

Current recorded breaches of the law

Ref	9	Date first recorded	9/19/2017	Owner	H Burnham
Category	Administration		Reported to TPR	No	
Breach by	Clwyd Pension Fund				
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.</p> <p>Q1 17/18 547 cases completed / 61%(338) were in breach.</p> <p>Q2 17/18 408 cases completed / 72% (292) were in breach.</p> <p>Q3 17/18 381 cases completed / 38% (375) were in breach.</p> <p>Q4 17/18 1340 cases completed / 78% (1041) were in breach.</p> <p>Q1 18/19/ Of 1246 cases completed / 84%(1050) were in breach</p>				
Possible effect and wider implications	Late scheme information sent to member which may result in lack of understanding and/or complaint from member affecting scheme reputation.				
Reaction to 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 Liasion 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. 				
Outstanding actions	Ongoing roll out of i-Connect and 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. Reviewing staff resources.				

Ref	11	Date first recorded	9/19/2017	Owner	H Burnham
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Category	Administration	Reported to TPR	No
Breach by	Clwyd Pension Fund		
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. 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.</p> <p>Q1 17/18 Of 59 cases completed 44% (26) were in breach.</p> <p>Q2 17/18 Of 77 cases completed 29% (22) were in breach</p> <p>Q3 17/18 66 cases completed / 41% (27) were in breach</p> <p>Q4 17/18 33 cases completed / 30% (10) were in breach</p> <p>Q1 18/19 Of 60 cases completed 42% (25) were in breach.</p>		
Possible effect and wider implications	Information being provided to scheme members later than hoped. Could have some financial implications. Members may contact the section to enquire as to the progress of the transfer.		
Reaction to breach	Continued training of team members to increase knowledge and expertise to ensure that transfers are dealt with more timelessly.		
Outstanding actions	Completion of training of team members in transfer and aggregation processes. Reviewing staff resources.		

Ref	12	Date first recorded	9/19/2017	Owner	H Burnham
Category	Administration	Reported to TPR	No		
Breach by	Clwyd Pension Fund				
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> <p>Q1 17/18 Of 77 cases completed 27% (21) were in breach</p> <p>Q2 17/18 Of 63 cases completed 8% (5) were in breach</p> <p>Q3 17/18 193 cases completed / 4% (7) were in breach</p> <p>Q4 17/18 49 cases completed / 0% (0) were in</p>				

	breach Kept open to monitor situation for next quarter. Q1 18/19/ of 119 cases completed 10%)(12) were in breach
Possible effect and wider implications	Information being provided to scheme members/new scheme later than hoped. Could have some financial implications. Members and providers may contact the section to enquire as to the progress of the transfer.
Reaction to breach	Continued training of team members to increase knowledge and expertise to ensure that transfers are dealt with more timely.
Outstanding actions	Completion of training of team members in transfer and aggregation processes. Reviewing staff resources.

Ref	13	Date first recorded	9/19/2017	Owner	H Burnham
Category	Administration			Reported to TPR	No
Breach by	Clwyd Pension Fund				
Description and cause of breach	<p>Requirement to provide notification of amount of retirement benefits 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 and late completion of calculation by CPF. Also, delay in receipt of AVC fund values from AVC provider.</p> <p>Q1 17/18 284 cases completed / 31% (87) were in breach Q2 17/18 196 cases completed / 31% (61) were in breach Q3 17/18 237 cases completed / 43% (103) were in breach Q4 17/18 243 cases completed / 51% (124) were in breach Q1 18/19 Of 297 cases completed 31% (91) were in breach</p>				
Possible effect and wider implications	Late payment of benefits which may miss payroll deadlines and result in accrual of interest on lump sums/pensions. Members upset about delays.				
Reaction to 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 more timely. Prioritising of task allocation. Set up of new process with one AVC provider to access AVC fund information.				
Outstanding actions	Further training of newly promoted team member to deal with volume of work. Identifying which				

	employers are causing delays. Reviewing staff resources.
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Ref	14	Date first recorded	9/20/2017	Owner	H Burnham
Category	Administration			Reported to TPR	No
Breach by	Clwyd Pension Fund				
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. Delays are late completion of calculation by CPF. Increasing estimate requests being made by members is causing problems.</p> <p>Q1 17/18 140 cases completed 34% (47) in breach Q2 17/18 155 cases completed 41% (65) in breach Q3 17/18 136 cases completed / 36% (49) were in breach Q4 17/18 56 cases completed / 38% (21) were in breach Q1 18/19/ of 79 cses completed 32% (25) were in breach</p>				
Possible effect and wider implications	Late notification of benefits/costs to member/employer resulting in complaints and poor understanding/ missed opportunities. Section contacted to check on progress of estimate.				
Reaction to breach	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 leaders. Estimates have been prioritised				
Outstanding actions	Additional staff training. Reviewing staff resources.				

Ref	15	Date first recorded	9/20/2017	Owner	H Burnham
Category	Administration			Reported to TPR	No
Breach by	Clwyd Pension Fund				
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				

	<p>complete the task.</p> <p>Q1 17-18 41 cases 58% (24) in breach</p> <p>Q2 17/18 47 cases 66% (31) in breach</p> <p>Q3 17/18 27 cases completed / 67% (18) were in breach</p> <p>Q4 17/18 38 cases completed / 39% (15) were in breach</p> <p>Q1 18/19/ of 53 cases completed 32% (17) were in breach</p>
Possible effect and wider implications	Late payment of benefits which may miss payroll deadlines and result in accrual of interest on lump sums/pensions. Beneficiaries upset about delays.
Reaction to breach	Further training of team and review of process to improve outcome (review now complete).
Outstanding actions	Further staff training required. Reviewing staff resources.

Ref	16	Date first recorded	10/30/2017	Owner	H Burnham
Category	Administration		Reported to TPR	No	
Breach by	Clwyd Pension Fund				
Description and cause of breach	<p>Requirement to issue annual benefit statements by 31st August each year. For 2017, all benefit statements were sent out to members on time apart from those members within the following employers:</p> <p>a) Connahs Quay High School – 68 members due to non-receipt of year end return</p> <p>b) Cefn Mawr Community Council – 2 members due to non-receipt of year end return</p> <p>c) Coedpoeth Community Council – 6 members due to non-receipt of 15/16 year end return (we have received return for 16/17 but require 15/16 to produce statements)</p>				
Possible effect and wider implications	Member less aware of pension provision. Member upset at not receiving statement on time.				
Reaction to breach	<p>a) Payroll provided by a payroll bureau. This has been chased up to no avail. FCC HR(Schools) are aware of the issue.</p> <p>b) Has been followed up but training required.</p> <p>c) have sent the data but it has not been received. It is being pursued.</p> <p>Update 30-11-17 -</p> <p>a) received</p> <p>c) received</p> <p>b) further reminder to be sent.</p> <p>Update 6/6/18 - despite ongoing chasing, information for 2017 has not been received albeit 2018 information has now been received.</p>				
Outstanding actions	Continue to chase for missing information from Cefn				

	Mawr Community Council
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Ref	17	Date first recorded	6/5/2018	Owner	D Fielder
Category	Contributions			Reported to TPR	No
Breach by	Employers				
Description and cause of breach	Three employers have been late in paying contributions. These are shown below along with number of late payments for April 18: Argoed - 1 CoedPoeth -1 Marchwiell- 1				
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.				
Reaction to breach	Argoed no details Coed Poeth ongoing issues. Marchweil ongoing. All contacted to chase outstanding payments				
Outstanding actions	Ongoing and regular chasing				

Ref	18	Date first recorded	6/5/2018	Owner	D Fielder
Category	Contributions			Reported to TPR	No
Breach by	Employers				
Description and cause of breach	The following employers have not yet sent the remittance advice for April 2018: a) Aura, Newydd, FCC b) Acton c) Argoed d) Civica e) Coedpoeth f) Coleg Cambria g) Denbigh Youth h) Marchweil				
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.				
Reaction to breach	Contacted employers to chase. Now received remittance advices for Aura, Newydd and FCC but still chasing the others outstanding.				
Outstanding actions	Ongoing and regular chasing				

Ref	19	Date	6/5/2018	Owner	H Burnham
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Category	Administration		Reported to TPR	Yes	
Breach by	One employer (confidential)				
Description and cause of breach	[Information removed for confidentiality purposes]				
Possible effect and wider implications	CARE pension will be under or over stated and for those who have retired, CARE pension will be under or overpaid. Might also impact the amount of employer contributions that should have been paid.				
Reaction to breach	Working group set up to: - Identify cases that have been impacted and advise Administration Section. - Work with payroll provider to ensure root problem is resolved.				
Outstanding actions	- Resolve root problem - Work with CPF to agree approach for resolving affected cases				

Ref	20	Date first recorded	6/5/2018	Owner	H Burnham
Category	Administration		Reported to TPR	Yes	
Breach by	Clwyd Pension Fund				
Description and cause of breach	[Information removed for confidentiality purposes]				
Possible effect and wider implications	CARE pension will be under or over stated and for those who have retired, CARE pension will be under or overpaid. Might also impact the amount of employer contributions that should have been paid.				
Reaction to breach	Working group set up to - Identify cases that have been impacted and consider options for correcting. - Work with employer to ensure root problem is resolved.				
Outstanding actions	- Identify and analyse case to understand full impact - Develop plan of action and work with employer for approach for resolving affected cases - Work with employer to ensure root problem is resolved				

Ref	21	Date first recorded	8/29/2018	Owner	Administration
Category	Administration		Reported to TPR	No	
Breach by	Clwyd Pension Fund				

Description and cause of breach	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). Q1 17/18 284 cases completed 1 case (< 1%) was late by 2 Q1 18/19/ of 437 cases completed 40% (173) were in breach
Possible effect and wider implications	Member less aware of pension provision. Member upset at not receiving statement on time.
Reaction to breach	Pensions assistants who complete this task have been required to concentrate on completing joiner cases.
Outstanding actions	Reviewing staff resources.

Ref	22	Date first recorded	8/28/2018	Owner	D Fielder
Category	Contributions			Reported to TPR	No
Breach by	Employers				
Description and cause of breach	Two employers have been late in paying contributions. These are shown below along with number of late payments for May and June 18: Argoed - May and June late Marchwiell -May and June late Home Farm Trustl- May late				
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.				
Reaction to breach	Argoed now up to date and paying on time, Hame Farm Trust up to date and paying on time. Marchwiell contacted to resolve issues.				
Outstanding actions	Ongoing and regular chasing				