



# 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 meeting held on 5 November 2024.

**For Decision**  
(Pages 5 - 8)

4. **COLP PENSIONS SCHEME - ADMINISTRATOR'S UPDATE**

Report of the Chamberlain.

**For Information**  
(Pages 9 - 18)

5. **SCHEME MANAGER UPDATE**

Report of the Commissioner.

**For Information**  
(Pages 19 - 20)

6. **COL POLICE PENSION SCHEME - RISK REGISTER**

Report of the Chamberlain.

**For Information**  
(Pages 21 - 42)

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

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

9. **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**

10. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 5 November 2024.

**For Decision**  
(Pages 43 - 44)

11. **COLP PENSION SCHEME ADMINISTRATORS UPDATE - NON PUBLIC APPENDIX**

Report of the Chamberlain, to be read in conjunction with item 4.

**For Information**  
(Pages 45 - 46)

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

13. **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

Tuesday, 5 November 2024

Minutes of the meeting of the City of London Police Pensions Board held at the Guildhall EC2 at 11.00 am

### Present

#### Members:

Ray Eaglesmith (Chair)	John Todd
Deputy Henry Colthurst (Deputy Chairman)	Alan Yau

#### Officers:

Kate Limna	- Chamberlain's
Graham Newman	- Chamberlain's
James Garmant	- Chamberlain's
Kezia Barrass	- Town Clerks Department

#### City of London Police

Alix Newbold	- City of London Police
Kelly Glazebrook	- City of London Police

#### 1. **APOLOGIES**

Apologies were received from Madush Gupta and Helen Isaacs.

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

There were no declarations.

#### 3. **MINUTES**

**RESOLVED**, - that the minutes of the meeting held on 17 July 2024 were approved as an accurate record.

#### 4. **COL 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 agreed to make the Service Level agreement and related statistics, which were contained in the non-public appendices publicly available in future reporting. In cases where an individual would be identifiable by the data, this would remain non-public.

Members discussed the complaints process, and it was outlined that a singular point of access through the HR website should be used, and all officers would be directed to this route.

Members noted that the breach of statutory regulations relating to the annual statements for some officers had been reported to and acknowledged by The Pensions Regulator.

- RESOLVED**, - that the report be noted.
5. **COL POLICE PENSION SCHEME - RISK REGISTER**  
Members received a report of the Chamberlain which outlined the City of London Police pension scheme risk register.  
The Chair requested that officers consider the risk in relation to the recent breach of pensions regulations regarding the annual statements for some police officers. Officers agreed to assess the risks in relation to scheme member understanding and provide further update at the next committee.  
Members noted that there had been anecdotal evidence that some police officers did not understand their statements, officers agreed to hold drop in sessions to answer questions and clarify misunderstandings where possible.  
**RESOLVED**, - that the risk register be approved.
6. **COLP SCHEME MANAGER UPDATE**  
Members received a report of the Commissioner which provided an update from the City of London Police pensions scheme manager.  
**RESOLVED**, - that the report be noted.
7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**  
There were no questions.
8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**  
A Member raised an issue that some scheme members had not received responses to email enquiries. It was outlined that due to the McCloud issues there had been significant increase in enquiries received by a small team of officers. Officers agreed to amend the automated response to manage expectations and explain the expected delay in response time.
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 meeting held on the 17 July 2024 were approved as an accurate record.
11. **COL POLICE PENSION SCHEME - UPDATE NON-PUBLIC APPENDICES**  
Members considered the non-public appendix in conjunction with Item 4.  
It was noted that all Members had completed the required training modules.
12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**  
There was one question from a Member who queried the communications that scheme members received during the delayed issuance of annual statements.
13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT THAT THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**  
There was one item of non public business.

**The meeting closed at 11:37am**

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Chairman

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

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## City of London Corporation Committee Report

<b>Committee(s):</b> Police Pensions Board	<b>Dated:</b> 10 February 2025
<b>Subject:</b> CoL Police Pension Scheme – Administrator’s Update	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• provides statutory duties</li> <li>• provides business enabling functions</li> </ul>	
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	n/a
<b>Report of:</b>	The Chamberlain
<b>Report author:</b>	Graham Newman – Chamberlain’s Department

### Summary

The administration of the City of London Police Pension Scheme (the Scheme) is undertaken by the Pensions Team within the Chamberlain’s Department.

The table below provides a summary of general information around a range of topics in relation to the administration of the Scheme since the last Board meeting on 5 November 2024. Members are asked to note the report and provide feedback.

<b>Item</b>	<b>Update</b>
Annual schedule of events for the Pensions Scheme	Update provided ( <b>Appendix 1</b> ).
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.
Any recent Police Pension Scheme breaches of the law	None 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	<p>The Pensions Office has rolled-out the Online Member Portal which allows members to access their pension record, make amendments to selected personal data (i.e. name and death grant nominees) and to run their own retirement estimates.</p> <p>The portal was used for providing the 2024 annual benefit statements and provides a potential platform for future bulk mailings.</p> <p>The system has been rolled out to all active scheme members and is now also available to retired and deferred members so that access to the portal can continue as active members leave the organisation. An advertising campaign to existing City Pensioners will begin shortly to encourage sign-up, but will make it clear that this is not compulsory.</p> <p>A similar campaign for existing deferred members will follow on from this.</p>
Legal Challenge 1	<p><u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u></p> <p>On 10 March 2022 the Public Service Pensions and Judicial Offices Act 2022 received Royal Assent.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>For eligible members, the 2024 Annual Benefit Statement included a ‘Remediable Service Statement’ (RSS) that</p>

provided comparative figures showing the benefits if the member accepted the Remedy together with those if they choose to reject it.

In addition, a Remediable Pension Savings Statement was sent to all members whose pension growth exceeded the Annual Allowance during the Remedy Period as a result of the Remedy implementation.

For the majority of officers whose legacy scheme was the 2006 Scheme, a refund of overpaid contributions was due if they elected to accept the terms of the Remedy. Where a valid election to accept the Remedy was received, the 'contribution adjustment' was paid to officers with either their December 2024 or January 2025 salary payment with the interest applied adjusted accordingly.

For those officers whose legacy scheme was the 1987 Scheme, in many cases if the officer elected to accept the terms of the Remedy they owed underpaid contributions to the scheme.

Where a valid election to accept the Remedy was received, the 'contribution adjustment' to collect the outstanding contributions took effect from January 2025 with the contributions being collected from officer's pay to ensure the tax relief was made via PAYE.

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.

Work in this respect had started in Summer 2024, but an issue with regards to the taxation of certain commutation lump sum arrears payments had caused a pause while discussions took place between the National Police Chief's Council (NPCC), His Majesty's Treasury (HMT) and His Majesty's Revenue and Collection (HMRC).

Guidance has now been released in respect of the issue that had arisen, however the NPCC have stated that the guidance is extremely complex and may not provide the full information that administrators need. They have therefore commissioned the Government Actuary's Department (GAD) to write additional guidance that helps to fill any gaps.

Work on producing RSS's for pensioner and deferred member cohorts can now recommence, but until the GAD guidance is issued there may be a number of cases that cannot be completed.

All RSS's for these ex-officers must be issued before the 31 March 2025 deadline.

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

<p>Legal Challenge 2</p>	<p><u>Evans &amp; 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>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>
<p>Pensions Dashboards</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The Pensions Regulator (TPR) updated its ‘Failing to comply with dashboards duties’ guidance in June 2023: (<a href="https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/failing-to-comply-with-pensions-dashboards-duties">https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/failing-to-comply-with-pensions-dashboards-duties</a>). 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.</p> <p>TPR expectations of schemes to show they ‘have regards to the connection guidance’ includes:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>

	<ul style="list-style-type: none"> <li>• Although the timelines in the guidance are not mandatory, schemes will be expected to demonstrate how they have had regard to the guidance.</li> <li>• 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.</li> <li>• Continuing to prepare for dashboards by engaging with those who will support them and their dashboard duties.</li> </ul> <p>The Pensions Dashboards Programme (PDP) has updated their FAQs to reflect the new connection deadline announcement  <a href="https://www.pensionsdashboardsprogramme.org.uk/faqs/">https://www.pensionsdashboardsprogramme.org.uk/faqs/</a></p> <p>The National LGPS Framework was set up to provide procurement facilities for all LGPS Funds to allow for an efficient route for sourcing external services by a compliant route.</p> <p>There are several Integrated Service Providers (ISPs) listed on the National LGPS Framework and the Pensions Office has started the process of making contact with these providers as a first step towards ensuring compliance with the staging deadline.</p> <p>It should be noted that this project will be carried out in conjunction with the administration of the Local Government Pension Scheme and is not ‘stand-alone’ for the Police Pension Scheme.</p> <p>Updates regarding the progress being made in respect of the Dashboards project will be brought to each Board meeting.</p>
Task Statistics	Update provided ( <b>Appendix 2</b> ).
Pension Board Training	<p>Board Members are asked to consider any topics of training they would like to cover in the coming year ahead.</p> <p>Details in respect of tPR training modules completed by each Member are included on the Non-Public agenda. (<b>Appendix 3</b>).</p>

### Recommendation

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

#### Appendices:

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

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

<b>Date Due</b>	<b>Event</b>	<b>Date Completed</b>
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)	23 May 2024
July 2024	HMRC Event Report / Tax Return for June Quarter	No data to submit
31 August 2024	Issue of Annual Statements Deadline	Issued in 3 batches: 4 Sept 2024, 11 Sept 2024 and 13 Sept 2024
October 2024	HMRC Event Report / Tax Return for September Quarter	No data to submit
6 October 2024	Deadline for the issue of Pension Saving Statements (Annual Allowance letter)	6 October 2024
22 November 2024	Deadline for Scheme Return to the Pensions Regulator	22 November 2024
January 2025	HMRC Event Report / Tax Return for December Quarter	
March / April 2025	Submit IAS19 data to Scheme Actuary	
31 March 2025	Deadline for issuing Remediable Service Statements to eligible scheme members.	
1 April 2025	Employee Contribution band implementation	

1 April 2025	Employer Contribution implementation	
1 April 2025	Revaluation of CARE benefits	
First Monday in April after 6 April 2025	Pensions Increase – Annual Inflation Increase	
April 2025	HMRC Event Report / Tax return for March Quarter	
May 2025 (TBC)	Home Office Year End Finance Return (submitted by City of London Police)	
July 2025	HMRC Event Report / Tax Return for June Quarter	
31 August 2025	Issue of Annual Statements Deadline	
October 2025	HMRC Event Report / Tax Return for September Quarter	
6 October 2025	Deadline for the issue of Pension Saving Statements (Annual Allowance letter)	



**City of London Police Pension Scheme - Administration Key Performance Indicators**

<b>Task</b>	<b>Target Working Days</b>
Initial payment of retirement benefits	10 days
Process refund and make payment	5 days
Statement notifying estimate of retirement benefits	20 days
Statement detailing transfer-in credit	20 days
Transfers-out payments	20 days
Answering general correspondence:	10 days
Payment of lump sum death grants:	14 days
Letters to dependants in respect of benefits due:	5 days

<b>Task</b>	<b>Target (Working Days)</b>	<b>Quarter 1 01/04/2024 – 30/06/2024</b>	<b>Quarter 2 01/04/2024 – 30/09/2024</b>	<b>Quarter 3 01/10/2024 – 31/12/2024</b>	<b>Number of cases in Quarter 3</b>	<b>Running total for the year 01/04/2024 – 31/12/2024</b>
Initial payment of retirement benefits	10 days	100%	100%	100%	6	100%
Process refunds and make payments	5 days	100%	100%	100%	9	100%
Statement notifying estimate of retirement benefits	20 days	90.91%	100%	100%	8	95.83%
Statement detailing transfer-in credit	20 days	91.67%	95.16%	100%	57	96.95%
Transfers-out payments	20 days	100%	100%	100%	25	100%
Answering general correspondence	10 days	100%	93.64%	99.48%	191	97.07%
Payment of lump sum death grants	14 days	n/a	n/a	n/a	n/a	n/a
Letters to dependant's in respect of benefits due	5 days	n/a	n/a	n/a	n/a	n/a

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# Agenda Item 5

<b>Committee(s):</b> Police Pensions Board	<b>Dated:</b> 10 February 2025
<b>Subject:</b> Scheme Manager Update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Kelly Glazebrook, Director of People Services	

## Summary

This report provides an update on Scheme Manager activities for the period of 1<sup>st</sup> October 2024 – 31<sup>st</sup> December 2024 including an update on the compensation claims process, communications to service and retired officers and complaints received.

## Recommendation(s)

Members are asked to note the report.

## Main Report

### BACKGROUND

1. This report provides an update on Scheme Manager activities over the period of 1<sup>st</sup> October 2024 – 31<sup>st</sup> December 2024.

### MAIN REPORT

#### Compensation Process

2. The Compensation process has been implemented and one application has been received and has been processed.

## **Complaints**

3. 6 formal complaints have been submitted in this period. These all relate to lack of response to emails that have been sent to the Pensions Office. The original queries either relate to RSS, officers unable to access the portal, paying back monies owed to the 1987 Pension scheme or the 2006 payment for contribution adjustments.
4. This is an increase in 1 from the previous period.

## **Communications**

5. There were face to face drop-in sessions arranged in December where officers booked an appointment to meet the Pensions Team and ask questions related to them personally. These were extremely popular with more people requesting appointments than what was available, more dates will be made available soon.
6. Communications were released in November 2024 advising on the processes that are taking place in relation to the 1987 and the 2006 scheme.

## **National Updates**

7. National Police Chiefs' Council have agreed to move to a single scheme manager. However, implementation is expected to take 1-2 years and may be linked to wider police reforms around creation of a new national policing body.

**Kelly Glazebrook**  
**Director of HR**  
**City of London Police**

## City of London Corporation Committee Report

<b>Committee(s):</b> Police Pensions Board	<b>Dated:</b> 10 February 2025
<b>Subject:</b> CoL Police Pension Scheme – Risk Register	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• provides statutory duties</li> <li>• provides business enabling functions</li> </ul>	
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	n/a
<b>Report of:</b>	The Chamberlain
<b>Report author:</b>	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 November 2024 Board meeting are recommending an additional action be added to the CHB COLP PSB 08 McCloud Legal Case risk to cover scheme member understanding of the Police Pension Scheme.

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 5 November 2024, 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
8. While no new risks have been identified, an additional action has been added to the risk CHB COLP PSB08 – McCloud Legal Case. At the last Board meeting on 5 November 2024, Members identified that scheme member lack of understanding of the scheme's rules and its complexities should be included within the Risk Register, as this will have a knock-on effect to the work of the administration team.

### **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 COLP PSB08 – McCloud Legal Case). 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:**

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# CHB CoLP Pensions Detailed risk register EXCLUDING COMPLETED ACTIONS

Report Author: Graham Newman

Generated on: 21 January 2025



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
NDB COLP NSB 08 McCloud Legal Case	<p><b>Cause:</b> Implementation of the remedy process following the resolution of the McCloud judgement.</p> <p><b>Event:</b> The impact to the pension administration team of implementing the McCloud judgement remedy.</p> <p><b>Effect:</b> The Pensions Office is unable to adequately comply with required administration processes arising from the resolution of the McCloud judgement.</p>	<p>Lifehood</p> <p>Impact</p>	<p>12</p>	<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 and subsequently published a consultation document that sets out options for how the government will remove the discrimination.</p>	<p>Lifehood</p> <p>Impact</p>	<p>6</p>	<p>30 June 2025</p>	

			<p>In February 2021 HM Treasury published its response to the consultation document and set out its preferred remedy choice.</p> <p>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.</p> <p>On 10 March 2022 the Public Services and Judicial Offices Act 2022 received Royal Assent.</p> <p>The main purpose of the Act was to support the implementation of the McCloud remedy and is to be implemented in two phases.</p> <p>Phase one took effect from 1 April 2022 and moved all remaining active members of the legacy schemes into the 2015 Scheme.</p> <p>Phase two is in respect of implementation of the deferred choice underpin.</p> <p>The finalised Police Pensions (Remediable Service) Regulations 2023 were laid in Parliament on 20 July 2023 and came into force from 1 October 2023.</p> <p>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</p>				
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22-Jan-2021 Graham Newman			<p>and what they would receive if they elected to reject it.</p> <p>Officers that retired before October 2023 must be contacted before April 2025 and be provided with their potential options under Remedy.</p> <p>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.</p> <p><del>22 February 2024</del> <u>27 January 2025</u></p>				Constant
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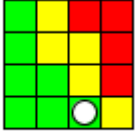
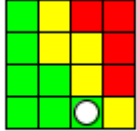

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 08a	The Public Service and Judicial Offices Act 2022 confirmed the intention to introduce legislation to the statute books from 1 October 2023 but applied retrospectively to 31 March 2012 and 31 March 2015. The 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.	<p>Continue with membership of working groups ( Police Technical Group, South East Counties Senior Officer Group (SECSOG), Aquila Heywood Remedy Implementation Group. Aquila Heywood Police &amp; Fire User Group), to ensure development of software and understanding of legislation.</p> <p>Attend conferences, webinars, forums and seminars as appropriate and keep up to date with bulletins and guidance from the Home Office / NPCC.</p> <p>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.</p>	Graham Newman	6-Oct-2023	<u>31 March 2025</u>
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	<p>Perform data review exercise in bulk and individually to identify scheme members who may qualify and/or identify missing data.</p> <p>Software provider has developed systems to identify qualifying scheme members in bulk reports.</p>	Graham Newman	6-Oct-2023	<u>31 March 2025</u>

		Any_missing information to be obtained and scheme member record update			
CHB COLP PSB 08c	System Development calculation/revaluation	<p>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.</p> <p>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</p>	Graham Newman	22 Feb 2024	<u>31 March 2025</u>
CHB COLP PSB 08d	<p>Continue to work in conjunction with Force HR/NPCC in respect of all communications to be sent to affected officers.</p> <p>Regular contact and discussion between all relevant parties – Force HR, Pensions Administration &amp; Federation.</p>	<p>It will be essential for communications to be regular and clear.</p> <p>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.</p> <p>For scheme members that are eligible for the McCloud Remedy, the 2024 Annual Benefit Statements included a ‘Remediable Service Statement’(ABS-RSS) that provided details in respect of McCloud, comparative details should they elect to accept or reject the Remedy and the estimated payment / refund due dependent upon their decision.</p> <p>Where, as a result of implementing the McCloud Remedy, a scheme member’s pensions growth has retrospectively exceeded the Annual Allowance during the Remedy Period a Remediable Pension Savings Statement (R-PSS) was issued.</p> <p>Document templates for both the ABS-RSS and R-PSS were provided by the National Police Chief’s Council (NPCC).</p>	Graham Newman	22 October 2024	<u>31 March 2025</u>
CHB COLP PSB 08e	Working to increase scheme member understanding of the <u>scheme and ensuring that any communications issued by the Pensions Office are as accurate, up-to-date and as easy to understand as possible.</u>	<p><u>The Police Pension Scheme regulations and rules are very complex, and this has been highlighted and increased by the McCloud Remedy and other adjustments that have been made to the Scheme in recent years.</u></p> <p><u>Scheme members are often required to make decisions in respect of their pension benefits that could have long-term consequences, and it is therefore essential that any communications and guidance is as clear and easy to understand as possible.</u></p> <p><u>A more knowledgeable scheme membership should help to reduce later disputes and the queries etc directed to the Pensions Team.</u></p> <p><u>To try to increase and maintain scheme member understanding of the Scheme, several workshops have been held to provide one-to-one discussions with the Pensions Team. These workshops proved to be successful and will look to be continued going forward.</u></p>	Graham Newman	21 January 2025	<u>30 June 2025</u>



**Appendix 1**

	help to prevent non-compliance with legislative requirements.	<p><del>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 the successful candidate was appointed to the new position with effect from 1 April 2024.</del></p> <p><u>Additional resources have been provided by the CoL Police and there are now two members of staff working on police pensions</u></p>			
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
<b>CHB COLP PSB 03 Pension Scheme Administration (Personnel)</b>	<p><b>Cause:</b> (i) Ineffective succession planning. (ii) Inadequately trained staff. (iii) Absences/ Increased Staff turnover. (iv) Data Accuracy.</p> <p><b>Event:</b> The failure of administrators to accurately calculate and pay the correct levels of benefits.</p> <p><b>Effect:</b>(i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/ sanctions</p>	 <p>Likelihood</p> <p>Impact</p>	<p>4</p>	<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 &amp; 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>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</p> <p>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 the successful candidate started with effect from 1 April 2024.</p>	 <p>Likelihood</p> <p>Impact</p>	<p>4</p>	<p>31 March 2025</p>	

## Appendix 1

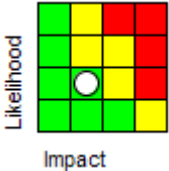
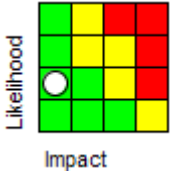
30-Aug-2019				22 May 2024 27 January 2025			Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 03a	Job descriptions used at recruitment to attract candidates with skills and experience related to 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.	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	<del>6 Oct 2023</del> 27 Jan 2025	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
<p><b>CHB COLP PSB 04 Pension Scheme admin (Systems)</b></p> <p>30-Aug-2019 Graham Newman</p>	<p><b>Cause:</b>(i) Ineffective succession planning. (ii) Inadequately trained staff. (iii) Absences/ Increased Staff turnover. (iv) IT system failure (v) Data Accuracy. (vi) Lack of resources.</p> <p><b>Event:</b> Failure of the Pension Scheme administration software.</p> <p><b>Effect:</b> (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/sanctions</p>	<p>Likelihood</p> <p>Impact</p>	<p>4</p>	<p>The Pension Scheme administration software is designed to support the administrator by providing efficient and accurate benefit calculations.</p> <p>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.</p> <p>If the software system fails it may lead to benefits being calculated inaccurately or the failure to calculate them at all.</p> <p>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.</p> <p>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.</p> <p><del>22 February 2024</del> <u>27 January 2025</u></p>	<p>Likelihood</p> <p>Impact</p>	<p>4</p>	<p>31 March 2025</p>	<p></p> <p>Constant</p>

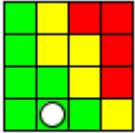
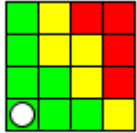

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 04a	Training on how to use the software and how to recognise and report problems and faults to be provided to all staff.	Any faults with the system should be reported to the software provider as soon as possible 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
<b>CHB COLP PSB 05 Pension Fraud</b>  30-Aug-2019 Graham Newman	<b>Cause</b> (i) Continued payment of pensions following death. (ii) Staff acting inappropriately  <b>Event:</b> Fraudulent claim of pension benefits.  <b>Effects:</b> (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.		2	31 March 2025	Constant

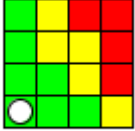
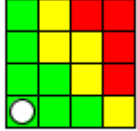

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP-PSB 05a	Robust fraud protection/detection processes.	Use of Mortality Screening Service and Tell Us Once Service [Government initiative that allows us to be notified of a death when registered]. Participation in 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

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
<b>CHB COLP PSB 07 Cyber Security</b>  23-Aug-2019 Graham Newman	<b>Cause:</b> IT system failures due to ineffective procedures, or Inadequately trained staff.  <b>Event:</b> Breach of Corporate IT systems and cyber security  <b>Effect:</b> (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  Impact	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.	 Likelihood  Impact	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

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
<p><b>CHB COLP PSB 01 Actuarial Data</b></p> <p>30-Aug-2019 Graham Newman</p>	<p><b>Cause:</b> (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.</p> <p><b>Event:</b> The actuarial data provided to the Home Office is inaccurate.</p> <p><b>Effect:</b> National employer rate incorrectly determined.</p>	<p>Likelihood</p>  <p>Impact</p>	<p>2</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><del>6 Oct 2023</del> <u>27 January 2025</u></p>	<p>Likelihood</p>  <p>Impact</p>	<p>1</p>	<p>31 March 2025</p> <p>Accept</p>	<p></p> <p>Constant</p>

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
<p><b>CHB COLP PSB 06 Protected Pension Age (PPA)</b></p> <p>30-Aug-2019 Graham Newman</p>	<p><b>Cause:</b> 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.</p> <p><b>Event:</b> Protected Pension Age (PPA)</p> <p><b>Effect:</b> HMRC make 'unauthorised payment' charges to both the member and the organisation.</p>	<p>Likelihood</p>  <p>Impact</p>	<p><b>1</b></p>	<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><del>6 Oct 2023</del> <u>27 January 2025</u></p>	<p>Likelihood</p>  <p>Impact</p>	<p><b>1</b></p>	<p>31 March 2025</p>	<p></p> <p>Constant</p>

## Appendix 1

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.	<p>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.</p> <p>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.</p>	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.	<p>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.</p> <p>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.</p>	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.	<p>The City of London Police HR will ensure that all retiring officers are informed of the rules regarding re-employment and PPA.</p> <p>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.</p> <p>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.</p>	Kelly Glazebrook ; Graham Newman	6 Oct 2023	31 March 2025





### 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)

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

#### (D) Risk score definitions

<b>RED</b>	Urgent action required to reduce rating
<b>AMBER</b>	Action required to maintain or reduce rating
<b>GREEN</b>	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

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