City of London Police Pensions Board

Date: **WEDNESDAY, 17 JULY 2024**

Time: 11.00 am

Venue: **2ND FLOOR WEST WING, GUILDHALL**

Members:

Scheme Representatives	**Employer Representatives**
Ray Eaglesmith (Chair)	Helen Isaac, Scheme Administrator
John Todd	Deputy Henry Colthurst (Deputy Chair)

Enquiries: **Kezia Barrass**
Kezia.Barrass@cityoflondon.gov.uk

Accessing the virtual public meeting

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https://www.youtube.com/@CityofLondonCorporation/streams

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic 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.

Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

   To approve the public minutes and non-public summary of the City of London Police Pensions Board meeting held on 18 April 2024.

   For Decision
   (Pages 5 - 8)

4. **TERMS OF REFERENCE**

   Report of the Town Clerk.

   For Decision
   (Pages 9 - 12)

5. **CITY OF LONDON POLICE PENSION SCHEME UPDATE**

   Report of the Chamberlain.

   For Discussion
   (Pages 13 - 18)

6. **CITY OF LONDON POLICE PENSION SCHEME - RISK REGISTER**

   Report of the Chamberlain.

   For Decision
   (Pages 19 - 42)

7. **THE CITY OF LONDON POLICE PENSION BOARD - REVIEW OF ACTIVITIES FOR THE PERIOD 1 APRIL 2023 TO 31 MARCH 2024**

   Report of the Chamberlain.

   For Information
   (Pages 43 - 50)

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

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

10. **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

11. **NON-PUBLIC MINUTES**

    To approve the non-public minutes of the City of London Police Pensions Board meeting on 18 April 2024.

    For Decision
    (Pages 51 - 52)

12. **CITY OF LONDON POLICE PENSION SCHEME UPDATE NON PUBLIC APPENDICES**

    Report of the Chamberlain. To be read in conjunction with item 5.

    For Decision
    (Pages 53 - 56)

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

14. **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
Thursday, 18 April 2024

Minutes of the meeting of the City of London Police Pensions Board held at Committee Room - 2nd Floor West Wing, Guildhall on Thursday, 18 April 2024 at 2.00 pm

Present

Members:
Alderman Alexander Barr (Chairman)
John Todd (Deputy Chairman)
Deputy Henry Colthurst
Ray Eaglesmith

Officers:
Kate Limna   -   Chamberlain's Department
Graham Newman   -   Chamberlain's Department
James Garmant   -   Chamberlain's Department
Mark Paddon   -   City of London Police
Kelly Glazebrook   -   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**
    The minutes of the City of London Police Pensions Board on 20 October 2023 were approved as an accurate record.

4. **CITY OF LONDON: POLICE PENSION SCHEME UPDATE**
    Members received a report of the Chamberlain which provided an update on the City of London Police Pension Scheme.

    It was noted that a new member of the Pensions Office started in April 2024 and would attend the next City of London Police Pensions Board.
    RESOLVED, - that the report be noted.

5. **CITY OF LONDON: POLICE PENSION SCHEME - RISK UPDATE**
    Members received a report of the Chamberlain which outlined the City of London Police pension scheme risk update.

    During the discussion the following points were noted:
    -   There were two risks which had been updated since the last meeting. Risk PSB 08 related to the McCloud Legal case and had been reduced

from a Red risk to an Amber risk on the basis that the release of final regulations in October 2023 has reduced the 'unknowns' and therefore the risks involved. Risk PSB 03 in respect of Pensions Office administrative staff had also been reduced to reflect the now full staff compliment, and the fact that the administration was adequate to meet demand.

- Members queried the PSB 08 target risk rating with regards to its relationship to the current risk rating. Officers agreed to assess this but felt comfortable with the current rating as the regulations had now been published. It was expected that as implementation proceeded this risk rating would reduce further.
- The Chair encouraged the Committee to assess the unidentified risks and expected that a change in Government should not impact on the unfunded pensions scheme.

RESOLVED, - that the report be noted.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no other business.

8. **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.

9. **NON-PUBLIC MINUTES**
RESOLVED, - that the non-public minutes of the City of London Police Pensions Board on 20 October 2023 were approved as an accurate record.

10. **CITY OF LONDON POLICE PENSIONS SCHEME: DRAFT COMPLAINTS PROCEDURE**
Members received a report of the Chamberlain which set out the City of London Police Pensions Scheme draft complaints procedure.

11. **CITY OF LONDON POLICE PENSION SCHEME TASK STATISTICS/KEY PERFORMANCE INDICATORS**
Members received a report of the Chamberlain which outlined the City of London Police Pension scheme task statistics and key performance indicators.

12. **POLICE PENSION SCHEME STATISTICAL DATA**
Members received a report of the Chamberlain which provided statistical data on the City of London Police Pension Scheme.

13. **CITY OF LONDON: POLICE PENSION SCHEME UPDATE - NON PUBLIC APPENDIX**
   Members received a report of the Chamberlain which set out the non-public appendix to be received in conjunction with Item 4.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
   There were no questions.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT THAT THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
   There was no other business.

The meeting ended at 14:32.

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Chairman

Contact Officer: Kezia Barrass
Kezia.Barrass**@cityoflondon.gov.uk**

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Committee(s): City of London Police Pensions Board	Dated: 17 July 2024
Subject: City of London Police Pensions Board Terms of Reference	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	**No**
If so, how much?	**£**
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Town Clerk	**For Decision**
Report author: Kezia Barrass, Governance and Member Services	

Recommendation(s)

Members are recommended to approve the suggested addition to the Terms of Reference, highlighted in yellow in Appendix 1.

Main Report

Background

It was agreed at the City of London Police Pensions Board on 18 April 2024 to review the Terms of Reference to reflect the expectation on Members of the Board to undertake The Pensions Regulator training and to assume responsibility for ensuring their training is current and up to date.

Appendices

• Appendix 1 – City of London Police Pensions Board Terms of Reference

Kezia Barrass
Governance and Member Services, Town Clerk's Department.

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City of London Police Pensions Board

Composition

- A Chair and Deputy Chair appointed by the Scheme Manager[1]

- The Chair and Deputy Chair shall not both be Employer representatives[2] or Member representatives[3]

- At least four, and no more than twelve, voting Members appointed by the Chair with Scheme Manager approval

- An equal number of Employer representatives and Member representatives shall be appointed to the Board

- The Chair may appoint, with Scheme Manager approval, up to four independent[4], non-voting Members to the Board

Terms of Reference

In line with the requirements of the Public Services Pensions Act 2013 and the Police Pensions Regulations 2015 for the management of the City of London Police's Pension Scheme, to be responsible for assisting the Scheme Manager (the City of London Police) in the following matters:

    a) Securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that it is connected to with

    b) Securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator in relation to the Scheme, or any statutory pension scheme that is connected with it; and

    c) The performance of the scheme manager's functions under the Police Pensions Regulations 2015

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[1] The Scheme Manager for the City of London Police Force (except the Commissioner) is the Commissioner of the City of London Police (Regulation 7 of Police Pension Regulations). The Scheme Manager for the Commissioner of Police is the Court of Common Council. The functions in relation to both to be delegated to the Police Authority Board (Regulation 11(2) of the Police Pension Regulations).

[2] An Employer representative is a person appointed to the Board for the purpose of representing employer for the scheme.

[3] A Scheme Member representative is a person appointed to the Board for the purpose of representing members of the scheme.

[4] An Independent Member is a person who is neither an employer representative nor a member representative.

d)   Other such matters as the scheme regulations may specify.

Quorum

- Three Members, with at least one Employer Representative and one Scheme Member representative present.

Frequency of Meetings

- Three times per year

Terms

- Board Members are appointed to three 4-year terms (total 12 years).
- Board Members are to undertake the Pensions Regulator training upon appointment and assume responsibility for ensuring their training remains up to date.

Committee: Police Pensions Board	Date: 17 July 2024
Subject: CoL: Police Pension Scheme - Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: The Chamberlain	For Discussion
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	There have been no complaints made under the Internal Dispute Resolution Procedures (IDRP) since the last Board meeting.
A record of any formal complaints received by the Pensions Office.	There have been no formal complaints received.
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.
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.
Guaranteed Minimum Pensions (GMP) Reconciliation	The project is still ongoing. A report will be brought to the Board once the reconciliation has been completed.
Procurement of Pension Administration System	The Pensions Office is currently in the process of implementing the Member Self-Service system. This system has the potential to allow members to access their pension record, make amendments to selected personal data (i.e. name, partnership status, death grant nominees) and to run their own retirement estimates. It will also provide a platform for providing annual benefit statements and other bulk mailings.

In-house User Acceptance Testing of the system has been finalised and the full roll-out for active scheme members has begun, with the roll-out for deferred and pensioner members to follow on at a later date. |
| Legal Challenge 1 | <u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u>

On 10 March 2022 the Public Service Pensions and Judicial Offices Act 2022 received Royal Assent.

The main purpose of the Act was to implement the 'McCloud Remedy' in the public service pension schemes and it is to be implemented in two phases.

Phase one was to move all remaining active members of the 'legacy' schemes (Police Pension Schemes 1987 and 2006) into the new scheme (Police Pension Scheme 2015) with effect from 1 April 2022.

Phase two was implemented with effect from 1 October 2023. This second phase provides the deferred choice underpin which gives eligible members the choice between legacy scheme or new scheme membership for the period 1 April 2015 to 31 March 2022.

The Pensions Office has implemented the Remedy in respect of active scheme members and all retirements that have occurred since this date (i.e. 1 October 2023) have been processed on this basis.

The Pensions Office, together with the City of London Police, is in the process of assessing and contacting all eligible retired and deferred officers to offer them their choices in respect of the Remedy.

Updates regarding the implementation of the McCloud Remedy will continue to be brought to each Board meeting. |

Legal Challenge 2	Evans & Ashcroft vs Chief Constable of South Wales
	This is a court of appeal case in respect of the Police (Injury Benefit) Regulations 2006.
	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.
Pensions Dashboards	Introduced by the Department for Work and Pensions (DWP), Pensions Dashboards have been designed to provide an online platform that will allow individuals to access details of their accrued pension benefits from multiple sources in one place. The intention is to support better planning for retirement, and help individuals reconnect with any pension pots they may have lost over time.
	In respect of Public Sector Pension Schemes, the initial expectation was that schemes would be required to connect to the online dashboard infrastructure by 30 September 2024.
	However, a written Ministerial Statement made on 2 March 2023 stated that delays setting up the dashboard programme has meant that the original timetables have been re-considered.
	A revised staging timetable has been set out in guidance with all schemes in scope given a single connection deadline of 31 October 2026, by which time they are legally required to be connected to the pensions dashboard ecosystem and be ready to respond to requests for pensions information.
	However, the guidance also sets out a staging timetable which provides a recommended connection date based upon scheme size and type – the connection date for public sector pension schemes is 31 October 2025.
	The Pensions Regulator (TPR) updated its 'Failing to comply with dashboards duties' guidance in June 2023: (https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/failing-to-comply-with-pensions-dashboards-duties). The purpose of the guidance is to outline what schemes will need to do to demonstrate that they have had regard to the staging timetable that will be set out in the connection guidance.
	TPR expectations of schemes to show they 'have regards to the connection guidance' includes: • Connect to dashboards by the connection deadline of 31 October 2026 that is set out in legislation. Failure to do so could result in regulatory action by TPR. • A revised staging timetable is set out in guidance which indicates when schemes are scheduled to connect. All trustees and scheme managers must have regard to this guidance. Failure to do so will be a breach.

	• Although the timelines in the guidance are not mandatory, schemes will be expected to demonstrate how they have had regard to the guidance. • A phased approach to staging enables a controlled and well-planned connection, reduces the risk of provider capacity constraints and means savers can realise the benefits of dashboards as early as possible. • Continuing to prepare for dashboards by engaging with those who will support them and their dashboard duties. The Pensions Dashboards Programme (PDP) has updated their FAQs to reflect the new connection deadline announcement https://www.pensionsdashboardsprogramme.org.uk/faqs/
Task Statistics	Update provided on the Non-Public agenda (**Appendix 2**).
Pension Board Training	Board Members are asked to consider any topics of training they would like to cover in the coming year ahead. Details in respect of tPR training modules completed by each Member are included on the Non-Public agenda. (**Appendix 3)**.

Recommendation

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

Appendices:
Appendix 1 – Annual Schedule of events
Appendix 2 – Key Performance Indicators (NON-PUBLIC)
Appendix 3 – Member Training (NON-PUBLIC)

Contact:
Graham Newman
Pensions Manager
Chamberlain's Department
Email: graham.newman@cityoflondon.gov.uk

City of London: Police Pension Scheme
Annual Schedule of Events

Date Due	Event	Date Completed
25 January 2024	Deadline for Scheme Return to the Pensions Regulator	25 January 2024
January 2024	HMRC Event Report / Tax Return for December Quarter	31 January 2024
March / April 2024	Submit IAS19 data to Scheme Actuary	1 May 2024
1 April 2024	Employee Contribution band implementation	1 April 2024
1 April 2024	Employer Contribution implementation	1 April 2024
1 April 2024	Revaluation of CARE benefits	1 April 2024
First Monday in April after 6 April 2024	Pensions Increase – Annual Inflation Increase	8 April 2024
April 2024	HMRC Event Report / Tax return for March Quarter	No data to submit
24 May 2024	Home Office Year End Finance Return (submitted by City of London Police)	(TBC)
July 2024	HMRC Event Report / Tax Return for June Quarter	
31 August 2024	Issue of Annual Statements Deadline	
October 2024	HMRC Event Report / Tax Return for September Quarter	
6 October 2024	Deadline for the issue of Pension Saving Statements (Annual Allowance letter)	
January 2025 (TBC)	Deadline for Scheme Return to the Pensions Regulator	
January 2025	HMRC Event Report / Tax Return for December Quarter	
February 2025 (TBC)	Deadline for Pensions Regulator Scheme Survey	
March / April 2025	Submit IAS19 data to Scheme Actuary	

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Committee:	Date:
Police Pensions Board	17 July 2024
Subject:	**Public**
CoL: Police Pension Scheme – Risk Register	
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	**n/a**
Does this proposal require extra revenue and/or capital spending?	**n/a**
If so, how much?	**n/a**
What is the source of Funding?	**n/a**
Has this Funding Source been agreed with the Chamberlain's Department?	**n/a**
Report of:	**For Decision**
The Chamberlain	
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 some similar/generic risks are also included in the Local Government Pensions Committee risk register. The risks are CHB COLP PSB 02 Legislative Compliances, CHB COLP PSB 05 Pension Fraud, CHB COLP PSB 07 Cyber security and CHB COLP PSB 08 McCloud Legal Case.

Officers have conducted a preliminary review of the Risk Register and following the discussion at the April 2024 Board meeting are recommending changes to one of the target scores – CHB COLP PSB 08 McCloud Legal Case (from target risk score amber 8 to amber 6).

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 exception 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 20 October 2023, 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 exception 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".

4. The Risk Register to be reviewed is attached at **Appendix 1**

Table 1: Risk Summary

Risk code	Risk title	Current Risk Score	Current Risk Score Indicator
CHB COLP PSB 08	McCloud legal Case	12	🔺
CHB COLP PSB 02	Legislative Compliance	4	✅
CHB COLP PSB 03	Pension Scheme Admin (Personnel)	4	✅
CHB COLP PSB 04	Pension Scheme Admin (Systems)	4	✅
CHB COLP PSB 05	Pension Fraud	4	✅
CHB COLP PSB 07	Cyber Security	4	✅
CHB COLP PSB 01	Actuarial Data	2	✅
CHB COLP PSB 06	Protected Pension Age	1	✅

5. The Risk Register contains eight risks which are summarised above. In the table, "Current Risk Score indicator" displays the current "RAG" rating for each risk. 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.

6. Officers have reviewed the Risk Register to establish whether the risk environment has changed and whilst all scores have been maintained at their previous levels each has been reviewed and updated where necessary in the Register itself.

Updates to the Risk Register are underlined throughout with deletions being struck through.

7. 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

Mitigation of amber and red risks

8. The target score for risk, CHB COLP PSB08 – McCloud Legal Case, had been given a score of amber 8. However, following discussions at the April Boad meeting, officers have reviewed the target score are recommending that it be reduced form an 8 to a 6.

Conclusion

9. The risks overseen by the Police Pension Board are primarily of low likelihoods but may represent substantial impact. There is one amber risk around the McCloud remedy (CHB Pensions 08). Continued implementation of the Remedy allows for the impact of the Remedy and the associated risk rating to be constantly assessed with the expectation that the score will continue to decrease.

10. 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
Email: graham.newman@cityoflondon.gov.uk
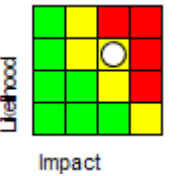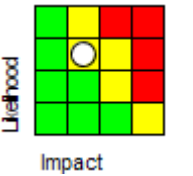
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CHB CoLP Pensions Detailed risk register EXCLUDING COMPLETED ACTIONS

Report Author: Graham Newman
Generated on: 22 May 2024

Rows are sorted by Risk Score

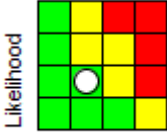| Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP CHB 08 McCloud Legal Case	**Cause**: Implementation of the remedy process following the resolution of the McCloud judgement. **Event:** The impact to the pension administration team of implementing the McCloud judgement remedy. **Effect**: The Pensions Office is unable to adequately comply with required administration processes arising from the resolution of the McCloud judgement.		12	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. On 15 July 2019 the government confirmed that the difference in treatment would be remedied in the Police Pension Scheme and subsequently published a consultation document that sets out options for how the government will remove the discrimination.		6	30 June 2024	

				In February 2021 HM Treasury published its response to the consultation document and set out its preferred remedy choice.				
				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.				
				On 10 March 2022 the Public Services and Judicial Offices Act 2022 received Royal Assent.				
				The main purpose of the Act was to support the implementation of the McCloud remedy and is to be implemented in two phases.				
				Phase one took effect from 1 April 2022 and moved all remaining active members of the legacy schemes into the 2015 Scheme.				
				Phase two is in respect of implementation of the deferred choice underpin.				
				The finalised Police Pensions (Remediable Service) Regulations 2023 were laid in Parliament on 20 July 2023 and came into force from 1 October 2023.				
				Since this date, all new retirements have been calculated with reference to the Remedy and retiring officers have been provided with a Remediable Service Statement to provide them with comparative figures – i.e. what they would receive with the Remedy				

				and what they would receive if they elected to reject it. Officers that retired before October 2023 must be contacted before April 2025 and be provided with their potential options under Remedy. Those officers that are still active members of the pension scheme must be provided with details of their benefits as a result of Remedy by September 2024.				
22-Jan-2021 Graham Newman				**22 February 2024**				Constant

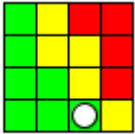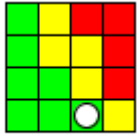| Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 08a	The Public Service and Judicial Offices Act 2022 confirmed the intention to introduce legislation to the statute books from 1 0ctober 2023 but applied retrospectively to 31 March 2012 and 31 March 2015. The Pensions Office will need to prepare for the implementation of the new regulations, including the development of processes and calculations for the amended schemes and should be aware of all relevant correspondence issued by the Home Office / National Police Chiefs Council (NPCC) and regular attendance at seminars, forums, webinars and user groups – this includes the Technical Working Group.	Continue with membership of working groups (Police Technical Group, South East Counties Senior Officer Group (SECSOG), Aquila Heywood Remedy Implementation Group. Aquila Heywood Police & Fire User Group), to ensure development of software and understanding of legislation. Attend conferences, webinars, forums and seminars as appropriate and keep up to date with bulletins and guidance from the Home Office / NPCC. Membership to these groups etc to continue to ensure that the Pensions Office is kept up to date with any developments and issues that may arise.	Graham Newman	6-Oct-2023	30-Sept 2024
CHB COLP PSB 08b	Identification of eligible scheme members who will qualify for the remedy. All data must be reviewed and if necessary amended. In some cases data may be missing and must be requested from Force and previous pension providers	Perform data review exercise in bulk and individually to identify scheme members who may qualify and/or identify missing data. Software provider has developed systems to identify qualifying scheme members in bulk reports.	Graham Newman	6-Oct-2023	30-Sept 2024

3

		Any missing information to be obtained and scheme member record update			
CHB COLP PSB 08c	System Development calculation/revaluation	The software has been updated to allow for calculations and recalculations of deferred benefits and those already in receipt of pension to identify incorrect values and any over/underpayments. The calculators are kept under constant review to ensure that they work as intended and regular updates are provided as they are developed by the software supplier. Calculators have also been developed and provided by the Government Actuary's Department to calculate arrears payable/collectible (benefits and contributions) plus interest payable if applicable	Graham Newman	22 Feb 2024	30-Sept 2024
CHB COLP PSB 08d	Continue to work in conjunction with Force HR/NPCC in respect of all communications to be sent to affected officers. Regular contact and discussion between all relevant parties – Force HR, Pensions Administration & Federation.	It will be essential for communications to be regular and clear. The Pensions Office Police Pensions webpage carries current information from various sources including the Home Office. Further communications will continue to be added as it is released. The 2023 Annual Benefit Statements (ABS) contained a statement on McCloud provided by the Home Office The ABS will need to be amended following implementation of the amended regulations as a Remediable Service Statement will need to be provided for each active scheme member in 2024. Scheme members who may be affected will need a final communication confirming if benefit values have been amended and if so by how much, including value of arrears and interest if applicable.	Graham Newman	22 Feb 2024	30-Sept 2024

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 30-Aug-2019 Graham Newman	**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	*[risk matrix: Likelihood vs 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. **6-Oct-2023**	*[risk matrix: Likelihood vs Impact]*	4	31 March 2025	➖ Constant

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 02a	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.	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	22 May 2024	31 March 2025

		Resources were confirmed by the City of London Police to provide for an additional pensions administrator role within the Pensions Office. Interviews were held in February 2024 and ~~an offer is to be made to one of the candidates~~ the successful candidate-was appointed to the new position with effect from 1 April 2024.			
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	6 Oct 2023	31 March 2025

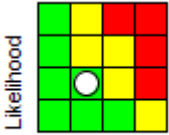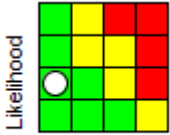| Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 03 Pension Scheme Administration (Personnel)	**Cause**: (i) Ineffective succession planning. (ii) Inadequately trained staff. (iii) Absences/ Increased Staff turnover. (iv) Data Accuracy. **Event**: The failure of administrators to accurately calculate and pay the correct levels of benefits. **Effect:**(i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/ sanctions		~~8~~ <u>4</u>	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. Incorrect member data, lack of administrative knowledge and skills could lead to incorrect calculation of pension benefits and delays in payment. This may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator The Pensions Office had a long outstanding vacancy for the lead police administrative role. This post was filled in October 2023 and resources to allow for a new police administrative role were confirmed by the City of London Police. Interviews for this new role were carried out in February 2024 and ~~an offer of employment was due to be made~~ <u>the</u>		4	<u>31 March 2025</u>	➖

				successful candidate started with effect from 1 April 2024.				
30-Aug-2019 Graham Newman				**22 May 2024**				Constant

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.	Kate Limna	6 Oct 2023	31 March 2025
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	6 Oct 2023	31 March 2025
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 originally to take account of COVID 19 and hybrid working.	Graham Newman	6 Oct 2023	31 March 2025
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.	Ensuring that skill sets are not restricted to one staff member alone. Priority cases and work types are identified to ensure continuation in the event that staff or other resources become unavailable. Disaster Recovery reviewed in light of hybrid working.	Graham Newman	6 Oct 2023	31 March 2025
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	6 Oct 2023	31 March 2025

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 04 Pension Scheme admin (Systems)	**Cause**:(i) Ineffective succession planning. (ii) Inadequately trained staff. (iii) Absences/ Increased Staff turnover. (iv) IT system failure (v) Data Accuracy. (vi) Lack of resources. **Event:** Failure of the Pension Scheme administration software. **Effect:** (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/ sanctions		4	The Pension Scheme administration software is designed to support the administrator by providing efficient and accurate benefit calculations. The software system is regularly updated by the provider as improvements to the software are developed and as new regulations and guidance is released by the legislative bodies. If the software system fails it may lead to benefits being calculated inaccurately or the failure to calculate them at all. A loss of confidence in the system may require all calculations to be carried out manually which would be time consuming and may mean that statutory deadlines are not met. This may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator. A' member self-service' on-line portal is in the process of being rolled-out to all pension scheme members. This will require an assessment for the purposes of adding to the Risk Register. **22 February 2024**		4	31 March 2025	
30-Aug-2019								Constant

Graham Newman								

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 04a	Training on how to use the software and how to recognise and report problems and faults to be provided to all staff.	Any faults with the system should be reported to the software provider as soon as possible and therefore it is important that all staff can recognise any issues and know how to report them.	Graham Newman	6 Oct 2023	31 March 2025
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.	Graham Newman	6 Oct 2023	31 March 2025
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.	Graham Newman	6 Oct 2023	31 March 2025
CHB COLP PSB 04d	Ensuring the security of the new pensions administration 'member self-service' portal.	Ensuring that the pensions administration 'member self-service' portal is accurately assessed for the purposes of the Risk Register.	Graham Newman	22 February 2024	31 March 2025

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 30-Aug-2019 Graham Newman	**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	Likelihood / Impact	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. **6 Oct 2023**	Likelihood / Impact	2	31 March 2025	━ Constant
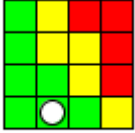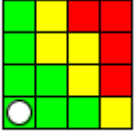
Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP- PSB 05a	Robust fraud protection/detection processes.	Use of Mortality Screening Service and Tell Us Once Service [Government initiative that allows us to be notified of a death when registered]. Participation in the National Fraud Initiative. Annually sending Life Certificates to Overseas Pensioners.	Graham Newman	6 Oct 2023	31 March 2025
CHB COLP PSB 05b	Robust identity verification processes	Controls in place to verify and ensure the legitimacy of any signed discharge form. This must also include timeframes in respect of how long a letter of authority from a scheme member is valid.	Graham Newman	6 Oct 2023	31 March 2025

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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 07 Cyber Security 30 Aug-2019 Graham Newman	**Cause:** IT system failures due to ineffective procedures, or Inadequately trained staff. **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		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. **6 Oct 2023**		4	31 March 2025	Constant

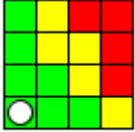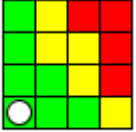| Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 07a	Pensions administration staff to be aware of the corporate policy regarding cyber security and to follow the guidelines given.	Corporate online training regarding cyber-security to be carried out by all staff and reviewed as required.	Graham Newman	6 Oct 2023	31 March 2025
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.	Graham Newman	6 Oct 2023	31 March 2025
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.	Graham Newman	6 Oct 2023	31 March 2025

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, ensuring the protection of scheme member data.	Graham Newman	6 Oct 2023	31 March 2025

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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 01 Actuarial Data 30-Aug-2019 Graham Newman	**Cause**: (i) Inaccurate data supplied to the Home Office either by City of London or any other Police Authority. (ii) Poor assumptions used by the Home Office. **Event:** The actuarial data provided to the Home Office is inaccurate. **Effect**: National employer rate incorrectly determined.		2	The rate of employers' pension contributions for the Police Pension Scheme is set nationally and is based upon the actuarial data provided by all police forces in the country. Data is supplied to the Home Office at the end of each financial year together with a forecast for the following 5 years. The forecasts are subsequently updated twice more during the financial year. If inaccurate data is supplied, either by the City of London Police or other Forces, the assumptions used to determine the employer contribution rate may be flawed which in turn may lead to an incorrect rate being used. At the Police Pension Board meeting of 9 October 2020 Members determined that the Impact of this risk should be increased from 1 to 2, but the Likelihood should remain at 1 thus increasing the overall risk score to 2 and remaining green. **6 Oct 2023**		1	31 March 2025 Accept	Constant

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.	Graham Newman	6 Oct 2023	31 March 2025

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) 30-Aug-2019 Graham Newman	**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.		1	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). 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. The required break is 6 months, but this can be reduced to 1 month if the employment is not materially similar. 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. **6 Oct 2023**		1	31 March 2025	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
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. A training session has been agreed with the Pensions Office to provide refresher training to all Human Resource officers on the rules regarding re-employment and PPA.	Kelly Glazebrook	6 Oct 2023	31 March 2025
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. Human Resource officers ask for a validation report that shows the last date of service. This then ensures the dates are checked so the required break is built into the recruitment start date. The return to work letter has been reviewed and approved by the Pensions Office.	Kelly Glazebrook	6 Oct 2023	31 March 2025
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. A line has been added into the retirement letter issued by Human Resources to remind officers of the required break should they be thinking of re-joining as a member of staff. 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.	Kelly Glazebrook ; Graham Newman	6 Oct 2023	31 March 2025

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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)

		Impact			
	X	Minor (1)	Serious (2)	Major (4)	Extreme (8)
Likelihood	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: 17 July 2024
Subject: The City of London Police Pension Board – Review of Activities for the period 1 April 2023 to 31 March 2024	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	**N/A**
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: The Chamberlain	**For Information**
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 2023 to 31 March 2024. As Members are aware, this Board meets three times each year. However the Board meeting scheduled for 12 March 2024 had to be rescheduled and was subsequently held on 18 April 2024. For the purposes of reporting to the Police Authority Board, officers have included the outcome of the April meeting within the draft report. Subject to any comments Members may have, it is proposed that this Appendix is submitted as a public report to the next 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 next CoL Police Authority Board.

Appendix

Appendix – Police Pensions Board - Review of Activities for the period 1 April 2023 to 31 March 2024

Contact: Graham Newman
Pensions Manager
Chamberlain's Department

E: graham.newman@cityoflondon.gov.uk

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Committee:	Date:
CoL Police Authority Board	17 July 2024
Subject: The City of London Police Pension Board – Review of Activities for the period 1 April 2023 to 31 March 2024	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: The Chamberlain	For Information
Report author: Graham Newman – Chamberlain's Department	

Summary

This report summarises the activities of the Police Pensions Board (the Board) for the period 1 April 2023 to 31 March 2024. 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 scheme members, prospective scheme members, leavers and retirees;
- monitored and where appropriate updated the Board's Risk Register ; 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 employer representatives and 2 scheme member representatives, plus a vacant position.

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:
Alderman Alexander Barr   (Chairman from April 2023) – Elected Member
Superintendent Helen Isaac   Serving CoL Police Officer
Mr Henry Colthurst –   Elected Member

Scheme Member Representatives:
Mr John Todd   (Deputy Chairman from April 2023) – Retired CoL Police Officer
Mr Ray Eaglesmith   Serving CoL Police Officer
Mr James Halkett   (From 22 March 2023 until 20 October 2023) Serving CoL Police Officer

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

6.   In accordance with the Regulations, the Chairmanship of the Board switches between Employer and Member Representatives on an annual basis in April each year.

7.   Where the role of Chair is filled by an Employer Representative the role of Deputy Chair must be filled by a Member Representative and vice versa. Therefore, as the Chairmanship switches so too does the Deputy Chairmanship.

Activities of the Board

8.   Since 1 April 2023 three meetings have been held – 8 June 2023, 20 October 2023 and 18 April 2024 (this meeting had been originally planned for 12 March

2024, but needed to be re-scheduled). It is expected that there will continue to be 3 meetings held in every year.

Training

9. 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.

10. 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.

11. The Pensions Regulator has created an online learning programme, the Trustee Toolkit. The Toolkit is aimed at the board members of occupational pension schemes and Police Pension Board Members have been provided with the necessary details and are expected to undertake all 7 training modules. Completion of the Trustee Toolkit is mandatory for all Board Members and the status of each Member's training is reviewed periodically. It should be noted that as at 18 April 2024, all training modules had been completed by the incumbent Members of the Board.

12. In addition to the training modules provided by the Pensions Regulator, the Pensions Office continues to provide training sessions to Members. Training sessions in respect of the McCloud Remedy was given at the October 2023 and April 2024 meetings.

Annual Schedule of Events

13. 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

14. 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.

Documentation and Communication

15. The Board continues to review the working practices of the City of London Police Pensions Office, including all letters and documents issued to scheme members, prospective scheme members, leavers and retirees to ensure optimum clarity as well as accuracy.

Data Protection Act 2018 (GDPR)

16. 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.

17. 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)

18. There were no known breaches during the year.

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

19. There were no known breaches during the year.

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

20. 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.

21. On 10 March 2022 the Public Service Pension and Judicial Offices Act 2022 (the Act) received Royal Assent. The main purpose of the Act was to support the implementation of the McCloud remedy in the public service pension schemes and has been implemented in two phases.

22. Phase one took effect from 1 April 2022 and moved all remaining active members of the 'legacy' pension schemes (the Police Pension Schemes 1987 and 2006) into the new scheme (the Police Pension Scheme 2015).

23. Phase two was implemented with effect from 1 October 2023 and gives eligible members the choice between legacy scheme and new scheme membership for the period 1 April 2015 and 31 March 2022.

24. The Pensions Office continues to attend several technical working groups in respect of the Remedy and has a dedicated webpage to communicate all relevant information to officers as it is released.

Service Level Agreement (SLA) and Complaints Procedure

25. In April 2023, the Board received a letter written jointly by the Chairs of the City of London Superintendents' Association and the City of London Police Federation expressing their concerns in respect of the administration of the Police Pension Scheme by the City of London Pensions Office.

26. The Pensions Office provided feedback in respect of these concerns, many of which were caused by a crucial staff vacancy within the Pensions Office. This post was filled with effect from October 2023. However, it was also apparent that the staffing levels within the pensions team were still insufficient to provide an adequate administration service to the Force and to this end additional resources were made available to create a new administrator post. This post was filled with effect from 1 April 2024.

27. The issues raised by the Superintendents' Association and the Federation indicated that a formal Service Level Agreement between the City of London Police and the City of London Corporation needed to be created in respect of

the pensions administration service provided. The Board commissioned this document and required that it be accompanied by a formal complaints procedure.

28. The complaints procedure was created by the City of London Pensions Office and the City of London Police HR Office and was agreed by the Board at their April 2024 meeting.

29. The Service Level Agreement is being finalised before it can be signed by the relevant Chief Officers.

Conclusions

30. The Police Pension Board was created with reference to the Public Services Pensions Act 2013 and the Police Pension Scheme Regulations 2015. The Board has met three times in 2023/24 and Board 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.

31. 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 Record of Attendance

Contact: Graham Newman   Email: graham.newman@cityoflondon.gov.uk
Pensions Manager, Chamberlain's Department

Police Pension Board - Board Member Record of Attendance

	08/06/2023	20/10/2023	18/04/2024 (originally scheduled for 12/03/2024
Alexander Barr	X	X	X
Helen Isaac	X	X	
Henry Colthurst			X
John Todd	X	X	X
Ray Eaglesmith	X	X	X
James Halkett (left w.e.f. 20/10/2023)	X		

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