

## Risks: Peninsula Pensions

Risk status (score)	Overdue (0 - 0)	Low (1 - 9)	Medium (10 - 14)	High (15 - 23)	Very high (24 - 30)
Mitigating controls	Not started	Green	Amber	Red	Completed

Risk details	Status and Risk owner	Mitigating controls
<p><b>PP1 Annual Benefit Statements</b></p> <p>Cause/s Staffing Absences ICT Failures Poor data quality Event Annual Benefit statements are not sent to active and deferred members by 31st August. Impact Fines from the regulator Damage to reputation Increased complaints from Members Increased demand on resources to rectify the situation Creation of a backlog of other tasks due to diverted resource.</p>	<p>Inherent status : 8 Low Current status : 6 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: <b>Daniel Harris</b> Accountable officer: <b>Martin Oram</b> Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> • Project management approach • Regular contact with employers to obtain data. • Monthly interfacing to reduce workload at year end • Statements to employers for 31/07 to allow time for distribution to staff prior to 31/08</p> <p><b>Amber</b> We are looking to increase employer take up of monthly interfaces and are exploring options to improve software processes.</p>

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<p>PP2 Failure to provide Basic information about the LGPS</p> <p>Cause/s Inability to access basic LGPS information via the website due to IT issues or non publication. Starter Packs not being sent and/or received by members. General scheme literature not being made available to members. LGPS Administration team not informed of new members.</p> <p>Event Failure to make available provide Basic information about the LGPS including: how benefits are worked out; how member and employer contributions are calculated.</p> <p>Impact Negative reporting by or fines from the Pension's regulator. Damage to reputation.</p>	<p>Inherent status : 10 Medium</p> <p>Current status : 8 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p>Green Reviews of documentation/letters</p> <p>Green Website regularly updated</p> <p>Green Links to Pension Funds investment information and LGPS included on website</p> <p>Completed A revised New Starter pack has been designed and is now provided to members</p> <p>Amber Our methods and content of communication will be reviewed to ensure that members and employers are provided with accurate and relevant information.</p>
<p>PP3 - Non-compliance with legislation and failure to correctly implement new legislation and regulations</p> <p>Cause Lack of structure/process to identify new legislation as it is released.</p> <p>Event</p>	<p>Inherent status : 12 Medium</p> <p>Current status : 6 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain</p>	<p>Green LGA/External training</p> <p>Green Project work approach to implementation of legislative changes.</p> <p>Green In house training for all staff. • Use of Perspective and Bulletins</p> <p>Amber A Training and Technical team is now in place, following the Pension</p>

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<p>Non-compliance with legislation/regulations. Impact Incorrect benefit payments. Damage to reputation. Fines from Regulators.</p>	<p>appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p>Review. The team has commenced delivering training across the teams.</p>
<p>PP4 - Failure of employing authority to provide timely and accurate member data</p> <p>Cause Employing authorities not fulfilling their responsibilities.</p> <p>Event Delays in the provision of pensions member data. Inaccuracies in the pension member data.</p> <p>Impact Incorrect benefit calculations. Financial Loss due to compensation to members. Incorrect benefit payments Delays to payments Additional work to request and correct information</p>	<p>Inherent status : 12 Medium Current status : 9 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Pension Administration Strategy in place since April 2015 and was revised in 2020. Employer duties are clearly identified in the PAS. Ability to fine employers is provided for in PAS and LGPS regulations.</p> <p><b>Green</b> Employing authorities are contacted for outstanding information when it is identified that information is missing or contains errors.</p> <p><b>Green</b> Outstanding data queries are passed to Employer and Communications Team to monitor</p> <p><b>Completed</b> Guidance available on website</p> <p><b>Green</b> Individual employer meetings include review of employer performance</p> <p><b>Amber</b> An Employer and Communications team is now in place. The team will consider employer performance and take action to address any issues, as required.</p>

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<p>PP6 - Communication of Entitlements</p> <p>Cause Insufficient communication and engagement with LGPS scheme members/employers.</p> <p>Event Employers and or Members are not made aware of their entitlements within LGPS resulting in Non-compliance with legislation and/or best practice.</p> <p>Impact Inability to determine policy Employees not joining the scheme. Inability to make effective decisions and/or deliver service</p>	<p>Inherent status : 12 Medium</p> <p>Current status : 9 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p>Green The Peninsula Pensions website is kept up to date</p> <p>Green Meetings between PP managers and Communications team on a regular basis, with a communications plan and strategy for the year ahead</p> <p>Green Meetings are held with the Funds Employing Authorities and on request for training</p> <p>Green Benefit illustrations are sent annually to contributing and deferred Fund members</p> <p>Green The contact list for employers is updated regularly.</p> <p>Green Annual forums are held for employers and Trade Unions</p> <p>Green The annual report and accounts are published on the Peninsula Pensions website</p> <p>Amber The Peninsula Pensions Senior Management team are in the process of reviewing our communication strategy and requirements to take the service forward.</p>

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<p>PP7 - Non Payment of Pension Benefits</p> <p>Cause Systems Failures Lack of information from employers Poor internal processes</p> <p>Event Pension benefits are not paid.</p> <p>Impact Damage to Reputation. Financial loss arising from compensation claims.</p>	<p>Inherent status : 12 Medium</p> <p>Current status : 8 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> The payroll system is set up to pay pensioners monthly.</p> <p><b>Green</b> Disaster recovery plan in place with Heywoods which will restore data within 7 days in the event of system failure</p> <p><b>Green</b> The payroll manual has been revised and updated following the introduction of RTI (Real Time Information) and new administration systems.</p> <p><b>Amber</b> Fully updated Pensioner Payroll Manual is now in place. An online training resource is being developed.</p>
<p>PP8 - Payment to deceased pensioners</p> <p>Cause LGPS Information is not updated as circumstances change. Poor internal processes.</p> <p>Event Pension benefits continue to be paid to deceased pensioners.</p> <p>Impact Damage to Reputation. Financial loss arising from overpayments. Additional resource to recover funds</p>	<p>Inherent status : 8 Low</p> <p>Current status : 6 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> All pensioners are contacted annually.</p> <p><b>Green</b> Pension suspended if post is returned</p> <p><b>Green</b> Pensioners are incorporated into National Fraud Initiative</p> <p><b>Green</b> Further targeted checks are conducted with credit reference agencies as appropriate</p> <p><b>Green</b> Monthly mortality screening is undertaken and any positive matches</p>

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		<p>are ceased immediately</p> <p><b>Green</b> Western Union overseas existence service undertaken bi annually</p> <p><b>Green</b> Tell us once service has been rolled out to LGPS. All relevant staff now have access and we are using fully utilising the service.</p>
<p><b>PP9 - Pensions transferred to other providers</b></p> <p>Cause Take up of Freedom of Choice Legislation.</p> <p>Event LGPS members transfer their pension pots to other pensions providers.</p> <p>Impact Significant cashflow out of the Fund. Reduction in assets greater than reduction in the Fund's liabilities.</p>	<p>Inherent status : 9 Low</p> <p>Current status : 6 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: <b>Daniel Harris</b></p> <p>Accountable officer: <b>Martin Oram</b></p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Effective communication of the benefits of remaining in the LGPS.</p> <p><b>Green</b> Actuarial calculation of transfer value should ensure current fair value and not be detrimental to the fund.</p> <p><b>Green</b> CLG monitoring CETVs nationwide and reviewing accordingly (may introduce regulations amendments to prohibit if thought necessary)</p>
<p><b>PP10 - Data and System Security</b></p> <p>Cause Insecure pensions and administration data.</p> <p>Event Loss/disclosure of Sensitive Data/Information.</p> <p>Impact Financial costs from legal action. Fines from ICO.</p>	<p>Inherent status : 9 Low</p> <p>Current status : 6 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: <b>Daniel Harris</b></p> <p>Accountable officer: <b>Martin Oram</b></p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Access and security controls exist and the system is tested regularly by Heywoods and PP.</p> <p><b>Green</b> The system is subject to regular checks by internal audit.</p> <p><b>Green</b> GDPR training was delivered to all team members throughout April and May 2018 to ensure that staff are fully aware of requirements under the new data protection legislation. All new staff</p>

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<p>PP11 - Personal Member Data</p> <p>Cause Error when printing/sorting/compiling data. Poor internal processes.</p> <p>Event Information issued to the wrong person/organisation.</p> <p>Impact Financial Costs from legal action. Fines from ICO.</p>	<p>Inherent status : 9 Low Current status : 6 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p>also undertake GDPR training. A GDPR refresher will be rolled out to all staff during 2020/21.</p> <p><b>Green</b> It is a mandatory requirement for all DCC employees every 2 years to undertake Data Protection training and to adhere to DCC's data protection policy.</p> <p><b>Completed</b> GDPR training was delivered to all team members throughout April and May 2018 to ensure that staff are fully aware of requirements under the new data protection legislation</p> <p><b>Completed</b> Internal E-Learning training 'Sharing personal data' was also undertaken by whole office during March 2018</p> <p><b>Amber</b> Staff are fully aware of requirements under GDRP legislation. New Data Protection ELearning to be undertaken when available.</p>
<p>PP12 - Knowledge Management</p> <p>Cause Departure or non-availability of staff who hold key knowledge.</p> <p>Event Breakdown in internal processes and service delivery.</p>	<p>Inherent status : 16 High Current status : 12 Medium ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Strategic Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain</p>	<p><b>Green</b> Knowledge of all tasks are shared by at least two team members and can in addition be covered by senior staff</p> <p><b>Green</b> Training requirements are set out in job descriptions.</p> <p><b>Amber</b> The Training and Technical are in the process of creating procedure</p>



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<p>Impact Financial Loss due to costs of obtaining resource, or delays/inefficiencies in existing processes. Reputation Damage.</p>	<p>appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p>notes for the team. These will help to ensure consistency across the teams and will assist with the training of new recruits.</p>
<p>PP13 - Scheme Membership Data</p> <p>Cause Incorrect information from employers. Fraudulent provision of data. System errors Poor internal processes.</p> <p>Event Unauthorised or invalid payments.</p> <p>Impact Financial loss Reputational Damage</p>	<p>Inherent status : 9 Low Current status : 6 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Information and instructions are only accepted from authorised sources. <b>Green</b> Employers and scheme members are required to review and confirm membership records annually <b>Green</b> Benefit calculations are checked by senior colleagues and are subject to independent authorisation <b>Green</b> All transactions comply with DCC financial regulations and are subject to independent authorisation <b>Green</b> All staff are covered by fidelity insurance up to £15 million <b>Green</b> Members approaching 75 are separately identified monthly <b>Green</b> Data accuracy checks undertaken by the systems team including address / NINO checks <b>Amber</b> Employer Self Service being introduced to including a reporting element to assist Employers with checking their data annually and signing off as correct</p>



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<p><b>PP14 - Compliance with Disclosure Regulations</b></p> <p>Cause Requirement to issue information within a certain timescale after a request/event.</p> <p>Event Failure to comply with disclosure regulations and to process accurate pension benefit payments in a timely manner.</p> <p>Impact Complaints which take up time to resolve. Additional Time spent chasing data Regulator Fines Compensation costs for members</p>	<p>Inherent status : 9 Low</p> <p>Current status : 6 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Robust workflow management system in place.</p> <p><b>Green</b> Payroll deadline procedures in place</p> <p><b>Green</b> Item in Business Continuity/Disaster Recovery Plan</p> <p><b>Green</b> Participate in National Fraud Initiative (NFI)</p> <p><b>Green</b> Life Certificates exercise carried out /mortality checks</p> <p><b>Amber</b> Full review of performance within PP being conducted to incorporate Employer performance and Admin strategies</p>
<p><b>PP15 - Fraud, Corruption &amp; Error</b></p> <p>Cause Poorly designed or implemented management practices/processes. Staff deliberately updating or providing fraudulent data.</p> <p>Event Fraud, corruption or error.</p> <p>Impact</p>	<p>Inherent status : 12 Medium</p> <p>Current status : 9 Low ( <input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Transactions are authorised by senior staff</p> <p><b>Green</b> All staff are covered by fidelity insurance up to £15 million</p> <p><b>Green</b> Sufficient members in the team to cover absence and leave</p> <p><b>Green</b> Heywoods Audit trace report</p> <p><b>Green</b> Appropriate separation of duties</p>

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Financial Loss Reputational Damage		exists <b>Green</b> Up to date regulations and practices <b>Green</b> Internal and external audit checks performed to ensure that appropriate and effective controls are in place
<b>PP16 - Loss of Shared Service Partner</b>  Cause Shared service partner choosing to use a different pensions administrator. Event Peninsula pensions no longer operates on the same scale. Impact Reputational Damage. Loss of staff / redundancies.	<b>Inherent status : 9 Low</b> <b>Current status : 9 Low ( <input checked="" type="checkbox"/> Unchanged)</b> Risk owner: <b>Daniel Harris</b> Accountable officer: <b>Martin Oram</b> Category: Strategic Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.	<b>Green</b> Constant assessment of Performance <b>Green</b> Quarterly Shared Service meetings with key Fund colleagues <b>Green</b> Regular meetings between Peninsula Pensions and Employers <b>Green</b> Employer Newsletters <b>Amber</b> Full review of performance within PP being conducted to incorporate Employer performance and Admin strategies
<b>PP17 - Pensions System Failure</b>  Cause Connection issues. Supplier fault Cyber Attack. Event The hosted Altair pensions system fails. Impact <ul style="list-style-type: none"> <li>• Loss of sensitive data.</li> <li>• Reputation risk.</li> </ul>	<b>Inherent status : 15 High</b> <b>Current status : Overdue (15 - High)</b> Risk owner: <b>Daniel Harris</b> Accountable officer: <b>Martin Oram</b> Category: Operational Last review: 22 Jan 2021 Latest review details Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.	<b>Green</b> The system is backed-up daily. System is hosted by Heywoods <b>Green</b> A full disaster recovery plan and Business Continuity Plan is in place and tested/updated annually.

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<p>• Financial loss arising from legal action</p> <p><b>PP18 - Cyber Attack</b></p> <p>Cause Cyber-attack on the Pensions ICT systems and or host systems.</p> <p>Event Loss of system access. Theft of confidential/personal data.</p> <p>Impact Inability to make payments to members. Fines from the ICO. Financial loss. Loss of membership data. Disclosure of sensitive data.</p>	<p>Inherent status : 15 High</p> <p>Current status : 10 Medium ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: <b>Daniel Harris</b></p> <p>Accountable officer: <b>Martin Oram</b></p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Ensure that the relevant people are suitably vetted and trained, that administrators and service providers have measures in place to avoid security breaches</p> <p><b>Green</b> A full disaster recovery plan and Business Continuity Plan is in place and tested/updated annually</p> <p><b>Green</b> Information from The Pensions Regulator: You can assess how secure your scheme is and find out more about protecting yourself on the government's Cyber Essentials website. And for more information about protecting against cyber threats, visit the National Cyber Security Centre's website.</p>
<p><b>PP19 - Member Self Service</b></p> <p>Cause Member Self Service access is compromised due to insecurity or lack of maintenance.</p> <p>Event Data is accessed and or obtained inappropriately.</p> <p>Impact Damage to reputation Loss of data Fines from ICO.</p>	<p>Inherent status : 9 Low</p> <p>Current status : 6 Low ( <input type="checkbox"/> Unchanged)</p> <p>Risk owner: <b>Daniel Harris</b></p> <p>Accountable officer: <b>Martin Oram</b></p> <p>Category: Operational</p> <p>Last review: 22 Jan 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risk reviewed by the Devon Pension Board 22/01/2021.</p>	<p><b>Green</b> Information and Instructions are only accepted from authorised sources</p> <p><b>Green</b> It is a mandatory requirement for all DCC employees to undertake Data Protection training and to adhere to DCC's Data Protection Policy</p> <p><b>Green</b> Regular penetration testing</p> <p><b>Green</b> Secure website (annual license renewal)</p>



14 Apr 2021

