

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
			Not clear	Refer to Head of Pensions to make recommendation
			Yes	Refer to Head of Pensions to make recommendation
6		Head of Pensions receives referral	Not clear if Breach is Material	Make recommendation and refer to S151 Officer for decision
			Breach is Material	Make recommendation and refer to S151 Officer for decision
7		S151 Officer decides breach is Material	Scheme Manager reports Breach to the Pensions Regulator	Update Breaches Log