

<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.  2018/19: 3855 cases completed / 66% (2551) were in breach.  2019/20:  - Q1 - 822 cases completed / 62% (507) were in breach  - Q2 - 750 cases completed / 46% (380) were in breach  - Q3 - 1086 cases completed / 55% (603) were in breach  - Q4 - 705 cases completed / 29% (207) were in breach  2020/21  -Q1 - 442 cases completed / 55% (245) 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>		
<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  -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> </ul>		

<b>Outstanding actions (if any)</b>	<ul style="list-style-type: none"> <li>- Ongoing roll out of i-Connect.</li> <li>- Bedding in of new staff/ training.</li> <li>- Carrying out backlogs of previous joiners (most of which are due to i-Connect roll out).</li> <li>- Contacting employers who are causing delays.</li> </ul> <p>28/1/19:</p> <ul style="list-style-type: none"> <li>- Introduce process to analyse specific employers causing problems.</li> </ul> <p>22/06/2020 - Identified the need for permanent positions within this area. Will take this into consideration when reviewing recruitment for McCloud.</p> <p>25/09/2020 - Recruitment complete, training on-going.</p>
<b>Assessment of breach and brief summary of rationale</b>	25/09/2020 - Due to movement in resource, it has proved difficult to keep on top of current caseloads. New appointments have been made and training is underway, this should improve in the coming months.
<b>Reported to tPR</b>	No

<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		
<b>Numbers affected</b>	<p>2017/18: 235 cases completed / 36% (85) were in breach.</p> <p>2018/19: 213 cases completed / 45% (95) were in breach.</p> <p>2019/20:</p> <ul style="list-style-type: none"> <li>- Q1 - 51 cases completed / 59% (30) were in breach</li> <li>- Q2 - 56 cases completed / 29% (16) were in breach</li> <li>- Q3 - 53 cases completed / 21% (11) were in breach</li> <li>- Q4 - 64 cases completed / 21% (14) were in breach</li> </ul> <p>2020/21</p> <ul style="list-style-type: none"> <li>-Q1- 59 cases completed / 19% (11) were in breach.</li> </ul>		
<b>Possible effect and wider implications</b>	<ul style="list-style-type: none"> <li>- Potential financial implications on some scheme members.</li> <li>- Potential complaints from members/previous schemes.</li> <li>- Potential for impact on CPF reputation.</li> </ul>		
<b>Actions taken to rectify breach</b>	- Continued training of team members to increase knowledge and expertise to ensure that transfers are dealt with in a more timely manner.		
<b>Outstanding actions (if any)</b>	<ul style="list-style-type: none"> <li>- Completion of training of team members in transfer and aggregation processes.</li> </ul> <p>29/1/19:</p> <ul style="list-style-type: none"> <li>- If KPIs don't improve, investigate how much of the delay is due to external schemes and look for ways to improve this.</li> </ul>		
<b>Assessment of breach and brief summary of rationale</b>	25/09/20 - Training on-going to ensure adequate sharing of knowledge.		
<b>Reported to tPR</b>	No		

<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>	<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"> <li>- late notification by employer of leaver information</li> <li>- late completion of calculation by CPF</li> <li>- for members who have AVC funds, delays in receipt of AVC fund values from AVC provider.</li> </ul>		
<b>Category affected</b>	Active members mainly but potentially some deferred members		
<b>Numbers affected</b>	<p>2017/18: 960 cases completed / 39% (375) were in breach.  2018/19: 1343 cases completed / 30% (400) were in breach  2019/20:</p> <ul style="list-style-type: none"> <li>- Q1 - 315 cases completed / 28% (87) were in breach</li> <li>- Q2 - 411 cases completed / 24% (99) were in breach</li> <li>- Q3 - 348 cases completed / 26% (93) were in breach</li> <li>- Q4 - 256 cases completed / 18% (47) were in breach</li> </ul> <p>2020/21</p> <ul style="list-style-type: none"> <li>-Q1 - 214 cases completed in total / 37% (79) were in breach</li> </ul>		
<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.  14/8/19 - Improvements have been made and more should be made as staff are settled in and trained. Business case approved.  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.</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.  30/1/2020 Ongoing liaison with employers</p>		
<b>Assessment of breach and brief summary of rationale</b>	25/09/20 - Retain as amber as employer challenges impacted performance this quarter so unable to identify if CPF improvement is required.		

Reported to tPR	No
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Ref	A5	Date entered in register	20/09/2017
Status	Closed	Date breached closed (if relevant)	24/06/2020
Title of Breach	Late estimate of benefits	Owner	SB
Party which caused the breach	CPF		
Description and cause of breach	<p>Requirement to provide quotations on request for potential retirements as soon as is practicable, but no more than 2 months from date of request unless there is a previous request in the last year.</p> <p>Delays are due to:</p> <ul style="list-style-type: none"> <li>- late completion of calculation by CPF.</li> <li>- Increasing numbers of estimate requests being made by members.</li> </ul>		
Category affected	Active members mainly but potentially some deferred members		
Numbers affected	<p>2017/18: 487 cases completed / 37% (182) were in breach.</p> <p>2018/19:</p> <ul style="list-style-type: none"> <li>- Q1 - 79 cases completed / 32% (25) were in breach</li> <li>- Q2 - 60 case completed / 22% (13) were in breach</li> <li>- Q3 - 123 case completed / 15% (18) were in breach</li> <li>- Q4 - 151 cases completed / 6% (4) were in breach</li> </ul> <p>2019/20:</p> <ul style="list-style-type: none"> <li>- Q1 - 165 cases completed / 4% (6) were in breach</li> <li>- Q2 - 244 cases completed / 2% (4) were in breach</li> <li>- Q3 - 244 cases completed / 0.5% (1) was in breach</li> <li>- Q4 - 352 cases completed / 0% were in breach</li> </ul>		
Possible effect and wider implications	<ul style="list-style-type: none"> <li>- Late notification of benefits/costs to member/employer.</li> <li>- Potential complaints from members/employers.</li> <li>- Potential for missed opportunities by members/employers.</li> <li>- Potential for impact on CPF reputation.</li> </ul>		
Actions taken to rectify breach	<ul style="list-style-type: none"> <li>- Introduction of MSS should alleviate the volume of requests received as member will be able to calculate own estimate through database.</li> <li>- Further training of team members also required.</li> <li>- Task allocation reviewed by team leader to ensure estimates are given a higher priority.</li> </ul> <p>3/6/19 - Review of staff resources now complete and new posts filled. 14/8/19 - Additional staff training.</p>		
Outstanding actions (if any)	-None		
Assessment of breach and brief	24/06/2020 - No further breaches so will now close		
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>		

<b>Category affected</b>	Dependant members + other contacts of deceased (which could be active, deferred, pensioner or dependant).
<b>Numbers affected</b>	2017/18: 153 cases completed / 58% (88) were in breach. 2018/19: 184 cases completed / 30% (56) were in breach 2019/20: - Q1 - 33 cases completed / 24% (8) were in breach - Q2 - 41 cases completed / 34% (14) were in breach - Q3 - 49 cases completed / 26% (13) were in breach - Q4 - 42 cases completed / 28% (12) were in breach 2020/21 -Q1- 39 cases completed / 23% (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). - Potential complaints from beneficiaries, particular given sensitivity of cases. - Potential for impact on CPF reputation.
<b>Actions taken to rectify breach</b>	- 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.
<b>Outstanding actions (if any)</b>	24/06/2020 - Ongoing training of death calculations on the team
<b>Assessment of breach and brief summary of rationale</b>	25/09/20 - Improvement in number breached, continued training is hoped to reduce number further.
<b>Reported to tPR</b>	No

<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. 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		
<b>Numbers affected</b>	2018/19: 3596 cases completed / 45% (1634) were in breach 2019/20: - Q1 - 541 cases completed / 6% (34) were in breach - Q2 - 391 cases completed / 6% (23) were in breach - Q3 - 541 cases completed / 6% (36) were in breach - Q4 - 306 cases completed / 3% (8) were in breach 2020/21 -Q1- 418 cases completed in total / 9% (37) were in breach		
<b>Possible effect and wider implications</b>	- Late notification of benefits/costs to member/employer. - Potential complaints from members/employers. - Potential for missed opportunities by members/employers. - Potential for impact on CPF reputation.		

<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 leavers (ongoing).</li> <li>- Set up of Employer Liaison Team (ELT) to monitor and provide leaver details in a more timely manner.</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>- Ongoing streamlining of aggregation cases with major employers.</li> <li>- Consider feasibility of whether tasks can be prioritised by date of leaving (no action taken).</li> <li>- Carrying out backlogs of previous leavers (most of which are due to i-Connect roll out).</li> </ul>
<b>Outstanding actions (if any)</b>	<ul style="list-style-type: none"> <li>- Ongoing roll out of i-Connect.</li> <li>- Bedding in of new staff/ training.</li> <li>- Contacting employers which are causing delays.</li> <li>28/1/19:</li> <li>- Introduce process to analyse specific employers causing problems.</li> </ul>
<b>Assessment of breach and brief summary of rationale</b>	25/09/2020 - Maintaining completion rate below 10%, remain as green.
<b>Reported to tPR</b>	No

<b>Ref</b>	A11	<b>Date entered in register</b>	29/05/2019
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	22/06/2020
<b>Title of Breach</b>	Scheme Changes Disclosure	<b>Owner</b>	KAM
<b>Party which caused the breach</b>	CPF		
<b>Description and cause of breach</b>	Amendment Regulations disclosure communication to members. This was sent in error to members who were categorised as "gone away" from last known address. This will have resulted in a data breach as names and addresses would have been visible to people now living at those addresses.		
<b>Category affected</b>	Active members, status 2 (undecided) members and deferred members who are shown as "gone away"		
<b>Numbers affected</b>	921 members impacted		
<b>Possible effect and wider implications</b>	<ul style="list-style-type: none"> <li>- Personal Details available to view by incorrect recipients</li> <li>- May result in complaints</li> <li>- Potential that same issue could occur in other communications if "gone away" status is not checked.</li> </ul>		
<b>Actions taken to rectify breach</b>	<ul style="list-style-type: none"> <li>- Followed Data Breach procedure</li> <li>14/8/19</li> <li>- Increased staff awareness / training for future distribution</li> <li>- Process put in place to ensure future mail shots to all members exclude this Category or are automatically redirected back to CPF</li> <li>22/06/2020 - FCC confirmed no further action required</li> </ul>		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	22/06/2020 - Breach closed		
<b>Reported to tPR</b>	No		

Ref	A12	Date entered in register	29/05/2019
Status	Closed	Date breached closed (if relevant)	24/06/2020
Title of Breach	APC calculation due to revised factors	Owner	SB/JT
Party which caused the breach	CPF		
Description and cause of breach	Recalculation of APC contracts due to GAD factor change not communicated within required timescales		
Category affected	Active members with APC contracts		
Numbers affected	<10 members 14/11/19 Now confirmed as only 1 member affected.		
Possible effect and wider implications	- Late notification to members of change to APC contracts / recalculation of benefits - May result in complaints		
Actions taken to rectify breach	- Re-calculation of APC contracts underway with explanation to those affected by the change. 14/11/19 Initial work completed and determined only 1 member requires a recalculation.		
Outstanding actions (if any)	None		
Assessment of breach and brief	24/06/2020 - All actions complete so breach can now be closed.		
Reported to tPR	No		

Ref	A13	Date entered in register	14/11/2019
Status	Closed	Date breached closed (if relevant)	24/06/2020
Title of Breach	Late transfer out estimate	Owner	SB
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 to higher number of cases, plus additional pressure to complete aggregation project by end of Q3 and incorporation of tasks from data improvement plan.		
Category affected	Active and deferred members		
Numbers affected	2019/20 - Q2 - 3 members in breach Q3 - 86 cases completed / 0% were in breach Q4 - 97 cases completed / 0% 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	14/11/19 - Better prioritisation of workload and any additional tasks that are not KPI driven		
Outstanding actions (if any)	None		
Assessment of breach and brief	24/06/2020 - No further breaches so will now close		
Reported to tPR	No		

Ref	A15	Date entered in register	14/02/2020
Status	Closed	Date breached closed (if relevant)	22/06/2020
Title of Breach	Duplicate lump sum payments	Owner	AH
Party which caused the breach	CPF		

<b>Description and cause of breach</b>	Duplicate lump sum amounts paid to the same beneficiary in error. This error happened in three separate instances. These errors were due to insufficient reconciliation processes and time pressures due to strict deadlines.
<b>Category affected</b>	Pensioner member and death grant beneficiary.
<b>Numbers affected</b>	
<b>Possible effect and wider implications</b>	Direct cost to the fund, reputational risk and member upset. Potential for further errors to occur.
<b>Actions taken to rectify breach</b>	28/02/2020 - Additional steps added to the reconciliation process. Increased engagement with finance team to balance payments. - Affected members contacted and error explained. All monies recovered.
<b>Outstanding actions (if any)</b>	None
<b>Assessment of breach and brief summary of rationale</b>	22/06/2020 Minimal amount of members affected and additional reconciliation steps now in place and monies recovered - breach closed.
<b>Reported to tPR</b>	No

<b>Ref</b>	A16	<b>Date entered in register</b>	29/05/2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	22/06/2020
<b>Title of Breach</b>	P60 not sealed correctly	<b>Owner</b>	AH
<b>Party which caused the breach</b>	CPF		
<b>Description and cause of breach</b>	One individual P60 was not sealed correctly when passing through the pressure seal machine. Member contacted the fund to complain that data protection had been breached as her details were visible.		
<b>Category affected</b>	Pensioner members.		
<b>Numbers affected</b>			
<b>Possible effect and wider implications</b>	Confidential member information visible to postal services etc. Reputational risk and member upset. Potential of further instances but none reported.		
<b>Actions taken to rectify breach</b>	22/06/2020 - Internal data breach procedures followed. Pressure seal machine serviced and additional spot checks now performed.		
<b>Outstanding actions (if any)</b>	None		
<b>Assessment of breach and brief summary of rationale</b>	22/06/2020 Minimal amount of members affected and sufficient steps put in place to rectify - breach closed.		
<b>Reported to tPR</b>	No		

<b>Ref</b>	A17	<b>Date entered in register</b>	28/02/2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	24/06/2020
<b>Title of Breach</b>	Member data sent in error	<b>Owner</b>	KW
<b>Party which caused the breach</b>	CPF		
<b>Description and cause of breach</b>	Member data had been included within an attachment sent to the Pension Board. It is normal practice for just a summary to be provided but an incorrect document had been attached.		
<b>Category affected</b>	All member statuses		
<b>Numbers affected</b>	A significant number of the scheme membership		
<b>Possible effect and wider implications</b>	Confidential member information shared, breaching GDPR regulations. Reputational risk and member upset.		
<b>Actions taken to rectify breach</b>	02/03/2020 - Internal data breach procedures followed, Pension Board members contacted and asked to delete and confirm deletion of attachment.		
<b>Outstanding actions (if any)</b>	None		

<b>Assessment of breach and brief summary of rationale</b>	24/06/2020 Although a significant number of member data was shared, the data was minimal and only shared with Pension Board members whom once aware deleted the attachment immediately. A separate summary sheet is now produced. Breach now closed.
<b>Reported to tPR</b>	No

<b>Ref</b>	F25	<b>Date entered in register</b>	10 Jan 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	10 Jun 2020
<b>Title of Breach</b>	Late payment of contributions	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Hafan Deg (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.  Contributions in relation to Nov 2019 were not received within the deadline. Subsequently, payments also delayed for Dec 2019, Jan 2020 and March 2020.		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	2 active members		
<b>Possible effect and wider implications</b>	<ul style="list-style-type: none"> <li>- Could expose employers to late payment interest charge.</li> <li>- Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer.</li> </ul>		
<b>Actions taken to rectify breach</b>	- 31/01/20 employer contacted when 1st payment received, no advice to show month it related to. Details provided to identify payments. Emailed on Feb 22nd when Jan payment not received. Payment made 18th March. Emailed 22nd April when March payment not received and escalated to Deputy Head of Pension Fund. March payment received June 10th.		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	10/06/2020 Payments received		
<b>Reported to tPR</b>	No		

<b>Ref</b>	F26	<b>Date entered in register</b>	10 Feb 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	15 Jun 2020
<b>Title of Breach</b>	No submission of contribution remittance advice	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Marchwiel Community Council		
<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.  Contributions relating to Jan 2020 were received within the legal timescales but no remittance advice was received. Subsequently no remittance for Feb or March received		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	1 active member		
<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>	- 22/02/20 emailed Employer each month to request remittances. This was escalated to Deputy Head of Clwyd Pension Fund and resolved 15th June.		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	15/06/20 Reassessed - remittance received.		
<b>Reported to tPR</b>	No		

Ref	F27	Date entered in register	26 Feb 2020
Status	Closed	Date breached closed (if relevant)	26 Feb 2020
Title of Breach	Late payment of contributions	Owner	DF
Party which caused the breach	Argoed Community Council		
Description and cause of breach	<p>Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions.</p> <p>Contributions in relation to Dec 2019 and Jan 2020 were not received within the deadline.</p>		
Category affected	Active members and employer		
Numbers affected	1 active member		
Possible effect and wider implications	<ul style="list-style-type: none"> <li>- Could expose employers to late payment interest charge.</li> <li>- Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer.</li> </ul>		
Actions taken to rectify breach	- 26/02/20 -Previous Town Clerk retired during 19/20 and a delay in appointing replacement. Payment was received 26th Feb and employer was emailed to provide a remittance identifying payments delayed. Fund clarified situation to Town Clerk		
Outstanding actions (if any)			
Assessment of breach and brief	26/02/20. Resolved payment and remittance received.		
Reported to tPR	No		

Ref	F28	Date entered in register	22 May 2020
Status	Closed	Date breached closed (if relevant)	09 Jul 2020
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Flintshire County Council		
Description and cause of breach	<p>A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made.</p> <p>Contributions relating to April 2020 were received within the legal timescales but no remittance advice was received.</p>		
Category affected	Active members and employer		
Numbers affected	5171 active members		
Possible effect and wider implications	Unable to verify information being paid or reconcile with member year end information.		
Actions taken to rectify breach	-22/05/20 emailed Employer to request remittance.		
Outstanding actions (if any)			
Assessment of breach and brief	09/07/20 Remittance received		
Reported to tPR	No		

Ref	F29	Date entered in register	22 May 2020
Status	Closed	Date breached closed (if relevant)	09 Jul 2020
Title of Breach	No submission of contribution remittance advice	Owner	DF
Party which caused the breach	Aura (Leisure and Libraries)		

<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.  Contributions relating to April 2020 were received within the legal timescales but no remittance advice was received.
<b>Category affected</b>	Active members and employer
<b>Numbers affected</b>	187 active employers
<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>	-22/05/20 emailed Employer to request remittance.(note payroll provider is FCC)
<b>Outstanding actions (if any)</b>	
<b>Assessment of breach and brief</b>	09/07/20 Remittance received
<b>Reported to tPR</b>	No

<b>Ref</b>	F30	<b>Date entered in register</b>	22 May 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	09 Jul 2020
<b>Title of Breach</b>	No submission of contribution remittance advice	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Newydd Catering and Cleaning		
<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.  Contributions relating to April 2020 were received within the legal timescales but no remittance advice was received.		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	418 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>	- 22/05/20 emailed Employer to request remittance.(note payroll provider is FCC)		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	09/07/20 Remittance received		
<b>Reported to tPR</b>	No		

<b>Ref</b>	F31	<b>Date entered in register</b>	22 May 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	02 Jul 2020
<b>Title of Breach</b>	No submission of contribution remittance advice	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Argoed Community Council		
<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.  Contributions relating to April 2020 were received within the legal timescales but no remittance advice was received. Contributions relating to May 2020 were also received within the legal timescales but no remittance advice was received		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	1 active member		
<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>	- 22/05/20 emailed Employer to request remittance. -22/06/20 emailed again for May remittance		

<b>Outstanding actions (if any)</b>	
<b>Assessment of breach and brief</b>	02/07/20 Both April and May remittances received
<b>Reported to tPR</b>	No

<b>Ref</b>	F32	<b>Date entered in register</b>	22 May 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	08 Jul 2020
<b>Title of Breach</b>	No submission of contribution remittance advice	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Marchwiel Community Council		
<b>Description and cause of breach</b>	<p>A remittance advice detailing information in relation to contribution payments should be submitted to CPF at the same point as the payment is made.</p> <p>Contributions relating to Apr 2020 were received within the legal timescales but no remittance advice was received.</p> <p>Previous Breach F26</p>		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	1 active member		
<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>	- 22/05/20 emailed Employer to request remittance.		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	08/07/2020 Details received		
<b>Reported to tPR</b>	No		

<b>Ref</b>	F33	<b>Date entered in register</b>	23 May 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	10 Jun 2020
<b>Title of Breach</b>	Late payment of contributions	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Hafan Deg (K L Care Ltd)		
<b>Description and cause of breach</b>	<p>Contributions must be paid by the 22nd (if BACs) or 19th (if cheque) of the month following the deductions.</p> <p>Contributions in relation to Apr 2020 were not received within the deadline.</p> <p>Previous Breach F25</p>		
<b>Category affected</b>	Active members and employer		
<b>Numbers affected</b>	2 active members		
<b>Possible effect and wider implications</b>	<ul style="list-style-type: none"> <li>- Could expose employers to late payment interest charge.</li> <li>- Assumptions regarding funding assume regular monthly payment; not adhering to this regulatory requirement could result in changed actuarial assumptions for the employer.</li> </ul>		
<b>Actions taken to rectify breach</b>	- 22/05/20 emailed Employer to request payment		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	10/06/20 reassessed as payment received		
<b>Reported to tPR</b>	No		

<b>Ref</b>	F34	<b>Date entered in register</b>	23 Jul 2020
<b>Status</b>	Closed	<b>Date breached closed (if relevant)</b>	02 Sep 2020
<b>Title of Breach</b>	Late payment of contributions	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Hafan Deg (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.  Contributions in relation to June 2020 and subsequently July were not received within the deadline. Previous Breach F33
<b>Category affected</b>	Active members and employer
<b>Numbers affected</b>	2 active members
<b>Possible effect and wider implications</b>	- 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.
<b>Actions taken to rectify breach</b>	- 23/07/20 and 23/08/20 - Emailed Employer to request payment
<b>Outstanding actions (if any)</b>	
<b>Assessment of breach and brief summary of rationale</b>	31/07/20 and 02/09/20 reassessed as payment received and also August payment received on 2 September. If future payments are late, will treat as amber or red breach as clearly processes have not been resolved.
<b>Reported to tPR</b>	No

<b>Ref</b>	F35	<b>Date entered in register</b>	31 Jul 2020
<b>Status</b>	Open	<b>Date breached closed (if relevant)</b>	
<b>Title of Breach</b>	No submission of contribution remittance advice	<b>Owner</b>	DF
<b>Party which caused the breach</b>	Hafan Deg (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.  Contributions relating to June and July Apr 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		
<b>Outstanding actions (if any)</b>			
<b>Assessment of breach and brief</b>	29/09/2020 - emailed for outstanding remittances		
<b>Reported to tPR</b>	No		