

LB Hackney Pension Fund - Breaches Register 2023 onwards

Breach ref	Date added	Date breach resolved	Type of breach (short description)	Party which caused breach	Number of scheme members affected	Category of members affected (active, deferred, pensioner etc)	Description and <u>cause</u> of breach	Possible <u>effect</u> of breach and <u>wider implications</u>	Reaction of relevant parties to breach (i.e. actions taken)	Outstanding actions	Assessment of breach (red/amber/ green)	Rational for assessment
1	30/05/2023	20/04/2023	Late payment of March contributions to Fund	Radish (Churchill)	2	Active	The March contributions were not paid by legal deadline of 19th April .	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	20/04/2023 - Contributions were paid and received before they could be chased but Equiniti still sent a reminder of legal deadline requirements at end of May.	None	G	30/05/2023 - although contributions were late they have now been paid
2	30/05/2023	23/05/2023	Late payment of April contributions to Fund	Brooke House	44	Active	The April contributions were not paid by the legal deadline of 19th May	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	23/5/2023 - contributions paid and received. 01/06/2023 - EQ sent a reminder of legal deadline requirements	None	G	30/05/2023 - although contributions were late they have now been paid
3	30/05/2023	06/06/2023	Late submission of contribution remittance for April	Mossbourne Parkside	31	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to April contributions was not received with the payment.	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	15/5/2023, 18/05/2023, 23/05/2023 and 25/05/2023 - EQ chased late submission of remittance via emails. Several phone calls also made	None	G	06/06/2023 - remittance received
4	30/05/2023	06/06/2023	Late submission of contribution remittance for April	Mossbourne Riverside	22	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to April contributions was not received with the payment.	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	15/5/2023, 18/05/2023, 23/05/2023 and 25/05/2023 - EQ chased late submission of remittance via email. Several phone calls also made	None	G	06/06/2023 - remittance received
5	30/05/2023		Inadequate Board membership	Hackney Pension Fund	N/A	N/A	Due to various resignations, the Pension Board does not have at least four members (the legal requirement). Only two employer representatives are in post. Two scheme member representative positions are vacant.	- No Pension Board meetings have been held since 22 September 2022. - This means that the legal requirements in relation to the Board responsibilities are not being met.	11/09/23 - Recruitment process is underway	11/09/2023: - Applications for scheme member representatives to be considered by Appointments Panel. - Meeting date to be arranged	R	11/09/2023 - the recruitment process has taken far longer than hoped meaning a meeting has not taken place for a year

6	11/09/2023	21/06/2023	Late submission of contribution remittance for May	Peabody Trust	1	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to May contributions was not received with the payment.	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	22/06/2023 - First offence warningsent by EQ via email	None	G	21/06/2023 - remittance received
7	11/09/2023	20/06/2023	Late payment of May contributions to Fund	Brooke House	44	Active	The May contributions were not paid by the legal deadline of 19th June	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	22/06/2023 - EQ raised a levy as it was their second offence within the current tax year	None	G	20/06/2023 payment received
8	11/09/2023	20/07/2023	Late submission of contribution remittance for June	Mossbourne Parkside	27	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to June contributions was not received with the payment.	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	26/07/2023 - First offence warningsent by EQ via email	None	G	20/07/2023 - remittance received
9	11/09/2023	20/07/2023	Late submission of contribution remittance for June	Mossbourne Riverside	23	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to June contributions was not received with the payment	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	26/07/2023 - First offence warningsent by EQ via email	None	G	20/07/2023 - remittance received
10	11/09/2023		Late submission of contribution remittance for June	EKO Trust	16	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to June contributions was not received with the payment	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	New payroll provider in place who have been contacted requesting receipt of the contribution remittance	'Equiniti to continue to chase receipt of contribution remittance	G	11/09/2023 - although remittance not received, do expect it to be received shortly based on employer response
11	11/09/2023	05/09/2023	Late payment of June contributions to Fund	EKO Trust	16	Active	The June contributions were not paid by the legal deadline of 19th July	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	05/09/2023 - contributions paid and received	None	G	05/09/2023 - contributions received
12	11/09/2023	20/07/2023	Late payment of June contributions to Fund	SND	1	Active	The June contributions were not paid by the legal deadline of 19th July	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	26/07/2023 - First offence warningsent by EQ via email	None	G	20/07/2023 - contributions received

13	11/09/2023	23/08/2023	Late submission of contribution remittance for July	COLASP	21	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to July contributions was not received with the payment	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	Employer had a new payroll provider this month and they have been made aware that the legal date for payment of contributions is the 19th of the following month	None	G	23/08/2023 - remittance received
14	11/09/2023	23/08/2023	Late submission of contribution remittance for July	City	56	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to July contributions was not received with the payment	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	Employer had a new payroll provider this month and they have been made aware that the legal date for payment of contributions is the 19th of the following month	None	G	23/08/2023 - contributions received
15	11/09/2023		Late submission of contribution remittance for July	EKO Trust	16	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to July contributions was not received with the payment	- Unable to verify information being paid or reconcile with scheme member record information - Additional administration by HPF/Equiniti to resolve issue	EQ have chased the payroll provider via phone and email on various dates during August	Equiniti to continue to chase receipt of contribution remittance	G	11/09/2023 - although remittance not received, do expect it to be received shortly based on employer response
16	11/09/2023	30/06/2023	Disclosure breach - leaver forms not processed within required legal deadline	Unknown	3	Active	Leavers must be notified of their entitlements within 2 months from the date of the initial notification	Statutory deadlines not being met Poor service to members	Now processed	None	G	Now processed
17	11/09/2023	30/06/2023	Disclosure breach - statutory notice for new joiner now issued within required legal deadline	Unknown	1	Active	New joiner information must be issued within 2 months from date of joining the scheme	Statutory deadlines not being met Poor service to members	Now issued	None	G	Now issued
18	11/09/2023		Annual Benefit Statements for 31 March 2023 have not all been issued	Various	750	Active and deferred	Annual Benefit Statements must be issued to all active and deferred members by 31 August each year	Statutory legal deadlines not being met Poor service to members	Further work ongoing between HPF and Equiniti to understand exact numbers involved in order to resolve and issue a statement to all affected members	Further work ongoing between HPF and Equiniti to understand exact numbers involved in order to resolve and issue a statement to all affected members	A	Assessment may change once full picture known