

Appendix 1
Breaches Log - 2022/2023

Type of Breach	Number of Incidents	Summary of Breach	Detail	Outcomes and Improvements
Regulatory Breaches Oct 22 to Oct 23				
Employer Late Payers	24	Late or non payment of contributions	6 employers have been late for more than 2 consecutive months. All are resolved.	Support/training for employers
Employer Year End Data	4	Late or incorrect data submitted	Employer Relations Team working through late returns to decide if any fines will be issued	Support/training for employers
5 Year Refund Breaches	447	Unable to pay refund within 5 year deadline	Due to no response from members or the inability to trace members	Member tracing continues
Regulatory KPIS not met		In some cases regulatory KPIs have not been met in respect of administration processes	See administration report for more details	see administration report for more details
Material Regulatory Breach	1	Failure to implement annual Pensions Increase for some pensioner members	Root causes of issue are being investigated and rectification plan in place. Incident has been reported to The Pensions Regulator	Team working through cases to correct as matter of urgency
Data Breaches Oct 22 to Oct 23				
Reported to Information Governance	20	3 x email 7 x enveloping 1 x member record not updated 9 x member record updated incorrectly	Personal data sent by email to the incorrect recipient(s) in error Documents intended for one member sent to another via post Request for information to be updated on member record not actioned Wrong member records updated or records updated with incorrect data via employer returns	Training and support to team members provided, including refresher training and bespoke training sessions Stop on bulk printing remains in place
Reported to ICO	0	No breach met the threshold for reporting to the ICO		