

LOCAL PENSION BOARD OF GREATER MANCHESTER COMBINED AUTHORITY FIREFIGHTER'S PENSION SCHEMES

Firefighter Pension Scheme Risk Register

Risk Area - OPERATIONS	Likelihood	Impact	Score	Control	Owner	Test / Review	Comments
Operational disaster (i.e. flood/fire)				All records are stored electronically. Data is backed up regularly and server providers also have business continuity procedures in place.	Scheme Manager P & P Manager	Annual review	Currently investigating moving the Pensions Administration System to a cloud hosting service provided by the software company. As part of the move, BCM will be reviewed to ensure that continuity of service remains in place. 25.10.2019
				The majority of pension documents are electronic and all personnel files scanned. Data is regularly backed up, can be accessed from anywhere on the network	Scheme Manager P & P Manager		Reviewed in October 2019 and the control remains in place. 25.10.2019

Member data incomplete or inaccurate				Annual reconciliation of member data to ensure accuracy and resolve any gaps	Scheme Manager P & P Manager	Annual	A review of Common Data and Scheme Specific Data taken place in Oct 2019 and reported to the Pensions Regulator. Scores – 97% for Common Data and 93% for Scheme Specific Data. A data improvement plan is being currently being drafted. 25.10.2019
				Errors in records identified and rectified annually as part of the production of the Annual Benefit Statements.			
				Reviewed annually for the Pensions Regulator Data Reviews. Reviewed annually for the GAD returns.			
				Address data cleanse completed annually and any addresses found to be incorrect are investigated	Scheme Manager P & P Manager	Annual	Undertaken as part of the ABS process – August 2019
				Robust payroll processes in place to ensure accuracy of data	Scheme Manager Deputy P & P Manager		Ongoing and reviewed on a regular basis.
Administration Failure / Maladministration				Authority Levels and signatory lists clearly documented and up to date	Scheme Manager	When there is a change in staff or policy	
				Review Pension audit reports	Scheme Manager P & P Manager		

				National advice and monthly guidance from the Pensions Adviser at the LGA	Scheme Manager P & P Manager		
				Completion and feedback from the TRP Scheme Return	Scheme Manager P & P Manager		

Risk Area – FINANCIAL	Likelihood	Impact	Score	Control	Owner	Test / Review	Comments
Fraud / Fraudulent behaviour							
Costs incurred due to failure to apply scheme/tax rules correctly or in a timely manner				<ul style="list-style-type: none"> - Keep up to date with changes - Attend regional meetings - Subscribe to knowledge hub - Subscribe to HMRC pension tax updates - Pension board involvement Access professional advice before proceeding			

Risk Area – FUNDING	Likelihood	Impact	Score	Control	Owner	Test / Review	Comments
Failure to deduct correct contributions from pay							
Failure of employer to pay contributions to the scheme				Pension deductions are accounted for by the FRA and therefore contributions are deducted directly from employee pay and accounted for in the pension fund account.	Finance / Treasurer	Monthly	
Failure to manage FPS fund correctly i.e. injury pension accounting				Training – Guidance Fire Finance network links			
Annual review the Pensionable Pay elements for each Scheme and ensure they comply with legal and pension regulations					Scheme Manager P & P Manager	Annual	Currently awaiting advice from Legal Counsel and when received a review to be undertaken of Pensionable Pay – October 2019

Risk Area – REGULATORY AND COMPLIANCE	Likelihood	Impact	Score	Control	Owner	Test / Review	Comments
Failure to interpret rules or legislation correctly				Central LGA resource and regional / national groups to assist with interpretation of rules and possible provision of legal opinion where this has been sought – with the caveat that each FRA should take own legal advice.			
				Access to knowledge hub and HMRC pension tax updates			
				Training			
				Access professional legal / tax advice where necessary			
Failure to comply with disclosure requirements or communicate with staff				IDRP process Communications with staff ABS HR processes in place for auto-enrolment and annual pension band changes mail merges			