

Breaches Flowchart

1	a	Possible Breach identified	Complete form within 3 days	
	b	Serious Breach raised with Head of Pensions	Head of Pensions to complete stage 3	
	c	Breaches have been raised with the Pension Committee	Head of Pensions to complete stage 3	
2	Breach form completed		Pass to Governance and Compliance Manager	
3	Form received by Governance and Compliance Manager		Check facts	
			Check requirements of the law	
4	Has a breach occurred	No	Refer to Head of Pensions to sign off	
		Yes	Enter in Breaches log	
5	Is the breach Material	No	Refer to Head of Pensions to sign off	update Breaches log
		Not clear	Refer to Head of Pensions to make recommendation	update Breaches log
		Yes	Refer to Head of Pensions to make recommendation	update Breaches log
6	Head of Pensions receives referral	Not clear if Breach is Material	Make recommendation and refer to S151 Officer for decision	update Breaches log
		Breach is Material	Make recommendation and refer to S151 Officer for decision	update Breaches log
7	S151 Officer decides breach is Material		Scheme Manager reports Breach to the Pensions Regulator	Update Breaches Log