

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 26/01/2024 recruitment is complete although meeting has not yet taken place	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 26/01/2024 recruitment is complete but a meeting has not yet taken place

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 warning sent 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 warning sent 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 warning sent by EQ via email	None	G	20/07/2023 - remittance received
10	11/09/2023	15/09/2023	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	15/09/2023 - remittance received
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 warning sent 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	15/09/2023	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	15/09/2023 - remittance received
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 26/01/2024 - 6909 statements have now been issued	Further work ongoing between HPF and Equiniti to understand exact numbers involved in order to resolve and issue a statement to all affected members 26/01/2024 Equiniti working through c160 deferred record queries	A	Assessment may change once full picture known 26/01/2024 remains amber as still some queries to resolve

19	19/12/2023	20/09/2023	Late submission of contribution remittance for September	Bridge Academy	72	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to August 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	26/09/2023 - as this was a second breach email sent to employer notifying them future late remittances will incur a levy charge	None	G	20/09/23 - remittance received
20	19/12/2023	16/11/2023	Late payment of September contributions to Fund	Petchey Academy	71	Active	The September contributions were not paid by the legal deadline of 19th October	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	16/11/2023 - payment of contributions received. This is the employer's first late payment and they have been notified further late payment will incur a levy charge	None	G	16/11/2023 - payment received
21	19/12/2023	28/11/2023	Late submission of contribution remittance for October	Arbor/Northwold Academy	28	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to October 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	28/11/2023 - remittance received	To email the employer to warn them future late submission of remittances may incur a levy charge	G	28/11/2023 - remittance received
22	19/12/2023	20/11/2023	Late submission of contribution remittance for October	Skidders Academy	46	Active	Contribution payments must be accompanied by a statement showing various information relating to the payments (remittance advice). The remittance advice relating to October 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	17/11/2023 - employer notified fund they were having issues uploading the remittance so no levy charge will be made	None	G	20/11/2023 - remittance received
23	19/12/2023	05/12/2023	Late payment of October contributions to Fund	Hackney Education	1730	Active	The October contributions were not paid by the legal deadline of 19th November	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	The payroll provider alerted the fund that the contributions would be late due to an authorising problem with their payroll system and the fund worked with the employer to resolve this, so no levy was raised	None	G	05/12/2023 - payment received
24	19/12/2023	05/12/2023	Late payment of October contributions to Fund	Lubavitch MAT	22	Active	The October contributions were not paid by the legal deadline of 19th November	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPF/Equiniti to resolve issue	The payroll provider alerted the fund that the contributions would be late due to an authorising problem with their payroll system and the fund worked with the employer to resolve this, so no levy was raised	None	G	05/12/2023 - payment received

25	19/12/2023	05/12/2023	Late payment of October contributions to Fund	Lubavitch Foundation	6	Active	The October contributions were not paid by the legal deadline of 19th November	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPPF/Equiniti to resolve issue	The payroll provider alerted the fund that the contributions would be late due to an authorising problem with their payroll system and the fund worked with the employer to resolve this, so no levy was raised	None	G	05/12/2023 - payment received
26	19/12/2023	27/11/2023	Late payment of October contributions to Fund	Petchey Academy	71	Active	The October contributions were not paid by the legal deadline of 19th November	- Assets not credited to pension fund - Could result in need to charge interest for late payment - Additional administration by HPPF/Equiniti to resolve issue	A levy is due to be raised once the employer has issued a revised remittance to reconcile with the payment	A levy is due to be raised once the employer has issued a revised remittance to reconcile with the payment	G	27/11/2023 - payment received
27	19/12/2023	30/09/2023	Disclosure breach - leaver forms received in September not processed within required legal deadline	Unknown	41	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
28	19/12/2023	31/10/2023	Disclosure breach - leaver forms received in October not processed within required legal deadline	Unknown	64	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
29	19/12/2023	30/11/2023	Disclosure breach - leaver forms received in November not processed within required legal deadline	Unknown	264	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