| Ref | A1 | | Date entered in register | 19/09/2017 |
|-----------------------|-------------|---|---|---|
| | Status Open | | Date breached closed (if relevant) | 10/00/2011 |
| Title of Br | - | Late notification | , | SB/AR |
| | | | CPF + various employers | <i>02/11</i> t |
| | | Requirement to send a Notification of Joining the LGPS to a scheme member within 2 in from date of joining (assuming notification received from the employer), or within 1 more receiving jobholder information where the individual is being automatically enrolled / reenrolled. Due to a combination of late notification from employers and untimely action by CPF the requirement was not met. 20/11/18 - (Q2) Staff turnover in August/September reduce number actioned. 29/1/19 The introduction of I-connect is also producing large backlog the point of implementation for each employer. I-connect submission timescales can a leave only a few days for CPF to meet the legal timescale. 14/8/19 General data clean including year-end is affecting whether legal timescale is met. Individual on long-terms impacting this. 14/2/22 Previous issues no longer relevant. Current situation is purely magnitude of cases being received and potentially employer delays. 31/10/2022 Staff redoing this process had internal secondment, so vacancy now needs to be filled, and the trained. 10/3/2023 New staff member is now being trained so will continue to have impuntil fully up to speed. 20/02/2024 Additional positions within this area approved at Aug Committee. Recruitment drive completed and new staff members started early Februar Breach expected to continue until new staff are fully up to speed. | | by CPF the legal or reduced ree backlogs at cales can also data cleansing long-term sick is purely due to 022 Staff member ed, and then o have impact ved at August |
| Category | affected | | Active members | |
| Numbers | | | 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 -Q3 - 1234 cases completed / 8% (99) were in breach -Q4 - 695 cases completed / 7% (50) were in breach | |
| Possible e implicatio | | wider | Late scheme information sent to members which may result in lack of under Potential complaints from members. Potential for there to be an impact on CPF reputation. | erstanding. |

| Actions taken to rectify breach | - 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. |
| | 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. |
| | 6/02/2024 Appointments made in December with start dates early February. Improvements |
| | expected once training complete 24/5/2024 New staff members now in post and training |
| | nearing completion. Improvements expected in next quarter. |
| Outstanding actions (if and | 20/05/20 Analysis navy ampleyer reports and appelete to individual ampleyers if required |
| Outstanding actions (if any) | 22/05/22 - Analyse new employer reports and escalate to individual employers if required. |
| Assessment of breach and brief | 24/5/2024 - Number in breach has reduced slightly but so has the number requiring |
| summary of rationale | completion. Assessment of breach to remain Amber until improvements are made. |
| Reported to tPR | No |

| Ref | A2 | | Date entered in register | 19/09/2017 |
|--|----------|------------------|---|------------|
| Status Open | | | Date breached closed (if relevant) | |
| Title of Bre | each | Late transfer in | n estimate Owner | AR |
| Party which | h caused | the breach | CPF + various previous schemes | |
| Party which caused the breach Description and cause of breach Requirement to obtain transfer details for transfer in, and calculate and provide member 2 months from the date of request. Breach due to late receipt of transfer information from previous scheme and la calculation and notification by CPF. Only 2 members of team fully trained to cases due to new team structure and additional training requirements. 29/1/19 changes to transfer factors meant cases were put on hold / stockpiled end of 2 2019. 31/10/2022 New regulatory requirements have resulted in additional steps hav which makes process longer and more complex. 10/11/2023 Due to awaiting new GAD guidance, there was a pause in process months to November 2023. 6/02/2024 Following on from receipt of GAD guidance, further software update | | | ate completion of carry out transfer 19 National 2018 / early wing to be taken, essing for a few | |
| 0.1 | • | | | |
| Category a | | | Active members | |
| Numbers a | affected | | 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 -Q3 - 52 cases completed / 54% (28) were in breach -Q4 - 95 cases completed / 77% (73) were in breach | |

| Possible effect and wider | - Potential financial implications on some scheme members. | |
|---------------------------------|--|--|
| implications | - Potential imancial implications on some scheme members Potential complaints from members/previous schemes. | |
| | - Potential for impact on CPF reputation. | |
| | | |
| Actions taken to rectify breach | 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. | |
| | 02/02/2021 - Training to continue. Complex area of work so training taking longer to | |
| | complete. Training will continue through Q4. | |
| | 21/05/2021 - Staff members attended external training course. | |
| | 08/03/2022 - Have investigated how much of the delay is due to external schemes. | |
| | 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. | |
| | 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. | |
| | 31/10/2022 - A review of this process is being undertaken as additional steps are now | |
| | required. | |
| | 03/03/2023 - Process has been reviewed and improvements expected in the next quarter | |
| | results. | |
| | 24/05/2023 - Completed training for required staff members | |
| | 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. | |
| | 10/11/2023 - Staff continuing to work through backlog following the pause in processing whilst | |
| | awaiting GAD guidance. | |
| | 6/02/2024 - Some transfers still on hold whilst awaiting software update following release of | |
| | guidance. Staff working through backlog of transfers that can be processed. Breach likely to | |
| | remain until all information received from outgoing pension providers. | |
| | 24/05/2024 - Some transfers continue to be on hold whilst awaiting further guidance. Staff | |
| | continue to work through backlog of transfers that can now be processed. Breach likely to | |
| | remain until all transfers can be processed and all information received from outgoing pension | |
| | provider. | |
| Outstanding setions (if such | 07/06/2024 implement new activers undeten when they are received | |
| Outstanding actions (if any) | 07/06/2024 - implement new software updates when they are received | |
| Assessment of breach and brief | 24/5/2024 - More cases have been completed due to guidance and information from outgoing | |
| summary of rationale | funds being received for a number of transfer types that were previously on hold. As the | |
| | breaches relate to historical cases and due to the temporary nature of the backlog, the | |
| | assessment of the breach will remain Amber. | |
| Reported to tPR | No | |

| Ref | A4 | | Date entered in register | | 19/09/2017 |
|--|--------------------|-------------------|--|--|---|
| Status | Status Open | | Date breached closed (if relevant) | | |
| Title of B | reach | Late notification | n of retirement benefits | Owner | SB |
| Party whi | ich caused | the breach | CPF + various employers + AVC providers | | |
| Title of Breach Late notification Party which caused the breach | | ise of breach | Requirement to provide notification of amount of retirement be of retirement if on or after Normal Pension Age or 2 months formal Pension Age. Due to a combination of: - late notification by employer of leaver information - late completion of calculation by CPF - for members who have AVC funds, delays in receipt of AVC - temporary large increases in work due to retrospective pay 31/10/2022 Also seeing general increase in number of retirer 20/02/2024 Previous vacancies within this area now filled. Bronew staff are fully up to speed. | rom date of retire fund values from award recalculati ments. | ement if before n AVC provider. ons |
| Category | affected | | Active members mainly but potentially some deferred member | ers | |

| NI 1 60 1 | 0047/40, 000 |
|----------------------------------|--|
| Numbers affected | 2017/18: 960 cases completed / 39% (375) were in breach. |
| | 2018/19: 1343 cases completed / 30% (400) were in breach |
| | 2019/20: 1330 cases completed / 25% (326) were in breach |
| | 2020/21: 1127 cases completed / 24% (269) were in breach |
| | 2021/22; 1534 cases completed / 14% (222) were in breach |
| | 2022/23 |
| | |
| | -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 |
| | 2023/24 |
| | -Q1- 370 cases completed / 12% (43) were in breach |
| | -Q2 - 478 cases completed / 13% (62) were in breach |
| | -Q3 - 434 cases completed / 18% (80) were in breach |
| | , , |
| | -Q4 - 456 cases completed / 15% (68) were in breach |
| Possible effect and wider | - Late payment of benefits which may miss payroll deadlines and result in interest due on |
| implications | lump sums/pensions (additional cost to CPF). |
| implications | , , |
| | - Potential complaints from members/employers. |
| | - Potential for there to be an impact on CPF reputation. |
| Actions taken to rectify 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 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. |
| | |
| | Actions prior to 2023 not shown, but recorded on the breaches log. |
| | 03/03/2023 - New staff have been appointed but will not be fully trained for a number of |
| | months. |
| | 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. |
| | 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. |
| | 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. |
| | 6/02/2024 - Training of new recruits is progressing well. Time taken to train and annual leave |
| | due to holiday season has impacted on the number of cases in breach this quarter. |
| | Improvements expected as training nears completion. |
| | 24/5/2024 - Number of cases completed has increased and the number in breach has |
| | reduced. Continued improvement expected in this area. |
| | reduced. Continued improvement expedied in this area. |
| | |
| | |
| | |
| Outstanding actions (if any) | 22/05/22 - Analyse new employer reports and escalate to individual employers if required. |
| Catotalianing dollorio (il dily) | Complete all recalculations so all appropriate staff can focus on retirements. |
| | |
| | 10/3/2023 - Training of new staff to be able to carry out retirements. |
| | 24/05/2023 - Transfer non KPI/ad hoc cases of work to project team. |
| Assessment of breach and brief | 24/05/2024 - Training continues and improvement is as expected but the number in breach |
| summary of rationale | still too high to reduce assessment. |
| Reported to tPR | No |
| reported to trit | |

| Ref | A6 | | Date entered in register | | 20/09/2017 |
|-----------------------------------|------|-------------------|------------------------------------|-------|------------|
| Status | Open | | Date breached closed (if relevant) | | |
| Title of Breach Late notification | | Late notification | n of death benefits | Owner | SB |
| Party which caused the breach CPF | | | | | |

| 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 complete the task. |
| | 31/10/2022 More staff now trained on deaths but they are impacted due to increases in other workloads. |
| | 20/02/2024 Training taking longer than expected due to complexity of cases and staff members are also training other members of staff in different areas. |
| | |
| Category affected | Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant). |
| Numbers offeeted | · · · · · |
| Numbers affected | 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 |
| | -Q3 - 53 cases completed / 26% (14) were in breach |
| | -Q4 - 42 cases completed / 29% (12) were in breach |
| | |
| Possible effect and wider | - Late payment of benefits which may miss payroll deadlines and result in interest due on |
| implications | 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 | - Further training of team |
| | - Review of process to improve outcome |
| | - Recruitment of additional, more experienced staff. |
| | 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. |
| | 24/5/2024 - Improvement are still expected due to the training of additional staff in this area. |
| | Breaches will continue to occur if the Fund is notified late within the 2 month period. Internal |
| | processing times suggest this to be the case. |
| | |
| Outstanding actions (if any) | 10/3/23 Ensure all training continues as quickly as possible to free up people to refocus on |
| J, | 110/3/23 Ensure all training continues as quickly as possible to free up beoble to relocus on |
| | death cases. |
| Assessment of breach and brief | |
| Assessment of breach and brief summary of rationale | death cases. |

| Ref | ef A26 | | Date entered in register | | 10/11/2023 |
|----------------------------------|-------------------------------|-----------------|------------------------------------|-------|------------|
| Status | Open | | Date breached closed (if relevant) | | |
| Title of Breach Late transfer of | | Late transfer o | ut estimate | Owner | AR |
| Party which | Party which caused the breach | | CPF | | |

| Description and cause 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 awaiting new GAD guidance (which resulted in a pause in processing for a few months to November 2023). | | |
|---|--|--|--|
| Category affected | Active and deferred members | | |
| Numbers affected | 2023/24 -Q2 - 103 cases completed / 32% (33) were in breach -Q3 - 72 cases completed / 19% (14) were in breach -Q4 - 88 cases completed / 51% (45) were in breach | | |
| Possible effect and wider implications | Potential financial implications on some scheme members. Potential complaints from members/new schemes. Potential for impact on CPF reputation. | | |
| 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. 24/05/2024 - Staff continue to work through backlog of cases following transfers being on hold. As more transfers are able to be completed the number in breach will continue to increase until all backlog cases have been completed. Staff members within relevant team are prioritising what can be done to reduce number of future backlogs. | | |
| Outstanding actions (if any) | None | | |
| Assessment of breach and brief summary of rationale | 24/05/2024 - Not all transfer types can be completed but work continues to process as many transfer cases as possible. As this is temporary and given the number in breach is impacted by the increase of numbers being completed that were previously on hold the breach will remain Amber until the backlog of cases on hold is completed. | | |
| Reported to tPR | No | | |

| 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 | ch caused | the breach | Marchwiel Community Council | | |
| | | | 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 6 | effect and v | wider | Unable to verify information being paid or reconcile with member year end information. | | |
| Actions ta | iken to rec | tify breach | 21/06/2023 - Emailed to request outstanding remittances. No See subsequent actions F112-F117,F119,F124 | response receiv | red. |
| Outstandi | ng actions | (if any) | See F124 | | |
| 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 | | |

| Ref | F112 | | Date entered in register | | 23 Jun 2023 |
|---------------------------------|------------|---------------|---|-------|-------------|
| Status | Open | | Date breached closed (if relevant) | | |
| Title of Breach No submission | | No submissior | of contribution remittance advice | Owner | DF |
| Party wh | ich caused | the breach | Marchwiel 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 | | 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 Marchwiel CC. Chair confirmed the Clerk had been contacted. |
|---|---|
| | See subsequent actions F113-F117,F119,F124 |
| Outstanding actions (if any) | See F124 |
| 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 |

| Ref | F113 | | Date entered in register | | 01 Aug 2023 | |
|---|-------------|-------------|--|-----------------------------------|----------------|--|
| Status | Open | | Date breached closed (if relevant) | ate breached closed (if relevant) | | |
| Title of Breach No submission | | | of contribution remittance advice | Owner | DF | |
| Party which | ch caused | the breach | Marchwiel 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 ta | aken to rec | tify breach | See subsequent actions F114-F117,F119,F124 | | | |
| Outstandi | ing actions | s (if any) | See F124 | | | |
| Assessment of breach and brief Amber - Multiple | | | Amber - Multiple unresolved missing remittances with risk of | recurrence, howe | ever effect is | |
| summary of rationale limited to a single employer and single active member. Fund is aware of circumstance wider implications are unlikely. | | | mstances and | | | |
| Reported | to tPR | | No | | | |

| Ref | F114 | Date entered in register | | 23 Aug 2023 | |
|--|-------------------------------------|---|--|-------------|--|
| Status | Open | Date breached closed (if relevant) | | | |
| Title of B | reach No subm | ission of contribution remittance advice | Owner | DF | |
| Party whi | ch caused the brea | ch Marchwiel Community Council | | | |
| Description and cause of breach A remittance advice detailing information in relation to contribution payments should 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. Problem of the payment is made. | | | | | |
| Category | affected | Active members and employer | | | |
| Numbers | umbers affected 1 active member | | | | |
| Possible | effect and wider | Unable to verify information being paid or reconcile with mem | Unable to verify information being paid or reconcile with member year end information. | | |
| Actions to | aken to rectify brea | tify 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-F117,F119,F124 | | | |
| Outstand | ing actions (if any) | See F124 | | | |
| | ent of breach and book 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 | | | |

| Ref F115 | | | Date entered in register | | 26 Sep 2023 |
|-------------------------------|--|---------------|------------------------------------|-------|-------------|
| Status Open | | | Date breached closed (if relevant) | | |
| Title of Breach No submission | | No submission | of contribution remittance advice | Owner | DF |
| Party which caused the breach | | | Marchwiel 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-F117,F119,F124 |
| Outstanding actions (if any) | See F124 |
| Assessment of breach and brief | Amber - Multiple unresolved missing remittances with risk of recurrence, however effect is |
| summary of rationale | limited to a single employer and single active member. Fund is aware of circumstances and |
| | wider implications are unlikely. |
| Reported to tPR | No |

| Ref | F116 | | Date entered in register | | 22 Oct 2023 |
|--|---|------------|--|--------------------|-------------|
| Status | Open | | Date breached closed (if relevant) | | |
| Title of Breach No submissio | | | of contribution remittance advice | Owner | DF |
| Party whi | ch caused | the breach | Marchwiel Community Council | | |
| Description and cause of breach A remittance advice detailing information in submitted to CPF at the same point as the p The remittance advice relating to Septembe | | | A remittance advice detailing information in relation to contribute submitted to CPF at the same point as the payment is made. The remittance advice relating to September 2023 was not reprevious breaches in 2023/24 are F110, F112, F113, F114, Inc. | eceived within th | |
| Category | Category affected Active members and employer | | | | |
| Numbers | | | 1 active member | | |
| Possible | effect and | wider | Unable to verify information being paid or reconcile with men | nber year end info | ormation. |
| Actions taken to rectify breach 06/11/2023 - Escalated to Debbie Fielder as Deputy Head of Fund. Emailed to requoutstanding remittances. Response received 09/11/2023. 09/11/2023 - DF replied, requesting outstanding remittances. See subsequent actions F117,F119,F124 | | | o request | | |
| Outstand | ing actions | s (if any) | See F124 | | |
| Assessment of breach and brief summary of rationale limited to a single employer and single active member. Fund is aware of circumstance wider implications are unlikely. | | | | | |
| Reported | to tPR | | No | | |

| Ref | F117 | | Date entered in register | | 23 Nov 2023 |
|--|--|---------------|--|--------------------|-------------|
| Status | Open | | Date breached closed (if relevant) | | |
| Title of Breach No submissio | | No submissior | of contribution remittance advice | Owner | DF |
| Party whi | ch caused | the breach | Marchwiel Community Council | | |
| Description | A remittance advice detailing information in relation to contribution payments submitted to CPF at the same point as the payment is made. The remittance advice relating to October 2023 was not received within the or Previous breaches in 2023/24 are F110, F112, F113, F114, F115, F116 | | | eived within the d | |
| 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 to | Actions taken to rectify breach See F119,F124 | | | | |
| Outstanding actions (if any) See F124 | | | | | |
| Assessment of breach and brief See F124. | | | | | |
| Reported | to tPR | | No | | |

| Ref | F118 | Date entered in register | 04 Jan 2024 |
|--------|--------|------------------------------------|-------------|
| Status | Closed | Date breached closed (if relevant) | 08 Feb 2024 |

| Title of Breach | No submissior | of contribution remittance advice | Owner | DF |
|---|---------------|--|--------------------|-----------|
| Party which caused | the breach | Home Farm Trust (HFT) | | |
| Description and cau | | A remittance advice detailing information in relation to contril submitted to CPF at the same point as the payment is made. The remittance advice relating to November 2023 was not re- | | |
| | | are no previous breaches in 2023/24. | | |
| Category affected | | Active members and employer | | |
| Numbers affected | | 19 active members | | |
| Possible effect and | wider | Unable to verify information being paid or reconcile with men | nber year end info | ormation. |
| Actions taken to rectify breach Emailed to request outstanding remittance. Response received, delay due to staffing changes. See F121. | | | staffing | |
| Outstanding actions | s (if any) | | | |
| Assessment of breach and brief Remittance received 08/02/2024 | | | | |
| Reported to tPR | | No | | |

| Ref | F119 | | Date entered in register | | 04 Jan 2024 |
|--|------------|---------------|--|------------------------------------|-------------|
| Status | Open | | Date breached closed (if relevant) | Date breached closed (if relevant) | |
| Title of Breach No submissio | | No submissior | of contribution remittance advice | Owner | DF |
| Party whi | ch caused | the breach | Marchwiel Community Council | | |
| Description | on and cau | | A remittance advice detailing information in relation to contribute submitted to CPF at the same point as the payment is made. The remittance advice relating to November 2023 was not reprevious breaches in 2023/24 are F110, F112, F113, F114, | eceived within the | e deadline. |
| 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 F124 | | | _ | | |
| Outstanding actions (if any) | | s (if any) | See F124 | | |
| Assessment of breach and brief See F124. | | | | | |
| Reported to tPR | | | No | | |

| Ref | F120 | Date entered in register | | 04 Jan 2024 |
|-------------|--|--|-----------------------------|-------------------|
| Status | Open | Date breached closed (if relevant) | | |
| Title of Br | each Late payment | of contributions | Owner | DF |
| Party which | ch caused the breach | Marchwiel Community Council | | |
| Description | on and cause of breach | Contributions must be paid by the 22nd (if BACs) or 19th (if of | cheque) of the mo | onth following |
| | | the deductions. | | |
| | | | | |
| | | Contributions in relation to November 2023 were not received | d within the dead | line. No previous |
| | | breaches of this type, but outstanding remittances ongoing (s | see F119). | |
| Category | affected | Active members and employer | | |
| Numbers | affected | 1 active member | | |
| Possible 6 | effect and wider | Could expose employers to late payment interest charge. | | |
| implicatio | ns | - Assumptions regarding funding assume regular monthly payment; not adhering to this | | |
| | | regulatory requirement could result in changed actuarial assu | umptions for the ϵ | employer. |
| Actions ta | aken to rectify breach | See F125 | | |
| Outstandi | ing actions (if any) | See F125 | | |
| Assessme | ent of breach and brief | Amber - No previous late payments, however several breach | es outstanding re | elate to missed |
| summary | of rationale | remittances. Effect is limited to a single employer and single | active member. F | Fund is aware of |
| | circumstances and wider implications are unlikely. Evidence of action being taken to r | | | ken to rectify. |
| | | | | |
| Reported | to tPR | No | | |

| Ref F121 | | | Date entered in register | | 23 Jan 2024 |
|-------------------------------|---|---------------|------------------------------------|-------|-------------|
| Status Closed | | | Date breached closed (if relevant) | | 08 Feb 2024 |
| Title of Breach No submission | | No submission | of contribution remittance advice | Owner | DF |
| Party which | Party which caused the breach Home Farm Trust (HFT) | | | | |

| | 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 December 2023 was not received within the deadline. Previous breach in 2023/4 is F118. |
| Category affected | Active members and employer |
| Numbers affected | 19 active members |
| Possible effect and wider | Unable to verify information being paid or reconcile with member year end information. |
| Actions taken to rectify breach | 22/01/24 - Emailed to request outstanding remittance. 07/02/24 - Emailed reminder. Response received advising that both outstanding remittances will be sent today. |
| Outstanding actions (if any) | |
| Assessment of breach and brief | Remittance received 08/02/2024 |
| Reported to tPR | No |

| Ref | F122 | | Date entered in register | | 23 Jan 2024 |
|--|---|-----------------------------------|--|----|-------------|
| Status | Closed | | Date breached closed (if relevant) | | 30 Jan 2024 |
| Title of Breach No submission of contribution remittance a | | of contribution remittance advice | Owner | DF | |
| Party which caused the breach | | | Offa Community Council | | |
| Description | on and cau | | 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 December 2023 was not received within the deadline. No previous breaches. | | |
| Category | Category affected Active members and employer | | | | |
| Numbers | affected | | 3 active members | | |
| Possible | effect and | wider | Unable to verify information being paid or reconcile with member year end information. | | |
| Actions to | aken to rec | tify breach | Emailed to request outstanding remittance. Response received, explaining clerk has left employment. 30/01/2024 - Remittance received. | | |
| Outstand | ing actions | s (if any) | | | |
| Assessm | ent of brea | ch and brief | Remittance received 30/01/24 | | |
| Reported | to tPR No | | | | |

| Ref | F123 | Date entered in register | | 23 Jan 2024 |
|------------------------------|-------------------------|--|-------|-------------|
| Status | Closed | Date breached closed (if relevant) 07 Feb | | 07 Feb 2024 |
| Title of Breach Late payment | | of contributions | Owner | DF |
| Party whi | ch caused the breach | Offa Community Council | | |
| Description | | Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions. Contributions in relation to December 2023 were not received within the deadline. No previous breaches. | | |
| Category | affected | Active members and employer | | |
| Numbers | affected | 3 active members | | |
| Possible (implication | effect and wider ons | 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. | | |
| Actions to | aken to rectify breach | Emailed to request outstanding remittance. Response received, explaining clerk has left employment. Locum confirmed will raise a cheque ASAP. 07/02/2024 - Payment received. | | |
| Outstand | ing actions (if any) | | | |
| Assessme | ent of breach and brief | Payment received 07/02/24 | | |
| Reported | to tPR | No | | |

| Ref | F124 | Date entered in register | 23 Jan 2024 |
|--------|------|------------------------------------|-------------|
| Status | Open | Date breached closed (if relevant) | |

| Title of Breach | No submissior | of contribution remittance advice | Owner | DF | |
|---|---|--|-------|-----------|--|
| Party which caused the breach | | Marchwiel 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 December 2023 was not received within the deadline. Previous breaches in 2023/24 are F110, F112, F113, F114, F115, F116, F117, F119 | | | |
| Category affected | Category affected | | | | |
| Numbers affected | | | | | |
| Possible effect and | Unable to verify information being paid or reconcile with member year end information | | | ormation. | |
| | | n details of eek. Not king to resolve se received. Ving date and in teams await cted up to ond this point. | | | |
| Outstanding actions | s (if any) | 29/05/2024 - Email locum by 31/05/24. If no response, escalate to Deputy Head CPF. 07/06/2024 - Agree a delivery deadline for all remaining information with the Locum Clerk. | | | |
| Assessment of brea summary of rational | | 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. Evidence of action being taken to rectify. | | | |
| Reported to tPR | Reported to tPR No | | | | |

| Ref F125 | Date entered in register | 23 Jan 2024 | |
|---|--|----------------|--|
| Status Open | Date breached closed (if relevant) | | |
| Title of Breach Late payment | of contributions Owner | DF | |
| Party which caused the breach | Marchwiel Community Council | | |
| Description and cause of breach | Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions. Contributions in relation to December 2023 were not received within the deadline. One | | |
| | previous breach of this type (F120). | | |
| Category affected | Active members and employer | | |
| Numbers affected | 1 active member | | |
| 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. | | |
| Actions taken to rectify breach | 05/02/2024 - Received email from outgoing clerk to incoming clerk, passing on details of outstanding payments and remittances. 08/0202024 - Operations team contacted locum clerk and confirmed he is looking sto resolve the backlog of outstanding issues. 27/03/2024 - Emailed outgoing clerk to chase outstanding figures. No response received. 15/05/2024 - Locum contacted Technical team confiming outgoing clerk's leaving date and there are now no active members as the locum himself has not enrolled. Admin teams await final information. 29/05/2024 - As there are no active members, contributions/ remittances are expected up to December 2023 only. Therefore, there are no further additional breaches beyond this point. | | |
| Outstanding actions (if any) | 29/05/2024 - Email locum by 31/05/24. If no response, escalate to Deputy Head CPF. 07/06/2024 - Agree a delivery deadline for all remaining information with the Locum Clerk. | | |
| Assessment of breach and brief summary of rationale | Amber - One previous unresolved late payment, however several breaches of to missed remittances. Effect is limited to a single employer and single active is aware of circumstances and wider implications are unlikely. Evidence of actor rectify. | e member. Fund | |
| Reported to tPR | No | | |