

Ref	A1	Date entered in register	19/09/2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of joining	Owner	SB/AR
Party which caused the breach	CPF + various employers		
Description and cause of breach	<p>Requirement to send a Notification of Joining the LGPS to a scheme member within 2 months from date of joining (assuming notification received from the employer), or within 1 month of receiving jobholder information where the individual is being automatically enrolled / re-enrolled.</p> <p>Due to a combination of late notification from employers and untimely action by CPF the legal requirement was not met. 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. 14/2/22 Previous issues no longer relevant. Current situation is purely due to magnitude of cases being received and potentially employer delays. 31/10/2022 Staff member doing this process had internal secondment, so vacancy now needs to be filled, and then trained. 10/3/2023 New staff member is now being trained so will continue to have impact until fully up to speed. 20/02/2024 Additional positions within this area approved at August Committee. Recruitment drive completed and new staff members started early February. Breach expected to continue until new staff are fully up to speed.</p>		
Category affected	Active members		
Numbers affected	<p>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: 4299 cases completed / 14% (588) 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 2024/25 -Q1 - 613 cases completed / 5% (32) were in breach -Q2 - 692 cases completed / 7% (48) were in breach</p>		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late scheme information sent to members which may result in lack of understanding. - Potential complaints from members. - Potential for there to be an impact on CPF reputation. 		

Actions taken to rectify breach	<ul style="list-style-type: none"> - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of new joiners (ongoing). - Set up of Employer 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. <p>Actions prior to 2022 not shown, but recorded on the breaches log.</p> <p>14/02/2022 - Appointed to vacant positions and Modern Apprentices trained in this area.</p> <p>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.</p> <p>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.</p> <p>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. 12/08/2024 Training is now complete. 6/11/2024 employer escalation process now in place which should help improve the number of cases in breach.</p>
Outstanding actions (if any)	
Assessment of breach and brief summary of rationale	6/11/2024 - No significant change therefore breach to remain Amber until improvement is made.
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 estimate	Owner	AR
Party which caused the breach	CPF + various previous schemes		
Description and cause of breach	<p>Requirement to obtain transfer details for transfer in, and calculate and provide quotation to member 2 months from the date of request.</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> <p>31/10/2022 New regulatory requirements have resulted in additional steps having to be taken, which makes process longer and more complex.</p> <p>10/11/2023 Due to awaiting new GAD guidance, there was a pause in processing for a few months to November 2023.</p> <p>6/02/2024 Following on from receipt of GAD guidance, further software updates are required to facilitate completion of certain transfers (club transfers).</p> <p>6/11/2024 New software updates are being developed by Heywood over a two year period which take account of McCloud.</p>		
Category affected	Active members		

Numbers affected	<p>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: 386 cases completed / 15% (57) 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 2024/25 -Q1 - 105 cases completed / 67% (71) were in breach -Q2 - 130 cases completed / 59% (77) were in breach</p>
Possible effect and wider implications	<ul style="list-style-type: none"> - Potential financial implications on some scheme members. - Potential complaints from members/previous schemes. - Potential for impact on CPF reputation.
Actions taken to rectify breach	<p>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. 12/08/2024 - Staff continuing to work through backlog. 6/11/2024 - Increased number completed as staff continue to work through backlog. Breach</p>
Outstanding actions (if any)	<p>07/06/2024 - implement new software updates when they are received 6/11/2024 - recruit to vacant position within transfer team</p>
Assessment of breach and brief summary of rationale	6/11/2024 - As previously mentioned, breach is caused by a delay of guidance and the hold on transfers. This is a temporary breach with the number of members impacted reducing over time. Assessment of breach to remain Amber.
Reported to tPR	No

Ref	A4	Date entered in register	19/09/2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of retirement benefits	Owner	SB
Party which caused the breach	CPF + various employers + AVC providers		

Description and cause of breach	<p>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.</p> <p>Due to a combination of:</p> <ul style="list-style-type: none"> - late notification by employer of leaver information - late completion of calculation by CPF - for members who have AVC funds, delays in receipt of AVC fund values from AVC provider. - temporary large increases in work due to retrospective pay award recalculations <p>31/10/2022 Also seeing general increase in number of retirements.</p> <p>20/02/2024 Previous vacancies within this area now filled. Breach expected to continue until new staff are fully up to speed.</p> <p>6/11/2024 Training is ongoing.</p>
Category affected	Active members mainly but potentially some deferred members
Numbers affected	<p>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: 1632 cases completed / 18% (286) were in breach 2023/24</p> <ul style="list-style-type: none"> -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 <p>2024/25</p> <ul style="list-style-type: none"> -Q1 - 487 cases completed / 20% (97) were in breach -Q2 - 545 cases completed / 11% (61) were in breach
Possible effect and wider implications	<ul style="list-style-type: none"> - Late payment of benefits which may miss payroll deadlines and result in interest due on lump sums/pensions (additional cost to CPF). - Potential complaints from members/employers. - Potential for there to be an impact on CPF reputation.
Actions taken to rectify breach	<ul style="list-style-type: none"> - Roll out of iConnect where possible to scheme employers including new admitted bodies to ensure monthly notification of 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. <p>Actions prior to 2023 not shown, but recorded on the breaches log.</p> <p>03/03/2023 - New staff have been appointed but will not be fully trained for a number of months.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>24/5/2024 - Number of cases completed has increased and the number in breach has reduced. Continued improvement expected in this area. 12/08/2024 -A recent vacancy within the team has impacted on performance and recruitment is underway to fill the position. Once appointed, the successful candidate will require training.</p> <p>6/11/2024 - Recruited to vacant positions within retirement team and training underway.</p>
Outstanding actions (if any)	6/11/2024 - Complete training of new members of staff
Assessment of breach and brief summary of rationale	06/11/2024 - Number of cases completed has increased and the number in breach has reduced. further reduction required before considering assessment of breach. Therefore, to remain amber for now.
Reported to tPR	No

Ref	A6	Date entered in register	20/09/2017
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late notification of death benefits	Owner	SB
Party which caused the breach	CPF		
Description and cause of breach	<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> <p>31/10/2022 More staff now trained on deaths but they are impacted due to increases in other workloads.</p> <p>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.</p> <p>6/11/2024 Training is ongoing.</p>		
Category affected	Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant).		
Numbers affected	<p>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: 190 cases completed / 26% (50) 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 2024/25 -Q1 - 46 cases completed / 28% (13) were in breach -Q2 - 36 cases completed / 28% (10) were in breach</p>		
Possible effect and wider implications	<ul style="list-style-type: none"> - Late payment of benefits which may miss payroll deadlines and result in interest due on 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	<ul style="list-style-type: none"> - Further training of team - Review of process to improve outcome - Recruitment of additional, more experienced staff. <p>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. 6/11/2024 - Recruited to vacant positions within relevant team and training underway.</p>		
Outstanding actions (if any)	<p>10/3/23 Ensure all training continues as quickly as possible to free up people to refocus on death cases. 12/08/2024 - Analysis of historical cases will help identify source of breach.</p>		
Assessment of breach and brief	06/11/2024 - Number of breaches remains high. Assessment of breach to remain Amber.		
Reported to tPR	No		

Ref	A26	Date entered in register	10/11/2023
Status	Open	Date breached closed (if relevant)	
Title of Breach	Late transfer out estimate	Owner	AR
Party which caused the breach	CPF		
Description and cause of breach	<p>Requirement to provide details of transfer value for transfer out on request within 3 months from date of request (CETV estimate). Note this is the same as breach A3 which was closed previously.</p> <p>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).</p> <p>New software updates are being developed by Heywood over a two year period which take account of McCloud.</p>		
Category affected	Active and deferred members		
Numbers affected	<p>2023/24</p> <p>-Q2 - 103 cases completed / 32% (33) were in breach</p> <p>-Q3 - 72 cases completed / 19% (14) were in breach</p> <p>-Q4 - 88 cases completed / 51% (45) were in breach</p> <p>2024/25</p> <p>-Q1 - 96 cases completed / 14% (13) were in breach</p> <p>-Q2 - 160 cases completed / 49% (78) were in breach</p>		
Possible effect and wider implications	<ul style="list-style-type: none"> - Potential financial implications on some scheme members. - Potential complaints from members/new schemes. - Potential for impact on CPF reputation. 		
Actions taken to rectify breach	<p>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.</p> <p>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.</p> <p>12/08/2024 - Staff have continued to work through backlog with numbers of cases completed increasing.</p> <p>6/11/2024 - Staff continue to work through the backlog with number of cases being completed increasing. Successful appointment of a staff member to one of two vacancies within the transfer team.</p>		
Outstanding actions (if any)	<p>12/08/2024 Still awaiting further software and guidance.</p> <p>6/11/2024 - recruit to vacant position within transfer team</p>		
Assessment of breach and brief summary of rationale	6/11/2024 - As previously mentioned, breach is caused by a delay of guidance and the hold on transfers. Numbers in breach have increased due to increase in numbers processed which include old cases. This is a temporary breach with the number of members impacted reducing over time. Assessment of breach to remain Amber.		
Reported to tPR	No		

Ref	A27	Date entered in register	07/11/2024
Status	Closed	Date breached closed (if relevant)	07/11/2024
Title of Breach	Overpayment of benefits case	Owner	KW
Party which caused the breach	CPF		
Description and cause of breach	Individual pensioner member's benefits overpaid since payment commenced in 2018 due to an incorrect pay figure being used by the CPF team when calculating the members deferred benefit		
Category affected	Pensioner member		
Numbers affected	1 employee		
Possible effect and wider implications	<p>Potential for impact on CPF reputation.</p> <p>Financial impact on Fund due to non recovery of overpayment</p>		
Actions taken to rectify breach	<p>07/11/2024 - legal advice sought and engagement with the Pensions Ombudsman.</p> <p>Numerous discussions had with the member ahead of being written to and urgent delegation used to obtain PFC approval to not recover the overpayment. System updated and correct benefits are now in payment. Data analysis complete to identify other potential overpayments of which none were identified.</p>		
Outstanding actions (if any)			
Assessment of breach and brief	07/11/2024 - this was an isolated incident and has been resolved and can be closed		
Reported to tPR	No		