

CHB CoLP Pensions Detailed risk register

Report Author: Graham Newman

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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 PSB 08 McCloud Legal Case	<p>Cause: Implementation of the remedy process following the resolution of the McCloud judgement.</p> <p>Event: The impact to the pension administration team of implementing the McCloud judgement remedy.</p> <p>Effect: The Pensions Office is unable to adequately comply with required administration processes arising from the resolution of the McCloud judgement.</p> <p>Cause: Implementation of the proposed remedy following new pension legislation and scheme specific regulations for the removal of age discrimination from the PPS due to the McCloud judgement.</p> <p>Event: The impact of scheme amendments upon scheme members, Pensions Office and the City Police Force due to implementation of the proposed remedy for McCloud.</p> <p>Effect: The Pensions Office is unable to adequately comply with legislative and regulatory amendments arising from the proposed McCloud remedy.</p>	<p>Likelihood</p> <p>Impact</p>	16	<p>In 2015 the Police Pension Scheme, was reformed. These reforms included 'transitional protection', for people closer to retirement. In December 2018, the Court of Appeal ruled that this directly discriminated against some younger pension scheme members — this is now referred to as the McCloud Judgement or McCloud.</p> <p>On 15 July 2019 the government confirmed that the difference in treatment would be remedied in the Police Pension Scheme.</p> <p>On 16 July 2020 the government published a consultation document that sets out options for how the</p>	<p>Likelihood</p> <p>Impact</p>	8	28 February 2022	

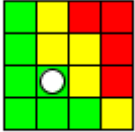
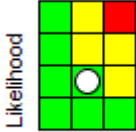

14-Jul-2021 Chamberlain			<p>government will remove the discrimination.</p> <p>On 4 February 2021 HM Treasury published its response to the consultation document and set out its preferred remedy choice.</p> <p>The Home Office also released a document relating to the government response but aimed specifically at the Police Pension Scheme. Their document gives general details as to how the remedy proposal would work for the Scheme.</p> <p>Further technical guidance and legislative changes are required before the remedy can be implemented.</p> <p><u>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.</u></p> <p><u>On 15 July 2019 the government confirmed that the difference in treatment would be remedied in the Police Pension Scheme.</u></p> <p><u>On 16 July 2020 the government published a consultation document that set out options for how the government proposed to remove the discrimination.</u></p>			Reduce	Constant
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			<p><u>On 4 February 2021 HM Treasury published its response to the consultation document and set out its preferred remedy choice.</u></p> <p><u>The Home Office also released a document relating to the government response but aimed specifically at the Police Pension Scheme. Their document gives general details as to how the remedy proposal would work for the Scheme.</u></p> <p><u>Further legislative changes are required before the remedy can be implemented. However, due to the complexity of the proposed remedy pension administrators and pension systems providers have commenced development of processes to enable the final remedy to be implemented.</u></p> <p><u>14 Jul 2021</u></p>				
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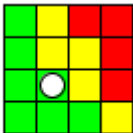
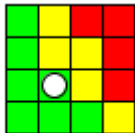

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 08a	<p>Staying aware of all relevant correspondence issued by the Home Office / TWB and regular attendance at seminars, forums, webinars and user groups.</p> <p><u>The Home Office has confirmed the proposed remedy and 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 understand what this means, develop processes and calculations to apply the regulations for the amended schemes and should be aware of all relevant correspondence issued by the Home Office / National Police Chiefs Council and regular attendance at seminars, forums, webinars and user groups – this includes the Technical Working Group.</u></p>	<p>Staying aware of all relevant correspondence issued by the Home Office / TWB and regular attendance at seminars, forums, webinars and user groups.</p> <p><u>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.</u></p> <p><u>Attend conferences, webinars, forums and seminars as appropriate and keep up to date with bulletins and guidance from the Home Office</u></p>	Matt Mott	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>

CHB COLP PSB 08b	<p><u>Regular contact and discussion between all relevant parties – Force HR / Force Finance / Pensions Administration.</u></p> <p><u>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</u></p>	<p><u>Regular contact and discussion between all relevant parties – Force HR / Force Finance / Pensions Administration</u></p> <p><u>Perform data review exercise in bulk and individually to identify scheme members who may qualify and/or identify missing data.</u></p> <p><u>Software provider currently developing systems to identify qualifying scheme member on bulk reports.</u></p> <p><u>Develop data process to request missing information and scheme member record update</u></p>	Matt Mott	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>
CHB COLP PSB 08c	<p><u>Working in conjunction with Force HR to prepare communications and standard responses (FAQs) to be sent to affected officers.</u></p> <p><u>System Development calculation/revaluation</u></p>	<p><u>Working in conjunction with Force HR to prepare communications and standard responses (FAQs) to be sent to affected officers.</u></p> <p><u>Software provider currently developing calculations and recalculations of deferred benefits and those already in receipt of pension to identify incorrect values and any over/underpayments.</u></p> <p><u>Development should include bulk calculations and calculations for individuals, include revised pension amounts, arrears payable/collectible (benefits and contributions) plus interest payable if applicable</u></p>	Matt Mott	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>
CHB COLP PSB 08d	<p><u>Working in conjunction with Force HR to prepare communications and standard responses (FAQs) to be sent to affected officers.</u></p> <p><u>Regular contact and discussion between all relevant parties – Force HR, Pensions Administration & Federation.</u></p>	<p><u>It will be essential for communications to be regular and clear. Further detail about the proposed remedy and delivery of it, including scheme members who may be affected, must be known prior to any specific remedy communications.</u></p> <p><u>The Pensions Office Police Pensions webpage carries current information from various sources including the Home Office. Further communications will be added when they are released.</u></p> <p><u>There will be joint communications throughout the next 2 years with the Police Force HR/Comms team and the Federation/Superintendents Association will be contacted for further information.</u></p> <p><u>The Annual Benefit Statements (ABS) contain a statement on McCloud provided by the Home Office</u></p> <p><u>The ABS will need to be amended following implementation of the amended regulations as it is anticipated McCloud data will need to be included for each scheme member.</u></p> <p><u>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.</u></p>	Matt Mott	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>

CHB COLP PSB 08e	<u>Understand how additional cost for remedy pensions will be paid.</u>	<u>It is anticipated that additional remedy pension costs will be paid for by a grant from the Home Office. It is also anticipated that arrears for underpayment may be expected to be paid with interest in line with the LGPS (i.e. 1% above base rate). It is not known if this will have to be paid by the Force or will also be included in the grant.</u>	<u>Azeem Bhatti</u>	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>
CHB COLP PSB 08f	<u>Be prepared for any additional claims that might arise.</u>	<p><u>While it is unlikely that any additional claims would directly impact the Scheme administration, the Pensions Office would likely be required to provide data to the relevant stakeholders (i.e. the Force / the Home Office etc) for any such claims to be addressed and must therefore be prepared for such an eventuality.</u></p> <p><u>The most probable additional claim would be for compensation for injured feelings and it is not clear who would meet these costs (i.e. individual Police Forces or HM Treasury) in the event a claim was successful. The Force should therefore ensure that they remain aware of any developments in order that the necessary preparations can be made if the need arises.</u></p>	<u>Police HR</u> <u>Azeem Bhatti</u> <u>Matt Mott</u>	<u>29-Sept-2021</u>	<u>14-Mar-2022</u>

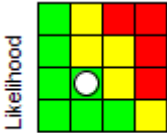
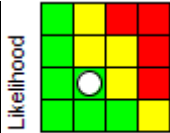
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 02 Legislative compliance 8-Oct-2019 Chamberlain	Cause: (i) Lack of appropriate knowledge or skill. (ii) Lack of training/ appropriately skilled staff. Event: The failure to comply with legislative requirements. Effect: (i) Inaccurate benefits paid. (ii) Financial loss (iii) Increase in Appeals (iv) Reputational damage (v) Fines from Pensions Regulator	Likelihood  Impact	4	<p>The Regulations of the Police Pension Scheme set out how police pensions should be calculated; the procedures to be followed in certain circumstances (i.e. normal retirement and ill health retirement); the timeframes/deadlines to be adhered to; and the notifications to be provided to Scheme members.</p> <p>In addition, other bodies such as the Pensions Regulator, HM Revenue & Customs, the Office of National Statistics and the Financial Conduct Authority impose rules that work alongside the Scheme Regulations or may even supersede them.</p> <p>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.</p>	Likelihood  Impact	4	30 April 2022	 Increasing
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 02a	Robust recruitment and training processes.	Ensuring that suitable staff are recruited at the correct salary levels and that appropriate training is provided will help to prevent non-compliance with legislative requirements.	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 02b	The governing legislation may change or evolve over time and it is therefore important that staff maintain accurate and up-to-date knowledge of the Regulations.	Regular attendance at seminars, forums, webinars and user groups will ensure that knowledge of the relevant legislation is kept up-to-date and accurate.	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022

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

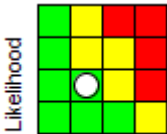


8-Oct-2019 Chamberlain				<p>payment of benefits may be delayed and may be inaccurate.</p> <p>This may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator.</p> <p>18 May 2021</p>				
							Accept	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 03a	Job descriptions used at recruitment to attract candidates with skills and experience related to police pension administration. The appraisals process to monitor progress and assess training needs.	Ensuring that candidates with the necessary skills and abilities are employed by the City. Once in post, staff continue to receive relevant training and attend courses, seminars and conferences when appropriate.	Matt Mott; Kate Limna	29-Sept-2021	30-Apr-2022
CHB COLP PSB 03b	Scheme administrators are trained to use the pensions administration software.	Ensuring that administrators are fully trained to use the pension administration software to enable them to provide accurate and efficient calculations. In addition, administrators should know the correct process to report to the software provider any errors encountered with the system in order that they can be investigated and resolved.	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 03c	Rigorous and thorough checking procedures are created and implemented to ensure all calculations and letters are checked for accuracy and legislative compliance.	All checking procedures reviewed and where necessary amended due to take account of COVID 19 and officers having worked from home since 23 March 2020.	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 03d	Practical disaster recovery/succession plans in place to ensure continuity in the event that key staff leave or are unable to work for a prolonged period of time.	<p>Ensuring that skill sets are not restricted to one staff member alone.</p> <p>Priority cases and work types are identified to ensure continuation in the event that staff or other resources become unavailable.</p> <p>Disaster Recovery reviewed in light of COVID 19 and officers having worked from home since 23 March 2020.</p>	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 03e	Sufficient preparation time is built into the production of any annual statement with a statutory deadline.	Ensuring that sufficient preparation and production time is allocated when planning for the issue of any statements etc with a statutory deadline. In particular, awareness of this issue is necessary if the production requires significant manual intervention.	Graham Newman; Matt Mott	29-Sept-2021	30-Apr-2022




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)	<p>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.</p> <p>Event: Failure of the Pension Scheme administration software.</p> <p>Effect: (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/sanctions</p>	 <p>Likelihood</p> <p>Impact</p>	4	<p>The 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>Likelihood</p> <p>Impact</p>	4	30 April 2022	Constant
8-Oct-2019 Chamberlain				21 Jan 2021			Accept	

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	Matt Mott	29-Sept-2021	30-Apr-2022

CHB COLP PSB 04b	The software provider is contracted to provide regular updates to the system as developments and enhancements are made. In addition, as regulations are amended, or legislation and factors are updated there is a requirement to ensure the software is also updated.	Monitoring the system updates made by the system provider to ensure they are made accurately and on time.	Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 04c	Ensuring that the pensions administration software is included in the departmental business continuity plans.	Updating the business impact analysis details used in the departmental continuity plan as required.	Matt Mott	29-Sept-2021	30-Apr-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
CHB COLP PSB 05 Pension Fraud 8-Oct-2019 Chamberlain	Cause: (i) Continued payment of pensions following death. (ii) Staff acting inappropriately Event: Fraudulent claim of pension benefits. Effects: (i) Overpaid pensions.(ii) Financial loss	 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. 21 Jan 2021	 Likelihood Impact	2	30 April 2022	 Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
CHB COLP-PSB 05a	Robust fraud protection/detection processes.	Use of Mortality Screening Service and Tell Us Once Service [Government initiative that allows us to be notified of a death when registered]. Participation in the National Fraud Initiative. Annually sending Life Certificates to Overseas Pensioners.			Matt Mott	29-Sept-2021	30-Apr-2022

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 8-Oct-2019 Chamberlain	Cause: (i) Ineffective procedures. (ii) Inadequately trained staff. (iii) IT system failure (iv) Data Accuracy. (v) Lack of resources. Event: Breach of Corporate IT systems and cyber security Effect: (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/sanctions. (iv) Breach of Data Protection regulations. (v) Loss/corruption of data	 Likelihood	4	A malicious breach of Corporate IT systems may lead to a failure of the pensions administration system and/or a breach of Data Protection regulations. A failure of the pensions administration system or a breach of the DP regulations may mean a failure or inability to calculate benefits accurately and on time which may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator or Information Commissioner's Office. 22 Jan 2021	 Likelihood	4	30 April 2022	 Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB COLP PSB 07a	Pensions administration staff to be aware of the corporate policy regarding cyber security and to follow the guidelines given.	Corporate online training regarding cyber-security to be carried out by all staff and reviewed as required.	Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 07b	Corporate and departmental specific software to be updated as required to ensure the latest and most secure version is being used.	To ensure the most up-to-date software is being used, staff should update their computers as and when prompted	Matt Mott	29-Sept-2021	30-Apr-2022
CHB COLP PSB 07c	Ensuring that the pensions administration software is included in the departmental business continuity plans.	Updating the business impact analysis details used in the departmental continuity plan as required.	Matt Mott	29-Sept-2021	30-Apr-2022

CHB COLP PSB 07d	Pensions administration staff to be aware of Data Protection legislation.	Data Protection reviewed and all staff reminded of the legislation and its importance. Processes amended for home working since 23 March 2020, ensuring the protection of scheme member data	Matt Mott	29-Sept-2021	30-Apr-2022
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CHB COLP PSB 01 Actuarial Data	<p>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.</p> <p>Event: The actuarial data provided to the Home Office is inaccurate.</p> <p>Effect: National employer rate incorrectly determined.</p>	<p>Likelihood</p> <p>Impact</p>	2	<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>18 May 2021</p>	<p>Likelihood</p> <p>Impact</p>	2	30 April 2021	
8-Oct-2019 Chamberlain							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.	Matt Mott	29-Sept-2021	30-Apr-2022

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CHB COLP PSB 06a	Ensuring that staff within City of London Police HR are aware of the rules regarding re-employment and PPA.	City of London Police HR will ensure that the necessary training in respect of re-employment and PPA is provided to members of the team and that procedures are in place so that this knowledge is maintained and passed on.	Azeem Bhatti	29-Sept-2021	30-Apr-2022
CHB COLP PSB 06b	Monitoring job-applicants to ensure retired officers who are being re-employed are leaving the required break.	City of London Police HR will monitor any new applicant to ensure that any retired officer that is between the ages of 50 and 55 and is looking to be re-employed has taken the required break between retirement and re-employment. If necessary, they will determine whether the new employment is materially similar when assessing the length of the break that is needed.	Azeem Bhatti	29-Sept-2021	30-Apr-2022
CHB COLP PSB 06c	Ensuring that officers that are coming up to retirement are aware of the rules regarding re-employment and PPA.	The City of London Police HR will ensure that all retiring officers are informed of the rules regarding re-employment and PPA. When required to provide input at pre-retirement courses, the Pensions Office will include details in respect of re-employment and PPA as part of their presentation.	Azeem Bhatti; Graham Newman	29-Sept-2021	30-Apr-2022