

City of London Corporation Committee Report

Committee(s): Pensions Committee (For Decision) Local Government Pensions Board (For Information)	Dated: 22 September 2025 12 January 2026
Subject: Risk Register for the Pensions Committee	Public report: For Decision
This proposal: <ul style="list-style-type: none">• provides statutory duties• provides business enabling functions	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	The Chamberlain
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Summary

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

When reviewing the risks, the Pensions Committee should be aware that some similar/generic risks are also included in the (CoL) Police Pension Board or the Investment Committee (previously Financial Investment Board, prior to its dissolution) Risk Registers: risks CHB Pensions 009 McCloud Remedy, 007 Cyber security and 005 Fraud are on the CoL Police Pensions Board Risk Register and risk CHB Pensions 013 Responsible Investment Duties is on the Investment Committee Risk Register.

The narrative “risk update” and “latest note” on associated actions has been amended where necessary.

The Risk Register is included at Appendix 2 and Members of the Committee are asked to review the risks and actions and confirm that appropriate measures are in place.

Recommendations

Members are asked to:

- review the existing risks and actions present on the Pensions Committee's Risk Register, and confirm that appropriate control measures are in place; and
- confirm that there are no further risks relating to the services overseen by the Pensions Committee.

Main Report

Background

1. The Pensions Committee reviews the Risk Register every 6 months and last reviewed it at the meeting held on 13 February 2025. At that meeting Members reviewed the existing actions and confirmed that appropriate controls were in place and that there were no other risks relating to the services overseen by the Committee. Members did however ask for Officers to consider the issues around the Section 37 Virgin Media case and determine whether this should be considered a new risk in its own right or if it could be incorporated into an existing risk. Following a review Officers have incorporated this into **CHB Pensions 012 Governance/Legislative Compliance** on the Pensions Committee risk register.

Review of Risks

2. 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 1** 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".
3. The Risk Register to be reviewed is set out in **Appendix 2**. Members should note that the layout of the risk register has been changed due to the introduction of new standardised reporting to ensure the consistency of information.

Table 1: Risk Summary

Risk code	Risk title	Current Risk Score	Current Risk Score Indicator
CHB Pensions 009	McCloud Remedy	12	
CHB Pensions 001	Insufficient assets - Pensions Fund	8	
CHB Pensions 007	Cyber Security	8	
CHB Pensions 010	Targeted returns – Pension Fund	6	
CHB Pensions 003	Short term Cash flow	4	
CHB Pensions 004	Breach of GDPR/Data Protection regulations	4	
CHB Pensions 006	Employer Insolvency	4	
CHB Pensions 008	Pension Scheme Administration	4	
CHB Pensions 011	Service provider failure	4	
CHB Pensions 012	Governance/Legislative Compliance	4	
CHB Pensions 013	Failure to discharge responsible investment duties	4	
CHB Pensions 005	Fraud	2	

Risk code	Risk title	Current Risk Score	Current Risk Score Indicator
CHB Pensions 002	Actuarial Valuation	1	

4. The Risk Register contains thirteen risks which are summarised in table 1 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 Committee, 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.
5. 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.
6. As requested by Members, Officers have reviewed the Section 37 Virgin Media Case and incorporated it in **CHB Pensions 012 Governance/Legislative Compliance** on the Pensions Committee risk register. The case is representative of potential new legislative requirements that need retrospective adjustments and the effect this could have on the Pension Fund. The latest note contains the background on the Virgin Media case and the most recent update regarding the Government’s decision to amend the Pensions Scheme Bill which is currently being read in Parliament to allow retrospective validation of amendments which may have otherwise been invalid.

Conclusion

7. The risks overseen by the Pensions Committee are primarily of low likelihood but represent substantial impact, particularly with regards to financial loss and reputational damage.
8. Officers have amended CHB Pensions 012 Governance/Legislative Compliance as per Members request at the last Committee to consider including the Section 37 Virgin Media Case.
9. The Pensions Committee is requested to review the risks and 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 – City of London Corporation Risk Matrix
- Appendix 2 – Pensions Committee Risk Register

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