

Ref	A1	Date entered in register	19/09/2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of joining	Owner	SB
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. 14/2/22 Previous issues no longer relevant. Current situation is purely due to magnitude of cases being received and potentially employer delays. 31/10/2022 Staff member doing this process had internal secondment, so vacancy now needs to be filled, and then trained. 10/3/2023 New staff member is now being trained so will continue to have impact until fully up to speed.</p>		
Category affected	Active members		
Numbers affected	<p>2017/18: 2676 cases completed / 76% (2046) were in breach. 2018/19: 3855 cases completed / 66% (2551) were in breach. 2019/20: 3363 cases completed / 50% (1697) were in breach. 2020/21: 3940 cases completed / 39% (1544) were in a breach 2021/22 -Q1 - 789 cases completed / 15% (118) were in breach -Q2 - 769 cases completed / 25% (190) were in breach -Q3 - 1444 cases completed / 15% (190) were in breach -Q4- 1070 cases completed / 12% (128) were in breach 2022/23 -Q1 - 947 cases completed / 5% (50) were in breach -Q2 - 968 cases completed / 12% (112) were in breach -Q3 - 1437 cases completed / 20% (286) were in breach -Q4 - 947 cases completed / 15% (140) were in breach</p>		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late scheme information sent to members which may result in lack of understanding. - Potential complaints from members. - Potential for there to be an 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 Liaison 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. <p>Actions prior to 2022 not shown, but recorded on the breaches log. 14/02/2022 - Appointed to vacant positions and Modern Apprentices trained in this area. 22/05/2022 - Training now complete. Expecting further reductions in next quarter results as staff members become more efficient. 12/08/2022 - Number of breaches fallen as expected due to completion of training. Recent staff vacancies will impact on this measure going forward as vacancies are filled and training starts again. 31/10/2022 - Number of breaches has increased this quarter. Staff vacancies have been advertised, shortlisting and interviews planned in the coming weeks. Prioritising workloads will be key so the number of cases in breach do not continue to rise. 03/03/2023 - Vacant positions filled and training underway. 24/05/2023 - Training continues and staff members attained a KPI presentation to fully understand implications if timescales not met.</p>		
Outstanding actions (if any)	<p>22/05/22 - Analyse new employer reports and escalate to individual employers if required. Continually review resource requirements to meet KPI. 10/3/2023 - Ensure training of new staff member is finalised.</p>		
Assessment of breach and brief summary of rationale	<p>24/05/2023 - Number of cases completed has reverted back to normal levels, Number in breach has reduced but assessment will remain Amber until further improvements are made following completion of training for new recruits.</p>		
Reported to tPR	No		

Ref	A2	Date entered in register	19/09/2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late transfer in estimate	Owner	SB
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> <p>31/10/2022 New regulatory requirements have resulted in additional steps having to be taken, which makes process longer and more complex.</p>		
Category affected	Active members		
Numbers affected	<p>2017/18: 235 cases completed / 36% (85) were in breach.</p> <p>2018/19: 213 cases completed / 45% (95) were in breach.</p> <p>2019/20: 224 cases completed / 32% (71) were in breach</p> <p>2020/21: 224 cases completed / 25% (57) were in breach</p> <p>2021/22</p> <p>-Q1 - 76 cases completed / 62% (47) were in breach</p> <p>-Q2 - 76 cases completed / 22% (17) were in breach</p> <p>-Q3 - 91 cases completed / 15% (14) were in breach</p> <p>-Q4 - 66 cases completed / 14% (9) were in breach</p> <p>2022/23</p> <p>-Q1 - 98 cases completed / 9% (9) were in breach</p> <p>-Q2 - 104 cases completed / 19% (20) were in breach</p> <p>-Q3 - 66 cases completed / 12% (8) were in breach</p> <p>-Q4 - 118 cases completed / 17% (20) were in breach</p>		
Possible effect and wider implications	<ul style="list-style-type: none"> - Potential financial implications on some scheme members. - Potential complaints from members/previous schemes. - Potential for impact on CPF reputation. 		
Actions taken to rectify breach	<p>17/11/2020 - Continued training of team members to increase knowledge and expertise to ensure that transfers are dealt with in a more timely manner.</p> <p>02/02/2021 - Training to continue. Complex area of work so training taking longer to complete. Training will continue through Q4.</p> <p>21/05/2021 - Staff members attended external training course.</p> <p>08/03/2022 - Have investigated how much of the delay is due to external schemes.</p> <p>22/05/2022 - Additional checks required in transfer process. Schemes taking longer to process therefore knock on effect. Expect this to reduce as industry adjusts to new processes.</p> <p>12/8/2022 - Ensure team is up to date with legislative and procedural changes. Some of this requirements are out of the Funds control so need to ensure required timescales are communicated effectively.</p> <p>31/10/2022 - A review of this process is being undertaken as additional steps are now required.</p> <p>03/03/2023 - Process has been reviewed and improvements expected in the next quarter results.</p> <p>24/05/2023 - Completed training for required staff members</p>		
Outstanding actions (if any)			
Assessment of breach and brief summary of rationale	24/05/2023 - Improvements to process have streamlined workload and numbers completed has increased significantly this quarter. Assessment to remain Amber until number in breach reduces further.		
Reported to tPR	No		

Ref	A4	Date entered in register	19/09/2017
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	<p>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.</p> <p>Due to a combination of:</p> <ul style="list-style-type: none"> - 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. - temporary large increases in work due to retrospective pay award recalculations <p>31/10/2022 Also seeing general increase in number of retirements.</p>
Category affected	Active members mainly but potentially some deferred members
Numbers affected	<p>2017/18: 960 cases completed / 39% (375) were in breach.</p> <p>2018/19: 1343 cases completed / 30% (400) were in breach</p> <p>2019/20: 1330 cases completed / 25% (326) were in breach</p> <p>2020/21: 1127 cases completed / 24% (269) were in breach</p> <p>2021/22</p> <ul style="list-style-type: none"> -Q1 - 329 cases completed / 16% (53) were in breach -Q2 - 388 cases completed / 16% (64) were in breach -Q3 - 444 cases completed / 14% (64) were in breach -Q4- 373 cases completed / 11% (41) were in breach <p>2022/23</p> <ul style="list-style-type: none"> -Q1 - 413 cases completed / 19% (81) were in breach -Q2 - 442 cases completed / 18% (81) were in breach -Q3 - 419 cases completed / 14% (58) were in breach -Q4 - 358 cases completed / 18% (66) 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 there to be an 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>Actions prior to 2022 not shown, but recorded on the breaches log.</p> <p>12/08/2022 - Staff members leaving and re-calculation of benefits following a retrospective pay award have negatively impacted the performance in this area. Recruitment drive to fill vacant positions and review of resource in this area to tackle number of required recalculations should improve performance following necessary training. 31/10/2022 - Recalculation of benefits still impacting this area with additional recalculations due in relation to retrospective 2022 pay award. Vacancies advertised and shortlisting and interviews planned in the coming weeks. Assessment of workload and staffing in this area is underway to determine appropriate staffing levels for the continued increase in number of cases. 03/03/2023 - New staff have been appointed but will not be fully trained for a number of months.</p> <p>24/05/2023- Training of new staff continues. New project team is being established to remove non KPI/ad hoc pressures from Operations which impacts on workload. Improvements will be made over a period of months.</p>
Outstanding actions (if any)	<p>22/05/22 - Analyse new employer reports and escalate to individual employers if required. Complete all recalculations so all appropriate staff can focus on retirements.</p> <p>31/10/2022 - Assessment of changes in workloads to determine any additional resource requirements.</p> <p>10/3/2023 - Training of new staff to be able to carry out retirements.</p> <p>24/05/2023 - Transfer non KPI/ad hoc cases of work to project team.</p>
Assessment of breach and brief summary of rationale	24/05/2023 - Number in breach remains too high to amend assessment. Recalculation of benefits due to late pay award and training new staff within this area continue to impact this KPI. Improvements will be over a number of months whilst training is undertaken, project team bedded in and recalculations completed.
Reported to tPR	No

Ref	A6	Date entered in register	20/09/2017
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> <p>31/10/2022 More staff now trained on deaths but they are impacted due to increases in other workloads.</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. 2018/19: 184 cases completed / 30% (56) were in breach 2019/20: 165 cases completed / 28% (53) were in breach 2020/21: 195 cases completed / 27% (53) were in breach 2021/22 -Q1- 59 cases completed / 8% (5) were in breach -Q2 - 42 cases completed / 5% (2) were in breach -Q3 - 52 cases completed / 17% (9) were in breach -Q4 - 54 cases completed / 19% (10) were in breach 2022/23 -Q1- 59 cases completed / 17% (10) were in breach -Q2 - 37 cases completed / 22% (8) were in breach -Q3 - 51 cases completed / 39% (20) were in breach -Q4 - 43 cases completed / 28% (12) were in breach</p>		
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 there to be an impact on CPF reputation. 		
Actions taken to rectify breach	<ul style="list-style-type: none"> - Further training of team - Review of process to improve outcome - Recruitment of additional, more experienced staff. <p>3/6/19 - Review of staff resources now complete and new posts filled. 3/2/20 - Training of additional staff now complete. 18/8/21 - Further work completed identifying where the delay fell e.g. request or receipt of information to facilitate the calculation of benefits, and action taken to improve these issues. 31/10/2022 - Due to pressures of other processes and vacancies within the team, key staff responsible for this process are stretched. Vacancies advertised, shortlisting and interviews planned within coming weeks. 03/03/2023 - Vacant positions have now been filled and training is underway.</p>		
Outstanding actions (if any)	10/3/23 Ensure all training continues as quickly as possible to free up people to refocus on death cases.		
Assessment of breach and brief summary of rationale	24/05/2023 - Number in breach has reduced but remains too high to amend assessment. Recalculation of benefits due to late pay award and training of staff continue to impact this KPI. Improvement may not be seen until all recalculations and training is complete.		
Reported to tPR	No		

Ref	A22	Date entered in register	21/05/2021
Status	Closed	Date breached closed (if relevant)	24/05/2023
Title of Breach	Members not entered into LGPS	Owner	KW
Party which caused the breach	Glyndwr		
Description and cause of breach	Number of employees entered into alternative pension schemes, rather than the LGPS, by Glyndwr.		
Category affected	Active members		
Numbers affected	6 employees		
Possible effect and wider implications	<ul style="list-style-type: none"> - As a result the employees may have less valuable pension rights, and so LGPS membership will need to be applied retrospectively. - LGPS Contributions will need to be collected from employer and employee/employer contributions paid into Clwyd Pension Fund in relation to retrospective period. - Employer will need to liaise with alternative provider to reverse membership there. 		

Actions taken to rectify breach	21/05/2021- Liaising with employer to determine how best to put employees back in correct position and detailed plan of actions has been developed. Letters sent to members to explain 14/10/2021 - Letter to 5 outstanding employees requesting confirmation of next steps issued with close date of 31/10/21. 14/2/2022 - Employer being chased by CPF. 22/05/2022 - CPF continuing to work with employer to resolve individual cases once employee responds with preferred action. Three outstanding cases remain. 12/08/2022 - As above, two outstanding cases remain. 31/10/2022 - All employees have now responded. Breakdown of contributions received by employer and member records to be amended. 10/3/2023 - All CPF member records have now been updated. 24/5/2023 Contributions now confirmed as to be paid imminently and therefore breach is closed."
Outstanding actions (if any)	
Assessment of breach and brief summary of rationale	24/05/2023 - Agreed with employer for outstanding contributions to be paid with next remittance. Breach to be closed.
Reported to tPR	No

Ref	A23	Date entered in register	21/05/2021
Status	Open	Date breached closed (if relevant)	
Title of Breach	Incorrect member contributions paid	Owner	KW
Party which caused the breach	Aura		
Description and cause of breach	When employees are stepping up from their substantive post to higher graded post, incorrect employee and employer contributions have been made. This is due to an incorrect recording on the payroll system.		
Category affected	Active and Deferred		
Numbers affected	20 current and previous employees		
Possible effect and wider implications	<ul style="list-style-type: none"> - As a result the employees may have less valuable pension rights, and so LGPS CARE pay and contributions will need to be checked and difference in contributions paid retrospectively. - LGPS Contributions will need to be collected from employer, and employee/employer contributions paid into Clwyd Pension Fund in relation to retrospective period. 		
Actions taken to rectify breach	<p>21/05/2021- Process has been updated to ensure correct contributions/CARE pay going forward.</p> <p>- Liaising with employer to determine how best to put employees back in correct position retrospectively and letters to be sent to members to explain.</p> <p>14/10/2021 Current employees contacted and all have agreed to pay outstanding contributions/payment plans agreed.</p> <p>14/02/2022 - CPF Pensions Administration Manager has been chasing for final cases to be resolved.</p> <p>22/05/2022 - Employer and Payroll provider being chased by CPF. Escalated to Payroll Team Leader.</p> <p>12/08/2022 - Financial figures have now been provided by payroll department to the employer. Letters to the nine members that have left employment have been issued with a response date of the 16/9/22.</p> <p>31/10/2022 - One member has now paid the difference in contributions and eight remaining are still due. Employer contributions to be paid in November.</p> <p>10/3/2023 - Employer contributions were paid in November for the one member. For eight remaining members, Aura has written to them and has sent reminders to them but responses are still awaited.</p> <p>24/5/2023 Remaining employer contributions now paid. Emailed to instruct Aura to settle member contributions either themselves or FCC, if not reimbursed by members.</p>		
Outstanding actions (if any)	03/03/2023 - Once responses have been received from the final eight members, outstanding contributions are to be paid by both employer and employee and member records can be updated (if applicable). CPF to liaise with Aura to conclude this matter by paying the correct contributions to the Fund.		
Assessment of breach and brief summary of rationale	24/05/2023 - Still awaiting response from 8 members that are deferred. Once response received, any outstanding contributions can be paid and member records updated.		
Reported to tPR	No		

Ref	A25	Date entered in register	12/08/2022
Status	Closed	Date breached closed (if relevant)	24/05/2023
Title of Breach	Members entered into LGPS in error	Owner	KW
Party which caused the breach	North Wales Fire		
Description and cause of breach	Number of employees entered into LGPS by employer instead of alternative pension schemes.		
Category affected	Active members		
Numbers affected	18 employees		
Possible effect and wider implications	<ul style="list-style-type: none"> - As a result the employees may have different pension rights, and so LGPS membership will need to be deleted and membership to correct scheme applied retrospectively. - LGPS Contributions will need to be collected and returned to employer and employee/employer Contributions paid into the correct scheme in relation to retrospective period. - employer will need to liaise with alternative provider to create membership there. 		
Actions taken to rectify breach	<p>12/08/2022- Liaising with employer and finance department to determine how best to put employees in correct position and detailed plan of actions is being developed.</p> <p>10/3/2023 - All employees have now been notified and CPF records have been updated. Contributions have been returned from CPF to North Wales Fire. Two of three transfers that were paid out have been returned and sent to NWF.</p> <p>All transfers have now been completed and all records have been updated appropriately. Breach can be closed.</p>		
Outstanding actions (if any)			
Assessment of breach and brief	24/05/2023 - All records now correct. Breach can be closed.		
Reported to tPR	No		

Ref	F102	Date entered in register	20 Mar 2023
Status	Closed	Date breached closed (if relevant)	17 Apr 2023
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Hafan Deg (K L Care Ltd)		
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>The remittance advice relating to January 2023 was not received within the deadline. Multiple breaches between 2019 and Feb 2022 (21 breaches in total). Previous breaches in 22/23 are F82, F84, F86, F88, F89 & F94.</p>		
Category affected	Active members and employer		
Numbers affected	2 active members		
Possible effect and wider	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	<p>23/2/2023 Chased employer for remittance.</p> <p>15/03/2023 Emailed employer to request all outstanding payments and advices.</p>		
Outstanding actions (if any)			
Assessment of breach and brief	Remittance received 17/04/2023		
Reported to tPR	No		

Ref	F103	Date entered in register	20 Mar 2023
Status	Closed	Date breached closed (if relevant)	23 Mar 2023
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Ruthin Town Council		
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>A remittance advice relating to January 2023 was not received within the deadline. Previous breaches F45, 55, 63, 64, 74, 75, 78, 79; last breach related to contributions paid in May 2022.</p>		
Category affected	Active members and employer		
Numbers affected	1 active member		
Possible effect and wider	Unable to verify information being paid or reconcile with member year end information.		

Actions taken to rectify breach	23/02/2023 Spoke to new clerk and they are unaware of how to complete process. CPF sent previous remittance advice to help them understand process. Since then have been a couple of phone calls to help the clerk understand process.
Outstanding actions (if any)	
Assessment of breach and brief	Payment received 23/03/2023
Reported to tPR	No

Ref	F104	Date entered in register	30 May 2023
Status	Closed	Date breached closed (if relevant)	27 Mar 2023
Title of Breach	Late payment of contributions	Owner	DF
Party which caused the breach	Hafan Deg (K L Care Ltd)		
Description and cause of breach	Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions. Contributions in relation to February 2023 were not received within the deadline. Multiple breaches between 2019 and Feb 2022 (21 breaches in total). Previous breaches in 22/23 are F83, F85, F87, F93, F101,		
Category affected	Active members and employer		
Numbers affected	2 active members		
Possible effect and wider implications	- Could expose employers to late payment interest charge. - Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer.		
Actions taken to rectify breach	15/03/2023 Emailed employer to request all outstanding payments and advices.		
Outstanding actions (if any)			
Assessment of breach and brief summary of rationale	Payment received 27/03/2023 Multiple repeat breaches, however services are being transferred to DCC 1 April so confident that this has been resolved.		
Reported to tPR	No		

Ref	F105	Date entered in register	30 May 2023
Status	Closed	Date breached closed (if relevant)	17 Apr 2023
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Hafan Deg (K L Care Ltd)		
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. A remittance advice relating to February 2023 was not received within the deadline. Multiple breaches between 2019 and Feb 2022 (21 breaches in total). Previous breaches in 22/23 are F82, F84, F86, F88, F89, F94 & F102.		
Category affected	Active members and employer		
Numbers affected	2 active members		
Possible effect and wider	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	15/03/2023 Emailed employer to request all outstanding payments and advices.		
Outstanding actions (if any)			
Assessment of breach and brief summary of rationale	Remittance received 17/04/2023 Multiple repeat breaches, however services are being transferred to DCC 1 April so confident that this has been resolved.		
Reported to tPR	No		

Ref	F106	Date entered in register	30 May 2023
Status	Closed	Date breached closed (if relevant)	28 Mar 2023
Title of Breach	Late payment of contributions	Owner	DF
Party which caused the breach	North Wales Valuation Tribunal		
Description and cause of breach	Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions. Contributions in relation to February 2023 were not received within the deadline. No previous breaches.		
Category affected	Active members and employer		
Numbers affected	3 active members		

Possible effect and wider implications	- Could expose employers to late payment interest charge. - Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer.
Actions taken to rectify breach	21/03/2023 Chased employer for payment. Received notification that payment arranged for 28/03/2023.
Outstanding actions (if any)	
Assessment of breach and brief	Payment received 28/03/2023
Reported to tPR	No