



City of London Police Pensions Board

Date: MONDAY, 7 JUNE 2021
Time: 11.00 am
Venue: 2ND FLOOR WEST WING, GUILDHALL

Members: Alexander Barr (Chairman)
John Todd (Deputy Chairman)
Henry Colthurst
Helen Isaac
Tim Parsons
Mike Reed

Enquiries: Polly Dunn
polly.dunn@cityoflondon.gov.uk

Accessing the virtual public meeting Members of the public can observe this virtual public meeting at the below link: <https://youtu.be/ynPYqHYNhXU>

This meeting will be a virtual meeting and therefore will not take place in a physical location. Any views reached by the Committee today will have to be considered by the Chamberlain after the meeting in accordance with the Court of Common Council's Covid Approval Procedure who will make a formal decision having considered all relevant matters. This process reflects the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Town Clerk and other officers nominated by him after the informal meeting has taken place and the will of the Committee is known in open session. Details of all decisions taken under the Covid Approval Procedure will be available on line via the City Corporation's webpages.

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Public Session

1. **APOLOGIES**
2. **MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To approve the public minutes of the previous meeting held on 8 February 2021.
For Decision
(Pages 5 - 8)
4. **OUTSTANDING REFERENCES**
Report of the Town Clerk
For Information
(Pages 9 - 10)
5. **PRESENTATION ON MCCLOUD**
The Chamberlain to be heard
For Information
6. **THE CITY OF LONDON: POLICE PENSION SCHEME - RISK REGISTER**
Report of the Chamberlain
For Decision
(Pages 11 - 32)
7. **THE CITY OF LONDON: POLICE PENSION SCHEME - UPDATE**
Report of the Chamberlain
For Information
(Pages 33 - 42)
8. **REVIEW REPORT FOR CITY OF LONDON POLICE AUTHORITY BOARD**
Report of the Chamberlain
For Decision
(Pages 43 - 50)

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

11. **EXCLUSION OF THE PUBLIC**

MOTION – that under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

Non-Public Session

12. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the previous meeting held on 8 February 2021.

For Decision
(Pages 51 - 52)

13. **NON-PUBLIC OUTSTANDING REFERENCES**

Report of the Town Clerk

For Information
(Pages 53 - 54)

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT THAT THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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CITY OF LONDON POLICE PENSIONS BOARD

Monday, 8 February 2021

Minutes of the virtual meeting of the City of London Police Pensions Board held at 11.00 am.

Present

Members:

John Todd (Chairman)	Helen Isaac
Alexander Barr (Deputy Chairman)	Mike Reed
Henry Colthurst	

Officers:

Kate Limna	- Chamberlain's Department
Matt Mott	- Chamberlain's Department
Graham Newman	- Chamberlain's Department
Antoinette Duhaney	- Town Clerk's Department
Azeem Bhatti	- City of London Police

1. APOLOGIES

There were no apologies.

2. MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. MINUTES

RESOLVED – That the public minutes of the previous meeting held on 09.10.20 be agreed as a correct record.

4. PUBLIC OUTSTANDING REFERENCES

The Board considered a report of the Chamberlain detailing outstanding references from previous meetings.

RESOLVED – That the report be noted.

5. THE CITY OF LONDON: POLICE PENSION SCHEME - RISK REGISTER

The Board considered a report of the Chamberlain reviewing key risks, ranking and mitigation measures.

Officers advised that following up the debate at the previous meeting, the risk register had been reviewed and risks updated as follows:

- CHB COLP PSB01 (Actuarial Data): score increased from 1 to 2 to reflect that the Board cannot influence the risk of other forces providing inaccurate

actuarial data to the Home Office.

- CHB COLP PSB03 (Pension Scheme (Administration)): risk updated to incorporate the potential need for manual calculation (overall score unchanged).
- CHB COLP PSB08 (McCloud Legal case): risk updated to reflect the involvement of Police HR. (overall risk unchanged).

It was noted that risk target expiration dates fell between meetings and Members supported target dates being rolled forward, with the exception of the McCloud judgement risk which would be reviewed at each meeting. Officers undertook to review target dates following the meeting and in response to concerns raised by a member, Officers also undertook to check whether the McCloud judgement was listed in the CoLP risk register.

Having reviewed the existing risks and actions of the Board's Risk Register, Members were satisfied that appropriate control measures had been put in place.

RESOLVED – That the report be noted.

6. THE CITY OF LONDON: POLICE PENSION SCHEME - UPDATE

The Board considered a report of the Chamberlain providing an update on key issues in respect of the CoLP Pension Scheme. Officers highlighted the non-public Appendix to the report and reminded Members that if they wished to discuss the appendix in detail, the public would need to be excluded before this debate took place.

The Board was advised that HMT had circulated information in respect of the McCloud remedy at the end of the previous week and Officers were currently looking at the implications/remedies for the scheme. The Pensions Office in conjunction with CoLP HR and Finance Officers had ongoing dialogue on proposed remedies, how they might be implemented and the potential impact on the Scheme administration.

There were proposals for a new website managed by the Pensions Team, which would be a central hub for sharing information with Officers including any updates on the McCloud judgement and remedy. This would be a more effective means of communicating with serving and former Officers and would relieve the pressure on the Pensions Team.

In response to questions and observations from Members, Officers advised that any financial impact of the McCloud Judgement would be funded by the Home Office. However, the potential impact on administration resources was not yet known.

Board Members commended Officers for the comprehensive report and requested that for future reports, Appendix 2 (page 39) should include data for the previous 4 quarters.

RESOLVED -

1. That the report be noted.
2. That for future reports, Appendix 2 as set out on page 39 of the agenda pack, should include data for the previous 4 quarters.
7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There were no public questions.
8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no other urgent public business.
9. **EXCLUSION OF THE PUBLIC**
RESOLVED - that under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
10. **NON-PUBLIC MINUTES**
RESOLVED – That the non-public minutes of the previous meeting held on 09.10.20 be agreed as a correct record.
11. **NON-PUBLIC OUTSTANDING REFERENCES**
The Board considered a report of the Chamberlain detailing outstanding non-public references from previous meetings.
12. **THE CITY OF LONDON: POLICE PENSION SCHEME STATISTICAL DATA**
The Board considered a report of the Chamberlain regarding the City of London Police Pension Scheme membership.
13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
The Board considered 1 question.
14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT THAT THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other urgent non-public business.

The meeting closed at 11.32 am

Chairman

Contact Officer: Polly Dunn
polly.dunn@cityoflondon.gov.uk

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POLICE PENSIONS BOARD

PUBLIC OUTSTANDING REFERENCES

Reference	Date / Detail	Responsible Officer	Update
12/2019/P	12 June 2019 Item 6 – Presentation Officers to be prepared to issue a communication to scheme members in the event of the legal challenge reaching a resolution.	Matt Mott (Chamberlain's Department)	Legal Challenges, McCloud & Injury Benefits, still ongoing
2/2020/P	9 October 2020 Item 7 – McCloud Ruling Training session to be provided to Members once implications of McCloud ruling are better understood.	Pensions Team	McCloud presentation training update to be provided at June 21 meeting
1/2021/P	21 February 2021 Item 5 – City of London: Police Pension Scheme – Risk Register Review to be undertaken on target dates for risks and officers to check that the	Pensions Team	Included in the Risk Register for June 21 meeting

POLICE PENSIONS BOARD

PUBLIC OUTSTANDING REFERENCES

	McCloud judgement was listed on the COLP risk register		
2/2021/P	21 February 2021 Item 5 – City of London: Police Pension Scheme – Data from the previous four quarters to be included within appendix 2 of future reports	Pensions Team	Included in administrators update

Agenda Item 6

Committee: Police Pensions Board	Date: 7 June 2021
Subject: The City of London: Police Pension Scheme – Risk Register	Public
Report of: The Chamberlain	For Information
Report author: Graham Newman – Chamberlain’s Department	

Summary

This report reviews the Risk Register for Police Pensions Board. The Risk Register details the key risks that the Board has identified alongside a risk score which indicates the likelihood of a risk being realised together with the potential impact and the appropriate mitigations.

When reviewing the risks, the Board should be aware that generic risks are also included in the Local Government Pensions Board risk register. The risks are CHB COLP PSB 02 Legislative Compliances, CHB COLP PSB 04 Pension Scheme Administration, CHB COLP PSB 05 Pension Fraud and CHB COLP PSB 07 Cyber security.

Officers have conducted a preliminary review of the Risk Register and are not recommending any changes to the current scores.

The Risk Register is included at Appendix 1 with risk updates underlined throughout. The Risk Register is reviewed at each meeting by the Police Pensions Board and more frequently by officers, who report any material changes or new risks identified in between reviews on an exceptions basis

Recommendation

Members are asked to:

- review the existing risks and actions present on the Police Pension Board's Risk Register, and confirm that appropriate control measures are in place; and
- consider whether there are any further risks relating to the pension administration overseen by the Police Pension Scheme Board

Main Report

Background

1. The Police Pension Board instituted a Risk Register to help identify and manage the strategic risks facing the Board in discharging its responsibilities to oversee administration of the Police Pension Scheme. The current Risk Register, as agreed by the Board on 8 February 2021, is included as Appendix 1.
2. The Board reviews the Risk Register at each meeting. Officers review the register more frequently and report any material changes between reviews on an exceptions basis to the Board. This is in line with standard risk review procedures across the rest of the City of London Corporation.

Review of Risks

3. The method of assessing risk reflects the City of London's standard approach to risk assessment as set out in its Risk Management Strategy approved by the Audit and Risk Management Committee in May 2014. The City of London Corporation risk matrix, which explains how risks are assessed and scored, is attached at Appendix 2 of this report. Risk scores range from one, being lowest risk, to the highest risk score of thirty-two. These scores are summarised into 3 broad groups, each with increasing risk, and categorised "green", "amber" or "red".

Update on Risks

4. The revised Risk Register is attached at Appendix 1 and the Risk matrix at Appendix 2.
5. At its meeting on the 8 February 2021, the Board asked for amendments to be made to the risk Target Dates. The amendments to be made were:
 - (i) in relation to the target date of risk CHB COLP PSB08 McCloud Legal Case, the Board asked for this risk to be assessed at every Board meeting and therefore the Target Date should reflect this.
 - (ii) in relation to all other risks Members requested that the Target Date be on a rolling 12 month basis. The dates have been amended to reflect this.

Mitigation of amber and red risks

6. The risk, CHB COLP PSB08 – McCloud Legal Case, has been given an overall risk score of red 16. The changes to be made to the Police Pension Scheme as a result of the McCloud Judgement are guaranteed which means the likelihood must be recorded at the highest level. The impact of the changes will be potentially very high and is therefore recorded as 'Major'. At this stage Officers consider that it is not possible to reduce the likelihood of this risk, but it may be possible to mitigate the impact.
7. HM Treasury have issued details of the preferred remedy that is to be applied to public sector pension schemes and the Home Office have produced a high level guide as to how this will apply to the Police Pension Scheme. However, until technical guidance is issued and the necessary legislative changes have been made it is not possible for the proposals to be implemented. By ensuring awareness of all correspondence and consultation documents that are published and by attending all available seminars/webinars, forums and user groups the Pensions Office will have as much advance knowledge and understanding as possible of the changes. This preparedness will mean the impact of the changes may not be as severe as it would have been otherwise.
8. The scores for the risks have been maintained at their previous levels, although these risks have each been reviewed and updated where necessary in the Register itself. Updates to the Risk Register are underlined throughout with deletions being struck through.
9. Officers have also considered whether any new risks have emerged since the last review. Although the Board's operating environment continually changes officers

have determined that the existing Register captures the material risks facing the Board and enables the Board to concentrate on the most prescient risks.

10. Each risk presented in the Risk Register is accompanied by one or more “action(s)” which reflect how the risk is managed and mitigated. A “due date” for required completion is set against each action. Due to the nature of the risks overseen by the Board, in many cases it is impossible to entirely eliminate a risk, and therefore corresponding actions will always remain live. These ongoing actions are necessary in order to maintain the current risk score. Where this is the case the Risk Register includes an annual due date, which will be renewed each year.

Conclusion

11. The risks overseen by the Police Pension Board are primarily of low likelihoods but may represent substantial impact. The Board is requested to confirm that appropriate control measures are in place for these risks and that there are no other risks that should be added to the Risk Register.

Appendices:

Appendix 1 – Risk Register

Appendix 2 – Risk Matrix

Contact:

Graham Newman

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CHB CoLP Pensions Detailed risk register

Report Author: Chris Anastasi

Generated on: 18 May 2021



Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP NSB 08 McCloud Legal Case	<p>Cause: Implementation of the remedy process following the resolution of the McCloud judgement.</p> <p>Event: The impact to the pension administration team of implementing the McCloud judgement remedy.</p> <p>Effect: The Pensions Office is unable to adequately comply with required administration processes arising from the resolution of the McCloud judgement.</p>	<p>Likelihood</p> <p>Impact</p>	16	<p>In 2015 the Police Pension Scheme, was reformed. These reforms included 'transitional protection', for people closer to retirement. In December 2018, the Court of Appeal ruled that this directly discriminated against some younger pension scheme members – this is now referred to as the McCloud Judgement or McCloud.</p> <p>On 15 July 2019 the government confirmed that the difference in treatment would be remedied in the Police Pension Scheme.</p> <p>On 16 July 2020 the government published a consultation document that sets out options for how the</p>	<p>Likelihood</p> <p>Impact</p>	8	31 October 2021	




Page 16 22-Jan-2021 Chamberlain				<p>government will remove the discrimination.</p> <p>No updates had been received at the date of updating the Register in January 2021.</p> <p><u>On 4 February 2021 HM Treasury published its response to the consultation document and set out its preferred remedy choice.</u></p> <p><u>The Home Office also released a document relating to the government response but aimed specifically at the Police Pension Scheme. Their document gives general details as to how the remedy proposal would work for the Scheme.</u></p> <p><u>Further technical guidance and legislative changes are required before the remedy can be implemented.</u></p> <p>18 May 2021</p>				
							Reduce	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 08a	Staying aware of all relevant correspondence issued by the Home Office / TWB and regular attendance at seminars, forums, webinars and user groups.	Staying aware of all relevant correspondence issued by the Home Office / TWB and regular attendance at seminars, forums, webinars and user groups.	Matt Mott	<u>18-May-2021</u>	31-Oct-2021
CHB COLP PSB 08b	Regular contact and discussion between all relevant parties – Force HR / Force Finance / Pensions Administration.	Regular contact and discussion between all relevant parties – Force HR / Force Finance / Pensions Administration	Matt Mott	<u>18-May-2021</u>	31-Oct-2021

CHB COLP PSB 08c	Working in conjunction with Force HR to prepare communications and standard responses (FAQs) to be sent to affected officers.	Working in conjunction with Force HR to prepare communications and standard responses (FAQs) to be sent to affected officers.	Matt Mott	<u>18-May-2021</u>	31-Oct-2021
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 02 Legislative compliance <div>Page 18</div>	Cause: (i) Lack of appropriate knowledge or skill. (ii) Lack of training/ appropriately skilled staff. Event: The failure to comply with legislative requirements. Effect: (i) Inaccurate benefits paid. (ii) Financial loss (iii) Increase in Appeals (iv) Reputational damage (v) Fines from Pensions Regulator	 Likelihood	 Impact	4 The Regulations of the Police Pension Scheme set out how police pensions should be calculated; the procedures to be followed in certain circumstances (i.e. normal retirement and ill health retirement); the timeframes/deadlines to be adhered to; and the notifications to be provided to Scheme members. In addition, other bodies such as the Pensions Regulator, HM Revenue & Customs, the Office of National Statistics and the Financial Conduct Authority impose rules that work alongside the Scheme Regulations or may even supersede them. Failure to comply with the governing legislation may lead to inaccurate benefits being paid or deadlines being missed which in turn may lead to damage to the City's reputation and/or fines being levied by bodies such as the Pensions Regulator.	 Likelihood	 Impact	4 30 April 2022	
							Accept	Increasing
8-Oct-2019 Chamberlain				22 Jan 2021				

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 02a	Robust recruitment and training processes.	Ensuring that suitable staff are recruited at the correct salary levels and that appropriate training is provided will help to prevent non-compliance with legislative requirements.	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 02b	The governing legislation may change or evolve over time and it is therefore important that staff maintain accurate and up-to-date knowledge of the Regulations.	Regular attendance at seminars, forums, webinars and user groups will ensure that knowledge of the relevant legislation is kept up-to-date and accurate.	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>

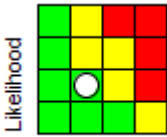
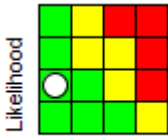
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 03 Pension Scheme Administration (Personnel)	<p>Cause: (i) Ineffective succession planning. (ii) Inadequately trained staff. (iii) Absences/ Increased Staff turnover. (iv) Data Accuracy.</p> <p>Event: The failure of administrators to accurately calculate and pay the correct levels of benefits.</p> <p>Effect:(i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/ sanctions</p>	 <p>Likelihood</p> <p>Impact</p>	4	<p>The Regulations of the Police Pension Scheme set out how police pensions should be calculated; the procedures to be followed in certain circumstances (i.e. normal retirement and ill health retirement); the timeframes/deadlines to be adhered to; and the notifications to be provided to Scheme members.</p> <p>In addition, other bodies such as the Pensions Regulator, HM Revenue & Customs, the Office of National Statistics and the Financial Conduct Authority impose rules that work alongside the Scheme Regulations or may even supersede them.</p> <p>The pensions administration software is designed to do the majority of the calculations that are performed, but in some cases manual calculations are required – this may be because the software has not caught up with regulatory changes or simply that the software cannot do what is asked of it. Manual calculations require greater knowledge and ability on behalf of the staff required to perform them; are often significantly more time consuming; and introduce a greater risk of human error.</p> <p>If the members of the Pensions Office that are responsible for administration of the Police Pension Scheme lack the necessary knowledge and skills</p>	 <p>Likelihood</p> <p>Impact</p>	4	<u>30 April 2022</u>	

8-Oct-2019 Chamberlain				<p>payment of benefits may be delayed and may be inaccurate.</p> <p>This may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator.</p> <p>18 May 2021</p>			Accept	Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 03a	Job descriptions used at recruitment to attract candidates with skills and experience related to police pension administration. The appraisals process to monitor progress and assess training needs.	Ensuring that candidates with the necessary skills and abilities are employed by the City. Once in post, staff continue to receive relevant training and attend courses, seminars and conferences when appropriate.	Matt Mott; Kate Limna	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 03b	Scheme administrators are trained to use the pensions administration software.	Ensuring that administrators are fully trained to use the pension administration software to enable them to provide accurate and efficient calculations. In addition, administrators should know the correct process to report to the software provider any errors encountered with the system in order that they can be investigated and resolved.	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 03c	Rigorous and thorough checking procedures are created and implemented to ensure all calculations and letters are checked for accuracy and legislative compliance.	All checking procedures reviewed and where necessary amended due to take account of COVID 19 and officers having worked from home since 23 March 2020.	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 03d	Practical disaster recovery/succession plans in place to ensure continuity in the event that key staff leave or are unable to work for a prolonged period of time.	<p>Ensuring that skill sets are not restricted to one staff member alone.</p> <p>Priority cases and work types are identified to ensure continuation in the event that staff or other resources become unavailable.</p> <p>Disaster Recovery reviewed in light of COVID 19 and officers having worked from home since 23 March 2020.</p>	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 03e	Sufficient preparation time is built into the production of any annual statement with a statutory deadline.	Ensuring that sufficient preparation and production time is allocated when planning for the issue of any statements etc with a statutory deadline. In particular, awareness of this issue is necessary if the production requires significant manual intervention.	Graham Newman; Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>

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CHB COLP PSB 04b	The software provider is contracted to provide regular updates to the system as developments and enhancements are made. In addition, as regulations are amended, or legislation and factors are updated there is a requirement to ensure the software is also updated.	Monitoring the system updates made by the system provider to ensure they are made accurately and on time.	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 04c	Ensuring that the pensions administration software is included in the departmental business continuity plans.	Updating the business impact analysis details used in the departmental continuity plan as required.	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 05 Pension Fraud 8-Oct-2019 Chamberlain	Cause: (i) Continued payment of pensions following death. (ii) Staff acting inappropriately Event: Fraudulent claim of pension benefits. Effects: (i) Overpaid pensions.(ii) Financial loss		4	If the death of a police pension scheme beneficiary is not reported, their pension may continue to be paid when there is no longer an entitlement. This may be a deliberate failure to report the death or may be where there is no fraudulent intention, but in either case it will lead to benefit overpayment and a potential financial loss. 21 Jan 2021		2	<u>30 April 2022</u> Reduce	Constant

Action no	Action description	Latest Note		Action owner	Latest Note Date	Due Date
CHB COLP-PSB 05a	Robust fraud protection/detection processes.	Use of Mortality Screening Service and Tell Us Once Service [Government initiative that allows us to be notified of a death when registered]. Participation in the National Fraud Initiative. Annually sending Life Certificates to Overseas Pensioners.		Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 07 Cyber Security Oct-2019 Chamberlain	Cause: (i) Ineffective procedures. (ii) Inadequately trained staff. (iii) IT system failure (iv) Data Accuracy. (v) Lack of resources. Event: Breach of Corporate IT systems and cyber security Effect: (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/sanctions. (iv) Breach of Data Protection regulations. (v) Loss/corruption of data	 Likelihood	4	A malicious breach of Corporate IT systems may lead to a failure of the pensions administration system and/or a breach of Data Protection regulations. A failure of the pensions administration system or a breach of the DP regulations may mean a failure or inability to calculate benefits accurately and on time which may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator or Information Commissioner's Office. 22 Jan 2021	 Likelihood	4	30 April 2022	 Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 07a	Pensions administration staff to be aware of the corporate policy regarding cyber security and to follow the guidelines given.	Corporate online training regarding cyber-security to be carried out by all staff and reviewed as required.	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 07b	Corporate and departmental specific software to be updated as required to ensure the latest and most secure version is being used.	To ensure the most up-to-date software is being used, staff should update their computers as and when prompted	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 07c	Ensuring that the pensions administration software is included in the departmental business continuity plans.	Updating the business impact analysis details used in the departmental continuity plan as required.	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>

CHB COLP PSB 07d	Pensions administration staff to be aware of Data Protection legislation.	Data Protection reviewed and all staff reminded of the legislation and its importance. Processes amended for home working since 23 March 2020, ensuring the protection of scheme member data	Matt Mott	<u>18-May-2021</u>	<u>30-Apr-2022</u>
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 01a	The year-end procedures of the Pensions Office remain thorough, accurate and timely.	The actuarial data supplied to the Home Office is based upon information extracted from the payroll system, the pension system and the general ledger. The extracts are reconciled and checked for errors or inconsistencies before submission to the Home Office. The City of London has no jurisdiction or control over data submitted by other Police Authorities.	Matt Mott	<u>18-May-2021</u> 1	<u>30-Apr-2022</u>

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 06 Protected Pension Age (PPA) <div>Page 29</div>	Cause: Retiring officers of a certain age losing their PPA as a result of being re-employed by the same sponsoring employer without a sufficient break between retirement and re-employment. Event: Protected Pension Age (PPA) Effect: HMRC make 'unauthorised payment' charges to both the member and the organisation.	<div> <div>Likelihood</div> </div> <div>Impact</div>	1	<p>The minimum retirement age as set by HMRC is 55, however the Police Pension Scheme Regulations 1987 allow officers to retire before this age. They are therefore awarded a Protected Pension Age (PPA).</p> <p>An officer that retires between the ages of 50 and 55 and is then re-employed by the same sponsoring employer (the City of London Police and the City of London Corporation) will lose their PPA if they do not leave a sufficient break between retirement and re-employment.</p> <p>The required break is 6 months, but this can be reduced to 1 month if the employment is not materially similar.</p> <p>If the PPA is lost, all pension payments made from that point until the member reaches age 55 will be deemed unauthorised by HMRC and a charge will be levied against the City of London Police (as the pension provider) and against the member</p> <p>21 Jan 2021</p>	<div> <div>Likelihood</div> </div> <div>Impact</div>	1	<u>30 April 2022</u>	<div> <div>Accept</div> <div>Constant</div> </div>
8-Oct-2019 City of London Police (HR)								

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
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CHB COLP PSB 06a	Ensuring that staff within City of London Police HR are aware of the rules regarding re-employment and PPA.	City of London Police HR will ensure that the necessary training in respect of re-employment and PPA is provided to members of the team and that procedures are in place so that this knowledge is maintained and passed on.	Azeem Bhatti	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 06b	Monitoring job-applicants to ensure retired officers who are being re-employed are leaving the required break.	City of London Police HR will monitor any new applicant to ensure that any retired officer that is between the ages of 50 and 55 and is looking to be re-employed has taken the required break between retirement and re-employment. If necessary, they will determine whether the new employment is materially similar when assessing the length of the break that is needed.	Azeem Bhatti	<u>18-May-2021</u>	<u>30-Apr-2022</u>
CHB COLP PSB 06c	Ensuring that officers that are coming up to retirement are aware of the rules regarding re-employment and PPA.	The City of London Police HR will ensure that all retiring officers are informed of the rules regarding re-employment and PPA. When required to provide input at pre-retirement courses, the Pensions Office will include details in respect of re-employment and PPA as part of their presentation.	Azeem Bhatti; Graham Newman	<u>18-May-2021</u>	<u>30-Apr-2022</u>



City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom left (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

(C) Risk scoring grid		Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	Less than one chance in a hundred (<10-2)

Likelihood		Impact			
	X	Minor (1)	Serious (2)	Major (4)	Extreme (8)
	Likely (4)	4 Green	8 Amber	16 Red	32 Red
	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely (2)	2 Green	4 Green	8 Amber	16 Red
	Rare (1)	1 Green	2 Green	4 Green	8 Amber

(B) Impact criteria

Impact title	Definitions
Minor (1)	Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or find less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives.
Serious (2)	Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives.
Major (4)	Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people objectives: Failure to achieve a strategic plan objective.
Extreme (8)	Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective.

(D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

Version date: December 2015

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Committee: Police Pensions Board	Date: 7 June 2021
Subject: The City of London: Police Pension Scheme - Update	Public
Report of: The Chamberlain	For Information
Report author: Graham Newman – Chamberlain's Department	

Summary

The Board have agreed that at each meeting that information regarding a range of topics in relation to the City of London Police Pension Scheme (the Scheme) would be provided along with any updates.

Item	Update
Annual schedule of events for the Pensions Scheme	Update provided (Appendix 1).
Information of Scheme Record Keeping	No amendments since the last Board meeting.
A record of any complaints or disputes under the Scheme's complaints procedure	None to report.
Any recent Police Pension Scheme breaches of the law	No breaches to report.
Any audit reports relating to the administration of the Scheme	None to report.
Required Training	No regulatory changes to report.
Data Protection Act 2018 (DPA18) – Data Retention Policy	No amendments since last Board meeting.
General Data Protection Regulation (GDPR) / Data Protection Act 2018 (DPA18) – Privacy Notice	No amendments since the last Board meeting.
Legal Challenge 1	<p><u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u></p> <p>The Court of Appeal has ruled that reforms made to the judges' and firefighters' pension schemes were discriminatory on the grounds of age.</p> <p>Update presentation to be given by the Pensions Office.</p>

Legal Challenge 2	<p><u>Evans & Ashcroft vs Chief Constable of South Wales</u></p> <p>This is a court of appeal case in respect of the Police (Injury Benefit) Regulations 2006.</p> <p>In October 2018 the Court of Appeal handed down its judgement in the case of Evans & Ashcroft v Chief Constable of South Wales Police. The Court held that the Chief Constable was entitled to deduct from a former police officer's police injury pension the full amount of certain social security benefits actually paid to the retired police officer, as increased with index-linking from year to year.</p> <p>However, the Court also held that the deductible levels of those social security benefits from the tax year 2010/11 onwards need to be recalculated as if the increases in the 2010/11 tax year had never been implemented and as if the base levels for subsequent increases had been correspondingly lower.</p> <p>The judgement currently only applies to the two officers involved in the case, but it is likely to be cited in any similar claims brought under those regulations for those officers that have been in receipt of a police injury pension prior to April 2010 and have had an entitlement to certain social security benefits.</p> <p>Guidance from the Home Office / Police Pensions Technical Group is awaited. Once received, a communication that can be sent to officers that make enquiries will be prepared.</p>
Task Statistics	<p>At the 12 June 2019 Board meeting, Members asked for statistics of the administration work carried out by the Pensions Office to be added as a standing item.</p> <p>Update provided (Appendix 2).</p>
Procurement of Pension Administration System	<p>The tender applications have been moderated by Procurement, IT and the Pensions Office.</p>

	<p>The Chamberlain has authorised the award of the contract and commencement of the work.</p> <p>The Procurement team has written to all applicants notifying them of the decision to award the contract.</p>
Pension Board Training	McCloud update presentation to be given by the Pensions Office.
Guaranteed Minimum Pensions (GMP) Reconciliation	<p>Pension data is continuing to be analysed and JLT/Mercer are liaising with HMRC.</p> <p>HMRC have advised they will issue a final report, but due to COVID-19 this has been delayed. HMRC have not advised when this will be published.</p> <p>A report will be brought to the Board once the reconciliation has been completed.</p>
COVID-19	<p>Due to COVID-19 the Pensions Office continue to work from home .</p> <p>The TPR guidance remains and 3 key services should be retained at all times and they are:</p> <ul style="list-style-type: none"> • Continued payment of pension benefits to existing pension members • Commencement of pension benefits to new retirees • Ceasing of pension payments due to notification of death. <p>The Pensions Office has continued to provide all services to scheme members, although postal communications are still a challenge.</p> <p>Generally communication continues to be by email and phone calls. Where scheme members have not or are unable to verify their details letters are still posted.</p> <p>The Pensions Office has created a shared team folder which staff access when they visit the office (voluntarily) to print and post letters.</p>

	<p>This is a collaborative effort as the letters posted could be from any colleague and any aspect of the pension administration.</p> <p>As COVID restrictions ease we hope to visit the office on a more regular basis to check inbound post and continue to send out letters.</p> <p>Returning to the Office. The Corporation intends to begin a gradual return to the Guildhall from 21 June</p> <p>The Corporation is looking ahead to what the future holds for the way we work and the Workplace Steering Group have developed a set of Workplace Design Principles of which the key recommendations are that:</p> <ul style="list-style-type: none"> • workplaces be used as a space for collaboration • employees are provided with the appropriate technology • staff are managed on their output, objectives and priorities, not on their physical presence in the workplace <p>There is a Chamberlain's "return to office" working group that the Pension Office is part of to ensure the business needs of the pension administration and the needs of its employees are considered in a new long term fundamental change into working more flexibly to allow us to be more efficient and responsive.</p>
The Target Operating Model (TOM)	<p>A new TOM has been announced for the financial year 2021/22 and a high level structure has been approved by the Court of Common Council.</p> <p>Recruitment to senior posts in the new structure has been finalised and the implementation of the TOM has begun – although many areas of it are still under</p>

	<p>consultation. It is anticipated to be fully in place with effect from 31 March 2022.</p> <p>When further relevant details are known they will be brought to the attention of the Board.</p>
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Recommendation

Members are requested to review the information and provide any comments.

Appendices:

Appendix 1 – Annual Schedule of events

Appendix 2 – Statistical information

Contact:

Graham Newman

Email: graham.newman@cityoflondon.gov.uk

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**City of London: Police Pension Scheme
Annual Schedule of Events**

Date Due	Event	Date Completed
12 February 2021	Deadline for Pensions Regulator Scheme Survey	12 February 2021
March / April 2021	Submit IAS19 data to Scheme Actuary	9 April 2021
1 April 2021	Employee Contribution band implementation	1 April 2021
1 April 2021	Employer Contribution implementation	1 April 2021
1 April 2021	Revaluation of CARE benefits	1 April 2021
First Monday in April after 6 April 2021	Pensions Increase – Annual Inflation Increase	12 April 2021
April 2021	IAS19 month 12 update if necessary	n/a
30 April 2021	Home Office Year End Finance Return and 5 year forecast	28 April 2021
July 2021	HMRC Event Report / Tax Return for June Quarter	
31 August 2021	Issue of Annual Statements Deadline	
30 September 2021 (tbc)	Home Office Autumn Finance Return and revised 5 year forecast	
October 2021	HMRC Event Report / Tax Return for September Quarter	
6 October 2021	Deadline for the issue of Pension Saving Statements (Annual Allowance letter)	
December 2021(TBC)	Deadline for Scheme Return to the Pensions Regulator	
January 2022	HMRC Event Report / Tax Return for December Quarter	

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**City of London: Police Pension Scheme
Task Statistics**

	April 2020 – June 2020	July 2020 – September 2020	October 2020 – December 2020	January 2021 – March 2021	Totals
New Starters	62	56	29	36	183
Leaver / Opt-outs	0	1	1	5	7
Estimates Requested	Statistics not available				
Estimates Provided	25	15	33	38	111
Retirements	5	10	9	5	29
Interforce-in	29	20	4	32	85
Interforce-out	1	1	2	2	6
Transfer-in Quote	0	2	4	9	15
Transfer-in Actual	0	0	4	1	5
Divorce Quote	1	4	1	3	9
Divorce Actual	0	0	0	0	0
General Correspondence / Member Maintenance	24	16	3	24	67
Freedom of Information	0	0	1	0	1

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Committee: Police Pensions Board	Date: 7 June 2021
Subject: Review Report for the CoL Police Authority Board	Public
Report of: Chamberlain	For Decision
Report author: Graham Newman – Chamberlain’s Department	

Summary

Members agreed that a report summarising the activities of the Police Pensions Board, should be submitted on an annual basis to the CoL Police Authority Board.

Attached is a draft report that sets out the work of this Board for the period 1 April 2020 to 31 March 2021. Subject to any comments Members may have, it is proposed that this Appendix is submitted as a public report to the June CoL Police Authority Board.

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Recommendation

Members are asked to

- (i) provide comment on the draft report to the CoL Police Authority Board and
- (ii) note that it will be submitted as a public report to the June CoL Police Authority Board.

Appendix

Appendix – Police Pensions Board Annual Report

Graham Newman
Chamberlain’s Department

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Committee:	Date:
CoL Police Authority Board	TBC
Subject: The City of London Police Pension Board – Review of Activities for the period 1 April 2020 to 31 March 2021	Public
Report of: The Chamberlain	For Information
Report author: Graham Newman – Chamberlain’s Department	

Summary

This report summarises the activities of the Police Pensions Board for the period 1 April 2020 to 31 March 2021. The Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager (the Commissioner of the City of London Police) in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).

Over the last twelve months the Board:

- continues to review the working practices of the City of London Police Pensions Office including reviews of all letters and documents issued to members, prospective members, leavers and retirees;
- monitored and where appropriate updated the Risk Register for the Board; and
- continues to undertake online training modules with the Pensions Regulator’s Toolkit.

The training needs of all Board Members continues to be monitored and training provided as required.

Recommendation

Members are asked to note this report.

Main Report

Background

1. The Public Services Pensions Act 2013 (the 2013 Act) included several provisions regarding better governance and improved accountability for all public-sector pension schemes. As a result, the Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).
2. The Scheme Manager for the City of London Police Pension Scheme is the City of London Police Commissioner, with responsibility for the administration of the Scheme delegated to the Chamberlain of the City of London Corporation.

The Role of the Police Pension Board

3. The Pension Board sits in an oversight role, to assist the Scheme Manager with ensuring the administration of the Scheme complies with
 - the Regulations;
 - other legislation relating to the governance and administration of the Scheme; and
 - the requirements imposed by The Pensions Regulator in relation to the Scheme.
4. In accordance with the Regulations, the structure of the Board must include an equal number of scheme member and scheme employer representatives. The City of London Police Pension Board consists of 3 scheme member representatives and 3 scheme employer representatives.
5. The 2013 Act makes it a legal requirement that members of the Board do not have a conflict of interest and therefore all members are expected to identify, monitor and manage any potential, actual or perceived conflicts of interest. The Members of the Board are as follows:

Scheme Employer Representatives:

Mr Alexander Barr (Deputy Chairman) – Elected Member
Superintendent Helen Isaac – Serving CoL Police Officer
Mr Henry Colthurst – Elected Member (since October 2020)
Alderman Ian Luder – Elected Member (until July 2020)

Scheme Member Representatives:

Mr John Todd (Chairman) – Retired CoL Police Officer
Sergeant Michael Reed – Serving CoL Police Officer (Since January 2020)
Mr Timothy Parsons – Retired CoL Police Officer

Appendix A sets out the attendance record of each Board Member.

Activities of the Board

6. Since 1 April 2020 two meetings have been held – 9 October 2020 and 8 February 2020. A meeting had been planned for June 2020, but due to the COVID 19 pandemic this was cancelled. It is expected that there will continue to be 3 meetings held in every year.

Training

7. Board Members have certain legal responsibilities and must be conversant with the PPS Regulations and the governance and administration of the Scheme to enable them to exercise their role as a Board Member.
8. Members are expected to keep their knowledge and understanding requirements under review. This will allow the training plan to be reviewed and updated as required to meet the training needs.
9. The Pensions Regulator has created an online learning programme, the Trustee Toolkit, which is aimed at the board members of occupational pension schemes. Members have been provided with the details of the Toolkit and are expected to undertake all 7 training modules.
10. The COVID 19 pandemic has prevented any formal training being delivered to the Board by the Pensions Office in the past year.
11. Individual training was provided to the two new Board Members in December 2020.

Annual Schedule of Events

12. In order that the Board is able to monitor and oversee the administration of the Police Pension Scheme an Annual Schedule of Events to illustrate the tasks carried out by the Pensions Office, their deadlines and the actual completion dates of each task is maintained. The Schedule is updated as required and is a standing agenda item for each Board meeting.

Risk Register

13. A risk register has been created to cover the risks in respect of the City of London Police Pension Scheme. The Register is a standing agenda item for each Board meeting and means that potential risks are continually assessed, reviewed and amended or added to or removed from the Register as deemed appropriate. Since April 2020 one additional risk has been added to the register. The additional risk is the 'McCloud' legal challenge and expected remedy implementation / amendments to be made to the Scheme legislation.

Documentation and Communication

14. The Board continues to review the working practices of the City of London Police Pensions Office, including all letters and documents issued to members, prospective members, leavers and retirees to ensure optimum clarity as well as accuracy. This work is ongoing and several recommendations have been made in the past twelve months.

Data Protection Act 2018 (GDPR)

15. On 25 May 2018 General Data Protection Regulations were introduced. Part of the requirement of pension schemes is to clearly communicate data use and retention. To meet this requirement, the Scheme Manager of City of London Police Pension Scheme must issue a privacy statement to scheme members.
16. A copy of the City of London Police Force's generic privacy statement was included with the 2019 annual benefit statement that was issued to all serving Police Officers by the Pensions Office. A copy of the privacy statement was also sent separately to all retired officers. A copy of the privacy statement is available to officers upon request.

Breaches of Data Security (Information Commissioner's Office (ICO) GDPR)

17. There were no known breaches during the year

Breaches of Pension Law (The Pensions Regulator (TPR) code of practice)

18. There were no known breaches during the year

Lord Chancellor and Secretary of State for Justice v McCloud and others

19. The Court of Appeal has ruled that reforms made to the judges' and firefighters' pension schemes were discriminatory on the grounds of age. It was determined that the reforms made to all public sector pensions schemes, including the PPS, were also be deemed to be discriminatory on the same grounds and all public sector pension schemes will need to review their regulations and possibly make amendments to them.
20. A consultation period lead to the issue of a Remedy proposal by HM Treasury. However, technical guidance and the necessary legislative changes to implement the proposed Remedy in respect of the Police Pension Scheme is still awaited.
21. The Pensions Office has joined several technical working groups in respect of the proposed Remedy and a dedicated webpage is being set up to communicate all relevant information to officers as it is released.

COVID-19

22. Due to the COVID-19 pandemic, the Pensions Office staff have been working from home since 18 March 2020.
23. The TPR have issued guidance that 3 key services should always be retained, they are:
- Continued payment of pension benefits to existing pension members
 - Commencement of pension benefits to new retirees
 - Ceasing of pension payments due to notification of death.
24. All services provided by the Pensions Office have continued to be provided to scheme members including transfers and estimates.

Conclusions

25. The Police Pension Board was created with reference to the Public Services Pensions Act 2013 and the Police Pension Scheme Regulations 2015. Since April 2018, the Board has met twice in 2020/21 and Members are aware that they should ensure their knowledge of the Scheme is up-to-date in order that they remain compliant with their legal requirements.
26. The Board continues to review the working practices of the City of London Police Pensions Office and regularly monitors all letters and documents issued to members, prospective members, leavers and retirees. The Board maintains a Risk Register and an approved Breaches Policy.

Appendices:

Appendix A – Board Member attendance record

Contact: Graham Newman

Email: graham.newman@cityoflondon.gov.uk

Police Pension Board - Board Member Record of Attendance

	9/10/2020	8/02/2021
Alexander Barr	X	X
Helen Isaac	X	X
Henry Colthurst ⁽ⁱ⁾	X	X
John Todd	X	X
Mike Reed	X	X
Timothy Parsons		

Notes:

(i) Joined the Board in October 2020

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