

Risks: Peninsula Pensions

Appendix 2

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>PP1 Annual Benefit Statements</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: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green • 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>Amber Following the completion of the historic data sign off exercise, employers will move to monthly interfacing which will reduce the number of queries at year-end. Target date for completion is 31st March 2022.</p>

Risk details	Status and Risk owner	Mitigating controls
<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 checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 28 June 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</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>Completed 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 checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris</p> <p>Accountable officer: Martin Oram</p> <p>Category: Operational</p> <p>Last review: 28 June 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>Completed A Training and Technical team is now in place, following the</p>

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<p>Non-compliance with legislation/regulations. Impact Incorrect benefit payments. Damage to reputation. Fines from Regulators.</p>	<p>appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Pension 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: 28 June 2021 Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green 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>Green Employing authorities are contacted for outstanding information when it is identified that information is missing or contains errors.</p> <p>Green Outstanding data queries are passed to Employer and Communications Team to monitor</p> <p>Completed Guidance available on website</p> <p>Green Individual employer meetings include review of employer performance</p> <p>Completed 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>PP5 – Withdrawal of support for Employer Self Service</p> <p>Cause Pensions software provider withdrawing support for ESS</p> <p>Event Employers will no longer be able to access member records, run estimates or submit and receive information via ESS.</p> <p>Impact Increased workloads and reduced efficiency for PP which may result in delays in information being provided to employers, possible breaches and an increase in complaints. Show less</p>	<p>Inherent status : 12 Medium Current status : 12 Medium</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram</p> <p>Category: Operational Last review: 28 Jun 2021 Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green Software provider is required to give 12 months' notice before any change to the contract</p> <p>Amber Consideration is being given to a number of options. The development of an internal solution is being prioritised to ensure continued service delivery in the short term.</p>
<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</p>	<p>Inherent status : 12 Medium Current status : 9 Low (<input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram</p> <p>Category: Operational Last review: 28 June 2021 Latest review details</p> <p>Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</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</p>

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<p>Inability to determine policy Employees not joining the scheme. Inability to make effective decisions and/or deliver service</p>		<p>Fund members Green The contact list for employers is updated regularly. Green Annual forums are held for employers and Trade Unions Green The annual report and accounts are published on the Peninsula Pensions website Amber The Peninsula Pensions Senior Management team are in the process of reviewing our communication strategy and requirements to take the service forward.</p>
<p>PP7 - Non Payment of Pension Benefits</p> <p>Cause Systems Failures Lack of information from employers Poor internal processes Event Pension benefits are not paid. Impact Damage to Reputation. Financial loss arising from compensation</p>	<p>Inherent status : 12 Medium Current status : 8 Low (<input checked="" type="checkbox"/> Unchanged) Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green The payroll system is set up to pay pensioners monthly. Green Disaster recovery plan in place with Heywoods which will restore data within 7 days in the event of system failure Green The payroll manual has been revised and updated following the introduction of RTI (Real Time Information) and new administration</p>

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claims.		<p>systems.</p> <p>Amber 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 Current status : 6 Low (<input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green All pensioners are contacted annually.</p> <p>Green Pension suspended if post is returned</p> <p>Green Pensioners are incorporated into National Fraud Initiative</p> <p>Green Further targeted checks are conducted with credit reference agencies as appropriate</p> <p>Green Monthly mortality screening is undertaken and any positive matches are ceased immediately</p> <p>Green Western Union overseas existence service undertaken bi annually</p> <p>Green 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>PP10 - Data and System Security</p> <p>Cause Insecure pensions and administration data.</p> <p>Event</p>	<p>Inherent status : 9 Low Current status : 6 Low (<input checked="" type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational</p>	<p>Green Access and security controls exist and the system is tested regularly by Heywoods and PP.</p> <p>Green The system is subject to regular</p>

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Loss/disclosure of Sensitive Data/Information. Impact Financial costs from legal action. Fines from ICO.	Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.	checks by internal audit. Green 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 also undertake GDPR training. A GDPR refresher will be rolled out to all staff during 2020/21.
PP11 - Personal Member Data Cause Error when printing/sorting/compiling data. Poor internal processes. Event Information issued to the wrong person/organisation. Impact Financial Costs from legal action. Fines from ICO.	Inherent status : 9 Low Current status : 6 Low (<input type="checkbox"/> Unchanged) Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.	Green 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. Completed 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 Completed Internal E-Learning training 'Sharing personal data' was also undertaken by whole office during March 2018
PP12 - Knowledge Management Cause Departure or non-availability of staff who hold key knowledge.	Inherent status : 16 High Current status : 12 Medium (<input type="checkbox"/> Unchanged) Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Strategic	Green Knowledge of all tasks are shared by at least two team members and can in addition be covered by senior staff Green Training requirements are set out

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<p>Event Breakdown in internal processes and service delivery. Impact Financial Loss due to costs of obtaining resource, or delays/inefficiencies in existing processes. Reputation Damage.</p>	<p>Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>in job descriptions. Amber The Training and Technical are in the process of creating procedure 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 Cause Incorrect information from employers. Fraudulent provision of data. System errors Poor internal processes. Event Unauthorised or invalid payments. Impact Financial loss Reputational Damage</p>	<p>Inherent status : 9 Low Current status : 6 Low (<input type="checkbox"/> Unchanged) Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green Information and instructions are only accepted from authorised sources. Green Employers and scheme members are required to review and confirm membership records annually Green Benefit calculations are checked by senior colleagues and are subject to independent authorisation Green All transactions comply with DCC financial regulations and are subject to independent authorisation Green All staff are covered by fidelity insurance up to £15 million Green Members approaching 75 are separately identified monthly Green Data accuracy checks undertaken by the systems team including address / NINO checks Completed Employer Self Service introduced.</p>

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		<p>Amber Employers are currently in the process of undertaking a historic data sign off exercise. Once an employer has been signed off, they will move to monthly data submissions. Target date for completion is 31st March 2022.</p>
<p>PP14 - Compliance with Disclosure Regulations</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 Current status : 6 Low (<input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green Robust workflow management system in place. Green Payroll deadline procedures in place Green Item in Business Continuity/Disaster Recovery Plan Green Participate in National Fraud Initiative (NFI) Green Life Certificates exercise carried out /mortality checks Amber Full review of performance within PP being conducted to incorporate Employer performance and Admin strategies</p>
<p>PP15 - Fraud, Corruption & Error</p> <p>Cause Poorly designed or implemented management practices/processes.</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</p>	<p>Green Transactions are authorised by senior staff Green All staff are covered by fidelity insurance up to £15 million Green Sufficient members in the team to</p>

Risk details	Status and Risk owner	Mitigating controls
<p>Staff deliberately updating or providing fraudulent data.</p> <p>Event</p> <p>Fraud, corruption or error.</p> <p>Impact</p> <p>Financial Loss</p> <p>Reputational Damage</p>	<p>Last review: 28 June 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate.</p> <p>Risks are reviewed quarterly by the Devon Pension Board and updated as necessary.</p> <p>Reviewed by DH, pending review by DPB.</p>	<p>cover absence and leave</p> <p>Green Heywoods Audit trace report</p> <p>Green Appropriate separation of duties exists</p> <p>Green Up to date regulations and practices</p> <p>Green Internal and external audit checks performed to ensure that appropriate and effective controls are in place</p>
<p>PP16 - Loss of Shared Service Partner</p> <p>Cause</p> <p>Shared service partner choosing to use a different pensions administrator.</p> <p>Event</p> <p>Peninsula pensions no longer operates on the same scale.</p> <p>Impact</p> <p>Reputational Damage.</p> <p>Loss of staff / redundancies.</p>	<p>Inherent status : 9 Low</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: Strategic</p> <p>Last review: 28 June 2021</p> <p>Latest review details</p> <p>Risks and mitigating controls remain appropriate.</p> <p>Risks are reviewed quarterly by the Devon Pension Board and updated as necessary.</p> <p>Reviewed by DH, pending review by DPB.</p>	<p>Green Constant assessment of Performance</p> <p>Green Quarterly Shared Service meetings with key Fund colleagues</p> <p>Green Regular meetings between Peninsula Pensions and Employers</p> <p>Green Employer Newsletters</p> <p>Amber Full review of performance within PP being conducted to incorporate Employer performance and Admin strategies</p>
<p>PP17 - Pensions System Failure</p> <p>Cause</p> <p>Connection issues.</p> <p>Supplier fault</p> <p>Cyber Attack.</p> <p>Event</p> <p>The hosted Altair pensions system fails.</p>	<p>Inherent status : 15 High</p> <p>Current status : 15 High (<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: 28 June 2021</p> <p>Latest review details</p>	<p>Green The system is backed-up daily. System is hosted by Heywoods</p> <p>Green A full disaster recovery plan and Business Continuity Plan is in place and tested/updated annually.</p>

Risk details	Status and Risk owner	Mitigating controls
<p>Impact</p> <ul style="list-style-type: none"> • Loss of sensitive data. • Reputation risk. • Financial loss arising from legal action 	<p>Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	
<p>PP18 - Cyber Attack</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 Current status : 10 Medium (<input type="checkbox"/> Unchanged)</p> <p>Risk owner: Daniel Harris Accountable officer: Martin Oram Category: Operational Last review: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary. Reviewed by DH, pending review by DPB.</p>	<p>Green 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>Green A full disaster recovery plan and Business Continuity Plan is in place and tested/updated annually</p> <p>Green 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>PP19 - Member Self Service</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</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: 28 June 2021 Latest review details Risks and mitigating controls remain appropriate. Risks are reviewed quarterly by the Devon Pension Board and updated as necessary.</p>	<p>Green Information and Instructions are only accepted from authorised sources</p> <p>Green 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>Green Regular penetration testing</p> <p>Green Secure website (annual license renewal)</p>

Risk details	Status and Risk owner	Mitigating controls
Loss of data Fines from ICO.	Reviewed by DH, pending review by DPB.	

14 Apr 2021

