

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.</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 		
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 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. - 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. 		
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. <p>28/1/19:</p> <ul style="list-style-type: none"> - Introduce process to analyse specific employers causing problems. - Ongoing streamlining of aggregation cases with major employers. - Consider feasibility and implications of removing reminders for joining pack. - Consider feasibility of whether tasks can be prioritised by date of joining. 		

Assessment of breach and brief summary of rationale	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. 4/6/19 New resource put in place but may take a few months to see full impact.
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	<p>2017/18: 235 cases completed / 36% (85) were in breach.</p> <p>2018/19:</p> <ul style="list-style-type: none"> - 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 		
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	- 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)	<p>- Completion of training of team members in transfer and aggregation processes.</p> <p>29/1/19:</p> <ul style="list-style-type: none"> - 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.		
Reported to tPR	No		

Ref	A3	Date entered in register	19 Sep 2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late transfer out estimate	Owner	JT
Party which caused the breach	CPF		
Description and cause of breach	<p>Requirement to provide details of transfer value for transfer out on request within 3 months from date of request (CETV estimate).</p> <p>Late completion of calculation and notification by CPF. Only 2 members of team fully trained to provide transfer details due to new team structure and additional training requirements.</p>		
Category affected	Deferred members mainly but potentially some active members		

Numbers affected	2017/18: 382 cases completed / 9% (33) were in breach. 2018/19: - Q1 - 119 cases completed / 10% (12) were in breach - Q2 - 94 case completed / 2% (2) were in breach - Q3 - 76 case completed / 3% (2) were in breach - Q4 - 103 cases completed / 6% (6) were 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	- 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.
Assessment of breach and brief summary of rationale	29/1/19 - Low number of cases impacted now.
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	<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. 		
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		
Possible effect and wider implications	- 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.</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. 		

Assessment of breach and brief summary of rationale	29/1/19 - Improvements have been made and more should be made as staff are settled in and 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.
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.</p> <p>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 		
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.</p>		
Outstanding actions (if any)	- Additional staff training.		
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>		
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	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). 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.
Category affected	Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant).
Numbers affected	2017/18: 153 cases completed / 58% (88) were in breach. 2018/19: - 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
Possible effect and wider implications	- 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.
Reported to tPR	No

Ref	A7	Date entered in register	05 Jun 2018
Status	Closed	Date breached closed (if relevant)	08 May 2019
Title of Breach	Incorrect APP notified	Owner	PL
Party which caused the breach	One employer (confidential)		
Description and cause of breach	CARE should be enhanced to Assumed Pensionable Pay (APP) in some circumstances where normal pay is reduced due to sickness or parental leave. The APP extracted from the payroll system was incorrect. This resulted in provision of an extract by the employer to CPF Administration team that included incorrect CARE pay information for some cases since 1 April 2014.		
Category affected	Active members, deferred members, pensioners, dependants and other exits (e.g. transfers out)		
Numbers affected	Approximately 1,400 members being investigated, albeit not all will have been affected.		
Possible effect and wider implications	- CARE pension may be under or over stated on annual benefit statements, member self-service and other notifications of benefits. - For those who have retired, transferred out, died or received a trivial commutation benefit, CARE pension may be under or overpaid. - The amount of employer contributions may also be under or over paid.		

Actions taken to rectify breach	Working group set up to: - Identify cases that have been impacted/carry out rectification exercise. - Work with payroll provider to ensure root problem is resolved. Project Plan developed with detailed actions. 8/5/19 '- Ongoing work to check all cases and rectify where necessary. - Ongoing work with payroll provider and employer to resolve root problem.
Outstanding actions (if any)	8/5/19 None
Assessment of breach and brief	29/1/19 Large number of members affected.
Reported to tPR	Yes

Ref	A8	Date entered in register	05 Jun 2018
Status	Closed	Date breached closed (if relevant)	08 May 2019
Title of Breach	Incorrect CARE pension calculated and/or paid	Owner	PL
Party which caused the breach	CPF		
Description and cause of breach	CARE should be enhanced to Assumed Pensionable Pay (APP) in some circumstances where normal pay is reduced due to sickness or parental leave. The APP extracted and provided to CPF Administration team was incorrectly calculated in some cases since 1 April 2014. This resulted in CPF incorrectly calculating CARE pensions for those members.		
Category affected	Active members, deferred members, pensioners, dependants and other exits (e.g. transfers out)		
Numbers affected	Approximately 1,400 members being investigated, albeit not all will have been affected.		
Possible effect and wider implications	<ul style="list-style-type: none"> - CARE pension may be under or over stated on annual benefit statements, member self-service and other notifications of benefits. - 2018 annual benefit statements delayed for members who are potentially affected/need checked. - For those who have retired, transferred out, died or received a trivial commutation benefit, CARE pension may be under or overpaid. - The amount of employer contributions may also be under or over paid. 		
Actions taken to rectify breach	Working group set up to: - Identify cases that have been impacted/carry out rectification exercise. - Work with payroll provider to ensure root problem is resolved. Project Plan developed with detailed actions. 8/5/19 - Ongoing work to check all cases and rectify where necessary. - Ongoing work with payroll provider and employer to resolve root problem.		
Outstanding actions (if any)	8/5/19 None		
Assessment of breach and brief	29/1/19 Large number of members affected.		
Reported to tPR	Yes		

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
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.
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 leavers (most of which are due to i-Connect roll out). - Contacting employers which are causing delays. <p>28/1/19:</p> <ul style="list-style-type: none"> - Introduce process to analyse specific employers causing problems. - Ongoing streamlining of aggregation cases with major employers. - Consider feasibility of whether tasks can be prioritised by date of leaving.
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 Cases in breach now drastically reduced so moved from amber to green. But will review in next quarter.</p>
Reported to tPR	No

Ref	A10	Date entered in register	29 May 2019
Status	Closed	Date breached closed (if relevant)	29 May 2019
Title of Breach	Scheme Changes Disclosure	Owner	KAM
Party which caused the breach	CPF		

Description and cause of breach	Amendment Regulations disclosure communication sent to members - deadline was 9th April 2019 - Communication was 10 days late
Category affected	All active members, status 2 (undecided) members and deferred members
Numbers affected	All active, undecided and deferred members
Possible effect and wider implications	- Late notification to members - May result in complaints
Actions taken to rectify breach	- Communication issued as quickly as possible after deadline - In future will focus on smarter working to improve turnaround time between notification of Regulation change and disclosure of change to members affected.
Outstanding actions (if any)	None
Assessment of breach and brief summary of rationale	Large proportion of members affected but communication was issued very soon after legal timescale.
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	- Personal Details available to view by incorrect recipients - May result in complaints		
Actions taken to rectify breach	- Followed Data Breach procedure		
Outstanding actions (if any)	- Increased staff awareness / training for future distribution - Process to be put in place to ensure future mail shots to all members exclude this category		
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.		
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		
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.		
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		
Reported to tPR	No		

Ref	F3	Date entered in register	03 Jun 2019
Status	Closed	Date breached closed (if relevant)	28 Mar 2019
Title of Breach	Late payment of contributions	Owner	DF
Party which caused the breach	Coedpoeth		
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 were only received for February 2019 on 28/3/19.		
Category affected	Active members and employer		
Numbers affected	Five active members		
Possible effect and wider implications	<ul style="list-style-type: none"> - 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	-Payment received before employer contacted		
Outstanding actions (if any)	28/3/19 No outstanding actions. Payment now received		
Assessment of breach and brief	28/03/19 Payment made		
Reported to tPR	No		

Ref	F4	Date entered in register	03 Jun 2019
Status	Open	Date breached closed (if relevant)	
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Chartwells		
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 March 2019 were received on 18 April 2019 but no remittance advice has been received.		
Category affected	Active members and employer		
Numbers affected	Two active members		
Possible effect and wider implications	<ul style="list-style-type: none"> - 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	- Contacted employer 3 times to chase submission of remittance advice		
Outstanding actions (if any)	03/06/19 Continue to chase for outstanding remittance. April remittance received on time. Chartwells use external payroll provider.		
Assessment of breach and brief	03/06/19 Remittance still outstanding		
Reported to tPR	No		

Ref	F5	Date entered in register	03 Jun 2019
Status	Closed	Date breached closed (if relevant)	27 Mar 2019
Title of Breach	Late payment of contributions	Owner	DF
Party which caused the breach	Home Farm Trust		
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 were only received for February 2019 on 27/3/19.		
Category affected	Active members and employer		
Numbers affected	43 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	-Payment received before employer contacted
Outstanding actions (if any)	27/03/19 No outstanding actions. Payment now received
Assessment of breach and brief	27/03/19 Payment made
Reported to tPR	No