

## Record of Breaches 2018-19

Date	Category	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported/Not reported (with justification if not reported and dates)	Traffic light system colour	Outcome of report and/or investigations	Outstanding actions	Comments
Aug-2018	LGPS Administration	In total, 7,735 Annual Benefit Statements were not issued by the deadline for deferred members.  This figure consisted of the following: Marked as 'gone away' - 2,962 Status 2 (undecided leaver): 4,413	The member has been unable to check: <ul style="list-style-type: none"><li>• personal data is complete and accurate</li><li>• correct contributions have been credited</li><li>• what their pension may be at retirement</li></ul>	n/a	Not reported.  A total of 20% of statements were not issued.  8% were not issued as a current address was not held (GBG Connexus are currently undertaking tracing work) and 12% we were awaiting information from employer).  New processes being put in place with employers including the introduction of monthly interfaces which should help to resolve these problems.  Deferred members not covered by Pensions Regulator specifically.	A failure by some participating employers to act in accordance with scheme procedures, indicating variable standards of implementing those procedures.	n/a	Introduction of improved processes requiring employers to submit monthly returns. Address tracing.	
Aug-2018	LGPS Administration	In total, 307 Annual Benefit Statements were not issued by the deadline for active members.  This figure consisted of:  Produced on 01/09/18: 196 Outstanding: 111	The member has been unable to check: <ul style="list-style-type: none"><li>• personal data is complete and accurate</li><li>• correct contributions have been credited</li><li>• what their pension may be at retirement</li></ul>	A letter was sent to all scheme members that we were unable to provide an ABS, explaining why this was not possible.	Not reported.  Less than 1% of ABS were not issued. Very few statements were affected and a large proportion of those not issued in time were issued shortly after deadline	A small number of members affected when compared with total statements issued.  Action has been taken to correct the breach, identify and tackle its cause, to minimise the risk of reoccurrence (members not contacted as only small delay in receiving statements)  It is unlikely that the scheme will be in breach of other legal requirements.	n/a	Encourage employers to use monthly CARE interface so that leavers and any issues are highlighted sooner - aim to make this mandatory for employers during 2019/20  Annual trace on addresses - trial of new tracing service underway	
Ongoing	LGPS Administration	Backlog of work - LGPS to be actioned.  Feb 2019 - When considered against disclosure requirements:  442 (over 30 days) - 121 of which on reply due awaiting information from elsewhere to be chased - balance outstanding: 321	The member has been unable to check: <ul style="list-style-type: none"><li>• personal data is complete and accurate</li><li>• correct contributions have been credited</li><li>• what their pension may be at retirement</li></ul>		Not reported.  A full review of the service has been undertaken and a new structure is in place with effect from July 2018.  The LGPS Framework was used to obtain quotes for assisting with the backlog, but this has had limited success and we have therefore taken the decision to address this internally.  The figures for the backlog are reported internally on a weekly basis and are presented to the Pension Board and management team on a regular basis.	We have attempted to increase staffing numbers, with some success, but attracting temporary staff has proven to be counter-productive. This area is still the subject of ongoing review.  We have considered outsourcing, but this has been largely unsuccessful, is very costly and does not tackle the problem in a reasonable timeframe, nor does it provide a complete solution.  We are also reviewing the source of some of the issues with the aim of tackling these at an earlier stage in the process, utilising increased training for employers and staff, better use of technology and revised procedures to improve the efficiency of processes. Some of these have a longer lead-in time than others, but this is being monitored against the Service Improvement Plan and we are making good progress.	n/a	Continue with actions set out in the service improvement plan including employer training & communications, staff training, revised procedures, implementation of technological solutions (enhanced member self-service, enhanced employer self-service, employer interfaces, etc.)	