

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.</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</p> <p>2020/21 -Q1 - 442 cases completed / 55% (245) were in breach -Q2 - 1430 cases completed / 56% (799) were in breach -Q3 - 1329 cases completed / 29% (386) were in breach -Q4 - 739 cases completed / 15% (114) 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. 02/02/2021 - Training now complete. Expecting further reductions in next quarter results as staff members become more efficient.
Outstanding actions (if any)	
Assessment of breach and brief summary of rationale	21/05/2021 - Improvements have continued. Further improvements expected in Q1. Number of cases that have breached remain too high to alter assessment of breach.
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>		
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 -Q3- 56 cases completed / 29% (16) were in breach - Q4-55 cases completed / 20% (11) 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	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. 02/02/2021 - Training to continue. Complex area of work so training taking longer to complete. Training will continue through Q4. 21/05/2021 - Staff members attended external training course.
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	21/05/2021 - Further improvements expected in Q1. Although number of breaches continue to improve, the number in breach remains too high to change the assessment level.
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 - Q3 - 331 cases completed / 19% (63) were in breach -Q4 - 350 cases completed / 19% (68) 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. 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. 02/02/21 - Completed case numbers continue to increase whilst percentage in breach has reduced again this quarter. Improved engagement with employers via new monthly reporting process should assist in reducing the number of breaches further in future quarters. 21/05/2021 - New reports to employers will go live in June so expected improvement in future quarters.</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. 30/1/2020 Ongoing liaison with employers and rolling out monthly monitoring.</p>
Assessment of breach and brief summary of rationale	21/05/2021 - Completed case numbers continue to increase whilst percentage in breach has remained the same. Assessment level to remain as amber. New reports will help to identify if CPF or employer responsible for 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	<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	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 -Q3- 31 cases completed / 29% (9) were in breach -Q4- 73 cases completed / 21% (15) 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. 3/2/20 - Training of additional staff now complete.
Outstanding actions (if any)	3/2/21 - Further work required to identify where the delay falls e.g. request or receipt of information to facilitate the calculation of benefits.
Assessment of breach and brief summary of rationale	21/05/2021 - Number of completed cases increased and number in breach reduced. Breach rating to remain as green as expect numbers to reduce again next month (as small backlog had accumulated).
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	<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	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 -Q3 - 311 cases completed / 1% (3) were in breach -Q4 - 592 cases completed / 0.17% (1) 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). 21/05/2021 - New reports to employers will go live in June so expected improvement in future quarters.
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. 3/2/21 '- Start providing monthly updates of problems with employers.
Assessment of breach and brief summary of rationale	21/05/2021 - Number of cases increased and number of breaches reduced to only 1. Rating will remain green and expect to close this breach if remain within legal timescales next quarter.
Reported to tPR	No

Ref	A19	Date entered in register	17/08/2020
Status	Closed	Date breached closed (if relevant)	21/05/2021
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)	
Assessment of breach and brief summary of rationale	21/05/2021 - Outstanding actions complete and breach can be closed
Reported to tPR	No

Ref	A20	Date entered in register	03/02/2021
Status	Open	Date breached closed (if relevant)	
Title of Breach	Members not entered into LGPS	Owner	KW
Party which caused the breach	Employer		
Description and cause of breach	Number of employees entered into the Peoples' Pension, rather than the LGPS, by their employer (confidential until all employees are communicated with). Some employees did opt out of Peoples' Pension.		
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 less valuable pension rights, and so LGPS membership will need to be applied retrospectively. - Unclear if the employees who opted out, would have also opted out of the LGPS. - 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 Peoples' Pension to reverse membership there. 		
Actions taken to rectify breach	<p>3/2/2021 - Liaising with employer to determine how best to put employees back in correct position. Letters sent to members to explain</p> <p>21/05/2021 - Regular meetings held with employer and have an action plan in place. Exact number of 18 members have now been identified.</p>		
Outstanding actions (if any)	26/5/2021 - Action plan to now be delivered.		
Assessment of breach and brief summary of rationale	21/05/2021 - Exact number of members impacted now identified as 18. Assessment of breach to remain as amber.		
Reported to tPR	No		

Ref	A21	Date entered in register	21/05/2021
Status	Open	Date breached closed (if relevant)	
Title of Breach	Data Breach	Owner	KW
Party which caused the breach	CPF		
Description and cause of breach	265 Pension Increase letters contained details relating to another member on the reverse side. This was as a result of the printing being out of order. Error not noticed internally and CPF unaware until member rang to question.		
Category affected	Pensioner members.		
Numbers affected	265 pensioner members		

Possible effect and wider implications	-As a result the letters that the pension members received in Welsh relate to another member and their information has been printed on the Welsh translation of another member's letter. Details on the letter included Name, address, pension reference number and annual amount of pension. - Reputational risk - Causing worry and distress to members concerned
Actions taken to rectify breach	21/05/2021 - All members concerned have received an apology letter and the correct Pension Increase letter - Breach reported to the internal Information Officer - Self- referral to the Information Commissioners Office
Outstanding actions (if any)	21/05/2021 - awaiting outcome of ICO report
Assessment of breach and brief summary of rationale	21/05/2021 - Despite the large number of members affected and the seriousness of the issue, it is a one off error and processes have now been revised to ensure it doesn't happen again. Therefore it is an amber assessment.
Reported to tPR	No

Ref	A22	Date entered in register	21/05/2021
Status	Open	Date breached closed (if relevant)	
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	- 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		
Outstanding actions (if any)	26/5/2021 - Action plan to now be delivered.		
Assessment of breach and brief summary of rationale	21/05/2021 - Small number of employees affected and still determining individual resolutions.		
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	Employer		
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	25 current and previous employees		

Possible effect and wider implications	- 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	21/05/2021- Process has been updated to ensure correct contributions/CARE pay going forward. - Liaising with employer to determine how best to put employees back in correct position retrospectively and letters to be sent to members to explain.
Outstanding actions (if any)	21/05/2021 - Detailed plan of specific actions and communications being developed.
Assessment of breach and brief summary of rationale	21/05/2021 - Small number of employees affected and still clarifying impact.
Reported to tPR	No

Ref	F38	Date entered in register	21 Jan 2021
Status	Closed	Date breached closed (if relevant)	08 Feb 2021
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 November and December 2020 were not received within the deadline. Previous Breach F37		
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	- 21/01/21 emailed Employer to request payment		
Outstanding actions (if any)	8/2/21 No outstanding actions. Payment now received.		
Assessment of breach and brief summary of rationale	8/2/21 November and December payments were received on 8th February. Will continue to monitor the situation for further delays in payments.		
Reported to tPR	No		

Ref	F39	Date entered in register	23 Feb 2021
Status	Closed	Date breached closed (if relevant)	24 Feb 2021
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 January 2021 were not received within the deadline. Previous Breach F38		
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	- 23/02/21 emailed Employer to request payment
Outstanding actions (if any)	24/2/21 No outstanding actions. Payment now received.
Assessment of breach and brief summary of rationale	24/02/21 - Amber due to previous issues but January payment now received. Will continue to monitor the situation for further delays in payments.
Reported to tPR	No

Ref	F40	Date entered in register	23 Mar 2021
Status	Closed	Date breached closed (if relevant)	30 Mar 2021
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 2021 were not received within the deadline. Previous Breach F39		
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	- 23/03/21 emailed Employer to request payment		
Outstanding actions (if any)	30/3/21 No outstanding actions. Payment now received.		
Assessment of breach and brief summary of rationale	30/03/21 - Amber due to previous issues but February payment now received. Will continue to monitor the situation for further delays in payments.		
Reported to tPR	No		

Ref	F41	Date entered in register	23 Apr 2021
Status	Closed	Date breached closed (if relevant)	30 Apr 2021
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 March 2021 were not received within the deadline. Previous Breach F40		
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	- 23/04/21 emailed Employer to request payment		
Outstanding actions (if any)	30/4/21 No outstanding actions. Payment now received.		
Assessment of breach and brief summary of rationale	30/04/21 - Despite previous issues March payment now received and April 2021 payment received on time.		

Reported to tPR	No
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