Date	Category	Description and	Possible effect of	Reaction of	Reported/Not	Traffic
		cause of breach	breach and wider	relevant parties	reported (with	light
			implications	to the breach	justification if	colour
					not reported	
					and dates)	
01-Oct-17	Administration	Failure of the	Failure of the	Member	The matter	
	Immaterial	scheme employer	employer to follow	contacted the	was referred	
		1,	the correct	Pensions Team	to the	
		to obtain a report	procedures in	on 9 April	Pensions	
		from a Registered	relation to the	2015.	Ombudsman.	
		Medical	LGPS has	Deferred	No referral has	
		Practitioner	prevented timely	benefits sent	been made to	
		(IRMP). Failure of	and appropriate	out 26 April	The Pensions	
		employer to	action under the	2017. Internal	Regulator.	
		decide whether	regulations.	Dispute		
		to refer the		Resolution		
		employee to an		Procedure		
		Independent		application		
		IRMP and to		received on 19		
		make a decision		January 2018.		
		on their				
		entitlement				
		under reg 35.				
		Failure to notify				
		the member of				
		any decisions				
		made.				

				_		
Aug-19	Administration	Failure to	Members and	Error reports	the matter	
		•	former members	identified	was not	
		Annual Benefit	do not receive	members	referred to the	
		Statement	have up to date	without	Pensions	
		notifications	information on the		Regulator. All	
			value of their LGPS		the issues	
			benefits affecting	technical team		
			their ability to	checked. Some	identified	
			make informed	had not	through error	
			decisions around	required a	reports and	
			pension provision.	statement as	resolved.	
			Non-compliance	they had not	Statements	
			with LGPS	passed an	were sent to	
			regulations	increase date.	all individuals	
			timescales.	The remainder	where a	
			Member has been	had the issues	statement was	
			unable to check	resolved and	required. No	
			personal data is	statements	further action	
			complete and	were sent out.		
			accurate or that			
			the correct			
			contributions have			
			been credited.			
			-			
Aug-20	Administration	Failure to	Members and	Error reports	The matter	
Aug-20	Administration		Members and former members	Error reports identified	The matter was not	
Aug-20	Administration					
Aug-20	Administration	produce 100% of	former members do not receive	identified	was not	
Aug-20	Administration	produce 100% of Annual Benefit	former members	identified members without	was not referred to the Pensions	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date	identified members without statements	was not referred to the	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the	identified members without statements	was not referred to the Pensions Regulator. All the issues	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting	identified members without statements which the	was not referred to the Pensions Regulator. All the issues	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS	identified members without statements which the technical team	was not referred to the Pensions Regulator. All the issues were identified	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to	identified members without statements which the technical team checked.	was not referred to the Pensions Regulator. All the issues were identified through error	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around	identified members without statements which the technical team checked. There was an error	was not referred to the Pensions Regulator. All the issues were identified through error reports and	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision.	identified members without statements which the technical team checked. There was an error suppressing	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around	identified members without statements which the technical team checked. There was an error suppressing ABS for	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved.	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS	identified members without statements which the technical team checked. There was an error suppressing ABS for members over	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales.	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA.	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a statement was	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and accurate or that	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements due. They are	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and accurate or that the correct	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements due. They are continuing to	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a statement was	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and accurate or that the correct contributions have	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements due. They are continuing to work on the	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a statement was	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and accurate or that the correct	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements due. They are continuing to	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a statement was	
Aug-20	Administration	produce 100% of Annual Benefit Statement	former members do not receive have up to date information on the value of their LGPS benefits affecting their ability to make informed decisions around pension provision. Non-compliance with LGPS regulations timescales. Member has been unable to check personal data is complete and accurate or that the correct contributions have	identified members without statements which the technical team checked. There was an error suppressing ABS for members over age 65 and under NPA. The technical team issued 98.69% of the statements due. They are continuing to work on the	was not referred to the Pensions Regulator. All the issues were identified through error reports and are being resolved. Statements have been or are being sent to all individuals where a statement was	

lan 21	Administration	Failure to inform	Mambars and	Historical	The issue has	
Jan-21	Administration	100% of scheme	Members and	backlog is	The issue has	
		members of their	former members	impacting	been	
		calculated	do not receive	performance.	identified and	
		benefits (refund or	have up to date	Contract has	action taken	
		deferred) –	information on the	now been awarded to	to rectify it.	
		backlog cases	value of their LGPS	Hymans	Outsourcing	
			benefits affecting	Robertson to	the historical	
			their ability to	provide	backlog leaves	
			make informed	administration services to clear	greater	
			decisions around	this backlog,	administrative	
			pension provision.	which is	capacity to	
			Non-compliance	currently in the mobilisation	calculate	
			with LGPS	phase.	current cases,	
			regulations		mitigting the	
			timescales.		risk of	
			Member has been		recurrence.	
			unable to check		This has	
			personal data is		therefore	
			complete and		been judged	
			accurate or that		as not	
			the correct		necessary to	
			contributions have		report to the	
			been credited.		Pensions	
					Regulator.	

Outcome of	Outstanding actions	Comments
report and	_	
or		
investigation		
s		
Stage 1		
complaint		
upheld on 1		
May 2018.		
Compensatio		
n payment of		
£500.00		
made 28		
March 2019		
for failure to		
notify		
benefits		
within		
required		
timescales.		
Stage 2		
complaint		
upheld on 1		
November		
2019.		
Pension		
Ombudsman		
has closed		
the case as		
the member		
has now		
settled with		
her		
employer.		

Not	
reported.	
Only 3.36%	
for active	
and 2% for	
deferred	
members	
not issued.	
The issues	
are being	
addressed	
so that	
notification	
s can be	
sent.	
Not	
reported.	
Only 2.12%	
for active	
and 0.27%	
for deferred	
members	
not issued.	
The issues	
are being	
addressed	
so that	
notification	
s can be	
sent.	
1	

Not		
reported to		
The		
Pensions		
Regulator.		
regulator.		

Breaches Process

Type of Breach	Timescale for reporting	Internal actions
Urgent and Material	Responsible officer informs Head of Pensions	Governance team to keep record of the breach and
	and Treasury and the governance team, the breach is reported immediately to The Pensions Regulator	investigate options to prevent further occurrence
Non urgent and Material	Responsible officer informs Head of Pensions and Treasury and the governance team, the breach is reported to the Pensions Regulator within 30 days	Governance team to keep record of the breach and investigate options to prevent further occurrence
Immaterial	Responsible officer informs Head of Pensions and Treasury and the governance team within 30 days	Governance team to keep record of the breach and investigate options to prevent further occurrence

Further actions

Report urgent and material breaches to Section 151 officer, Chair and Vice Chair of Committee and Local Pension Board. Full report to be submitted at the next available meeting

Report non urgent and material breach at next Pension Committee and Pension Board meeting

Report immaterial breach at next Pension Committee and Pension Board meeting

Rating	Description	Breach occurred	
	Cause, effect, reaction and wider implications considered together ARE LIKELY to be of material significance	Error has occurred	PLUS
	Cause, effect, reaction and wider implications considered together MAY be of material significance	Error has occurred	PLUS
	Cause, effect, reaction and wider implications considered together ARE NOT Likely to be of material significance	Error has occurred	PLUS

Breach identified		Action taken
Errors not recongnised	PLUS	No action taken to rectify and tackle the cause
Errors rectified	PLUS	Systemic causes not addressed so issue may arise again
Errors rectified	PLUS	Systemic causes addressed to mitigate against issue arising again

Decision

MUST Report to TPR

MAY Report to TPR

Consider the evidence and make a decision.

DON'T Report to TPR