

## CURRENT BREACHES OF THE LAW

<b>Reference</b>	01	<b>Date recorded</b>	11/3/2016	<b>Date breach resolved</b>	Ongoing
<b>Category</b>	Administration	<b>Owner</b>	H Burnham	<b>Reported to TPR</b>	To be decided
<b>Description and cause of breach</b>	Notification of deferred benefit entitlement for those who have left the scheme not sent within the legally prescribed timescale. Whilst it is acknowledged that there are a number of these breaches there is no detail yet available regarding numbers affected.				
<b>Possible effect and wider implications</b>	The impact of the breach will vary dependant on the individuals concerned but as a minimum will mean they do are not fully aware of the benefits they will eventually become entitled to.				
<b>Reaction to breach</b>	Still trying to identify cases. Backlog project put in place including using external resource (Mercers) to assist with rectifying the situation as soon as possible. Methods of internal working reviewed to focus on older cases including greater focus on identifying cases and monitoring.				
<b>Outcome of report and/ or investigations</b>	Ongoing				
<b>Outstanding actions</b>	Information being collated to quantify deferred benefit notifications over 2 months late together with reasons why there is a delay and what steps are being taken to prevent a recurrence of the breach.				

<b>Reference</b>	02	<b>Date recorded</b>	11/3/2016	<b>Date breach resolved</b>	08/8/16
<b>Category</b>	Administration	<b>Owner</b>	H Burnham	<b>Reported to TPR</b>	No
<b>Description and cause of breach</b>	There is a potential Admitted Body which is due to become one of our employers with effect from January 2016. Since having dialogue with the company in question it transpired that 2 members TUPE transferred over to this company in December 2014 and therefore the body should have arranged access to the LGPS from that date. We were not made aware of this. Instead the company got the individuals to sign and enter into their Auto Enrolment Scheme, and subsequently are now wanting them to join the LGPS.				
<b>Possible effect and wider implications</b>	Unclear until legal advice received but it is possible these members will miss out on approximately 1 year's LGPS benefits.				
<b>Reaction to breach</b>	We took legal advice on how next to proceed.				
<b>Outcome of report and/ or investigations</b>	Legal advice has now confirmed that there is no actual breach of the law.				
<b>Outstanding actions</b>	None				

<b>Reference</b>	03	<b>Date recorded</b>	19/9/2016	<b>Date breach resolved</b>	Ongoing
<b>Category</b>	Administration	<b>Owner</b>	H Burnham	<b>Reported to TPR</b>	To be decided
<b>Description and cause of breach</b>	There are a number of cases where we are not notifying the amount of retirement benefits within the legal timescales (1 month from date of retirement if on or after Normal Pension Age or 2 months if before NPA).				
<b>Possible effect and wider implications</b>	The impact of the breach will vary dependant on the individuals concerned but as a minimum will mean a delay in payment and uncertainty for scheme members. Delays in payments will incur interest cost to the Fund.				
<b>Reaction to breach</b>	Still trying to determine reasons for, and extent of, delays. Officers and Advisors to review performance results and identify method of improvement where appropriate.				
<b>Outcome of report and/ or investigations</b>	Ongoing				
<b>Outstanding actions</b>	Meeting of officers and advisors being held on the 5 <sup>th</sup> October 2016 to determine reasons and extent of issue, and further action to be taken.				