CoLP PSB Pensions - Detailed Report

Report Type: Risks Report

Report Author: Graham Newman Generated on: 01 October 2025



Rows are sorted by Risk Score

Risk Level Description Service

Risk Code CHB COLP PSB 08	Risk Title	McCloud Legal Case
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Description

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.

Current Risk	Impa Impa	oct
Risk Score	Likelihood	Impact

Target Risk	po de la	
Risk Score	Likelihood	Impact

Original Risk	[Feb.000]	ot t
Risk Score	Likelihood	Impact

12	Possible	Major
Amber	Trend	Constant

6	Possible	Serious
Amber	Target Date	31-Mar- 2026

16	Likely	Major
Red	Creation Date	22-Jan-2021

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.

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.

Latest Note

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.

197.5% of all Remediable Service Statements were issued before the deadline of 31/03/2025.

While the initial deadlines have now been passed, McCloud still poses a significant challenge for the Pensions Office and City of London Police and therefore the current risk score remains high. However, it is hoped that this may be reduced later in 2025.

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Graham Newman

01-Oct-2025

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
date with	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	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 08b Preparing for additional workload	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	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.	1-Oct-2025	Graham Newman	31-Mar-2026

	requested from Force and previous pension providers.	Any missing information to be obtained and scheme member record update			
CHB COLP PSB 08c System preparedness	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	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 08d Managing officer expectations	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.	1-Oct-2025	Graham Newman	31-Mar-2026

		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. 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. Document templates for both the ABS-RSS and R-PSS were provided by the National Police Chief's Council (NPCC).			
CHB COLP PSB 08e Managing officer expectations	Working to increase scheme member understanding of the scheme and ensuring that any communications issued by the Pensions Office are as accurate, up-to-date and as easy to understand as possible.	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. 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	1-Oct-2025	Graham Newman	31-Mar-2026

communications and guidance is as clear and easy to understand as possible.	
A more knowledgeable scheme membership should help to reduce later disputes and the queries etc directed to the Pensions Team.	
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.	

		CHB COLP PSB 02	Risk Title	Legislative compliance
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	Cause: (i) Lack of appropriate knowledge or skill. (ii) Lack of training/ appropriately skilled staff.					
Deceriation	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					

Current Risk	Impact		
Risk Score	Likelihood	Impact	
4	Unlikely	Serious	
	,	0 0110 010	

Target Risk	Impact		
Risk Score	Likelihood	Impact	
4	Unlikely	Serious	
Green	Target Date	31-Mar- 2026	

Original Risk	Impact		
Risk Score	Likelihood	Impact	
3	Possible	Minor	
Green	Creation Date	30-Aug-2019	

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. 1-O Tailure 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.	1-Oct-2025
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Risk Level	Service	
Department	Chamberlain's	

Risk Approach	Reduce
Risk Owner Graham Newman	

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CHB COLP PSB 02a Recruitment and training	levels and that appropriate	Ensuring that suitable staff are recruited at the correct salary levels and that appropriate training is provided will help to prevent noncompliance with legislative requirements. Additional resources have been provided by the CoL Police and there are now two members of staff working on police pensions.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 02b Up to date knowledge	change or evolve over time and it	Regular attendance at seminars, forums, webinars and user groups will ensure that knowledge of the relevant legislation is kept up-to-date and accurate.	1-Oct-2025	Graham Newman	31-Mar-2026

Risk Code	CHB COLP PSB 03	Risk Title	Pension Scheme Administ	tration (Personnel)	
	* 7	on 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					

Current Risk	Impact		
Risk Score	Likelihood	Impact	
4	Rare	Major	
Green	Trend	Decreasing	

Target Risk	Liefnod	act
Risk Score	Likelihood	Impact
4	Rare	Major
Green	Target Date	31-Mar- 2026

Original Risk	Impact		
Risk Score	Likelihood Impact		
4	Unlikely	Serious	
Green	Creation Date	30-Aug-2019	

Latest Note	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 payelties and canations being imposed by the	05-Mar-2025	
	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 the successful candidate started with effect from 1 April 2024.

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Graham Newman

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CHB COLP PSB 03a Recruitment and training	with skills and experience related to police pension administration.	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.	1-Oct-2025	Kate Limna	31-Mar-2026
CHB COLP PSB 03b Software	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 03c	0 0	All checking procedures reviewed and where necessary amended to take account of hybrid working	1-Oct-2025	Graham Newman	31-Mar-2026

Checking procedures	calculations and letters are checked for accuracy and legislative compliance.				
recovery	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.	1-Oct-2025	Graham Newman	31-Mar-2026
	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	31-Mar-2026

Risk Code	CHB COLP PSB 04	Risk Title	Pension Scheme admin (Systems)
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Description

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

Current Risk	Impact	
Risk Score	Likelihood	Impact
4	Unlikely	Serious
Green	Trend	Constant

Target Risk	Impact		
Risk Score	Likelihood Impact		
4	Unlikely	Serious	
Green	Target Date	31-Mar- 2026	

Original Risk	Likelihood Impact		
Risk Score			
4	Unlikely	Serious	
Green	Creation Date	30-Aug-2019	

	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.	
Latest Note	If the software system fails it may lead to benefits being calculated inaccurately or the failure to calculate them at all.	1-Oct-2025
	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.	

An Online Member Portal is now available to all members of the pension scheme and will require an assessment for the purposes of adding to the Risk Register.	
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Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Graham Newman

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CHB COLP PSB 04a Software training	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 04b Sotware updates	contracted to provide regular	Monitoring the system updates made by the system provider to ensure they are made accurately and on time.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 04c Business continuity	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.	1-Oct-2025	Graham Newman	31-Mar-2026

	,	Ensuring that the pensions administration 'member self-service' portal is accurately	Graham Newman	31-Mar-2026
	l'	assessed for the purposes of the Risk		
Member		Register.		
Portal				

Risk Code CHB COLP PSB 05	
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Description

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

Current Risk	Impact	
Risk Score	Likelihood Impact	
4	Unlikely	Serious
Green	Trend	Constant

Target Risk	Impact	
Risk Score	Likelihood	Impact
2	Unlikely	Minor
Green	Target Date	31-Mar-

Original Risk	Impact	
Risk Score	Likelihood Impact	
4	Unlikely	Serious
Green	Creation Date	30-Aug-2019

1-Oct-2025

Latest	Note

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.

Risk Level	Service
Department	Chamberlain's

Risk Approach	Avoid
Risk Owner Graham Newman	

ef No: Description	Latest Note	Note Date	Owned By	Due Date
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CHB COLP- PSB 05a Protection and 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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 05b Identification and verification	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 05c Due diligence		In the cases of transfers-out, once a legitimate and verified transfer-out discharge form has been received, staff dealing with the transfer should carry out the necessary due diligence in respect of the potential receiving scheme that the transfer can be legally paid.	1-Oct-2025	Graham Newman	31-Mar-2026

Risk Code	CHB COLP PSB 07	Risk Title	Cyber Security
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Description 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 due to inadequate preparation and not maintaining robust effective IT security systems and procedures. 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. Harm to individuals. Reputational damage

Current Risk	Impact		
Risk Score	Likelihood Impact		
4 <u>8</u>	Unlikely	Serious Major	
Green	Trend	Constant	

Target Risk	Impact Likelihood Impact		
Risk Score			
4	Unlikely	Serious	
Green	Target Date	31-Mar- 2026	

Original Risk	Impact		
Risk Score	Likelihood Impact		
4	Unlikely	Serious	
Green	Creation Date	30-Aug-2019	

	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. The Corporate IT system has a minimum-security baseline which has been agreed as part of the National Cyber Security Centre's (NCSC) Cyber Assurance Framework.	
	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.	

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Graham Newman

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
to follow cyber	Pensions administration staff to be aware of the corporate policy regarding cyber security and to follow the guidelines integrating cyber security into risk management processes.	Corporate online training regarding cybersecurity to be carried out by all staff and in line with the organisation approach to risk management integrating cyber security into risk management processes.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 07b Software updates	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 07c Software included in business continuity plans	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.	1-Oct-2025	Graham Newman	31-Mar-2026
CHB COLP PSB 07d Staff to be aware of data protection legislation	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.	1-Oct-2025	Graham Newman	31-Mar-2026

Risk Code	CHB COLP PSB 01	Risk Title	Actuarial Data
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Description

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.

Current Risk	Down and the second sec		
Risk Score	Likelihood Impact		
2	Rare	Serious	
Green	Trend	Constant	

Target Risk	Impact		
Risk Score	Likelihood	Impact	
1	Rare	Minor	
Green	Target Date	31-Mar- 2026	

Original Risk	D Impact		
Risk Score	Likelihood	Impact	
1	Rare	Minor	
Green	Creation Date	30-Aug-2019	

Latest Note	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.	1-Oct-2025
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Risk Level	Service
Department	Chamberlain's

Risk Approach	Accept
Risk Owner	Graham Newman

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
		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.	1-Oct-2025	Graham Newman	31-Mar-2026

Risk Code	CHB COLP PSB 06	Risk Title	Protected Pension Age (PPA)
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Description	Cause:Retiring officers of a certain age losing their PPA as a result of being re-employed by the same sponsoring employer without a sufficent break between retirement and re-employment. Event: Protected Pension Age (PPA) Effect:HMRC make 'unauthorised payment' charges to both the member and the organisation.
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Current Risk	Impact		
Risk Score	Likelihood Impact		
1	Rare	Minor	
Green	Trend	Constant	

Target Risk	Dough The second		
Risk Score	Likelihood Impact		
1	Rare	Minor	
Green	Target Date	31-Mar- 2026	

Original Risk	DO Impact		
Risk Score	Likelihood	Impact	
1	Rare	Minor	
Green	Creation Date	30-Aug-2019	

	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.	1-Oct-2025	
	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.		

Risk Level	Service		Risk Approach	Ac
Department	Chamberlain's		Risk Owner	Gr

Risk Approach	Accept
Risk Owner	Graham Newman

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
staff are aware of re- employment	Ensuring that staff within City of London Police HR are aware of the rules regarding reemployment and PPA.	City of London Police HR will ensure that the necessary training in respect of reemployment and PPA is provided to members of the team and that procedures are in place so that this knowledge is maintained and passed on.	1-Oct-2025	Kelly Glazebrook	31-Mar-2026
rules		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.			
PSB 06b Monitor	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.		Kelly Glazebrook	31-Mar-2026

		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.		
CHB COLP PSB 06c Ensure	Ensuring that officers that are coming up to retirement are aware of the rules regarding reemployment and PPA.	The City of London Police HR will ensure that all retiring officers are informed of the rules regarding re-employment and PPA.	Kelly Glazebrook; Graham Newman	31-Mar-2026
officers are aware of re- employment rules		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.		