



Secretariat: bluelight.pensions@local.gov.uk

Breach Assessment Template

Date of assessment

26 January 2024 – Panel: Elizabeth Hipworth, HR Business Partner

Introduction

Under Regulation 8 of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2015, individuals should be notified of material alternations to basic scheme information within 3 months of the changes taking place.

Under the Matthews 2nd options exercise, legislation came into effect on the 1 October 2023. Under the disclosure requirements, expressions of interest letters should have been sent to those individuals who had been identified as being in scope by the 31 December 2023.

Identified

- 865 individuals are in scope of the Matthews 2nd options exercise
- Records had been checked with multiple sources to verify addresses: There have been 2 HRIS used for pay purposes and 2 Fire rota systems.
- Letters went out to 308 individuals on the 11 December 2023 where we had verified addresses.

- Additionally a procurement process was undertaken for a tracing company and following appointment of Target Professional Services (UK) Ltd the relevant Information Assurance arrangements made.
- The names of 557 individuals were sent to Target for an address trace and results received on the 19 January 2024, from the initial trace. Addresses were found for 367 individuals. Addresses for 166 individuals needed a fuller trace and 24 individuals were confirmed as deceased.

Assessment

[Using the [TPR guidance](#) comment on the four areas and score red, amber or green

	Cause	Effect	Reaction	Wider Implications
Red				
Amber	Length of time since employment and individuals have moved since employment ended.	Not able to write in desired timescales	Tracing company appointed and letters sent once addresses verified	Some ex employed will not be informed of options. May contact at a later date.
Green				

Action

The plan is to write to the 367 individuals that have been located via the tracing company by 29th February 2024.

When addresses are located for any of the remaining 166 individuals, we will write to the within 6 weeks of locating.

Where there are no addresses located, there will be no further action, unless the individuals make contact at a later date.

History / Frequency

This breach has not occurred before, it is a one off and specific to the Matthew 2nd options exercise.

Decision

Report as material breach	No
Recorded as breach	Yes

Assessed by: Vicki Sharpe, Elizabeth Hipworth

Date of assessment: 31 January 2024

Board Review:

Tabled at Board Meeting: 6 March 2024

Agreed by board:

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