



West Northamptonshire Council

Pension Fund Committee

5 December 2023

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund Potential Breaches of the Law Report
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List of Appendices

Appendix A – Details of potential breaches that fall within the LGPS Regulations.

Appendix B - Other regulatory requirements the Northamptonshire Pension Fund must adhere to.

1. Purpose of Report

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- 1.1 The purpose of this report is to highlight potential breaches of the law in relation to the management and administration of the Fund. The report aims to provide assurance to the Northamptonshire Pension Committee that adequate controls are in place for both identifying and reporting such breaches.

2. Executive Summary

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- 2.1 The below potential breach areas are covered by the Pensions Act 2004 and the Pensions Regulator's (TPR) Code of Practice and the detail for each can be found in sections 6.1-6.8 of the report.
- Knowledge and understanding
 - Conflicts of interest
 - Publishing information about schemes

- Scheme record keeping
- Internal controls
- Contributions
- Providing information to members
- Internal dispute resolution

2.2 The below potential breach areas are covered by the LGPS Regulations, the detail can be found in Appendix A of the report.

- Membership
- Contributions
- Pension accounts and benefits
- Strategies, statements and reports
- Actuarial valuations
- Payments
- Decisions
- Transfers
- Governance
- Investment

2.3 There are other regulatory requirements the Northamptonshire Pension Fund must adhere to; these are listed below. Details of the requirements in these areas are covered in Appendix B of the report.

- Finance Act and HMRC requirements
- Public Sector accessibility requirements
- Pensions Dashboards
- Data protection and information requests
- Data breaches

2.4 Section 6.9 of the report highlights potential Pensions Regulator consequences from breaches of the law.

3 Recommendation

3.1 The Pension Fund Committee is asked to note the potential breaches of the Northamptonshire Pension Fund and associated control measures.

4 Reasons for Recommendation

- To ensure adequate oversight of potential breaches for the Northamptonshire Pension Fund.
- To ensure good governance and compliance with the Local Government Pension Scheme Regulations and other relevant legislation and guidance.

5 Report Background

5.1 As required by clause 70 of the Pensions Act 2004, and laid out in the TPR Code of Practice for Public Service Pension Schemes 14, certain individuals are required to report breaches of the law to TPR where they have reasonable cause to believe that:

- A legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with.

- The failure to comply is likely to be of material significance to the regulator in the exercise of any of its function.

5.2 Those who are subject to the reporting requirements (“reporters”) for public service pension schemes are:

- Scheme Managers i.e. pension committee members and officers involved in the management of the fund at the administering authority
- Members of pension boards
- Participating employers
- Professional advisers (this includes individuals such as the Fund’s external auditor, actuary, investment consultant, governance/benefit consultant and legal adviser)
- Any person who is otherwise involved in advising the managers of the scheme in relation to the scheme
- Any person who is otherwise involved in the administration of a public service pension scheme.

5.3 In addition to the legal requirements, TPR’s Code of Practice provides expectations that schemes should be satisfied that:

- those responsible for reporting breaches are made aware of the legal requirements and their guidance
- they have a sufficient level of knowledge and understanding to fulfil that duty and
- they have appropriate procedures in place to identify and assess

5.4 The Northamptonshire Pension Fund has in place a ‘Reporting Breaches of the Law to the Pensions Regulator Policy’ and this report is designed to be supplementary in providing detail of the types of potential breaches the Fund may encounter.

6 Issues and Choices

Details of potential breaches that fall within the Pensions Act 2004 and TPR’s Code of Practice are outlined below:

6.1 Knowledge and Understanding

6.1.1 Requirement: A member of the pension board of a public service pension scheme:

- must be conversant with the rules of the scheme, and any document recording policy about the administration of the scheme.
- must have knowledge and understanding of the law relating to pensions, and any other matters which are prescribed in regulations.

Controls in place	Measures against the controls & oversight
Training Strategy in place.	Regularly reviewed in line with approved review cycle and published on the Pensions Service website. Prescribed timescales for mandatory training to be undertaken and the Chair of respective Committee/Board is notified of non-compliance.

Controls in place	Measures against the controls & oversight
Training recorded in the Annual Report and statement of Accounts.	Annual Report published by 1 December each year. Draft and final report presented to the Committee and Board each year.
Adequate policies and strategies in place.	Regularly reviewed in line with approved review cycle and published on the Pension Service website (except Cyber).
Activities undertaken by the Committee and Board are reported to Full Council.	An annual report is approved by the Chair of the Pension Committee and taken to Full Council for oversight purposes. The Board's annual report is produced by Democratic Services and presented at a Board meeting prior to being taken to Full Council.

6.2 Conflicts of Interest

6.2.1 Requirement: The scheme manager must be satisfied:

- that a person to be appointed as a member of the pension board does not have a conflict of interest.
- from time to time, that none of the members of the pension board have a conflict of interest.
- each member or proposed member of a pension board must provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.
- the pension board must include employer representatives and member representatives in equal numbers.

Controls in place	Measures against the controls & oversight
Conflicts of Interest Policy in place.	Regularly reviewed in line with approved review cycle and published on the Pension Service website.
Conflicts of Interest Register in place.	Declarations issued annually and the respective Chair is notified of any non-compliance.
Conflicts of interest training in place.	A link to COI training is sent with all declaration requests.
Constitution in place.	A Governance Policy and Compliance Statement is in place that reflects the WNC Constitution and is reviewed by officers annually. The Committee and Board structures are reflective of the Constitution.

6.3 Publishing information about Schemes

6.3.1 Requirement: The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up to date. The information must include:

- who the members of the pension board are.
- representation on the board of members of the scheme(s).
- the matters falling within the pension board's responsibility.

Controls in place	Measures against the controls & oversight
Published information on the Committee and Board.	The Pensions Service website contains details of membership and remit of the Committee, ISC and Board. Democratic Services also publish membership details.
WNC Constitution in place.	The responsibility of the WNC Monitoring Officer and is maintained and reviewed by Democratic Services. The Constitution is published and contains the roles and responsibilities of the Committee, ISC and Board.
Governance Policy and Compliance Statement in place.	Regularly reviewed by Officers and material changes are approved by the Monitoring Officer. The Policy is published on the Pensions Service website and contains roles and responsibilities of the Committee, ISC and Board.

6.4 Scheme Record Keeping

6.4.1 Requirement: Scheme managers must keep records of information relating to:

- member information.
- transactions.
- pension board meetings and decisions.

Controls in place	Measures against the controls & oversight
Pension Administration System in place.	Holds information on all membership types and contains transactional information for all events such as transfers and retirements. Heywood is contracted to ensure the system is fit for purpose, data is secure, and the Fund continually cleanses data for accuracy. The administration system provides an audit trail of all activity undertaken and stores associated documentation.
Data Improvement Policy in place.	Regularly reviewed in line with approved review cycle and published on the Pensions Service website.
Data Improvement Plan in place.	Updated annually and presented to the Committee and Board.
Data scoring undertaken.	Common and Conditional data scores are a component of the Pension Regulator's annual Scheme Return which is mandatory.

Controls in place	Measures against the controls & oversight
Meetings undertaken in line with statutory obligations.	Meetings are co-ordinated by Democratic Services who ensure statutory obligations are adhered to in line with the Constitution. Minutes are taken at each meeting for a clear audit trail of any decisions made. Public items are published for transparency.

6.5 Internal Controls

6.5.1 Requirement: The scheme manager of a public service pension scheme must establish and operate internal controls. These must be adequate for the purpose of ensuring that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law. Internal controls refer to:

- arrangements and procedures to be followed in the administration and management of the scheme.
- systems and arrangements for monitoring that administration and management.
- arrangements and procedures to be followed for the safe custody and security of the assets of the scheme.

Controls in place	Measures against the controls & oversight
Task Management Processing.	The task management system contains procedural notes and checklists that are continually reviewed and updated by the Quality Assurance Officer. Training is also provided on procedural changes.
Policies and Strategies in place.	Regularly reviewed in line with approved review cycle and published on the Pensions Service website.
System reporting.	Workflow monitoring reports are produced by the Quality Assurance Officer on a weekly basis. Key Performance Indicator statistics are reported to the Committee and Board at every meeting via the Administration Report and operate under a RAG system basis.
Financial Transactions	Transactions entered within the system require managerial approval, staff who input the transaction cannot approve the transaction. These approvals are contingent upon the value associated with each transaction, with varying approval thresholds requiring different levels of authorisation. On a monthly basis, the approval hierarchy is subject to scrutiny and assessment by the Fund Accounting team.

Controls in place	Measures against the controls & oversight
Custodian in place.	Robust procurement process to appoint an appropriate custodian. Oversight from both the Investment Sub Committee and Pension Fund Committee.

6.6 Contributions

6.6.1 Requirement: Where employee contributions are deducted from a member's pay, the amount deducted must be paid to the managers of the scheme at the latest by the 19th day of the month following the deduction, or by the 22nd day if paid electronically (the 'prescribed period'), or earlier if required by scheme regulations.

Controls in place	Measures against the controls & oversight
Payment of Employee and Employer Contribution Policy in place.	Regularly reviewed in line with approved review cycle and published on the Pensions Service website.
Automated reconciliation process.	A defined process is in place to monitor the employer contribution payments to the Fund. An electronic return is completed by the employer and an automated check is carried out against the return and compares the amount received. The database flags any missed payments and/or returns for resolution.
Internal escalation Policy in place.	Where issues are not resolved within the Funding Team the issue is referred to the Employer's Team who will deal with the employer directly.
Pension Regulator Report where applicable.	Persistent late/non-payment of contributions may result in a late payment report being submitted to the Pensions Regulator. All employers reported to the Pensions Regulator are notified to the Committee and Board via the Administration Report.

6.7 Providing information to members

6.7.1 Requirement: The law requires schemes to disclose information about benefits and scheme administration to scheme members and others, this includes:

- Benefit Statements – both timescales and requirements relating to the content of annual benefit statements
- other information to be provided in other circumstances within defined timescales including: – basic scheme information
 - information about the scheme that has materially altered.
 - information about the constitution of the scheme.
 - information about transfer credits.
 - information about life styling.
 - information about accessing benefits.
 - information about benefits in payment.

Controls in place	Measures against the controls & oversight
Communication Plan in place.	Reviewed annually and presented to the Committee and Board for comment. The Communications Officer is responsible for delivering timely and accurate communications to appropriate audiences in a suitable manner. Scheme changes are covered by the disclosure regulations and must be communicated to affected members within 3 months, these are managed by the Communications Officer with support from the regulations team.
Constitution in place.	The WNC Monitoring Officer/Democratic Services are responsible for maintaining and publishing the constitution. There is a Fund specific Governance Policy & Compliance Statement in place that reflects the Constitution.
Pensions Service website in place.	Basis scheme information is accessible via the Pensions Service website. Officers are responsible for keeping it updated with current and accurate information obtained via national bodies such as the Local Government Association, Scheme Advisory Board and the Fund's governance advisors.
Cyclical processes.	Yearly processes built into work planning to ensure benefit statements are accurate and issued on time. These processes include reconciling year end data, the production of the statements and that effective communications are in place to ensure members are aware when they have been issued.
Key performance indicators.	A suite of KPI measures is in place to monitor both administrative performance against service level targets and statutory targets that measure the overall customer experience. The KPI measures ensure action can be taken at particular pressure points (within the service or with employers) and ensure members receive timely and accurate information.
Technical guidance.	The LGPC Annual Benefit Statements technical guide is used as a reference tool for ensuring the content of the statements is compliant.

- 6.8.1 Requirement: Scheme managers must make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pension disputes between the scheme manager and a person with an interest in the scheme. Scheme managers and specified persons must take the decision required on the matters in dispute within a reasonable period of receiving the application. They must notify the applicant of the decision within a reasonable period of having taken it.
- 6.8.2 Internal dispute resolution procedures must state the manner in which an application for the resolution of a pension dispute is to be made, the particulars which must be included in such an application and the manner in which any decisions required in relation to such an application are to be reached and given. The procedure must specify a reasonable period within which applications must be made by certain people.
- 6.8.3 Scheme managers must provide information about the scheme’s dispute resolution procedure as well as information about the Money and Pensions Service and the Pensions Ombudsman to certain people at certain stages.

Controls in place	Measures against the controls & oversight
Internal Dispute Resolution Procedure published and accessible.	The full process and statutory timescales are detailed in the administering authority decision guide. An internal control log to monitor stage 1 & 2 cases is managed by the Governance and Regulations Manager. Letters to the member include details on the Pensions Ombudsman and information on the Money and Pensions Service.
Comprehensive documentation.	IDRP documentation including guidance, claim forms and determinations cover all regulatory requirements and timescales. Appropriate adjudicators in place at stage 1 and 2 with clear separation of processes. Information on the Pensions Ombudsman and Money and Pensions Service provided at relevant stages.
Continual monitoring.	A monitoring log is in place to ensure that all stage 1 & 2 disputes are managed appropriately adhering to prescribed timescales.

6.9 Potential Pensions Regulator breach of the law consequences

- 6.9.1 The Pensions Regulator ensures that their decisions are proportionate, accountable, consistent, transparent and targeted. A risk based and proportional approach is taken when deciding whether to take enforcement action. The role of the regulator is to support those that they regulate and to change behaviours.
- 6.9.2 Enforcement options are considered once any evidence that has been obtained is analysed. The decision is based on the most proportionate means to achieve the desired outcome, taking into consideration how long enforcement action might take.
- 6.9.3 The potential outcomes fall into 5 categories as detailed below:

Prevention – an improvement notice may be issued to mitigate a breach being repeated in the future. The notice sets out the steps that must be taken to remedy the breach within a prescribed timeframe.

Remedy – an improvement notice may be issued as with above or a financial penalty may be imposed. A fixed penalty notice can be issued to encourage compliance, if this is not successful an escalating penalty notice can be issued. For persistent or subsequent non-compliance, a criminal sanction may be appropriate.

Restoration – if an act has detrimentally affected scheme benefits the aim will be for the members pension benefits to be put back to where they would have been if the breach had not occurred. A notice maybe issued to the Fund, and potentially penalty or criminal powers under the Pensions Act 2004 may be used in addition.

Deterrence – some contravention of pensions legislation cannot be put right or remedied. When these contraventions are persistent, indicate intentional non-compliance or that a criminal offence has been committed, powers may be used to punish and deter. In this scenario financial penalty or prosecution proceedings may be immediately pursued. The prosecution powers are generally reserved for the most serious behaviour, in particular dishonest, wilful or fraudulent. In some instances, these can lead to a criminal conviction. Each prosecution case is tested against the criteria set out in TPR prosecution policy.

Settlement – in some circumstances it may be appropriate to not pursue or continue action, this will not apply where civil or regulatory proceedings have commenced. The settlement should offer a fair and appropriate outcome having regard to the circumstances of the case and the statutory objectives. Each case will offer its own unique challenges and circumstances, so an acceptable settlement for one case may be very different from that for another, even if the same regulatory power is being used.

6.10 Local Pension Board Review

6.10.1 The Local Pension Board reviewed the requirements and controls in place at its meeting of 2 November 2023 with no further recommendations made.

7 Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The Fund's governance advisors Aon produced an initial report that highlighted potential breach areas.

7.1 Legal

7.1.1 There could be legal implications if a breach of the law was to occur. Any actual breaches of the law would be captured in the Administration Reports presented to both the Committee and Board at every meeting.

7.2 Risk

7.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below –

Risk	Residual risk rating
Those charged with the governance of the Fund and scheme are unable to fulfil their responsibilities effectively	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green
Risk of fraud and error.	Green
Failure to understand and monitor risk compliance.	Green
Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed	Green
Failure to recognise and manage conflicts of interest.	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Failure to act appropriately upon expert advice and/or risk of poor advice.	Green

7.3.2 Please see the [Northamptonshire Pension Fund Risk Register Executive Summary](#).

7.4 Relevant Pension Fund Objectives

7.4.1 The following objectives as per the Business Plan have been considered in this report -

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.
- To ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
- To put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary.
- To maintain accurate records and ensure data is protected and used for authorised purposes only.
- To provide scheme members with up-to-date information about the scheme in order that they can make informed decisions about their benefits.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

7.5 Consultation

7.5.1 Not applicable.

8. Background Papers

8.1 Internal Audit Report - [Agenda for Pensions Fund Committee on Wednesday 12th October 2022, 1.00 pm - West Northamptonshire Council \(moderngov.co.uk\)](#)

Appendix A - Details of potential breaches that fall within the LGPS Regulations.

Potential breach area	Potential breach	Comments
Membership.	An employer not entering eligible employees into the scheme.	Employer responsibility. The Fund will communicate responsibilities with scheme employers and provide training and support.
Contributions.	Incorrect contribution rates applied by an employer.	Employer responsibility. Limited validation checks will be carried out by the Fund.
	Incorrect application of assumed pensionable pay by an employer.	
	Not deducting contributions correctly from what is defined as pensionable pay.	
Pension accounts and benefits.	Errors in calculating benefits.	Checking processes. Skills and knowledge. Pension software system. Quality Assurance Officer in post to check processes are fit for purpose. Escalation to Governance and Regulations team if any queries/unusual cases.
Strategies, statements and reports.	Missing the 1 December deadline for publishing the annual report.	The annual report is managed as a project to ensure all activities are undertaken to allow the annual report to be published on time. Relevant Committee and Board oversight factored in to meet the deadline.
	Not having all policies/statements in place as required by the regulations.	The Fund has in place an approved policy/strategy review cycle that the Committee and Board have oversight of. The Funds governance advisors provide advice in this area.
	Not publishing any policy/statement that is required to be published.	All policies and strategies are published on the Pension Service website.
Actuarial valuations	Not having triennial actuarial valuation documents finalised by the first anniversary from valuation date.	The Valuation Report is published following each triennial valuation. The Actuary is in place to ensure the process and delivery is adhered to. Committee and Board engagement on prescribed timescales to meet the deadline. Professional actuarial guidance and advice.

	Not having appropriate revised rates and adjustment certificates for existing employers or not publishing/providing copies in accordance with Regulation 66.	The rates and adjustments certificate is incorporated in the Valuation Report and therefore published in accordance with the above. Employers in the Fund are sent their individual rates alongside the Valuation Report.
Payments	Incorrect amounts of contributions paid by employers.	Employer responsibility.
	Late payment of contributions.	Payment of Employee and Employer Contribution Policy in place. Reconciliation of contributions. Escalation process in place.
	Late or non-provision of a remittance advice with payment.	Payment of Employee and Employer Contribution Policy in place. Reconciliation of contributions. Escalation process in place.
Decisions	Delays in decisions being made (noting the “as soon as reasonably practicable” requirement).	Monitoring of all complaints and IDRP stage 1 and 2 cases to ensure compliance with internal policy and statutory obligations. Performance monitoring in place to establish any delays to processes and subsequent delays in decisions being made.
	Not including appropriate information in notifications of decisions.	Comprehensive determination letters including sequence of events, reason for decision and what to do next if the member does not agree the decision.
	Employer not meeting notification procedures for required information on an ongoing basis and at year end in accordance with Regulation 80(2) (Regulation 80 – LGPS Regulations 2013).	Employer responsibility. Escalation and penalties in line with the Fund’s Administration Strategy.
	Not issuing annual benefit statements to all active, deferred and pension credit members and/or missing the 31 August deadline.	As per TPR Code of Practice response in main report (6.7).

Potential breach area	Potential breach	Comments
Transfers	Paying a transfer which is not a “recognised transfer” under the meaning of the Finance Act 2004.	LGPC technical transfer guidance is incorporated into business processes and adhered to. Internal processes in place to protect members.
	Not complying with the provisions of the Club Memorandum when paying a club transfer.	LGPC technical transfer guidance is incorporated into business processes and adhered to. Internal processes in place to identify the types of transfer arrangements and associated guidance notes.
	During a bulk transfer, not providing members with sufficient information in writing before agreement.	Communication work streams between the employer and pension funds are set up at the start of a bulk transfer process. Staged approach with information and guidance provided as well as actions to be undertaken flagged. All communication is documented and discussed at progress meetings.
	Not calculating a transfer to another administering authority in accordance with actuarial guidance issued by the Secretary of State (unless it relates to 10 or more members).	LGPC technical transfer guidance is incorporated into business processes and adhered to. Internal processes in place to identify the types of transfer arrangements and associated guidance notes.
Governance	Not appointing at least 4 members to the local pension board, in equal numbers of employer representatives and member representatives	3 member representatives and 3 employer representatives appointed to the Board as per the Constitution.
	Not being satisfied from time to time that none of the local pension board members has a conflict of interest.	Conflicts of Interest Register in place.

Potential breach area	Potential breach	Comments
Investment	Not holding a separate bank account for all fund money.	The Northamptonshire Pension Fund has a separate bank account.
	Not taking proper advice when formulating an investment strategy or the strategy not being in accordance with the Secretary of State's guidance.	Appropriate procurements of a Fund Investment consultant and Independent Investment Advisor. The investment consultant must be authorised by the FCA, and individual advisors should have the relevant experience and qualifications.
	Not investing in accordance with the investment strategy, any fund money that is not needed immediately to make payments from the fund.	All investment decisions are delegated and approved by the Investment Sub- Committee.
	Not setting out within the investment strategy, the maximum percentage of the total value of all investments of fund money that it will invest in particular investments or classes of investment.	The Funds strategic asset allocation is set out in the Fund's investment strategy statement and reviewed periodically by the Investment Sub-Committee and approved by the Pension Committee.
	Not reviewing the investment strategy at least every 3 years or not publishing it.	The investment strategy statement is reviewed and approved by the Pension Committee of the Fund at least every 3 years.
	The authority borrowing money if, at the time of the borrowing, the authority does not reasonably believe that the sum borrowed, and interest charged in respect of that sum can be repaid out of its pension fund within 90 days of the borrowing.	No applicable as the Fund does not borrow money for its operations.

Appendix B - Other regulatory requirements the Northamptonshire Pension Fund must adhere to

Regulatory area	Potential breach	Comment
Finance Act and HMRC requirements	Missing deadlines for Pension Saving Statements (PSSs)	The issuing of PSSs is part of the cyclical annual allowance process. The Committee and Board are notified of any breaches via the Administration Report.
	Missing other notifiable events requirements	Quarterly reports are submitted to the HMRC that cover annual allowance charges/lifetime allowance charges/short service refund lump sum charges and special lump sum death benefit changes which are all generated through BAU processes and actioned by the Funding Team. Event reporting which includes PSS statements, benefit crystallisation and lifetime allowance, ceased ill health pensions and unauthorised payments is undertaken on an annual basis and are generated through BAU processes and actioned by the Funding Team.
Public Sector accessibility requirements	Not meeting accessibility standards or not publishing an accessibility statement on the Pensions Service website.	Accessibility checks are made on all website content and an accessibility statement is published on the website. Accessibility statement for Cambridgeshire and Northamptonshire LGPS
Pensions Dashboards	Missing the staging date for pensions dashboards.	Following TPR checklist and guidance to be prepared for the 31 October 2026. Further guidance is awaited on the staging timescale since the project reset. National guidance and regional group support.
	Not providing information to the dashboards in line with the prescribed deadlines set.	Following TPR checklist and guidance to be prepared for the 31 October 2026. Further guidance is awaited on the staging timescale since the project reset. National guidance and regional group support.
Regulatory area	Potential breach	Comment

Data protection and information requests	Not responding to requests from members in line with GDPR requirements including data subject access requests and right to withdraw.	<p>The Northamptonshire Pension Fund follows the West Northamptonshire Council Data Protection Policy and has a privacy notice published on the Pensions Service website stating how the Fund uses personal data. Data protection policy West Northamptonshire Council (westnorthants.gov.uk).</p> <p>Privacy summary Northamptonshire Pension Fund</p> <p>Subject access requests and rights are covered by the West Northamptonshire Council FOI process. Make a Freedom of Information (FOI) request West Northamptonshire Council (westnorthants.gov.uk)</p>
	Not complying with UK General Data Protection Regulations.	<p>The Northamptonshire Pension Fund follows the West Northamptonshire Council Data Protection Policy and has a privacy notice published on the Pension Service website stating how the Fund uses personal data. Data protection policy West Northamptonshire Council (westnorthants.gov.uk).</p> <p>Privacy summary Northamptonshire Pension Fund</p>
Data breaches	Not notifying the Information Commissioners Office (ICO) within 72 hours of becoming aware of a network and information systems (NIS) incident where there is substantial impact on the provision of your digital service	<p>The Northamptonshire Pension Fund follows the West Northamptonshire Council Data Protection Policy on reporting data breaches which is compliant with the ICO reporting requirements. Data protection policy West Northamptonshire Council (westnorthants.gov.uk).</p>