**Breaches of the Law Policy – Appendix 3**

**Examples of breaches of the law**

The table below contains examples of breaches of the law that may occur and that the Breaches of the Law Group would need to assess, record, and potentially report as part of the breaches of the law procedure.

This is not an exhaustive list. These breaches are just typical examples of common or material breaches that could occur and that the Group would need to assess and report following the procedure.

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| **Breach** | **Comments** |
| Failure to pay pensions correctly and on time | For example, if we failed to pay pensions on the payroll payment date this would be a breach of the law. The number of pensions not paid on time would be a consideration as part of the assessment of materiality. However, if we paid most or all pensions on a payroll late this would certainly be a breach that we would need to report to TPR. |
| Failure to meet statutory deadlines | For example, if we failed to issue annual benefit statements by the statutory deadline of 31 August this would be a breach of the law. The number of statements not issued would be a consideration as part of the assessment of materiality. However, if most or all were late, this would certainly be a breach that we would need to report to TPR. |
| Failure to meet statutory requirements | For example, if a member of the Local Pension Board had not undertaken any training for their role and was unable to demonstrate that they had the required knowledge to conduct their duties effectively, then the Board or Scheme Manager may consider this to be a breach of the law. |
| Failure to collect contributions on time | For example, a breach of the law by an employer would arise if it failed to pay to GMPF the contributions it had deducted from its employees or failed to do so promptly and in line with the requirements in the Pensions Administration Strategy. The Group may regard the breach to be material if the employer fails to rectify the matter in a timely way or fails to engage to resolve it. |
| Failure to collect and record pay and contribution data on time | For example, a breach of the law by an employer would arise if it failed to provide contributions and pay data for its employees each month and in line with the requirements in the Pensions Administration Strategy. The Group may regard the breach to be material if the employer fails to rectify the matter in a timely way or fails to engage to resolve it. |
| Failure to address data errors | For example, a breach would arise if reports highlighted a data error has occurred on member records. The Group may regard the breach to be material if we fail to rectify the matter in a timely way or if the error effects a considerable proportion of members records. |