| Date      | Category                     | Description and<br>cause of breach  | Possible effect of<br>breach and wider<br>implications   | Reaction of relevant<br>parties to the breach  | Reported/Not reported (with<br>justification if not reported<br>and dates)   | Traffic<br>light<br>colour | Outcome of<br>report and<br>or<br>investigation<br>s   | Outstanding actions | Comments |
|-----------|------------------------------|---|--|--|--|----------------------------|--|---------------------|----------|
| 01-Oct-17 | Administration<br>Immaterial | (not the Council)<br>to obtain a report<br>from a Registered<br>Medical<br>Practitioner | the correct<br>procedures in   | Member contacted the<br>Pensions Team on 9<br>April 2015. Deferred<br>benefits sent out 26<br>April 2017. Internal<br>Dispute Resolution<br>Procedure application<br>received on 19 January<br>2018. | The matter was referred to<br>the Pensions Ombudsman.<br>No referral has been made<br>to The Pensions Regulator.   |                            | Stage 1<br>complaint<br>upheld on 1<br>May 2018.<br>Compensatio<br>n payment of<br>£500.00<br>made 28<br>March 2019<br>for failure to<br>notify<br>benefits<br>within<br>required<br>timescales.<br>Stage 2<br>complaint<br>upheld on 1<br>November<br>2019.<br>Pension<br>Ombudsman<br>has closed<br>the case as<br>the member<br>has now<br>settled with<br>her<br>employer. |                     |          |
| Aug-19    | Administration               | Failure to<br>produce 100% of<br>Annual Benefit<br>Statement<br>notifications           | Members and<br>former members<br>do not receive<br>have up to date<br>information on the<br>value of their LGPS<br>benefits affecting<br>their ability to<br>make informed<br>decisions around<br>pension provision.<br>Non-compliance<br>with LGPS<br>regulations<br>timescales.<br>Member has been<br>unable to check<br>personal data is<br>complete and<br>accurate or that<br>the correct<br>contributions have<br>been credited. | Some had not required  | the matter was not<br>referred to the Pensions<br>Regulator. All the issues<br>were identified through<br>error reports and resolved.<br>Statements were sent to all<br>individuals where a<br>statement was required.<br>No further action was<br>needed. |                            | Not<br>reported.<br>Only 3.36%<br>for active<br>and 2% for<br>deferred<br>members<br>not issued.<br>The issues<br>are being<br>addressed<br>so that<br>notification<br>s can be<br>sent.   |                     |          |

| Jan 2 Administration Failure to informer members<br>and marker information on the<br>statement in have up to date<br>information on the<br>administration<br>on on receiving cases are roor<br>unable of their LGPs<br>benefits affecting<br>marker information cases<br>decisions around<br>person provision<br>there ability to<br>marker information state.<br>There ability to<br>marker information<br>person provision<br>there ability to<br>marker information<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>person provision<br>there ability to<br>marker information<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>person provision<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>person provision<br>to rectify it. Otsourcing<br>provides greater<br>and the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>becomplete and<br>accurate or that<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>becomplete and<br>accurate or that<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>becomplete and<br>accurate or that<br>the correct<br>contributions have<br>been credited. The issue has been<br>information and<br>becomplete and<br>accurate or that<br>the correct to accurate or that<br>the correct contributions have<br>been credited. The anster has not been<br>reported to the Persions<br>and al areasonable effores N/A Minis  |         |                | <b>E</b> 11        | ·                    | <b></b>                  |                             | <br>       | 1           |
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| Jan-21 Administration Failure to inform<br>members of their<br>of our creative<br>relacional performance<br>information on the<br>deformation on the<br>backlog cases Members and<br>missication survices to<br>administration may be<br>administration excertly it. Dutourcing<br>the isticatal backlog<br>administration capacity,<br>missication survices to<br>administration capacity,<br>make informed<br>deformation on the<br>persion provides,<br>regulations. Not<br>reported to<br>Derectly it. Dutourcing<br>the isticatal backlog<br>administration capacity,<br>missication survices to<br>administration capacity,<br>missication survices to<br>administration capacity,<br>make informed<br>decisions around<br>persion provides,<br>regulations. Not<br>report of<br>the isotabul<br>the isotabul<br>persion formed<br>administration capacity,<br>missication survices to<br>momenter informed<br>decisions around<br>persion provides,<br>regulations. Not<br>make informed<br>make informed<br>members water<br>reported to the Persion<br>Regulator. N/A Multiput<br>the informed<br>decision around<br>to care informed<br>members in the reported to the Persion<br>Regulator. N/A   Sep 21 Administration<br>members in the matter has not been<br>refund of scheme<br>persion fund,<br>who left after the<br>diministration<br>members in the reported to the Persion<br>and the Syear deadine<br>within Syears of<br>the members in the<br>members in the runds<br>around transfer<br>is due to another transfer<br>and the Syear deadine<br>within Syears of<br>the rund is related to<br>approaching Sy ear<br>processed. A quar  |         |                |                    |                      |                          |                             |            |             |
| Sep-21   Administration   Finite remembers of the relaction of the results of re  |         |                |                    | seen createa.        |                          |                             |            |             |
| Sep-21   Administration   Finite remembers of the relaction of the results of re  |         |                |                    |                      |                          |                             |            |             |
| Sep-21   Administration   Finite remembers of the relaction of the results of re  | Jan-21  | Administration | Failure to inform  | Members and          | Historical backlog is    | The issue has been          | Not        |             |
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| Sep-21   Administration   Failure to pay a<br>refund of scheme<br>members affecting<br>their ability to<br>make informed<br>decisions around<br>generation provision.<br>Non-compliance<br>with LGPS<br>regulations<br>timescales.<br>Member has been<br>unable to check<br>personal data is<br>complete and<br>accurate or that<br>the correct<br>contributions have<br>been credited.   Image: Control of the control<br>of the correct<br>contributions have<br>been credited.   Image: Control<br>of the correct<br>contributions have<br>been credited.   N/A   Image: Control<br>of the correct<br>contributions have<br>been credited.     Sep-21   Administration<br>failure to pay a<br>with LGPS<br>regulations<br>timescales.   Possible tax<br>refund of scheme<br>implications for<br>the correct<br>contributions to<br>the correct<br>contributions to<br>the member in the<br>persion fund,<br>who left affer the<br>persion fund,<br>who left affer the<br>persion fund,<br>within Syears of<br>contributions to<br>members of the<br>control control<br>the correct<br>control control<br>control control<br>control<br>control control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>control<br>con<br>control<br>con<br>control<br>control<br>con<br>con<br>control<br>control<br>con   |         |                |                    |                      |                          | , 0                         |            |             |
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| Sep-21   Administration   Failure to pays<br>regulations<br>timescales.<br>Member has been<br>unable to check<br>personal data is<br>complete and<br>accurate or that<br>the correct<br>contributions have<br>been credited.   Administration team<br>accurate or that<br>the correct<br>contributions to<br>personal data is<br>complete and<br>accurate or that<br>the correct<br>contributions to<br>provided by the<br>pension fund,<br>sy sars. Burden of<br>the correct<br>contributions to<br>provided by the<br>pension fund,<br>sy sars. Burden of<br>the correct<br>contributions to<br>the members of the<br>reparately chase<br>members with<br>is due to another LGPS<br>regulations<br>contributions<br>contributions to<br>the members of the<br>reparately chase<br>members for<br>the correct<br>contributions to<br>the members of the<br>reparately chase<br>members for<br>the correct<br>contributions<br>contributions to<br>the members of the<br>reparately chase<br>members for<br>the correct<br>controlutions<br>contributions to<br>the members of the<br>reparately chase<br>members for<br>the correct<br>controlutions<br>contributions<br>contributions<br>the server sound<br>details to former<br>members and the syster deading<br>processed. A quarterly<br>commendation (see<br>if an automatic transfer<br>the fund is reliant on<br>members responds is in line with<br>created and inform<br>members control comply with the<br>regulations. The fund's<br>approach is in line with<br>check of the LGPS<br>Regulations<br>2013; Current<br>number of cases<br>as at 31 August<br>2021 is 200   Members and the<br>syster share<br>period/age75 re- admin   N/A   https://withs//withs//withs//withs//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendations//<br>commendatio   |         |                |                    |                      |                          | -                           | negulator. |             |
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| Sep-21AdministrationFailure to pay a<br>refund of scheme<br>implications to<br>members of the<br>pension fund,<br>who left after the<br>author systemPossible tax<br>implications for<br>the member if the<br>or email address<br>provided by the<br>members of the<br>repartedly chase<br>adtess is due to another LGPS<br>fund. Reports run<br>quarterly to find those<br>as at 31 August<br>2021 is 240Possible tax<br>implications<br>provided by the<br>members of the<br>repartedly chaseAdministration team<br>use last known address<br>or email address<br>provided by the<br>members definitionN/Ahttps://w<br>www.lgsli<br>rary.org/a<br>members making them<br>aware of their options.<br>The fund is reliant on<br>members responding in<br>order to comply with the<br>repartedly chase<br>as at 31 August<br>2021 is 240Administration team<br>use last Nown address<br>or email address<br>provided by the<br>members making them<br>aware of their options.<br>The fund is reliant on<br>members responding in<br>order to comply with the<br>regulations. The Fund's<br>approaching is due to another LGPS<br>fund. Reports run<br>quarterly to find those<br>approaching S year<br>period/age 75 – adminN/Ahttps://w<br>wow.lepsli<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)N/ASeptimized<br>address<br>addetions<br>2021 is 240Failure of the context chases<br>a database is made to see<br>a approaching S year<br>period/age 75 – adminAdministration team<br>the set of the context chases<br>a database is adation administration<br>processed. A quarterly<br>fund. Reports run<br>quarterly to find those<br>approaching S year<br>period/age 75 – adminN/AN/AAdministration<br>respectedly chase<br>a database is adation<br>approaching S year<br>period/age 75 – adminAdministration te   |         |                |                    |                      |                          |                             |            |             |
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| Sep-21   Administration   Failure to pay a refund of scheme implications for the member if the member if the pension fund, bears of the refund is paid after provided by the members of the refund is paid after the administration of the members if the administration details to former members of the resources to resources to repeatedly chase members.   The matter has not been refund has made all reasonable efforts to trace and inform members of their options.   N/A   https://w     01 April 2014   resources to repeatedly chase members.   members.   members making them and to 5 year calculation processed. A quarterly check of the LGPS NI database is made to resources to run mumber of cases as at 31 August 2021 is 240   members find. Reports run quarterly to find those approaching 5 year period/age 75 – admin   September 2018)   |         |                |                    |                      |                          |                             |            |             |
| Sep-21AdministrationFailure to pay a<br>refund of scheme<br>contributions to<br>members of the<br>pension fund,<br>who left after the<br>administrationAdministration team<br>use last known address<br>provided by the<br>sensult to trace and inform<br>members of their options.<br>The fund is reliant on<br>members responding in<br>or ersult of the LGPS Ni<br>(regulation 18(5)<br>of the LGPS<br>Regulation 18(5)<br>of the LGPS<br>at any er of tage of the optiors<br>is due to another LGPS<br>Ni database is made to see<br>if an automatic transfer<br>is due to another LGPS<br>approach is in line with<br>recommendations (see<br>tig an automatic transfer<br>is due to another LGPS<br>2013). Current<br>number of cases<br>a as at 31 August<br>2021 is 240Possible tax<br>Administration team<br>members to a daministration<br>members transfer<br>is due to another LGPS<br>approach is in line with<br>technical Group minutes<br>28 September 2018)N/Ahttps://wN/Ahttps://www.lgpsil<br>members of their options<br>and the 5 year deadline<br>processed. A quarterly<br>quarterly to find those<br>approach is on line with<br>technical Group minutes<br>28 September 2018)N/Ahttps://wN/Ahttps://whttps://whttps://whttps://whttps://whttps://wN/Ahttps://whttps://whttps://whttps://whttps://wN/Ahttps://whttps://w <t< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>  |         |                |                    |                      |                          |                             |            |             |
| refund of scheme<br>contributions to<br>members of the<br>pension fund,<br>who left after the<br>administration<br>with less than<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>Regulations<br>2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240   |         |                |                    |                      |                          |                             |            |             |
| refund of scheme<br>contributions to<br>members of the<br>pension fund,<br>who left after the<br>administration<br>with less than<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>Regulations<br>2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240   |         |                |                    |                      |                          |                             |            |             |
| refund of scheme<br>contributions to<br>members of the<br>pension fund,<br>who left after the<br>administration<br>with less than<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>Regulations<br>2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240   | Sep-21  | Administration | Failure to pay a   | Possible tax         | Administration team      | The matter has not been     | N/A        | https://w   |
| members of the<br>pension fund,<br>who left after the<br>administrationrefund is paid after<br>employer to send<br>details to former<br>members making them<br>aware of their optionsmade all reasonable efforts<br>to trace and inform<br>members of their options.sets/minu<br>es/TG20101 April 2014<br>with less than<br>two years<br>members,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPSmembers<br>espected with 1201<br>members is made on the 1GPS<br>if an automatic transfer<br>fund. Reports run<br>number of cases<br>as at 31 August<br>2021 is 240members of their options<br>aware of their options<br>aware of their options<br>aware of their options<br>and the 5 year deadline<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)sets/minu<br>est/S201<br>D928.pdf01 April 2014<br>with less than<br>two years<br>members.members making them<br>aware of their options<br>and the 5 year deadline<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>(resource for up minutes<br>28 September 2018)members responding in<br>approach is in line with<br>Technical Group minutes<br>28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240members run<br>period/age 75 – admin28 September 2018)  |         |                |                    |                      |                          |                             |            | ww.lgpslib  |
| pension fund,<br>who left after the<br>administration5 years. Burden of<br>administrationemployer to send<br>details to formerto trace and inform<br>members of their options.es/TG20101 April 2014resources to<br>repeatedly chase<br>two yearsmembers making them<br>aware of their optionsThe fund is reliant on<br>members responding in<br>order to comply with theThe fund is reliant on<br>members responding in<br>order to comply with the0928.pdfwith less than<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPSmembers<br>processed. A quarterly<br>database is made to see<br>if an automatic transfer<br>fund. Reports run<br>number of cases<br>as at 31 August<br>2021 is 240to trace and inform<br>members naking them<br>aware of their options<br>and the 5 year deadline<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Groupto trace and inform<br>members responding in<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group10 20 28.pdfdatabase is made to see<br>if an automatic transfer<br>fund. Reports run<br>quarterly to find those<br>as at 31 August<br>2021 is 240fund. Reports run<br>period/age 75 – admin   |         |                | contributions to   | the member if the    | or email address         | Regulator. The fund has     |            | rary.org/as |
| who left after the<br>01 April 2014administration<br>resources to<br>repeatedly chase<br>members making them<br>aware of their options<br>and the 5 year deadline<br>when leaver calculation<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)O928.pdf0928.pdf  |         |                | members of the     | refund is paid after | provided by the          | made all reasonable efforts |            | sets/minut  |
| 01 April 2014<br>with less than<br>two years<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240resources to<br>members making them<br>aware of their options<br>and the 5 year deadline<br>when leaver calculation<br>processed. A quarterly<br>check of the LGPS NI<br>if an automatic transfer<br>quarterly to find those<br>as at 31 AugustThe fund is reliant on<br>members responding in<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)01 April 2014<br>members than<br>repeatedly chase<br>when leaver calculation<br>processed. A quarterly<br>that automatic transfer<br>if an automatic transfer<br>quarterly to find those<br>as at 31 August<br>2021 is 240The fund is reliant on<br>members responding in<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>tecommendations (see<br>Technical Group minutes<br>28 September 2018)  |         |                | pension fund,      | 5 years. Burden of   | employer to send         | to trace and inform         |            | es/TG2018   |
| with less than<br>two years<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>Regulationsrepeatedly chase<br>members.aware of their options<br>and the 5 year deadline<br>when leaver calculation<br>processed. A quarterly<br>check of the LGPS NI<br>if an automatic transfer<br>f und. Reports run<br>number of cases<br>as at 31 August<br>2021 is 240membership,<br>membership,<br>processed. A quarterly<br>check of the LGPS NI<br>if an automatic transfer<br>quarterly to find those<br>approaching 5 year<br>period/age 75 – adminmembers responding in<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240quarterly to find those<br>approaching 5 year<br>period/age 75 – adminmembers responding in<br>order to comply with the<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)  |         |                | who left after the | administration       | details to former        | members of their options.   |            | 0928.pdf    |
| two years<br>membership,<br>within 5 years of<br>leaving<br>(regulation 18(5)<br>of the LGPS<br>Regulationsmembership,<br>processed. A quarterly<br>check of the LGPS NI<br>if an automatic transfer<br>si due to another LGPS<br>aptroaching 5 year<br>as at 31 August<br>2021 is 240and the 5 year deadline<br>when leaver calculation<br>processed. A quarterly<br>regulations. The Fund's<br>approach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)two years<br>membership,<br>within 5 years of<br>(regulation 18(5)<br>of the LGPS<br>(atabase is made to see<br>if an automatic transfer<br>fund. Reports run<br>number of cases<br>as at 31 August<br>2021 is 240and the 5 year deadline<br>processed. A quarterly to find those<br>approaching 5 year<br>period/age 75 – admin  |         |                | 01 April 2014      | resources to         | members making them      | The fund is reliant on      |            |             |
| membership,<br>within 5 years of<br>leavingwhen leaver calculation<br>processed. A quarterly<br>check of the LGPS NI<br>database is made to see<br>of the LGPSregulations. The Fund's<br>approach is in line with<br>Technical Group(regulation 18(5)<br>of the LGPSdatabase is made to see<br>if an automatic transfer<br>to another LGPSrecommendations (see<br>Technical Group minutes<br>28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240quarterly to find those<br>approaching 5 year<br>period/age 75 – adminapproach is in line with<br>Technical Group  |         |                | with less than     | repeatedly chase     | aware of their options   | members responding in       |            |             |
| within 5 years of<br>leavingprocessed. A quarterly<br>check of the LGPS NI<br>database is made to see<br>if an automatic transfer<br>segulationsapproach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutesof the LGPS<br>Regulationsif an automatic transfer<br>is due to another LGPS<br>fund. Reports run<br>quarterly to find those<br>as at 31 August<br>2021 is 240gproaching 5 year<br>period/age 75 – adminapproach is in line with<br>Technical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)   |         |                | two years          | members.             | and the 5 year deadline  | order to comply with the    |            |             |
| leavingcheck of the LGPS NI<br>database is made to seeTechnical Group<br>recommendations (seeof the LGPSif an automatic transfer<br>is due to another LGPSTechnical Group minutesRegulationsis due to another LGPS28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240quarterly to find those<br>approaching 5 year<br>period/age 75 – adminTechnical Group<br>recommendations (see<br>Technical Group minutes<br>28 September 2018)  |         |                | membership,        |                      | when leaver calculation  | regulations. The Fund's     |            |             |
| (regulation 18(5)database is made to see<br>if an automatic transfer<br>is due to another LGPSrecommendations (see<br>Technical Group minutes<br>28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240fund. Reports run<br>approaching 5 year<br>period/age 75 – adminapproaching 5 year<br>admin  |         |                | within 5 years of  |                      | processed. A quarterly   | approach is in line with    |            |             |
| of the LGPSif an automatic transfer<br>is due to another LGPSTechnical Group minutes<br>28 September 2018)2013). Current<br>number of cases<br>as at 31 August<br>2021 is 240fund. Reports run<br>quarterly to find those<br>approaching 5 year<br>period/age 75 – adminTechnical Group minutes<br>28 September 2018)  |         |                | leaving            |                      | check of the LGPS NI     | Technical Group             |            |             |
| Regulationsis due to another LGPS28 September 2018)2013). Currentfund. Reports runnumber of casesquarterly to find thoseas at 31 Augustapproaching 5 year2021 is 240period/age 75 – admin  |         |                | (regulation 18(5)  |                      | database is made to see  | recommendations (see        |            |             |
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| number of casesquarterly to find thoseas at 31 Augustapproaching 5 year2021 is 240period/age 75 – admin  |         |                | Regulations        |                      | is due to another LGPS   | 28 September 2018)          |            |             |
| as at 31 August approaching 5 year<br>2021 is 240 period/age 75 – admin  |         |                | 2013). Current     |                      | fund. Reports run        |                             |            |             |
| 2021 is 240 period/age 75 – admin  |         |                | number of cases    |                      | quarterly to find those  |                             |            |             |
|  |         |                | as at 31 August    |                      | approaching 5 year       |                             |            |             |
| team to try to make  |         |                | 2021 is 240        |                      | period/age 75 – admin    |                             |            |             |
|  |         |                |                    |                      | team to try to make      |                             |            |             |
| contact again – address  |         |                |                    |                      | contact again – address  |                             |            |             |
| searches carried out if  |         |                |                    |                      | searches carried out if  |                             |            |             |
| required.  |         |                |                    |                      | required.                |                             |            |             |
|  |         |                |                    |                      |                          |                             |            | 1           |

| Sep-21 | Finance | Failure of the    | Lack of accurate   | The accounts have been   | The matter has not been      | N/A | Head of Pensions to |  |
|--------|---------|-------------------|--------------------|--------------------------|------------------------------|-----|---------------------|--|
|        |         | Fund to publish   | data available on  | prepared and             | reported to the Pension      |     | continue to liaise  |  |
|        |         | the Fund          | which to base      | submitted to audit for   | Regulator. Progress has      |     | with Audit on       |  |
|        |         | Accounts for year | funding            | approval. However        | been delayed due to the      |     | progress            |  |
|        |         | 2019/20 by 30     | requirements. This | Audit have still not     | issuing of the Section 114   |     |                     |  |
|        |         | September 2020.   | could result in    | finished their work in   | notice applicable to         |     |                     |  |
|        |         |                   | insufficient funds | preparing their opinion. | Croydon and, more widely,    |     |                     |  |
|        |         |                   | to pay all benefit | The Head of Pensions is  | to the impact of the Covid   |     |                     |  |
|        |         |                   | liabilities.       | in regular contact with  | 19 pandemic. Many other      |     |                     |  |
|        |         |                   |                    | Audit to check on        | LGPS Funds have been         |     |                     |  |
|        |         |                   |                    | progress.                | unable to finalise their     |     |                     |  |
|        |         |                   |                    |                          | accounts due to the impact   |     |                     |  |
|        |         |                   |                    |                          | of the pandemic. The         |     |                     |  |
|        |         |                   |                    |                          | failure to sign off the      |     |                     |  |
|        |         |                   |                    |                          | accounts does not relate to  |     |                     |  |
|        |         |                   |                    |                          | a failure on the part of the |     |                     |  |
|        |         |                   |                    |                          | Fund to produce them but     |     |                     |  |
|        |         |                   |                    |                          | with delays in the audit     |     |                     |  |
|        |         |                   |                    |                          | process which is beyond      |     |                     |  |
|        |         |                   |                    |                          | the control of the Fund.     |     |                     |  |
|        |         |                   |                    |                          | The breach has been rated    |     |                     |  |
|        |         |                   |                    |                          | as green but a view on this  |     |                     |  |
|        |         |                   |                    |                          | is welcomed from             |     |                     |  |
|        |         |                   |                    |                          | Members.                     |     |                     |  |
|        |         |                   |                    |                          |                              |     |                     |  |

| Rating | Description  | Breach occurred    | ]    | Breach identified      | ]    | Action taken  | Decision            |  |
|--------|--|--------------------|------|------------------------|------|---|---------------------|--|
|        |  |                    | -    |                        |      |   | I .                 | 1  |
|        | Cause, effect, reaction and wider implications considered  | Error has occurred | PLUS | Errors not recongnised | PLUS | No action taken to rectify and tackle the cause                   | MUST Report to TPR  |  |
|        | together ARE LIKELY to be of material significance   |                    |      |                        |      |   |                     |  |
|        |  | L                  |      |                        |      |   |                     |  |
|        | Cause, effect, reaction and wider implications considered together MAY be of material significance               | Error has occurred | PLUS | Errors rectified       | PLUS | Systemic causes not addressed so issue may arise again            | MAY Report to TPR   | Consider the evidence and make a decision. |
|        |  |                    |      |                        |      |   |                     |  |
|        | Cause, effect, reaction and wider implications considered together ARE NOT Likely to be of material significance | Error has occurred | PLUS | Errors rectified       | PLUS | Systemic causes addressed to mitigate against issue arising again | DON'T Report to TPR |  |

## **Breaches Process**

| Type of Breach      | Timescale for reporting     | Internal actions  | Further actions                           |
|---------------------|-----------------------------|-------------------|---|
| Urgent and Material |                             | Governance team   | Report urgent and material breaches to    |
|                     | Responsible officer         | to keep record of | Section 151 officer, Chair and Vice Chair |
|                     | informs Head of Pensions    | the breach and    | of Committee and Local Pension Board.     |
|                     | and Treasury and the        | investigate       | Full report to be submitted at the next   |
|                     | governance team, the        | options to        | available meeting                         |
|                     | breach is reported          | prevent further   |   |
|                     | immediately to The          | occurrence        |   |
|                     | Pensions Regulator          |                   |   |
| Non urgent: Assess  | Responsible officer         | Governance team   | Report breach at next Pension             |
| whether Material /  | informs Head of Pensions    | to keep record of | Committee and Pension Board meeting       |
| Immaterial          | and Treasury and the        | the breach and    |   |
|                     | governance team, the        | investigate       |   |
|                     | breach is considered and if | options to        |   |
|                     | deemed necessary it is      | prevent further   |   |
|                     | reported to the Pensions    | occurrence        |   |
|                     | Regulator within 30 days    |                   |   |
| Immaterial          | Responsible officer         | Governance team   | Report immaterial breach at next          |
|                     | informs Head of Pensions    | to keep record of | Pension Committee and Pension Board       |
|                     | and Treasury and the        | the breach and    | meeting                                   |
|                     | governance team within      | investigate       |   |
|                     | 30 days                     | options to        |   |
|                     |                             | prevent further   |   |
|                     |                             | occurrence        |   |
|                     |                             |                   |   |