payroll deadlines and result in interest due on lump sums/pensions (additional cost to CPF). - Potential complaints from members/employers. - Potential for impact on CPF reputation.
Actions taken to rectify breach	<ul style="list-style-type: none"> - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of retirees (ongoing). - Set up of ELT to monitor and provide leaver details in a more timely manner. - Prioritising of task allocation. - Set up of new process with one AVC provider to access AVC fund information. - Increased staff resources. <p>3/6/19 - Review of staff resources now complete and new posts filled. 14/8/19 - Improvements have been made and more should be made as staff are settled in and trained. Business case approved.</p>
Outstanding actions (if any)	<ul style="list-style-type: none"> - Further training of newly promoted team member to deal with volume of work. - Identifying which employers are causing delays. <p>14/11/19 Continuation of training.</p>
Assessment of breach and brief summary of rationale	<p>4/6/19 New resource put in place but may take a few months to see full impact. 14/11/19 Number of retirements increased and those in breach reduced so improvements continue to be made, but remain as amber for now.</p>
Reported to tPR	No

Ref	A5	Date entered in register	20 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late estimate of benefits	Owner	SB
Party which caused the breach	CPF		
Description and cause of breach	<p>Requirement to provide quotations on request for potential retirements as soon as is practicable, but no more than 2 months from date of request unless there is a previous request in the last year.</p> <p>Delays are due to:</p> <ul style="list-style-type: none"> - late completion of calculation by CPF. - Increasing numbers of estimate requests being made by members. 		
Category affected	Active members mainly but potentially some deferred members		
Numbers affected	<p>2017/18: 487 cases completed / 37% (182) were in breach. 2018/19:</p> <ul style="list-style-type: none"> - Q1 - 79 cases completed / 32% (25) were in breach - Q2 - 60 case completed / 22% (13) were in breach - Q3 - 123 case completed / 15% (18) were in breach - Q4 - 151 cases completed / 6% (4) were in breach <p>2019/20:</p> <ul style="list-style-type: none"> - Q1 - 165 cases completed / 4% (6) were in breach - Q2 - 244 cases completed / 2% (4) were in breach 		

Possible effect and wider implications	<ul style="list-style-type: none"> - Late notification of benefits/costs to member/employer. - Potential complaints from members/employers. - Potential for missed opportunities by members/employers. - Potential for impact on CPF reputation.
Actions taken to rectify breach	<ul style="list-style-type: none"> - Introduction of MSS should alleviate the volume of requests received as member will be able to calculate own estimate through database. - Further training of team members also required. - Task allocation reviewed by team leader to ensure estimates are given a higher priority. <p>3/6/19 - Review of staff resources now complete and new posts filled. 14/8/19 - Additional staff training.</p>
Outstanding actions (if any)	-None
Assessment of breach and brief summary of rationale	<p>29/1/19 - Improvements have been made including from MSS and more should be made as staff are settled in and trained. Business case will also assist if approved.</p> <p>3/6/19 Cases in breach now drastically reduced so moved from amber to green. But will review in next quarter.</p> <p>14/8/19 Reassessed - Still minor breach but all reasonable actions have been taken.</p> <p>14/11/19 Reassessed - Still minor breach but all reasonable actions have been taken and progress has been maintained.</p>
Reported to tPR	No

Ref	A6	Date entered in register	20 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of death benefits	Owner	SB
Party which caused the breach	CPF		
Description and cause of breach	<p>Requirement to calculate and notify dependant(s) of amount of death benefits as soon as possible but in any event no more than 2 months from date of becoming aware of death, or from date of request by a third party (e.g. personal representative).</p> <p>Due to late completion by CPF the legal requirements are not being met. Due to complexity of calculations, only 2 members of team are fully trained and experienced to complete the task</p>		
Category affected	Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant).		
Numbers affected	<p>2017/18: 153 cases completed / 58% (88) were in breach.</p> <p>2018/19:</p> <ul style="list-style-type: none"> - Q1 - 53 cases completed / 32% (17) were in breach - Q2 - 26 case completed / 35% (9) were in breach - Q3 - 41 case completed / 39% (16) were in breach - Q4 - 64 cases completed / 22% (14) were in breach <p>2019/20:</p> <ul style="list-style-type: none"> - Q1 - 33 cases completed / 24% (8) were in breach - Q2 - 41 cases completed / 34% (14) were in breach 		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late payment of benefits which may miss payroll deadlines and result in interest due on lump sums/pensions (additional cost to CPF). - Potential complaints from beneficiaries, particular given sensitivity of cases. - Potential for impact on CPF reputation. 		

Actions taken to rectify breach	- Further training of team - Review of process to improve outcome - Recruitment of additional, more experienced staff. 3/6/19 - Review of staff resources now complete and new posts filled.
Outstanding actions (if any)	- Additional staff training.
Assessment of breach and brief summary of rationale	29/1/19 - Improvements have been made and more should be made as staff are trained. Business case will also assist if approved. 4/6/19 New resource put in place but may take a few months to see full impact. 14/11/19 Continuation of training to other Pension officers will hopefully reduce this further so retain as amber.
Reported to tPR	No

Ref	A9	Date entered in register	29 Aug 2018
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of leaver rights and options	Owner	SB/JT
Party which caused the breach	CPF + various employers		
Description and cause of breach	<p>Requirement to inform members who leave the scheme of their leaver rights and options, as soon as practicable and no more than 2 months from date of initial notification (from employer or from scheme member).</p> <p>Due to a combination of late notification from employers and untimely action by CPF the legal requirement was not met. 20/11/18 - (Q2) Staff turnover in August/September reduced number actioned. 29/1/19 The introduction of I-connect is also producing large backlogs at the point of implementation for each employer. I-connect submission timescales can also leave only a few days for CPF to meet the legal timescale.</p>		
Category affected	Active members		
Numbers affected	<p>2018/19:</p> <ul style="list-style-type: none"> - Q1 - 437 cases completed / 40% (173) were in breach - Q2 - 1463 cases completed / 66% (963) were in breach - Q3 - 951 cases completed / 51% (481) were in breach - Q4 - 745 cases completed / 2% (17) were in breach <p>2019/20:</p> <ul style="list-style-type: none"> - Q1 - 541 cases completed / 6% (34) were in breach - Q2 - 391 cases completed / 6% (23) were in breach 		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late notification of benefits/costs to member/employer. - Potential complaints from members/employers. - Potential for missed opportunities by members/employers. - Potential for impact on CPF reputation. 		

Actions taken to rectify breach	<ul style="list-style-type: none"> - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of leavers (ongoing). - Set up of Employer Liaison Team (ELT) to monitor and provide leaver details in a more timely manner. - Training of new team members to raise awareness of importance of time restraint. - Prioritising of task allocation. KPIs shared with team members to further raise awareness of importance of timely completion of task. - 6/6/18 - Updating KPI monitoring to understand employers not sending information in time. 3/6/19 - Review of staff resources now complete and new posts filled. 14/8/19 - Ongoing streamlining of aggregation cases with major employers. - Consider feasibility of whether tasks can be prioritised by date of leaving (no action taken). - Carrying out backlogs of previous leavers (most of which are due to i-Connect roll out).
Outstanding actions (if any)	<ul style="list-style-type: none"> - Ongoing roll out of i-Connect. - Bedding in of new staff/ training. - Contacting employers which are causing delays. 28/1/19: - Introduce process to analyse specific employers causing problems.
Assessment of breach and brief summary of rationale	<p>29/1/19 Large proportion of leaving members affected but business case has been put forward to increase resources. In the meantime, temporary resources are being requested to assist.</p> <p>3/6/19 Reassessed - Cases in breach now drastically reduced so moved from amber to green. But will review in next quarter.</p> <p>14/8/19 Reassessed - Still minor breach but all reasonable actions have been taken.</p> <p>15/11/19 Reassessed - Still green whilst progress is maintained.</p>
Reported to tPR	No

Ref	A11	Date entered in register	29 May 2019
Status	Open	Date breached closed (if relevant)	
Title of Breach	Scheme Changes Disclosure	Owner	KAM
Party which caused the breach	CPF		
Description and cause of breach	Amendment Regulations disclosure communication to members. This was sent in error to members who were categorised as "gone away" from last known address. This will have resulted in a data breach as names and addresses would have been visible to people now living at those addresses.		
Category affected	Active members, status 2 (undecided) members and deferred members who are shown as "gone away"		
Numbers affected	921 members impacted		
Possible effect and wider implications	<ul style="list-style-type: none"> - Personal Details available to view by incorrect recipients - May result in complaints - Potential that same issue could occur in other communications if "gone away" status is not checked. 		

Actions taken to rectify breach	- Followed Data Breach procedure 14/8/19 - Increased staff awareness / training for future distribution - Process put in place to ensure future mail shots to all members exclude this Category or are automatically redirected back to CPF
Outstanding actions (if any)	-Still being considered by FCC to ensure change in processes are adequate 14/11/19 Contact FCC to find out if any further actions are required.
Assessment of breach and brief summary of rationale	Large number of members impacted but no personal information other than name included in communications so low impact. 14/11/19 Maintain as green as no further action notified by FCC
Reported to tPR	No

Ref	A12	Date entered in register	29 May 2019
Status	Open	Date breached closed (if relevant)	
Title of Breach	APC calculation due to revised factors	Owner	SB/JT
Party which caused the breach	CPF		
Description and cause of breach	Recalculation of APC contracts due to GAD factor change not communicated within required timescales		
Category affected	Active members with APC contracts		
Numbers affected	<10 members 14/11/19 Now confirmed as only 1 member affected.		
Possible effect and wider implications	- Late notification to members of change to APC contracts / recalculation of benefits - May result in complaints		
Actions taken to rectify breach	- Re-calculation of APC contracts underway with explanation to those affected by the change. 14/11/19 Initial work completed and determined only 1 member requires a recalculation.		
Outstanding actions (if any)	Re-calculation and notification to members required		
Assessment of breach and brief summary of rationale	Low number of cases impacted and remedial action likely to be complete by 30 June 2019 14/8/19 Reassessed - Low number of cases however remedial action delayed due to other workloads by 31 October 2019. 14/11/19 Reassessed - remain green as only 1 member is affected.		
Reported to tPR	No		

Ref	A13	Date entered in register	14 Nov 2019
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late transfer out estimate	Owner	JT/KCW
Party which caused the breach	CPF		
Description and cause of breach	Requirement to provide details of transfer value for transfer out on request within 3 months from date of request (CETV estimate). Note this is the same as breach A3 which was closed previously. Late completion of calculation and notification by CPF due to higher number of cases, plus additional pressure to complete aggregation project by end of Q3 and incorporation of tasks from data improvement plan.		

Category affected	Active and deferred members
Numbers affected	2019/20 - Q2 - 3 members in breach
Possible effect and wider implications	- Potential financial implications on some scheme members. - Potential complaints from members/new schemes. - Potential for impact on CPF reputation.
Actions taken to rectify breach	14/11/19 - Better prioritisation of workload and any additional tasks that are not KPI driven
Outstanding actions (if any)	None
Assessment of breach and brief summary of rationale	14/11/19 As only a small number of members were affected the risk is considered minimal
Reported to tPR	No

Ref	F17	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	09 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Wrexham County Borough Council		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to May 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	14355 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- emailed employer to request - employer advised delay due to staffing issues and it will be looked at asap		
Outstanding actions (if any)	9/9/19 No outstanding actions. Remittance now received.		
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding. First occurrence and will continue to chase. 9/9/19 Reassessed - remittance now received.		
Reported to tPR	No		

Ref	F18	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	04 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Wrexham Commercial Services		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to May 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	350 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		

Actions taken to rectify breach	- emailed employer to request - employer advised delay due to staffing issues and it will be looked at asap (note payroll is Wrexham County Borough Council)
Outstanding actions (if any)	4/9/19 No outstanding actions. Remittance now received.
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding. First occurrence and will continue to chase. 4/9/19 Reassessed - remittance now received.
Reported to tPR	No

Ref	F19	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	04 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Penley Maelor		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to June 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	10 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- emailed employer to request - employer advised delay due to staffing issues and it will be looked at asap (note payroll is Wrexham County Borough Council)		
Outstanding actions (if any)	4/9/19 No outstanding actions. Remittance now received.		
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding. First occurrence and will continue to chase. 4/9/19 Reassessed - remittance now received.		
Reported to tPR	No		

Ref	F21	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	24 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Denbigh Youth Project		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to June 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	1 active member		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- emailed to request		

Outstanding actions (if any)	24/9/19 No outstanding actions. Remittance now received.
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding but will continue to chase (first occurrence). 24/9/19 Reassessed - remittance received.
Reported to tPR	0

Ref	F22	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	09 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Wrexham County Borough Council		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to June 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	14355 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- employer advised delay due to staffing issues and it will be looked at asap		
Outstanding actions (if any)	9/9/19 No outstanding actions. Remittance now received.		
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding. Second occurrence but clearly all due to the same staffing issue. Will continue to chase. 9/9/19 Reassessed - remittance received.		
Reported to tPR	0		

Ref	F23	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	04 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Wrexham Commercial Services		
Description and cause of breach	A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. Contributions relating to June 2019 were received within the legal timescales but no remittance advice was received.		
Category affected	Active members and employer		
Numbers affected	350 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- employer advised delay due to staffing issues and it will be looked at asap (note payroll is Wrexham County Borough Council)		
Outstanding actions (if any)	4/9/19 No outstanding actions. Remittance now received.		
Assessment of breach and brief summary of rationale	21/8/19 Remittance still outstanding. Second occurrence but clearly all due to the same staffing issue. Will continue to chase. 4/9/19 Reassessed - remittance received.		
Reported to tPR	0		

Ref	F24	Date entered in register	19 Aug 2019
Status	Closed	Date breached closed (if relevant)	04 Sep 2019
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Penley Maelor		
Description and cause of breach	<p>A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made.</p> <p>Contributions relating to June 2019 were received within the legal timescales but no remittance advice was received.</p>		
Category affected	Active members and employer		
Numbers affected	110 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	- employer advised delay due to staffing issues and it will be looked at asap (note payroll is Wrexham County Borough Council)		
Outstanding actions (if any)	4/9/19 No outstanding actions. Remittance now received.		
Assessment of breach and brief summary of rationale	<p>21/8/19 Remittance still outstanding. Second occurrence but clearly all due to the same staffing issue. Will continue to chase.</p> <p>4/9/19 Reassessed - remittance received.</p>		
Reported to tPR	0		