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| <b>Ref</b>                                    | A1  | <b>Date entered in register</b>           | 19/09/2017 |
| <b>Status</b>                                 | Open  | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                        | Late notification of joining  | <b>Owner</b>                              | SB/JT      |
| <b>Party which caused the breach</b>          | CPF + various employers   |   |            |
| <b>Description and cause of breach</b>        | <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> |   |            |
| <b>Category affected</b>                      | Active members  |   |            |
| <b>Numbers affected</b>                       | <p>2017/18: 2676 cases completed / 76% (2046) were in breach.<br/> 2018/19: 3855 cases completed / 66% (2551) were in breach.<br/> 2019/20:<br/> - Q1 - 822 cases completed / 62% (507) were in breach<br/> - Q2 - 750 cases completed / 46% (380) were in breach<br/> - Q3 - 1086 cases completed / 55% (603) were in breach<br/> - Q4 - 705 cases completed / 29% (207) were in breach<br/> 2020/21<br/> -Q1 - 442 cases completed / 55% (245) were in breach<br/> -Q2 - 1430 cases completed / 56% (799) were in breach<br/> -Q3 - 1329 cases completed / 29% (386) were in breach</p>   |   |            |
| <b>Possible effect and wider implications</b> | <ul style="list-style-type: none"> <li>- Late scheme information sent to member which may result in lack of understanding.</li> <li>- Potential complaints from members.</li> <li>- Potential for impact on CPF reputation.</li> </ul>  |   |            |

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| <b>Actions taken to rectify breach</b>                     | <ul style="list-style-type: none"> <li>- Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of new joiners (ongoing).</li> <li>- Set up of Employer Liaison Team (ELT) to monitor and provide joiner details more timelessly.</li> <li>- Training of new team members to raise awareness of importance of time restraint.</li> <li>- Prioritising of task allocation. KPIs shared with team members to further raise awareness of importance of timely completion of task.</li> <li>- 6/6/18 - Updating KPI monitoring to understand employers not sending information in time.</li> <li>3/6/19 - Review of staff resources now complete and new posts filled.</li> <li>14/8/19</li> <li>-Streamlining of aggregation cases with major employers.</li> <li>- Consider feasibility and implications of removing reminders for joining pack (agreed not to change).</li> <li>- Consider feasibility of whether tasks can be prioritised by date of joining (agreed not to change).</li> <li>14/11/19 - Utilising FCC trainees to assist with this procedure. Joined early September.</li> <li>30/01/2020 - backlog completed and addressed older case work.</li> <li>25/09/2020 - Appointed and training new members of staff</li> <li>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.</li> <li>02/02/2021 - Training now complete. Expecting further reductions in next quarter results as staff members become more efficient.</li> </ul> |
| <b>Outstanding actions (if any)</b>                        | <ul style="list-style-type: none"> <li>- Ongoing roll out of i-Connect.</li> <li>28/1/19:</li> <li>- Introduce process to analyse specific employers causing problems.</li> <li>17/11/2020 - Training of new recruits to be completed this quarter.</li> </ul>   |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021 - Improvements have continued in Q3 and further improvements expected in Q4 as staff members become more efficient and confident. Number of cases that have breached remain too high to alter assessment of breach.   |
| <b>Reported to tPR</b>                                     | No   |

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| <b>Ref</b>                             | A2   | <b>Date entered in register</b>           | 19/09/2017 |
| <b>Status</b>                          | Open   | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                 | Late transfer in estimate  | <b>Owner</b>                              | JT         |
| <b>Party which caused the breach</b>   | CPF + various previous schemes   |   |            |
| <b>Description and cause of breach</b> | <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> |   |            |
| <b>Category affected</b>               | Active members   |   |            |

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| <b>Numbers affected</b>                                    | 2017/18: 235 cases completed / 36% (85) were in breach.<br>2018/19:213 cases completed / 45% (95) were in breach.<br>2019/20:<br>- Q1 - 51 cases completed / 59% (30) were in breach<br>- Q2 - 56 cases completed / 29% (16) were in breach<br>- Q3 - 53 cases completed / 21% (11) were in breach<br>- Q4 - 64 cases completed / 21% (14) were in breach<br>2020/21<br>-Q1- 59 cases completed / 19% (11) were in breach<br>-Q2- 54 cases completed / 35% (19) were in breach<br>-Q3- 56 cases completed / 29% (16) were in breach |
| <b>Possible effect and wider implications</b>              | - Potential financial implications on some scheme members.<br>- Potential complaints from members/previous schemes.<br>- Potential for impact on CPF reputation.  |
| <b>Actions taken to rectify breach</b>                     | 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.<br>02/02/2021 - Training to continue. Complex area of work so training taking longer to complete. Training will continue through Q4.   |
| <b>Outstanding actions (if any)</b>                        | - Completion of training of team members in transfer and aggregation processes.<br>29/1/19:<br>- If KPIs don't improve, investigate how much of the delay is due to external schemes and look for ways to improve this.   |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021- Although number of breaches have reduced, it remains too high to change the assessment level.   |
| <b>Reported to tPR</b>                                     | No  |

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| <b>Ref</b>                             | A4   | <b>Date entered in register</b>           | 19/09/2017 |
| <b>Status</b>                          | Open   | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                 | Late notification of retirement benefits   | <b>Owner</b>                              | SB         |
| <b>Party which caused the breach</b>   | CPF + various employers + AVC providers  |   |            |
| <b>Description and cause of breach</b> | 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.<br><br>Due to a combination of:<br>- late notification by employer of leaver information<br>- late completion of calculation by CPF<br>- for members who have AVC funds, delays in receipt of AVC fund values from AVC provider.   |   |            |
| <b>Category affected</b>               | Active members mainly but potentially some deferred members  |   |            |
| <b>Numbers affected</b>                | 2017/18: 960 cases completed / 39% (375) were in breach.<br>2018/19: 1343 cases completed / 30% (400) were in breach<br>2019/20:<br>- Q1 - 315 cases completed / 28% (87) were in breach<br>- Q2 - 411 cases completed / 24% (99) were in breach<br>- Q3 - 348 cases completed / 26% (93) were in breach<br>- Q4 - 256 cases completed / 18% (47) were in breach<br>2020/21<br>- Q1 - 214 cases completed in total / 37% (79) were in breach<br>- Q2 - 232 cases completed / 25% (59) were in breach<br>- Q3 - 331 cases completed / 19% (63) were in breach |   |            |

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| <b>Possible effect and wider implications</b>              | <ul style="list-style-type: none"> <li>- Late payment of benefits which may miss payroll deadlines and result in interest due on lump sums/pensions (additional cost to CPF).</li> <li>- Potential complaints from members/employers.</li> <li>- Potential for impact on CPF reputation.</li> </ul>  |
| <b>Actions taken to rectify breach</b>                     | <ul style="list-style-type: none"> <li>- Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of retirees (ongoing).</li> <li>- Set up of ELT to monitor and provide leaver details in a more timely manner.</li> <li>- Prioritising of task allocation.</li> <li>- Set up of new process with one AVC provider to access AVC fund information.</li> <li>- Increased staff resources.</li> </ul> <p>3/6/19 - Review of staff resources now complete and new posts filled.<br/> 14/8/19 - Improvements have been made and more should be made as staff are settled in and trained. Business case approved.<br/> 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.<br/> 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.<br/> 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.</p> |
| <b>Outstanding actions (if any)</b>                        | <ul style="list-style-type: none"> <li>- Further training of newly promoted team member to deal with volume of work.</li> <li>- Identifying which employers are causing delays.</li> </ul> <p>14/11/19 Continuation of training.<br/> 30/1/2020 Ongoing liaison with employers and rolling out monthly monitoring.</p>   |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021 Assessment level to remain as amber. New reports will help to identify if CPF or employer responsible for breach.   |
| <b>Reported to tPR</b>                                     | No   |

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| <b>Ref</b>                             | A6   | <b>Date entered in register</b>           | 20/09/2017 |
| <b>Status</b>                          | Open   | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                 | Late notification of death benefits  | <b>Owner</b>                              | SB         |
| <b>Party which caused the breach</b>   | CPF  |   |            |
| <b>Description and cause of breach</b> | <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> |   |            |
| <b>Category affected</b>               | Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant).  |   |            |

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| <b>Numbers affected</b>                                    | 2017/18: 153 cases completed / 58% (88) were in breach.<br>2018/19:184 cases completed / 30% (56) were in breach<br>2019/20:<br>- Q1 - 33 cases completed / 24% (8) were in breach<br>- Q2 - 41 cases completed / 34% (14) were in breach<br>- Q3 - 49 cases completed / 26% (13) were in breach<br>- Q4 - 42 cases completed / 28% (12) were in breach<br>2020/21<br>-Q1- 39 cases completed / 23% (9) were in breach<br>-Q2- 52 cases completed / 38% (20) were in breach<br>-Q3- 31 cases completed / 29% (9) were in breach |
| <b>Possible effect and wider implications</b>              | - Late payment of benefits which may miss payroll deadlines and result in interest due on lump sums/pensions (additional cost to CPF).<br>- Potential complaints from beneficiaries, particular given sensitivity of cases.<br>- Potential for impact on CPF reputation.  |
| <b>Actions taken to rectify breach</b>                     | - Further training of team<br>- Review of process to improve outcome<br>- Recruitment of additional, more experienced staff.<br>3/6/19 - Review of staff resources now complete and new posts filled.<br>3/2/20 - Training of additional staff now complete.  |
| <b>Outstanding actions (if any)</b>                        | 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.  |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021 - Number of breaches has reduced this quarter but unfortunately so had the number of completed cases. Further work required to identify where the delay falls e.g. request or receipt of information to facilitate the calculation of benefits.  |
| <b>Reported to tPR</b>                                     | No  |

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| <b>Ref</b>                             | A9   | <b>Date entered in register</b>           | 29/08/2018 |
| <b>Status</b>                          | Open   | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                 | Late notification of leaver rights and options   | <b>Owner</b>                              | SB/JT      |
| <b>Party which caused the breach</b>   | CPF + various employers  |   |            |
| <b>Description and cause of breach</b> | <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.<br/>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> |   |            |
| <b>Category affected</b>               | Active members   |   |            |

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| <b>Numbers affected</b>                                    | 2018/19: 3596 cases completed / 45% (1634) were in breach<br>2019/20:<br>- Q1 - 541 cases completed / 6% (34) were in breach<br>- Q2 - 391 cases completed / 6% (23) were in breach<br>- Q3 - 541 cases completed / 6% (36) were in breach<br>- Q4 - 306 cases completed / 3% (8) were in breach<br>2020/21<br>-Q1- 418 cases completed / 9% (37) were in breach<br>- Q2 -313 cases completed / 2% (6) were in breach<br>-Q3 - 311 cases completed / 1% (3) were in breach  |
| <b>Possible effect and wider implications</b>              | - Late notification of benefits/costs to member/employer.<br>- Potential complaints from members/employers.<br>- Potential for missed opportunities by members/employers.<br>- Potential for impact on CPF reputation.  |
| <b>Actions taken to rectify breach</b>                     | - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of leavers (ongoing).<br>- Set up of Employer Liaison Team (ELT) to monitor and provide leaver details in a more timely manner.<br>- Training of new team members to raise awareness of importance of time restraint.<br>- Prioritising of task allocation. KPIs shared with team members to further raise awareness of importance of timely completion of task.<br>- 6/6/18 - Updating KPI monitoring to understand employers not sending information in time.<br>3/6/19 - Review of staff resources now complete and new posts filled.<br>14/8/19<br>- Ongoing streamlining of aggregation cases with major employers.<br>- Consider feasibility of whether tasks can be prioritised by date of leaving (no action taken).<br>- Carrying out backlogs of previous leavers (most of which are due to i-Connect roll out). |
| <b>Outstanding actions (if any)</b>                        | - Ongoing roll out of i-Connect.<br>- Bedding in of new staff/ training.<br>- Contacting employers which are causing delays.<br>28/1/19:<br>- Introduce process to analyse specific employers causing problems.<br>3/2/21<br>'- Start providing monthly updates of problems with employers.   |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021 - Percentage of breach reduced again so will maintain as green.  |
| <b>Reported to tPR</b>                                     | No  |

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| <b>Ref</b>                             | A19   | <b>Date entered in register</b>           | 17/08/2020 |
| <b>Status</b>                          | Open  | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                 | TUPE process not followed correctly   | <b>Owner</b>                              | KW         |
| <b>Party which caused the breach</b>   | Employer  |   |            |
| <b>Description and cause of breach</b> | TUPE process not followed as employer unsure of procedures and didn't realise their responsibilities. |   |            |
| <b>Category affected</b>               | Active members  |   |            |
| <b>Numbers affected</b>                | 12 employees  |   |            |

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| <b>Possible effect and wider implications</b>              | Contributions may be being deducted by new employer even though not officially approved as a CPF employer.<br>Members may not be aware of situation (they possibly think they are in the CPF but our records do not reflect this).<br>Risk of reputational impact for employer and CPF.<br>Potential complaints from employees. |
| <b>Actions taken to rectify breach</b>                     | 17/11/2020 - Meeting held between originating employer, legal advisor, benefit advisor and members of CPF to resolve breach and devise action plan.   |
| <b>Outstanding actions (if any)</b>                        | 17/11/2020 Relevant process and forms to be completed by all parties to confirm membership in CPF, and pensions system to be updated reflecting correct membership.<br>02/02/2021 - Some actions remain outstanding. Reminder emails sent to employers.   |
| <b>Assessment of breach and brief summary of rationale</b> | 02/02/2021 - No changes to nature or detail of breach so assessment level remains the same.   |
| <b>Reported to tPR</b>                                     | No  |

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| <b>Ref</b>   | A20   | <b>Date entered in register</b>           | 03/02/2021 |
| <b>Status</b>  | Open  | <b>Date breached closed (if relevant)</b> |            |
| <b>Title of Breach</b>                                     | Members not entered into LGPS   | <b>Owner</b>                              | KW         |
| <b>Party which caused the breach</b>                       | Employer  |   |            |
| <b>Description and cause of breach</b>                     | 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.  |   |            |
| <b>Category affected</b>                                   | Active members  |   |            |
| <b>Numbers affected</b>                                    | Estimated approx 30 employees   |   |            |
| <b>Possible effect and wider implications</b>              | <ul style="list-style-type: none"> <li>- As a result the employees may have less valuable pension rights, and so LGPS membership will need to be applied retrospectively.</li> <li>- Unclear if the employees who opted out, would have also opted out of the LGPS.</li> <li>- LGPS Contributions will need to be collected from employer and employee/employer conts paid into Clwyd Pension Fund in relation to retrospective period.</li> <li>- Employer will need to liaise with Peoples' Pension to reverse membership there.</li> </ul> |   |            |
| <b>Actions taken to rectify breach</b>                     | 3/2/2021 - Liaising with employer to determine how best to put employees back in correct position.  |   |            |
| <b>Outstanding actions (if any)</b>                        | 3/2/2021 - Detailed plan of specific actions and communications being developed.  |   |            |
| <b>Assessment of breach and brief summary of rationale</b> | 3/2/2021 - Small number of employees affected and still clarifying wider implications.  |   |            |
| <b>Reported to tPR</b>                                     | No  |   |            |

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| <b>Ref</b>                           | F35   | <b>Date entered in register</b>           | 31 Jul 2020 |
| <b>Status</b>                        | Closed  | <b>Date breached closed (if relevant)</b> | 18 Nov 2020 |
| <b>Title of Breach</b>               | No submission of contribution remittance advice | <b>Owner</b>                              | DF          |
| <b>Party which caused the breach</b> | Hafan Deg<br>(K L Care Ltd)                     |   |             |

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| <b>Description and cause of breach</b>        | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made.<br><br>Contributions relating to June and July 2020 were received late but no remittance advices were received. August remittance is still outstanding. |
| <b>Category affected</b>                      | Active members and employer   |
| <b>Numbers affected</b>                       | 2 active members  |
| <b>Possible effect and wider implications</b> | Unable to verify information being paid or reconcile with member year end information.  |
| <b>Actions taken to rectify breach</b>        | 31/07/2020 - Emailed employer to request remittance. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.  |
| <b>Outstanding actions (if any)</b>           |   |
| <b>Assessment of breach and brief</b>         | 18/11/20 - outstanding remittances received.  |
| <b>Reported to tPR</b>                        | No  |

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| <b>Ref</b>                                    | F36  | <b>Date entered in register</b>           | 23 Sep 2020 |
| <b>Status</b>                                 | Closed   | <b>Date breached closed (if relevant)</b> | 18 Nov 2020 |
| <b>Title of Breach</b>                        | No submission of contribution remittance advice  | <b>Owner</b>                              | DF          |
| <b>Party which caused the breach</b>          | Hafan Deg<br>(K L Care Ltd)  |   |             |
| <b>Description and cause of breach</b>        | A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made.<br><br>Contributions relating to August 2020 were received within the legal timescale but no remittance advice was received. September remittance is still outstanding.<br>Previous Breach F35 |   |             |
| <b>Category affected</b>                      | Active members and employer  |   |             |
| <b>Numbers affected</b>                       | 2 active members   |   |             |
| <b>Possible effect and wider implications</b> | Unable to verify information being paid or reconcile with member year end information.   |   |             |
| <b>Actions taken to rectify breach</b>        | 17/11/2020 - Emailed employer to request remittance. Escalated to Deputy Head of Pension Fund to continue dialogue in relation to this and other outstanding breaches.   |   |             |
| <b>Outstanding actions (if any)</b>           |  |   |             |
| <b>Assessment of breach and brief</b>         | 18/11/20 - outstanding remittances received.   |   |             |
| <b>Reported to tPR</b>                        | No   |   |             |

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| <b>Ref</b>                             | F38  | <b>Date entered in register</b>           | 21 Jan 2021 |
| <b>Status</b>                          | Open   | <b>Date breached closed (if relevant)</b> |             |
| <b>Title of Breach</b>                 | Late payment of contributions  | <b>Owner</b>                              | DF          |
| <b>Party which caused the breach</b>   | Hafan Deg<br>(K L Care Ltd)  |   |             |
| <b>Description and cause of breach</b> | Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions.<br><br>Contributions in relation to November and December 2020 were not received within the deadline.<br>Previous Breach F37 |   |             |
| <b>Category affected</b>               | Active members and employer  |   |             |
| <b>Numbers affected</b>                | 2 active members   |   |             |

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| <b>Possible effect and wider implications</b>              | - Could expose employers to late payment interest charge.<br>- Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer. |
| <b>Actions taken to rectify breach</b>                     | - 21/01/21 emailed Employer to request payment   |
| <b>Outstanding actions (if any)</b>                        | Continue to try and make contact with the employer   |
| <b>Assessment of breach and brief summary of rationale</b> | Whilst October payment was received on time, November and December are still outstanding with no response to the email requesting payment  |
| <b>Reported to tPR</b>                                     | No   |