

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/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. 2018/19: 3855 cases completed / 66% (2551) were in breach. 2019/20: - Q1 - 822 cases completed / 62% (507) were in breach - Q2 - 750 cases completed / 46% (380) were in breach - Q3 - 1086 cases completed / 55% (603) were in breach - Q4 - 705 cases completed / 29% (207) were in breach 2020/21 -Q1 - 442 cases completed / 55% (245) were in breach -Q2 - 1430 cases completed / 56% (799) were in breach</p>		
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. 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. 30/01/2020 - backlog completed and addressed older case work. 25/09/2020 - Appointed and training new members of staff 17/11/2020 - Training of new staff continuing. An increase of cases completed compared to previous. Expecting next quarter results to improve due to completion of training.
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 who are causing delays. 28/1/19: - Introduce process to analyse specific employers causing problems. 22/06/2020 - Identified the need for permanent positions within this area. Will take this into consideration when reviewing recruitment for McCloud. 25/09/2020 - Recruitment complete, training on-going. 17/11/2020 - Training to be completed this quarter.
Assessment of breach and brief summary of rationale	<p>17/11/2020 - New appointments made in September have proved vital to the number of cases that have been completed this quarter. Improvements in KPI target increased through the quarter and should continue going forward.</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	JT
Party which caused the breach	CPF + various previous schemes		

Description and cause of breach	Requirement to obtain transfer details for transfer in, and calculate and provide quotation to member 2 months from the date of request. 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.
Category affected	Active members
Numbers affected	2017/18: 235 cases completed / 36% (85) were in breach. 2018/19:213 cases completed / 45% (95) were in breach. 2019/20: - Q1 - 51 cases completed / 59% (30) were in breach - Q2 - 56 cases completed / 29% (16) were in breach - Q3 - 53 cases completed / 21% (11) were in breach - Q4 - 64 cases completed / 21% (14) were in breach 2020/21 -Q1- 59 cases completed / 19% (11) were in breach.' -Q2- 54 cases completed / 35% (19) 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	17/11/2020 - Still need to investigate what is causing the delay of information coming into CPF to establish reason for breach. Pension Funds facing challenges due to Covid 19 and transferring paperwork in appropriate timescales.
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	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: 1343 cases completed / 30% (400) were in breach 2019/20: - Q1 - 315 cases completed / 28% (87) were in breach - Q2 - 411 cases completed / 24% (99) were in breach - Q3 - 348 cases completed / 26% (93) were in breach - Q4 - 256 cases completed / 18% (47) were in breach 2020/21 -Q1 - 214 cases completed in total / 37% (79) were in breach -Q2- 232 cases completed / 25% (59) 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	- 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. 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. 25/09/20 - Increased engagement with employers to assist with challenges faced due to working from home in relation to Covid-19 requirements. Employers faced challenges in getting information to us in relevant timescales. 17/11/2020- Number of cases completed has increased whilst percentage in breach has reduced compared to last quarter. This is hoped to continue due to increased engagement with employers and processes amended to mitigate challenges faced by Covid-19.
Outstanding actions (if any)	- Further training of newly promoted team member to deal with volume of work. - Identifying which employers are causing delays. 14/11/19 Continuation of training. 30/1/2020 Ongoing liaison with employers
Assessment of breach and brief summary of rationale	17/11/2020 - Whilst pleasing to see reduction in number of cases in breach, this remains an area where improvement is required. Due to development of new reporting, it will be easier in future to identify if CPF or employer is causing the breach.
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	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: 184 cases completed / 30% (56) were in breach 2019/20: - Q1 - 33 cases completed / 24% (8) were in breach - Q2 - 41 cases completed / 34% (14) were in breach - Q3 - 49 cases completed / 26% (13) were in breach - Q4 - 42 cases completed / 28% (12) were in breach 2020/21 -Q1- 39 cases completed / 23% (9) were in breach -Q2- 52 cases completed / 38% (20) 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)	24/06/2020 - Ongoing training of death calculations on the team
Assessment of breach and brief summary of rationale	17/11/2020 - Number of cases completed has increased but unfortunately so has the number in breach. Death process reviewed in full and training to be undertaken. Hopeful that changes made will lead to improvements in Q3.
Reported to tPR	No

Ref	A9	Date entered in register	29/08/2018
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	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). 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.		
Category affected	Active members		

Numbers affected	2018/19: 3596 cases completed / 45% (1634) were in breach 2019/20: - Q1 - 541 cases completed / 6% (34) were in breach - Q2 - 391 cases completed / 6% (23) were in breach - Q3 - 541 cases completed / 6% (36) were in breach - Q4 - 306 cases completed / 3% (8) were in breach 2020/21 -Q1- 418 cases completed / 9% (37) were in breach - Q2 -313 cases completed / 2% (6) were in breach
Possible effect and wider implications	- 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	- 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)	- 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	17/11/2020 - Percentage of breach reduced again so will maintain as green.
Reported to tPR	No

Ref	A18	Date entered in register	01/10/2020
Status	Closed	Date breached closed (if relevant)	22/10/2020
Title of Breach	Incorrect data on Annual Benefit Statements	Owner	KW
Party which caused the breach	DCC		
Description and cause of breach	Incorrect member data sent by DCC to CPF which resulted in incorrect pay data populated on the Annual Benefit Statements (ABS). Benefits quoted on ABS over inflated for members affected. Error not notified to CPF until after statements had been issued.		
Category affected	Active members		
Numbers affected	400 plus members		
Possible effect and wider	Potential complaints from scheme members		

Actions taken to rectify breach	17/11/2020 - DCC provided correct information . Benefits were recalculated and amended Annual Benefit Statements provided 22/10/2020.
Outstanding actions (if any)	None
Assessment of breach and brief summary of rationale	17/11/2020 Assessed green due to the small number of members affected, the small difference in figures quoted and the correct statements having been issued very quickly. Breach now closed.
Reported to tPR	No

Ref	A19	Date entered in register	17/08/2020
Status	Open	Date breached closed (if relevant)	
Title of Breach	TUPE process not followed correctly	Owner	KW
Party which caused the breach	Employer		
Description and cause of breach	TUPE process not followed as employer unsure of procedures and didn't realise their responsibilities.		
Category affected	Active members		
Numbers affected	12 employees		
Possible effect and wider implications	Contributions may be being deducted by new employer even though not officially approved as a CPF employer. Members may not be aware of situation (they possibly think they are in the CPF but our records do not reflect this). Risk of reputational impact for employer and CPF. Potential complaints from employees.		
Actions taken to rectify breach	17/11/2020 - Meeting held between originating employer, legal advisor, benefit advisor and members of CPF to resolve breach and devise action plan.		
Outstanding actions (if any)	17/11/2020 Relevant process and forms to be completed by all parties to confirm membership in CPF, and pensions system to be updated reflecting correct membership.		
Assessment of breach and brief summary of rationale	17/11/2020 Assessed amber due to the serious nature of it (albeit not affecting many employees), length of time issue has been a breach and although actions taken to resolve still remains outstanding.		
Reported to tPR	No		

Ref	F35	Date entered in register	31 Jul 2020
Status	Open	Date breached closed (if relevant)	
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. Contributions relating to June and July 2020 were received late but no remittance advices were received. August remittance is still outstanding.		
Category affected	Active members and employer		
Numbers affected	2 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	31/07/2020 - Emailed employer to request remittance. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.		

Outstanding actions (if any)	17/11/20 Escalated to Deputy Head of Pension Fund who will carry out further contact to include other breaches.
Assessment of breach and brief summary of rationale	17/11/20 - outstanding remittances still not received. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.
Reported to tPR	No

Ref	F36	Date entered in register	23 Sep 2020
Status	Open	Date breached closed (if relevant)	
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. Contributions relating to August 2020 were received within the legal timescale but no remittance advice was received. September remittance is still outstanding. Previous Breach F35		
Category affected	Active members and employer		
Numbers affected	2 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	17/11/2020 - Emailed employer to request remittance. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.		
Outstanding actions (if any)	17/11/20 Escalated to Deputy Head of Pension Fund who will carry out further contact to include other breaches.		
Assessment of breach and brief summary of rationale	17/11/20 - outstanding remittances still not received. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.		
Reported to tPR	No		

Ref	F37	Date entered in register	23 Oct 2020
Status	Closed	Date breached closed (if relevant)	28 Oct 2020
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 September 2020 were not received within the deadline. Previous Breach F34		
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	17/11/20 - Although payment received on Oct 28th, Deputy Head of Pension Fund emailed Employer to remind of duty to pay contributions within legal timescale		
Outstanding actions (if any)			

Assessment of breach and brief	17/11/20 - reassessed as payment received
Reported to tPR	No