

The Pensions Regulator

Breaches of Law (Disclosure breach)

Your scheme details:
LGPS - London Borough of Brent Pension Fund

1. Introduction

The details on the following pages are taken from the Breach of Law: Disclosure breach submitted on 28 September 2017 at 6:32 PM.

These details were submitted by Ms Anna Maria McCormack.

2. Scheme details

Scheme details	
Scheme name	LGPS - London Borough of Brent Pension Fund
PSR number	10272080
Benefit type	Defined benefit
Address	London Borough of Brent Brent Civic Centre Engineers Way WEMBLEY Middlesex HA9 0FJ United Kingdom

3. Breach of law details

Breach of law details	
Breach details	
Breach date	31/08/2017
What type of disclosure has been breached?	Failure to supply Annual Benefit Statement
Details of the breach	<p>i. The number of members that have not received the 2017 Statements broken down by membership data Active 1556 Deferred 2095</p> <p>ii. The number of members that have correctly received the 2017 Statements broken down by membership status Active 4123 Deferred 5919</p> <p>iii. An explanation for the delay in providing the statements. Active There have been a number of issues that have meant that 1556 ABS have not been issued to date</p> <p>a) Late returns from employers/schools b) There were 931 records on the return for which no corresponding pension administration record was held, a request for starter information has been sent to the school/employer to ensure that a record can be set up and a Statement issued. c) There were 204 records where the full time equivalent pay was lower than the minimum wage and this has been queried with the school/employer d) There were 136 CARE event was incomplete. These are being investigated by Capita and the records corrected and if the information is unavailable referred back to the employer or school. e) There were 203 Missing CARE history. These are being investigated by Capita and the records corrected and if the information is unavailable referred back to the employer or school. f) There were 82 CARE calculation issues. These are being investigated by Capita and the records corrected and if the information is unavailable referred back to the employer or school.</p> <p>Deferred a) There were 108 newly notified leavers who have been sent a deferred benefit statement. b) There are 1484 deferred members that we do not hold an up to date address for. Brent are in the process of commissioning a tracing service to locate addresses and despatch the ABS for these members. c) There are 103 were the member were over the Normal Retirement Age and they have been sent a letter to claim their deferred pension d) There are 371 records that are awaiting an IT correction with our pension administrator Capita's system and once this has been made the ABS will be despatched. e) There are 29 records with queries that have been referred back to the employer and Capita are awaiting a response.</p>
Rectifying the breach	
Has this breach been rectified?	No

<p>What steps are being taken to rectify the breach?</p>	<p>Please see earlier comments on details of the breach. As previously notified our analysis of the 2016 and 2017 ABS have identified a large number of un-notified and/or un-actioned leavers on our pension administration system. We came to this conclusion as individuals have been missing from the year end returns for two consecutive years. We are in the process of contacting scheme employers for leaving details so that members can be notified of their entitlements.</p> <p>We are working on a record keeping plan to address the areas of concern in respect of un notified leavers, missing addresses for our deferred benefits and a report from our administrator Capita Employee Benefits on our common and conditional data</p>
<p>What are the timescales for completion?</p>	<p>Whilst every effort is being made to correct and create records to despatch Statements, it may be that we will still not be in a position to despatch some Statements. Therefore the proposal is that as at the if there are still statements not issued by 15 October then those scheme members will be sent a letter by 31 October 2017 apologising for the delay and informing them of the efforts being made to bring their record up to speed.</p>
<p>Additional breaches or any other information</p>	
<p>Breach details or additional information</p>	<p>None</p>

4. Trustee/Scheme Manager details

Trustee/Scheme Manager details	
Company name	London Borough of Brent
Title	Ms
First name	Anna
Surname	McCormack
Type of trustee	Other
Direct telephone number	0208-937-3190
Email address	anna.mccormack@brent.gov.uk
Address	London Borough of Brent Brent Civic Centre Engineers Way WEMBLEY Middlesex HA9 0FJ United Kingdom

5. Employer details

Employer details	
Employer name	London Borough Of Brent
Employer trading status	Active
Companies house number	None
Registered charity number	None
Title	Ms
First name	Anna Maria
Surname	McCormack
Direct telephone number	020 8937 3190
Email address	anna.mccormack@brent.gov.uk
Address	London Borough of Brent Brent Civic Centre Engineers Way WEMBLEY Middlesex HA9 0FJ United Kingdom

6. Reporter(s) details

Reporter's details	
Title	Ms
First name	Anna
Surname	McCormack
Role in scheme	Scheme administrator
Role in scheme - further details	None
Direct telephone number	020-8937-3190
Email address	anna.mccormack@brent.gov.uk
Address	London Borough of Brent Brent Civic Centre Engineers Way WEMBLEY Middlesex HA9 0FJ United Kingdom