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| 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/AR |
| 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 breach 2021/22: 4072 cases completed / 15 % (626) 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 2023/24 -Q1 - 713 cases completed / 12% (86) were in breach -Q2 - 794 cases completed / 7% (61) 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. 16/08/2023 - Internal staff movement has had a short term impact on this KPI. Expecting reductions in next quarter results as staff members become more efficient. 10/11/2023 Additional resource approved at last Committee. Expecting further reduction of breaches once appointed.</p> | | |
| Outstanding actions (if any) | 22/05/22 - Analyse new employer reports and escalate to individual employers if required. | | |
| Assessment of breach and brief summary of rationale | 10/11/2023 - Number of cases completed has increased slightly and the number in breach has reduced. Assessment will remain Amber until further improvements are made. | | |
| Reported to tPR | No | | |

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| Ref | A2 | Date entered in register | 19/09/2017 |
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| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | Late transfer in estimate | Owner | AR |
| 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> <p>10/11/2023 Due to awaiting new GAD guidance, there was a pause in processing for a few months to November 2023.</p> | | |
| Category affected | Active members | | |
| Numbers affected | <p>2017/18: 235 cases completed / 36% (85) were in breach. 2018/19:213 cases completed / 45% (95) were in breach. 2019/20: 224 cases completed / 32% (71) were in breach 2020/21: 224 cases completed / 25% (57) were in breach 2021/22: 309 cases completed / 28% (87) were in breach 2022/23 -Q1 - 98 cases completed / 9% (9) were in breach -Q2 - 104 cases completed / 19% (20) were in breach -Q3 - 66 cases completed / 12% (8) were in breach -Q4 - 118 cases completed / 17% (20) were in breach 2023/24 -Q1 - 31 cases completed / 55% (17) were in breach -Q2 - 111 cases completed / 59% (66) 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> <p>16/08/2023 - Transfers have been on hold whilst awaiting GAD guidance and relevant factors for calculation. Guidance has now been received and staff are working through backlog.</p> <p>10/11/2033 - Staff continuing to work through backlog following the pause in processing whilst awaiting GAD guidance.</p> | | |
| Outstanding actions (if any) | None | | |
| Assessment of breach and brief summary of rationale | 10/11/2023 - Number in breach is high due to the previous hold on transfers. Number complete is starting to return to normal amount. Number in breach will remain high until all backlog cases have been processed. As this is temporary, assessment of breach will remain Amber. | | |
| Reported to tPR | No | | |

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| 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 | | |

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| 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: 1534 cases completed / 14% (222) were in breach</p> <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 <p>2023/24</p> <ul style="list-style-type: none"> -Q1- 370 cases completed / 12% (43) were in breach -Q2 - 478 cases completed / 13% (62) 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. - <u>Potential for there to be an impact on CPF reputation.</u> |
| 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> <p>16/08/2023 - Recruitment campaign underway to fill vacant positions within operations team following internal promotion. Further improvements expected once positions filled and new staff members trained. Workload reviewed and new structure being proposed at August Pension Committee for approval. If approved, additional resource will assist with reducing number of cases in breach.</p> <p>10/11/2023 - New structure approved and vacant positions within the retirement team have been filled. Further reductions expected once new recruits are fully trained.</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>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 | 10/11/2023 - Number of cases completed continues to increase with number in breach remaining consistent. Further improvements expected over coming months when training of new recruits is complete. |
| Reported to tPR | No |

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| 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 |

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| 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: 207 cases completed / 13% (26) 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 2023/24 -Q1 - 43 cases completed / 28% (12) were in breach -Q2 - 33 cases completed / 36% (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. 16/08/2023 - Training nearing completion, improvements expected in coming months. 10/11/2023 - Training still ongoing as also training new staff members on retirement process. A number of these breaches incurred due to being notified of death quite late into the 2 month legal timeframe.</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 | 10/11/2023 - Number in breach remains too high to amend assessment. |
| Reported to tPR | No |

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| 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. | | |

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| 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> <p>16/08/2023 - meeting held with Aura to progress this. Further meeting planned in the coming weeks.</p> <p>10/11/2023 - advice taken from Aon regarding outstanding contributions and forwarded to Aura or their consideration.</p> |
| Outstanding actions (if any) | <p>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.</p> <p>10/11/2023 - Contact Aura if no response by end-November to ensure final contributions are paid.</p> |
| Assessment of breach and brief summary of rationale | 10/11/2023 - Assessment unchanged and breach to remain open until outstanding member contributions for deferred members received. |
| Reported to tPR | No |

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| Ref | A26 | Date entered in register | 10/11/2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | Late transfer out estimate | Owner | AR |
| 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). Note this is the same as breach A3 which was closed previously.</p> <p>Late completion of calculation and notification by CPF due awaiting new GAD guidance (which resulted in a pause in processing for a few months to November 2023).</p> | | |
| Category affected | Active and deferred members | | |
| Numbers affected | <p>2023/24</p> <p>-Q2 - 103 cases completed / 32% (33) were in breach</p> | | |
| Possible effect and wider implications | <p>- Potential financial implications on some scheme members.</p> <p>- Potential complaints from members/new schemes.</p> <p>- Potential for impact on CPF reputation.</p> | | |
| Actions taken to rectify breach | 10/11/2023 - Transfers have been on hold whilst awaiting GAD guidance and relevant factors for calculation. Guidance has now been received and staff are working through backlog. | | |
| Outstanding actions (if any) | None | | |
| Assessment of breach and brief summary of rationale | 10/11/2023 - Number in breach is high due to the previous hold on transfers. Number in breach will remain high until all backlog cases have been processed. As this is temporary and not affecting many members, assessment of breach is green. | | |
| Reported to tPR | No | | |

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| Ref | F110 | Date entered in register | 01 Jun 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |

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| 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. The remittance advice relating to April 2023 was not received within the deadline. Multiple previous breaches, however only one within the last two years, F73. |
| 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 | 21/06/2023 - Emailed to request outstanding remittances. No response received. See subsequent actions F112-F116 |
| Outstanding actions (if any) | See F116 |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. |
| Reported to tPR | No |

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| Ref | F112 | Date entered in register | 23 Jun 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |
| Description and cause of breach | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. The remittance advice relating to May 2023 was not received within the deadline. Previous breach in 2023/24 is F110. | | |
| 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 | 21/07/2023 - Escalated to Deputy Head of Fund, emailed Chair of Marchwiell CC. Chair confirmed the Clerk had been contacted. See subsequent actions F113-F116 | | |
| Outstanding actions (if any) | See F116 | | |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. | | |
| Reported to tPR | No | | |

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|--|--|---|-------------|
| Ref | F113 | Date entered in register | 01 Aug 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |
| Description and cause of breach | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. The remittance advice relating to June 2023 was not received within the deadline. Previous breaches in 2023/24 are F110, F112 | | |
| 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 | See subsequent actions F114-F116 | | |
| Outstanding actions (if any) | See F116 | | |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. | | |
| Reported to tPR | No | | |

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| Ref | F114 | Date entered in register | 23 Aug 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |

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| 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. The remittance advice relating to July 2023 was not received within the deadline. Previous breaches in 2023/24 are F110, F112, F113 |
| 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 | 06/09/2023 - Email received from clerk explaining absence. 07/09/2023 - Emailed clerk to request outstanding remittances. Response received. 08/09/2023 - Emailed clerk. Response received. See subsequent actions F115-F116 |
| Outstanding actions (if any) | See F116 |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. |
| Reported to tPR | No |

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|--|--|---|-------------|
| Ref | F115 | Date entered in register | 26 Sep 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |
| Description and cause of breach | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. The remittance advice relating to August 2023 was not received within the deadline. Previous breaches in 2023/24 are F110, F112, F113, F114 | | |
| 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 | 25/09/2023 - Emailed clerk. Response received 28/09/2023. 03/10/2023 - Emailed clerk to request outstanding remittances. No Response received. See subsequent actions F116 | | |
| Outstanding actions (if any) | See F116 | | |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. | | |
| Reported to tPR | No | | |

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|--|---|---|-------------|
| Ref | F116 | Date entered in register | 22 Oct 2023 |
| Status | Open | Date breached closed (if relevant) | |
| Title of Breach | No submission of contribution remittance advice | Owner | DF |
| Party which caused the breach | Marchwiell Community Council | | |
| Description and cause of breach | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made. The remittance advice relating to September 2023 was not received within the deadline. Previous breaches in 2023/24 are F110, F112, F113, F114, F115 | | |
| 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 | 06/11/2023 - Escalated to Debbie Fielder as Deputy Head of Fund. Emailed to request outstanding remittances. Response received 09/11/2023. 09/11/2023 - DF replied, requesting outstanding remittances. | | |
| Outstanding actions (if any) | If no response to Deputy Head by 23/11/2023, chase. | | |
| Assessment of breach and brief summary of rationale | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is limited to a single employer and single active member. Fund is aware of circumstances and wider implications are unlikely. | | |
| Reported to tPR | No | | |