

Record of Breaches – 01/07/2020-30/06/2021

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
Q2 01/07/2020 - 30/09/2020  Q3 01/10/2020- 31/12/2020  Q4 01/01/2021- 31/03/2021  Q1 01/04/2021- 30/06/2021	Administration	11 refunds of employee contributions were paid in excess of 5 years since their date of leaving  4 refunds of employee contributions were paid in excess of 5 years since their date of leaving  6 refunds of employee contributions were paid in excess of 5 years since their date of leaving  7 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 stipulate 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

31/08/2021	Administration	100% of annual benefit statements not issued by statutory deadline, 98.14% issued	Non-compliance with statutory regulations	None received	Not reported	In 2019/20 78.90% of ABS were issued by the deadline due to an inaccurate return received from a large employer with revision not received in time to issue ABS to their members. Intervention and regular meetings with this employer and with others has resulted in an improvement in data quality for 2020/21	N/A – Green breach
21/06/2021	Administration	AVC Fund options not provided to Scheme member by AVC provider within designated timeframes	Non-compliance with stated turnaround times	Scheme member and BPF raised with AVC provider, Pensions Ombudsman, Financial Ombudsman and Local Government Association	Reported to The Pensions Regulator in accordance with their whistleblowing procedures	AVC provider service standards have declined nationally due to the introduction of a new software system and global pandemic. Member has now been provided with options and has made their decision.	Amber breach – continued discussion with provider and LGA who have raised this on behalf of all Funds. AVC review to be undertaken

30/06/2021	Contributions	<p>Employees/employer's contributions not received by the 19<sup>th</sup> of the month following the month in which they were deducted:</p> <p>2019/20 Value outstanding £16,874.73</p> <table border="1" data-bbox="539 579 994 946"> <thead> <tr> <th colspan="3">2020/21</th> </tr> <tr> <th colspan="3">Late Payments</th> </tr> </thead> <tbody> <tr> <td>1-10 days late</td> <td>121</td> <td></td> </tr> <tr> <td>11-30 days late</td> <td>27</td> <td></td> </tr> <tr> <td>1-3 months late</td> <td>25</td> <td></td> </tr> <tr> <td>4-7 months late</td> <td>4</td> <td></td> </tr> <tr> <td>8-11 months late</td> <td>3</td> <td></td> </tr> <tr> <td>12+ months late</td> <td>-</td> <td></td> </tr> <tr> <td></td> <td>180</td> <td></td> </tr> </tbody> </table> <p>Value received late £1,513,705.80</p> <table border="1" data-bbox="539 1058 994 1544"> <thead> <tr> <th colspan="3">Outstanding Payments</th> </tr> </thead> <tbody> <tr> <td>April</td> <td>-</td> <td></td> </tr> <tr> <td>May</td> <td>-</td> <td></td> </tr> <tr> <td>June</td> <td>7</td> <td></td> </tr> <tr> <td>July</td> <td>5</td> <td></td> </tr> <tr> <td>August</td> <td>5</td> <td></td> </tr> <tr> <td>September</td> <td>4</td> <td></td> </tr> <tr> <td>October</td> <td>5</td> <td></td> </tr> <tr> <td>November</td> <td>5</td> <td></td> </tr> <tr> <td>December</td> <td>3</td> <td></td> </tr> <tr> <td>January</td> <td>5</td> <td></td> </tr> <tr> <td>February</td> <td>3</td> <td></td> </tr> </tbody> </table>	2020/21			Late Payments			1-10 days late	121		11-30 days late	27		1-3 months late	25		4-7 months late	4		8-11 months late	3		12+ months late	-			180		Outstanding Payments			April	-		May	-		June	7		July	5		August	5		September	4		October	5		November	5		December	3		January	5		February	3					<p>Review of contribution receipting procedure was completed by 31/03/2021.</p> <p>We are working on a new debt procedure. This includes a 3-stage process communicated by email/letter to the employers when payments are late, detailing the charging process.</p>	<p>Amber breach</p> <p>Monthly debt days have been scheduled into the finance teams' diaries to ensure this is addressed every month</p>
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March	2		
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Value outstanding £62,195.04

2021/22		
Late Payments		
1-10 days late	13	
11-30 days late	7	
1-3 months late	2	
4-7 months late	-	
8-11 months late	-	
12+ months late	4	
	26	

Value received late £169,476.82

Outstanding Payments		
April	4	
May	7	
June	3	

Value outstanding £132,072.31

Total value  
outstanding@30/06/2021

2019/20 £16,874.73  
2020/21 £62,195.04  
2021/22 £132,072.31

£211,142.08