

Appendix 1
Breaches Log - 2024/2025

Type of Breach	Number of Incidents	Summary of Breach	Detail	Outcomes and Improvements
Regulatory Breaches October 2024 to October 2025				
Employer Late Payers (October 2024 - September 2025)	14	Late or non payment of contributions	No employers have missed consecutive months and the majority of late payments have been made. Two payments remain outstanding - one company in liquidation and one new employer with onboarding issues.	Support/training for employers
Employer Year End Data	6	Late or incorrect data submitted	All employers issued fines for late/missing data submissions in October 2025.	
Employer Breaches	4	Leaver process issues	Unauthorised and incorrect refunds issued.	
5 Year Refund Breaches	399	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		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	0			
Data Breaches October 2024 to October 2025				
Reported to Information Governance	7	1 x incorrect link sharing 3 x postal breach (wrong address) 2 x postal breach (enveloping) 1 x email breach	An incorrect link to a Secure Share folder containing more than one member's data was shared Documents intended for one member sent to the wrong address Two sets of documents for different members contained in one member's envelope Spreadsheet sent to wrong employer contact	Training and support to team members provided, including refresher training and bespoke training sessions. Internal process reviews being carried out to ensure compliance and necessity. Procedure notes are being reviewed to ensure all consistency across teams. Regular data protection reminders issued to staff.
Reported to ICO	0	No breach met the threshold for reporting to the ICO		