Ref	A1		Date entered in register	19/09/2017
Status Open			Date breached closed (if relevant)	
		Late notificatio		SB/JT
Party which caused the breach			CPF + various employers	
Description	on and cau	se of breach	Requirement to send a Notification of Joining the LG member within 2 months from date of joining (assum received from the employer), or within 1 month of recinformation where the individual is being automatical enrolled.	ing notification ceiving jobholder
			Due to a combination of late notification from employ action by CPF the legal requirement was not met. 20 Staff turnover in August/September reduced number 29/1/19 The introduction of I-connect is also producir at the point of implementation for each employer. I-c submission timescales can also leave only a few day meet the legal timescale. 14/8/19 General data clea year-end is affecting whether legal timescale is met. long-term sick impacting this.	0/11/18 - (Q2) actioned. Ing large backlogs connect is for CPF to Insing including
Category			Active members	
Numbers	affected		2017/18: 2676 cases completed / 76% (2046) were 2018/19: - Q1 - 1246 cases completed / 84%(1050) were in bready - Q2 - 551 cases completed / 87% (480) were in bready - Q3 - 1123 cases completed / 50% (563) were in bready - Q4 - 935 cases completed / 49% (458) were in bready - Q1 - 822 cases completed / 62% (507) were in bready - Q2 - 750 cases completed / 46% (380) were in bready - Q3 - 1086 cases completed / 55% (603) were in bready - Q3 - 1086 cases completed / 55% (603) were in bready - 2018/16/16/16/16/16/16/16/16/16/16/16/16/16/	each ach each ach ach
Possible 6	effect and	wider	- Late scheme information sent to member which ma	y result in lack of
implicatio	ns		understanding.	
			- Potential complaints from members.	
Actions ta	iken to rec	tify breach	<ul> <li>Potential for impact on CPF reputation.</li> <li>Roll out of iConnect where possible to scheme empnew admitted bodies to ensure monthly notification of (ongoing).</li> <li>Set up of Employer Liasion Team (ELT) to monitor details more timelessly.</li> <li>Training of new team members to raise awareness time restraint.</li> <li>Prioritising of task allocation. KPIs shared with tean further raise awareness of importance of timely complete and 14/8/19.</li> <li>Streamlining of staff resources now complete and 14/8/19.</li> <li>Streamlining of aggregation cases with major emploration of reasibility and implications of removing regioning pack (agreed not to change).</li> <li>Consider feasibility of whether tasks can be prioritis joining (agreed not to change).</li> <li>14/11/19 - Utilising FCC trainees to assist with this pearly September.</li> <li>30/01/2020 - backlog completed and addressed olde</li> </ul>	f new joiners and provide joiner of importance of members to oletion of task. ployers not I new posts filled. yers. minders for eed by date of rocedure. Joined

Outstanding actions (if any)	<ul> <li>Ongoing roll out of i-Connect.</li> <li>Bedding in of new staff/ training.</li> <li>Carrying out backlogs of previous joiners (most of which are due to i-Connect roll out).</li> <li>Contacting employers which are causing delays.</li> <li>28/1/19:</li> </ul>
	- Introduce process to analyse specific employers causing problems.
Assessment of breach and brief summary of rationale	29/1/19 Large proportion of joining members affected but business case has been put forward to increase resources. In the meantime, temporary resources are being requested to assist. 4/6/19 Reassessed - New resource put in place but may take a few months to see full impact. 14/11/19 - status reassessed and remains amber whilst training of new staff continues 30/1/2020 as per above, and backlog now complete so retain as amber.
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		Late transfer in	` <u> </u>	JT	
Party whice	ch caused	the breach	CPF + various previous schemes		
Description and cause of breach		se 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 a	affected		Active members		
Numbers a	affected		2017/18: 235 cases completed / 36% (85) were in 2018/19: - Q1 - 60 cases completed / 42% (25) were in bread - Q2 - 66 case completed / 38% (25) were in bread - Q3 - 31 case completed / 32% (10) were in bread - Q4 - 56 cases completed / 62% (35) were in bread 2019/20: - Q1 - 51 cases completed / 59% (30) were in bread - Q2 - 56 cases completed / 29% (16) were in bread - Q3 - 53 cases completed / 21% (11) were in bread	ch n n ch ch	
Possible e implication	effect and v	vider	<ul> <li>Potential financial implications on some scheme n</li> <li>Potential complaints from members/previous sche</li> <li>Potential for impact on CPF reputation.</li> </ul>	emes.	
	ken to rect		<ul> <li>Continued training of team members to increase kexpertise to ensure that transfers are dealt with in amanner.</li> </ul>	n more timely	
Outstandi	ng actions	(if any)	<ul> <li>Completion of training of team members in transferocesses.</li> <li>29/1/19:</li> <li>If KPIs don't improve, investigate how much of the external schemes and look for ways to improve this</li> </ul>	e delay is due to	

summary of rationale	29/1/19 Stockpiling will likely make KPIs worse in short term but then longer term additional training will result in improvements.  14/11/19 - whilst improvements have been made - this needs to be consistent and numbers reducing further prior to changing to green 30/1/2020 - further progress made and breaches are reducing on a quarterly basis. Retain as amber.
Reported to tPR	No

Ref	A4		Date entered in register	19/09/2017
Status	Open		Date breached closed (if relevant)	
Title of B	reach	Late notificatio	n of retirement benefits Owne	er SB
Party whi	ch caused	the breach	CPF + various employers + AVC provider	s
Description and cause of breach		ise of breach	Requirement to provide notification of amounthin 1 month from date of retirement if of Age or 2 months from date of retirement Age.  Due to a combination of:	on or after Normal Pension if before Normal Pension
			<ul> <li>late notification by employer of leaver inf</li> <li>late completion of calculation by CPF</li> <li>for members who have AVC funds, delay</li> <li>values from AVC provider.</li> </ul>	
Category	affected		Active members mainly but potentially sor	ne deferred members
Numbers	affected		2017/18: 960 cases completed / 39% (375) 2018/19: - Q1 - 297 cases completed / 31% (91) we - Q2 - 341 case completed / 26% (89) we - Q3 - 357 case completed / 30% (108) we - Q4 - 348 cases completed / 32% (112) ve 2019/20: - Q1 - 315 cases completed / 28% (87) we - Q2 - 411 cases completed / 24% (99) we - Q3 - 348 cases completed / 26% (93) we	ere in breach re in breach ere in breach vere in breach ere in breach ere in breach
Possible implication	effect and ons	wider	<ul> <li>Late payment of benefits which may mis result in interest due on lump sums/pensic</li> <li>Potential complaints from members/emp</li> <li>Potential for impact on CPF reputation.</li> </ul>	ons (additional cost to CPF).
Actions to	aken to rec	tify breach	<ul> <li>Roll out of iConnect where possible to so new admitted bodies to ensure monthly not (ongoing).</li> <li>Set up of ELT to monitor and provide learnanner.</li> <li>Prioritising of task allocation.</li> <li>Set up of new process with one AVC proinformation.</li> <li>Increased staff resources.</li> <li>3/6/19 - Review of staff resources now co 14/8/19 - Improvements have been made as staff are settled in and trained. Busine</li> </ul>	otification of retirees aver details in a more timely ovider to access AVC fund mplete and new posts filled, and more should be made

Outstanding actions (if any)	<ul> <li>Further training of newly promoted team member to deal with volume of work.</li> <li>Identifying which employers are causing delays.</li> <li>14/11/19 Continuation of training.</li> <li>30/1/2020 Ongoing liaison with employers</li> </ul>
Assessment of breach and brief summary of rationale	4/6/19 New resource put in place but may take a few months to see full impact. 14/11/19 Number of retirements increased and those in breach reduced so improvements continue to be made, but remain as amber for now. 30/1/2020 - Retain as amber as 96% completed within CPF target so 3rd party delays are causing the legal percentage to lower to 74%, so focus is now on employer education.
Reported to tPR	No

Ref	A5		Date entered in register		20/09/2017
Status	Open		Date breached closed (if relevant)		
Title of Br	Title of Breach Late estimate of		of benefits	Owner	SB
Party whi	ch caused t	the breach	CPF		
Description and cause of breach		se of breach	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 due to: - late completion of calculation by CPF Increasing numbers of estimate requests being made by members.		
Category			Active members mainly but potentia	•	
Numbers affected			2017/18: 487 cases completed / 37' 2018/19: - Q1 - 79 cases completed / 32% (2 - Q2 - 60 case completed / 22% (13 - Q3 - 123 case completed / 15% (1 - Q4 - 151 cases completed / 6% (4' 2019/20: - Q1 - 165 cases completed / 4% (6' - Q2 - 244 cases completed / 2% (4' - Q3 - 244 cases completed / 0.5%	25) were in breach (8) were in breach (9) were in breach (5) were in breach (1) were in breach (1) was in breach (1) was in breach	ch ch i i i h
Possible effect and wider implications			<ul> <li>Late notification of benefits/costs t</li> <li>Potential complaints from member</li> <li>Potential for missed opportunities</li> <li>Potential for impact on CPF reputation</li> </ul>	rs/employers. by members/em ation.	ployers.
Actions taken to rectify breach			<ul> <li>Introduction of MSS should allevia as member will be able to calculate</li> <li>Further training of team members</li> <li>Task allocation reviewed by team given a higher priority.</li> <li>3/6/19 - Review of staff resources needed</li> <li>14/8/19 - Additional staff training.</li> </ul>	own estimate th also required. leader to ensure	rough database.
Outstandi	ng actions	(if any)	-None		

Assessment of breach and brief summary of rationale	29/1/19 - Improvements have been made including from MSS and more should be made as staff are settled in and trained. Business case will also assist if approved.  3/6/19 Cases in breach now drastically reduced so moved from amber to green. But will review in next quarter.  14/8/19 Reassessed - Still minor breach but all reasonable actions have been taken.  14/11/19 Reassessed - Still minor breach but all reasonable actions have been taken and progress has been maintained.  30/10/2020 Still only one breach so remains green. Training ongoing.
Reported to tPR	No

Ref	A6		Date entered in register	20/09/2017
Status	Open		Date breached closed (if relevant)	
Title of Br	each	Late notfication	n of death benefits Owner	SB
Party which caused the breach			CPF	
Description and cause of breach		se 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 (vactive, deferred, pensioner or dependant).	which could be
Numbers affected		vider	2017/18: 153 cases completed / 58% (88) were in breach. 2018/19: - Q1 - 53 cases completed / 32% (17) were in breach - Q2 - 26 case completed / 35% (9) were in breach - Q3 - 41 case completed / 39% (16) were in breach - Q4 - 64 cases completed / 22% (14) 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	
	Possible effect and wider implications		result in interest due on lump sums/pensions (additio - Potential complaints from beneficaries, particular gi cases Potential for impact on CPF reputation.	nal cost to CPF).
Actions taken to rectify breach			<ul> <li>Further training of team</li> <li>Review of process to improve outcome</li> <li>Recruitment of additional, more experienced staff.</li> <li>3/6/19 - Review of staff resources now complete and</li> </ul>	new posts filled.
Outstandi	ng actions	(if any)	Ongoing training of death calculations on the team	
	Assessment of breach and brief summary of rationale		29/1/19 - Improvements have been made and more sas staff are trained. Business case will also assist if 4/6/19 New resource put in place but may take a few full impact. 14/11/19 Continuation of training to other Pension off hopefully reduce this further so retain as amber. 30/1/2020 Still small number of breach cases; trainin Remain amber for now.	approved. months to see icers will

Reported to tPR	No

Ref	A9		Date entered in register	29/08/2018
Status	Open		Date breached closed (if relevant)	
Title of Bro	each	Late notification	n of leaver rights and options Owner	SB/JT
Party whice	Party which caused the breach		CPF + various employers	
Description and cause of breach		se of breach	Requirement to inform members who leave the schrights and options, as soon as practicable and no n from date of initial notification (from employer or fromember).	nore than 2 months
			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 a			Active members	
Numbers affected			2018/19: - Q1 - 437 cases completed / 40% (173) were in breach - Q2 - 1463 cases completed / 66% (963) were in breach - Q3 - 951 cases completed / 51% (481) were in breach - Q4 - 745 cases completed / 2% (17) 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	
Possible effect and wider implications			<ul> <li>Late notification of benefits/costs to member/emp</li> <li>Potential complaints from members/employers.</li> <li>Potential for missed opportunities by members/en</li> <li>Potential for impact on CPF reputation.</li> </ul>	nployers.
Actions ta	ken to rect		<ul> <li>Roll out of iConnect where possible to scheme ennew admitted bodies to ensure monthly notification (ongoing).</li> <li>Set up of Employer Liasion Team (ELT) to monito leaver details in a more timely manner.</li> <li>Training of new team members to raise awarenestime restraint.</li> <li>Prioritising of task allocation. KPIs shared with teafurther raise awareness of importance of timely cor.</li> <li>6/6/18 - Updating KPI monitoring to understand essending information in time.</li> <li>3/6/19 - Review of staff resources now complete and 14/8/19</li> <li>Ongoing streamlining of aggregation cases with meson consider feasibility of whether tasks can be prioritile leaving (no action taken).</li> <li>Carrying out backlogs of previous leavers (most of Connect roll out).</li> </ul>	of leavers or and provide as of importance of am members to appletion of task. apployers not and new posts filled. anajor employers. ased by date of

Outstanding actions (if any)	<ul> <li>Ongoing roll out of i-Connect.</li> <li>Bedding in of new staff/ training.</li> <li>Contacting employers which are causing delays.</li> <li>28/1/19:</li> <li>Introduce process to analyse specific employers causing problems.</li> </ul>
Assessment of breach and brief summary of rationale	29/1/19 Large proportion of leaving members affected but business case has been put forward to increase resources. In the meantime, temporary resources are being requested to assist.  3/6/19 Reassessed - Cases in breach now drastically reduced so moved from amber to green. But will review in next quarter.  14/8/19 Reassessed - Still minor breach but all reasonable actions have been taken.  15/11/19 Reassessed - Still green whilst progress is maintained.  30/01/2020 - Higher numbers completed and maintained the 6% breach percentage through streamlined procedure, so retain green.
Reported to tPR	No

Ref A11		Date entered in register		29/05/2019
<b>Status</b> Open		Date breached closed (if relevant	)	
Title of Breach	Scheme Chang	ges Disclosure	Owner	KAM
Party which caused	the breach	CPF		
Description and cause	se of breach	Amendment Regulations disclosure was sent in error to members who was from last known address. This will hames and addresses would have those addresses.  Active members, status 2 (undecided)	vere categorised have resulted in a been visible to pe	as "gone away" I data breach as ople now living at
Category arrected		members who are shown as "gone		deletted
Numbers affected		921 members impacted	,	
Possible effect and vimplications		<ul> <li>Personal Details available to view</li> <li>May result in complaints</li> <li>Potential that same issue could or "gone away" status is not checked.</li> <li>Followed Data Breach procedure</li> </ul>		
Actions taken to rect	my breach	14/8/19     Increased staff awareness / trainir     Process put in place to ensure fut exclude this Category or are automated.	ure mail shots to a	all members
Outstanding actions	, í	-Still being considered by FCC to er adequate 14/11/19 Contact FCC to find out if	any further action	s are required.
Assessment of bread summary of rationals		Large number of members impacted than name included in communication 14/11/19 Maintain as green as no full 30/1/2020 No change to above assets.	ons so low impacurther action notifi	t.
Reported to tPR		No		

Ref	A12		Date entered in register		29/05/2019
Status	Open		Date breached closed (if relevant	:)	
Title of Breach APC calculation		APC calculation	n due to revised factors	Owner	SB/JT

Party which caused the breach	CPF
Description and cause of breach	Recalculation of APC contracts due to GAD factor change not communicated within required timescales
Category affected	Active members with APC contracts
Numbers affected	<10 members 14/11/19 Now confirmed as only 1 member affected.
Possible effect and wider implications	<ul> <li>Late notification to members of change to APC contracts / recalculation of benefits</li> <li>May result in complaints</li> </ul>
Actions taken to rectify breach	- Re-calculation of APC contracts underway with explanation to those affected by the change. 14/11/19 Initial work completed and determined only 1 member requires a recalculation.
Outstanding actions (if any)	Re-calculation and notification to members required
Assessment of breach and brief summary of rationale	Low number of cases impacted and remedial action likely to be complete by 30 June 2019 14/8/19 Reasessed - Low number of cases however remedial action delayed due to other workloads by 31 October 2019. 14/11/19 Reassessed - remain green as only 1 member is affected. 30/1/2020 No change to above assessment.
Reported to tPR	No

Ref	A13		Date entered in register		14/11/2019
Status	Open		Date breached closed (if relevant)		
Title of Br	each	Late transfer of	ut estimate	Owner	JT/KCW
Party which	ch caused t	he breach	CPF		
Description and cause of breach		se of breach	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.  Late completion of calculation and notification by CPF due to higher number of cases, plus additional pressure to complete aggregation project by end of Q3 and incorporation of tasks from data improvement plan.		
<b>Category</b> a	affected		Active and deferred members		
Numbers	affected		2019/20 - Q2 - 3 members in breacl Q3 - 86 cases completed / 0% were		
Possible e implicatio	ssible effect and wider plications		<ul> <li>Potential financial implications on some scheme members.</li> <li>Potential complaints from members/new schemes.</li> <li>Potential for impact on CPF reputation.</li> </ul>		
Actions taken to rectify breach		ify breach	14/11/19 - Better prioritisation of workload and any additional tasks that are not KPI driven		
Outstanding actions (if any)		(if any)	None		
, 100000mi	ent of breac of rationale		14/11/19 As only a small number of considered minimal 30/1/2020 Retained on log to ensure quarter.		
Reported	to tPR		No		

Ref	A14		Date entered in register		01/12/2019
Status	Closed		Date breached closed (if relevant	t)	09/12/2019
Title of Breach Late AVC payr		Late AVC payr	nent schedules	Owner	SB
Party which caused the breach		the breach	FCC		

Description and cause of breach	AVC schedules were not sent to the AVC provider, Prudential, by FCC which meant Prudential did not know which AVC amounts to allocate to which members' accounts. FCC Payroll Manager confirmed in an email 05/12/2019 that AVC credits for August to October had not been allocated to members' accounts as schedules had not been provided to Prudential. August had been delayed due to a remittance discrepancy, September was submitted on time and October was delayed (no reason provided). FCC and Prudential were aware of the problem but this was not communicated to CPF until Dec 2019.
Category affected	Active members including 3 who have since left/retired.
Numbers affected	Approximately 104 active scheme members including 3 who have since left/retired.
Possible effect and wider implications	- Active members who were retiring were not being given their full AVC fund value as part of their retirement figures. This meant that when the AVCs for these months were allocated to their AVC account, they had already retired and received their pension and lump sum. The member who had already received their AVC benefits instead had to have a refund of these AVC contributions and they did not form a part of their pension benefits.  - Potential for all active members to have lost potential investment income (but this was resolved so it was not the case).
Actions taken to rectify breach	30/1/2020 CPF meetings with FCC Payroll to understand the problem. Missing schedules have now been sent by FCC to Prudential. CPF gave feedback to both FCC and Pru about not being communicated with them when the issue originally arose. All members had their AVCs deposited at original payment date (so no financial detriment). A refund of the relevant AVCs was paid to the one scheme member who had already retired. Procudures have been put in place by both FCC and Prudential to ensure the issue does not arise again and they have confirmed CPF would be notified immediately in the future.
Outstanding actions (if any)	None
Assessment of breach and brief	30/1/2020 Minimal amount of members affected and problem now
summary of rationale	resolved.
Reported to tPR	No