

Record of Breaches – 2019/20

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	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)	Outcome of report and/or investigations	Outstanding actions
31/08/2019	Administration	100% of annual benefit statements not issued by statutory deadline, 97.26% issued	Non-compliance with statutory regulations	None received	Reported to Pension Board on 02/10/2019	A revised procedure was introduced for 2019/20 as only 79.06% of ABS were issued by the deadline in 2018. The considerable increase in the number of ABS issued is a substantial improvement	N/A – Green breach

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*31/08/2019	Contributions	<p>Employees & employer's contributions not received by the 19th of the month following the month in which they were deducted as follows:</p> <table border="1" data-bbox="539 775 1115 1098"> <thead> <tr> <th colspan="2" data-bbox="539 775 1115 815">2019/20</th> </tr> </thead> <tbody> <tr> <td data-bbox="539 815 828 938">2018/19 outstanding amount</td> <td data-bbox="828 815 1115 938">£285,097.85</td> </tr> <tr> <td data-bbox="539 938 828 1061">Payments received after 19/04/2019 in relation to 2018/19</td> <td data-bbox="828 938 1115 1061">£31,587.99</td> </tr> <tr> <td data-bbox="539 1061 828 1098"></td> <td data-bbox="828 1061 1115 1098">£253,509.86</td> </tr> </tbody> </table>	2019/20		2018/19 outstanding amount	£285,097.85	Payments received after 19/04/2019 in relation to 2018/19	£31,587.99		£253,509.86	Non-compliance with Pensions Act 1995 and payments not made within the prescribed period set out in the Service Level Agreement	None received	Not reported. Reason for late payments was due to the employer's procedures/administratio n function and not due to an inability to make payment or cash flow problems	For the period April to July 2019 it took an average of 14.34 days to receive late payments. This is an improvement on 2018/19	N/A – Green breach with improvement plan continuing
2019/20															
2018/19 outstanding amount	£285,097.85														
Payments received after 19/04/2019 in relation to 2018/19	£31,587.99														
	£253,509.86														

2019/20		
Late Payments		
1-10 days late	104	
11-30 days late	43	
1-3 months late	23	
4-7 months late	7	
8-11 months late	-	
12+ months late	4	
	181	

Value received late £1,308,467.35

Outstanding Payments		
April	7	
May	7	
June	6	
July	7	
August	9	
September	8	
October	6	
November	5	
December	8	
January	6	
February	5	
March	8	
	82	

		Value outstanding £308,060.27 Plus 2018/19 £253,509.86 Total outstanding £561,570.13					
*Q4	Administration	4 refunds of employee contributions were paid in excess of 5 years since their date of leaving.	Non-compliance with statutory regulations	None received	Not reported. The LGPS Regulations 2013 state that a refund of contributions must be paid before the expiry of 5 years of the member leaving however, there is little action that can be taken if a member does not claim the refund	Members are written to immediately after leaving and informed that they have a refund of contributions. They can claim the refund or transfer the value of their fund to another approved pension arrangement. Where an election is not received, a reminder is sent to the member 6 months prior to the 5 year expiry date so that the member has a further option to make a refund election	N/A – Green breach

Record of Breaches – 2020/21

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	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)	Outcome of report and/or investigations	Outstanding actions
*Q1 01/04/2020 - 30/06/2020	Administration	8 refunds of employee contributions were paid in excess of 5 years since their date of leaving.	Non-compliance with statutory regulations	None received	Not reported. The LGPS Regulations 2013 state that a refund of contributions must be paid before the expiry of 5 years of the member leaving however, there is little action that can be taken if a member does not claim the refund	Members are written to after leaving and informed that they have a refund due. They can claim the refund or transfer the value of their fund to another approved pension arrangement. Where an election is not received, a reminder is sent to the member 6 months prior to the 5 year expiry date	N/A – Green breach

*31/08/2020	Administration	100% of annual benefit statements not issued by statutory deadline, 78.90% issued.	Non-compliance with statutory regulations	None received	Due to be reported to the Pensions Board on 14/10/2020	In 2019/20, 97.26% of ABS were issued by the deadline. This year a large Scheme employer submitted an annual return which was found to be of poor quality. The revised return was not received in time to produce ABS for their members. Excluding the employer concerned, 97.42% of were issued	Amber breach Work underway to upload the revised annual return and issue outstanding ABS on a week by week basis depending upon the accuracy of data provided by the employer concerned to resolve any queries.				
*31/05/2020	Contributions	<p>Employees & employer's contributions not received by the 19th of the month following the month in which they were deducted as follows:</p> <table border="1" data-bbox="537 1246 1052 1407"> <thead> <tr> <th colspan="2" data-bbox="537 1246 1052 1289">2020/21</th> </tr> </thead> <tbody> <tr> <td data-bbox="537 1289 824 1407">2019/2020 outstanding amount</td> <td data-bbox="824 1289 1052 1407">£561,570.13</td> </tr> </tbody> </table>	2020/21		2019/2020 outstanding amount	£561,570.13	Non-compliance with Pensions Act 1995 and payments not made within the prescribed period set	None received	Not reported as the extent of any issues will not be known until the review of contribution receipting has been completed	Data on the average number of days to receive late payments for April-May is not available. Reporting on the receipt of contributions is being reviewed	Amber breach Review of contribution receipting procedure to be completed by 31/03/2021
2020/21											
2019/2020 outstanding amount	£561,570.13										

		<table border="1"> <tr> <td>Payments received after 19/04/2020 in relation to 2019/20</td> <td>£86,886.83</td> </tr> <tr> <td></td> <td>£474,683.30</td> </tr> </table>	Payments received after 19/04/2020 in relation to 2019/20	£86,886.83		£474,683.30	out in the Service Level Agreement																		
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		<table border="1"> <tr> <td colspan="2">2020/21</td> </tr> <tr> <td colspan="2">Late Payments</td> </tr> <tr> <td>1-10 days late</td> <td>46</td> </tr> <tr> <td>11-30 days late</td> <td>7</td> </tr> <tr> <td>1-3 months late</td> <td>7</td> </tr> <tr> <td>4-7 months late</td> <td>-</td> </tr> <tr> <td>8-11 months late</td> <td>-</td> </tr> <tr> <td>12+ months late</td> <td>4</td> </tr> <tr> <td></td> <td>64</td> </tr> </table>	2020/21		Late Payments		1-10 days late	46	11-30 days late	7	1-3 months late	7	4-7 months late	-	8-11 months late	-	12+ months late	4		64					
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		Value received late £317,774.50																							
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*New/revised breaches since the previous meeting should be highlighted