

Breaches Log 2019 & 2020

Appendix 1

Type of Breach	Period	Number of Incidents	Detail	Outcomes & Improvements
Regulatory Breaches				
Employer Late Payers	Jan to Dec 2019	34	No material breaches	
Employer Year End Data	Year end 31/3/19	17	2 late returns & 15 data errors	12 attended training, 5 paid fines Data Improvement plans set up
5 Year Refund Breaches	April 2019 to Dec 2019	105	Unable to pay refund before 5 year deadline due to no response or no trace of member	Tracing of members continues as part of project
5 Year Refund Breaches	Jan to Sept 2020	269	Unable to pay refund before 5 year deadline due to no response or no trace of member	Tracing of members continues as part of project
Other Breaches	Aug 2019	1	900 ABSs issued incorrectly due to system error in calculation of death benefits.	All re-calculated & re-issued before 31 August deadline. Improved testing plan put in place
	Oct 2020	1	Pension Savings Statements issued one week late.	This was due to the implementation of new statement template
Data Breaches				
Reported to Information Governance	Jan to Dec 2019	4	2 x data sent to incorrect employer (Globalscape) 2 x data sent to incorrect member	Checking step added to Globalscape procedure More training to staff
Reported to ICO	Jan to Dec 2019	1	IConnect – first line of address incorrect (71 members)	This incident lead to set up of the IConnect Team and implementation of further controls
Reported to Information Governance	Jan to Oct 2020	3	2 x pensioner payslips sent to incorrect person (Toplink – Print Service) 1 x data sent via Secure Share to wrong recipient 1 x member data sent to old address	Review of Toplink’s procedures Initial mistake made when procedure was introduced Training & education of staff members
Reported to ICO	Jan to Oct 2020	0		