

LPPA Senior Leadership Team

LPPA Breach Reporting

Authority & decision trail:	Decision Trail: LCPF Local Pension Board Authority: LPPA Senior Leadership Team
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LPP Information Classification: - Applies to The LPP Group	Confidential

Purpose

This paper seeks to provide an overview of the process used to assess and rate administration breaches.

Background

An action was raised at the last Board meeting requesting LPPA to provide a paper to explain the process adopted for administration breaches.

Summary

Since the formation of the LPPA Risk & Compliance team in 2020, the breach process has been enhanced to capture and report on all breaches, not just data breaches. This process has 3 categories of breach as detailed below:

Data Breach	Code of Practice 14 Breach	LPPA Process Breach
This type of breach impacts on personal data	This type of breach impacts on the administration of a pension scheme that is covered under the Pensions Regulator’s CoP14	This type of breach impacts on LPPA’s own Policies and Procedures
Examples: <ul style="list-style-type: none"> ➤ Disclosure of information to an unauthorised party ➤ Inaccurate record keeping ➤ Loss of or damage to data records 	Examples: <ul style="list-style-type: none"> ➤ Inaccurate record keeping (e.g. service history / transactions etc.) ➤ Contribution Payments ➤ Disclosure Requirements (e.g. ABS / Retirement Options etc.) ➤ IDRPs not processed in time 	Examples: <ul style="list-style-type: none"> ➤ Process not followed ➤ Use of personal email / phone ➤ Email sent to incorrect email address (where no personal data is included)

N.B. These examples are not exhaustive

LPPA take all breaches extremely seriously. A breach leads to errors which need to be addressed. Upon notification of any breach the Risk & Compliance team log these on the Breach Register and investigate how the breach happened, ensure any corrective work has been completed, and engage with the individual who caused the breach and their direct line manager to put in place measures to prevent the breach reoccurring.

Where a Member has been directly affected, measures are taken to apologise and provide protection if deemed appropriate, for example CIFAS.