

# London Borough of Barnet Pension Fund Pension Administration Risk Register

Updated by: London Borough of Barnet Pensions Team

Date Updated: June 2024

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# London Borough of Barnet Pension Fund – Pension Administration Risk Register

## Evaluating risks and Risk Matrix

The LBB Pension Fund evaluates the pension administration risks on a four-point scale on the likelihood of the risk occurring and the impact caused should the risk occur. Risks are evaluated with their controls in place. Risks are plotted on a risk matrix (see below) and prompt action will be taken on those risks that fall into the red zone. Action is considered for “yellow” risk, while “green” risks are regarded as acceptable.

Likelihood	4 – Almost Certain				
	3 - Likely		<u>5</u> , <u>6</u> , <u>18</u>		
	2 - Unlikely		<u>10</u> , <u>14</u> , <u>19</u> , <u>20</u>	<u>2</u> , <u>8</u> , <u>11</u> , <u>12</u> , <u>13</u>	<u>15</u>
	1 - Rare		<u>4</u> , <u>7</u> , <u>9</u>	<u>1</u> , <u>3</u> , <u>13</u> , <u>16</u> , <u>17</u>	
		1 - Trivial	2 - Medium	3 - Major	4 - Catastrophic
		Impact			

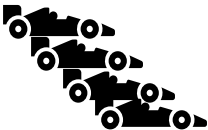


### Risks

1. Operational disaster
2. Incomplete or inaccurate data
3. Maladministration
4. Excessive charges by suppliers
5. Failure to pay contributions
6. Failure of non-public sector employers
7. Failure to interpret rules correctly
8. Appropriate personnel in key roles
9. Conflicts of interest
10. Admission agreements not in place
11. Commercial viability of suppliers
12. Non-compliance with GDPR
13. Negative media exposure
14. Impact of staffing issues on admin
15. Cyber security breach
16. Risk of fraud
17. Effect of new pensions regulations
18. Failure to produce annual report and accounts within deadline
19. Employer unable to pay contributions
20. Business Continuity for LBB Pensions Team

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## Risk Velocity

Risk Velocity is defined as the time to impact (i.e., an estimate of the timeframe within which a risk may occur). The Pensions Team use a traffic light system to classify how risk velocity measured:

<a href="#">1</a> , <a href="#">12</a> , <a href="#">13</a> , <a href="#">15</a>		- very rapid; within a couple of days
<a href="#">2</a> , <a href="#">3</a> , <a href="#">8</a> , <a href="#">14</a> , <a href="#">16</a>		- risk may occur within a few days up to a couple of months
<a href="#">4</a> , <a href="#">5</a> , <a href="#">6</a> , <a href="#">7</a> , <a href="#">9</a> , <a href="#">10</a> , <a href="#">11</a> , <a href="#">17</a> , <a href="#">18</a>		- a slow impact that may occur over several months or more

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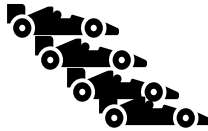




## Risk Scores

The risk scores are calculated as Likelihood x Impact.

As the Impact tends to be fixed, it is the Likelihood that requires risk management.

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## Summary of Risks

Risk	Description	Current Risk Score	Lowest Possible Risk Score	Risk Velocity	Risk Owner	Date Risk Identified
<b>ADM01</b> Operational disaster (Fire / flood etc)	An event occurs that would impact the ability to deliver all / parts of the pension service.	3 [3,1]	3 [3.1]		WYPF	August 2017
<b>ADM02</b> Incomplete or inaccurate member data	To fulfil legal obligations, the pension service is dependent on receiving accurate information and data from scheme employers, and for the administrator to maintain member records.	6 [2.3]	3 [1.3]		WYPF	August 2017
<b>ADM03</b> Administration process failure/maladministration	Administration of the pension scheme should be in line with the Local Government Pension Scheme (LGPS) rules.	3 [1,3]	3 [1,3]		WYPF	August 2017
<b>ADM04</b> Excessive charges by suppliers	The cost of running the pension scheme should not exceed the agreed budget.	2 [1,2]	2 [1.2]		Head of Pensions & Treasury	August 2017
<b>ADM05</b> Employer's failing to pay contributions to the fund	If the fund does not receive the correct contributions from employers to fund pension liabilities, this could lead to a scheme deficit.	6 [3,2]	4 [2,2]		Finance Manager - Pensions	August 2017

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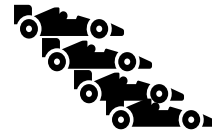

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<b>ADM06</b> Failure of non-public sector employers	Should admitted bodies default on payments, the fund is left with additional pension liabilities.	<b>6</b> <b>[3,2]</b>	2 [2,2]		Pensions Manager, LBB	August 2017
<b>ADM07</b> Failure to interpret rules or legislation correctly	The Board does not have the level of pension knowledge to perform their role effectively.	2 [1,2]	2 [1,2]		Senior Pensions Officer - LBB	August 2017
<b>ADM08</b> Appropriate personnel in place to perform in designated and key roles	WYPF does not comply with statutory obligations and is unable to evidence appropriate governance.	<b>6</b> <b>[2,3]</b>	3 [1,3]		WYPF	August 2017
<b>ADM09</b> Conflicts of interest	Decisions made may be influenced by other factors and may be subject to challenge.	2 [1,2]	2 [1,2]		Pensions Manager, LBB	August 2017
<b>ADM10</b> Admission agreements & bonds not arranged in good time	If a new employer is not admitted to the Fund in a timely manner, then employees will not be able to have access to their benefits.	4 [2,2]	2 [1,2]		Pensions Manager, LBB	January 2019

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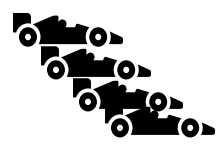



Risk	Description	Current Risk Score	Lowest Possible Risk Score	Risk Velocity	Risk Owner	Date Risk Identified
<b>ADM11</b> Commercial viability of strategic suppliers	If the commercial viability of a strategic supplier declines this could lead to operational failings resulting in service disruption / reduction, failure to complete statutory duties and financial costs.	6 [2,3]	4 [2,2]		Head of Pensions & Treasury	March 2019
<b>ADM12</b> Non-compliance with GDPR	Failure to adhere to GDPR may lead to the breach of GDPR regulations (e.g. breach of personal information), which will result in enforcement action from TPR and the ICO, resulting in financial and reputational impact on the Council.	6 [2,3]	4 [2,2]		Pensions Manager, LBB	March 2019
<b>ADM13</b> Negative media exposure and member experience	Negative media attention may lead to ineffective media management impacting on the reputation of the Council and impacting on staff morale.	6 [2,3]	3 [1,3]		Pensions Manager, LBB	March 2019
<b>ADM14</b> Impact of staffing issues on pensions administration	WYPF staff absence (due to both illness and leave) should be managed to ensure that the service levels are maintained so there is no detrimental effect on the payment of members benefits and general service levels.	4 [2.2]	4 [2,2]		Pensions Manager, LBB	April 2020

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Risk	Description	Current Risk Score	Lowest Possible Risk Score	Risk Velocity	Risk Owner	Date Risk Identified
<b>ADM15</b> Cyber security breach	The Fund holds large amounts of personal data which can make them a target for fraudsters and criminals. Steps need to be taken to protect members which includes protecting them against the 'cyber risk'.	8 [2,4]	4 [1,4]		Head of Pensions & Treasury	March 2019
<b>ADM16</b> Risk of fraud by paying pensions to ineligible individuals or transferring fraudulent arrangements	The Fund should evaluate the various forms of fraud in relation to pensions administration and then arrange for the implementation of appropriate controls that are proportionate.	3 [1,3]	3 [1,3]		Pensions Manager, LBB	March 2019
<b>ADM17</b> Effect of new pensions legislation and LGPS regulations	New pensions legislation or updates to the LGPS regulations can affect members pension benefits within the Fund.	3 [1,3]	3 [1,3]		Pensions Manager, LBB	March 2019
<b>ADM18</b> Failure to produce compliant annual report and accounts within deadline	The Accounts and Audit Regulations 2015 (2022 amendment) require audited accounts to be published on the 30 September after the year end. The risk of the Pension Fund Accounts not being published is that the Council Accounts will not be complete.	6 [3,2]	2 [1,2]		Pensions Finance Manager, LBB	April 2020

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Risk	Description	Current Risk Score	Lowest Possible Risk Score	Risk Velocity	Risk Owner	Date Risk Identified
<b>ADM19</b> Employer unable to pay contributions	If an employer is unable to pay the contributions on behalf of their members, this could lead to a cessation for that employer in the Fund with members earning no future pension benefits.	4 [2,2]	4 [2,2]		Head of Pensions & Treasury	Feb 2024
<b>ADM20</b> Business Continuity for the Barnet Pensions Team	There should be adequate business continuity planning within the Council for the Barnet Pensions Team to ensure that the service provided to all stakeholder to the fund is not reduced which could lead to member, employer and investment issues.	4 [2,2]	4 [2,2]		Head of Pensions & Treasury	Feb 2024



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## Risk Details

Risk	Nature of Risk	Controls in Place	Actions to mitigate risk	Action Owner	Action Completion Date
<b>ADM01</b> Operational disaster (Fire / flood etc)	Business Continuity	<ul style="list-style-type: none"> <li>WYPF has Business Continuity Procedures and Disaster Recover Plans in place, which are reviewed and tested regularly.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF have advised that two further tests will take place in the summer of 2023. The LBB Pensions Team will review the reports when available. <b>June 24 - Reports have been chased.</b></li> </ul>	WYPF Mark Fox	July 2024
<b>ADM02</b> Incomplete or inaccurate member data	Governance	<ul style="list-style-type: none"> <li>Common and Conditional data analysis provided monthly by WYPF.</li> <li>Regular updates provided by WYPF on the Data Improvement Plan.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF to update the LBB Pensions Team when employers are not providing the relevant information, so appropriate action can be taken.</li> <li>The LBB Pensions Team continue to work with employers who still have unprocessed leavers.</li> <li>Regular updates provided by WYPF on progress on the data improvement plan.</li> <li>Employers to be reminded of their responsibilities at each employer forum meeting.</li> <li>Process for rectification historical records documented.</li> </ul>	WYPF  Jim Nokku WYPF  Mark Fox  Mark Fox/Jim Nokku/WYPF	Ongoing - Monthly  March 2024  Ongoing - Monthly  Ongoing - Biannually  Ongoing - Monthly

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<b>ADM03</b> Administration process failure / maladministration	Statutory Duty	<ul style="list-style-type: none"> <li>Formal agreement in place with WYPF, including agreed SLA's.</li> <li>WYPF authority levels agreed with clear definition of delegated authorities and individual approval authorities.</li> <li>Scheme Event Calendar in place to ensure regulatory deadlines are achieved.</li> <li>WYPF staff training plans in place to ensure processing in accordance with LGPS requirements.</li> <li>Monthly reports by WYPF provided to LBB Pensions Manager.</li> </ul>	<ul style="list-style-type: none"> <li>The LBB Pensions Team to review the latest WYPF ISO9001 and ISO27001 reports , when available, which details the controls in place at WYPF. <b>June 24 - Reports have been chased</b></li> <li>WYPF to update the LBB Pensions Team on any errors or issues in the monthly report, or earlier, if deemed appropriate</li> </ul>	Mark Fox  WYPF	July 2024  Ongoing - Monthly
<b>ADM04</b> Excessive charges by suppliers	Finance	<ul style="list-style-type: none"> <li>Pension scheme budget agreed annually.</li> <li>Periodic review of suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>LBB Pensions Team to review supplier charges – looking at budgets and value for money.</li> <li>Business plan and strategy on fees, including asking for budgets from suppliers, is in progress.. To be shared with Board and Committee when review complete.</li> </ul>	David Spreckley  David Spreckley	April 2024  Ongoing - Annually

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<b>ADM05</b> Employer's failing to pay contributions to the fund	Financial	<ul style="list-style-type: none"> <li>LBB reconcile contributions paid against contributions reported to be paid by employers.</li> <li>WYPF undertake a 'rough check' that contributions paid are in line with the Rates &amp; Adjustments Certificate.</li> </ul>	<ul style="list-style-type: none"> <li>New Admitted Bodies are asked to commence paying contributions (at a temporary rate) prior to the Admission Agreement being to avoid delays in payment.</li> <li><b>June 24 - To understand WYPF checks in detail.</b></li> <li><b>June 24 - Also see Risk ACC01 in Non-Administration Risk Register.</b></li> </ul>	Mark Fox  Adam McPhail	Ongoing – when applicable  June 2024
<b>ADM06</b> Failure of non-public sector employers	Financial	<ul style="list-style-type: none"> <li>The LBB Pension Team monitor employer covenant and business strength.</li> <li>The LBB Pensions Team have access to a Hymans modeller, enabling the employer contribution rate to be calculated quicker.</li> </ul>	<ul style="list-style-type: none"> <li>The LBB Pensions Team to ensure all admitted bodies have an appropriate bond/guarantee is in place.</li> <li>New process with effect from April 2024 means that new admissions (with less than 100 members) will be on a pass-through basis which eliminate the need for new employers to provide a bond/guarantee.</li> <li><b>June 24 – Covenant review being undertaken for major employer</b></li> </ul>	Mark Fox  Mark Fox  David Spreckley	Ongoing – when applicable  Ongoing – when applicable  July 2024

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<b>ADM07</b> Failure to interpret rules or legislation correctly	Compliance	<ul style="list-style-type: none"> <li>Up to date training log in place for Local Pensions Board to show completion of training undertaken.</li> <li>Training is a standing item at Local Pensions Board meetings, where training is reviewed, and further training needs can be identified.</li> </ul>	<ul style="list-style-type: none"> <li>The LBB Pensions Team to update the training for undertaken by Board members monthly.</li> <li>The LBB Pensions Team to facilitate training requests received from Board members (either external or internal training).</li> </ul>	<p>Jim Nokku</p> <p>Jim Nokku</p>	<p>Ongoing – Monthly</p> <p>Ongoing – when applicable</p>
<b>ADM08</b> Appropriate personnel in place to perform in designated and key roles	Compliance	<ul style="list-style-type: none"> <li>WYPF ensure that the personnel in key roles in relation to the administration of the Fund are suitably experienced and qualified to perform in their roles and have the appropriate authorities.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF review the roles and responsibilities of relevant individuals to ensure they hold appropriate authorities, by annual appraisal reviews and setting of objectives</li> <li>LBB Pensions Team to obtain confirmation that WYPF staff in key positions have the appropriate experience and authority.</li> </ul>	<p>WYPF</p> <p>Mark Fox</p>	<p>Ongoing – at least annually</p> <p>Ongoing – at least annually</p>

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<b>ADM09</b> Conflicts of interest	Compliance	<ul style="list-style-type: none"> <li>All Pension Board members to declare any conflicts and potential conflicts before each meeting and recorded in the conflict-of-interest register.</li> <li>All pension board members to complete and renew relevant educational material.</li> </ul>	<ul style="list-style-type: none"> <li>No further actions required; risk has reached its target score and is being tolerated with the existing controls and mitigations in place.</li> </ul>	Mark Fox	N/A
<b>ADM10</b> Admission agreements & bonds not arranged in good time	Governance	<ul style="list-style-type: none"> <li>The LBB Pensions Team now have access to a Hymans modeller, enabling calculation of the employer's contribution rate, thus speeding up the admission process.</li> </ul>	<ul style="list-style-type: none"> <li>LBB Pensions Team to review and update the Admissions, Bonds and Cessations process to make it less labour intensive and more efficient.</li> <li>New process with effect from April 2024 means that new admissions will be processed quicker and more efficiently going forward.</li> </ul>	Mark Fox	Ongoing - Monthly

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Risk	Nature of Risk	Controls in Place	Actions to mitigate risk	Action Owner	Action Completion Date
<b>ADM11</b> Commercial viability of strategic suppliers	Business Continuity	<ul style="list-style-type: none"> <li>Contract monitoring takes place monthly with quarterly reporting to Financial Performance and Contracts Committee.</li> <li>Contract register kept under review with checks on financial status of strategic suppliers.</li> <li>Contract management arrangements in place, including indicators to identify financial stress.</li> </ul>	<ul style="list-style-type: none"> <li>In the unlikely event that WYPF go out of business and cease to provide third party admin services, the LBB Pensions Team will be able to tender for a new provider by using the This can be done by using the National LGPS Framework.</li> </ul>	David Spreckley	Ongoing – when applicable
<b>ADM12</b> Non-compliance with GDPR	Statutory Duty	<ul style="list-style-type: none"> <li>The LBB Pensions Team are required to undertake regular training on GDPR regulations and information security.</li> <li>WYPF staff must also complete GDPR awareness training.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF to confirm that staff have completed their GDPR training.</li> <li>WYPF to update LBB on any data breaches and actions taken to mitigate breach.</li> <li>The LBB Pensions Team to report any data breaches to the Council’s Data Protection Team.</li> </ul>	WYPF WYPF WYPF	July 2024 Ongoing – Monthly Ongoing – when applicable



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<b>ADM13</b> Negative media exposure and member experience	Governance	<ul style="list-style-type: none"> <li>External Communications team to liaise with S151 Officer should a media enquiry arises.</li> <li>WYPF to refer any media enquiries to the LBB Pensions Team for action.</li> </ul>	<ul style="list-style-type: none"> <li>Press releases to be shared with Local Pension Board and Pension Fund Committee members prior to publication (if possible).</li> <li>Member experience to be measured by quarterly satisfaction surveys and feedback by WYPF.</li> <li><b>June 24 - Standard response drafted in relation to investments held in Israeli companies.</b></li> </ul>	Mark Fox  WYPF  David Spreckley	Ongoing – when applicable  Ongoing – Quarterly  Completed
<b>ADM14</b> Impact of staffing issues on pensions administration	Business Continuity	<ul style="list-style-type: none"> <li>WYPF have developed their own Business Continuity plan which considers staff absence.</li> <li>The LBB Pensions Team monitor service levels through regular reports and calls with WYPF. This information is also reported to the Local Pension Board.</li> </ul>	<ul style="list-style-type: none"> <li>The LBB Pensions Team to continue to regularly monitor WYPF performance levels, complaints and resourcing levels.</li> <li>Should there be any issues, these will be raised with senior management at WYPF and Commercial Team at the LBB.</li> <li>The LBB Pensions Team speak at least quarterly with WYPF on staffing levels.</li> </ul>	Mark Fox  Mark Fox  Mark Fox	Ongoing – Monthly  Ongoing – quarterly  Ongoing – quarterly

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<b>ADM15</b> Cyber security breach	Compliance	<ul style="list-style-type: none"> <li>WYPF, as part of its Information Governance Toolkit, has adopted a Cyber Security policy which outlines how the Fund protects members' data from incidents of Cyber Crime and risk of hacking together with outlining the Fund's control mechanisms for its pension administration software system.</li> </ul>	<ul style="list-style-type: none"> <li>The LBB Pensions Team to the updated WYPF Cyber Security Report when available. <b>Report now received.</b></li> <li>The LBB Pensions Team to check whether the WYPF policy is updated in line with the TPR cyber security principles.</li> </ul>	Mark Fox  Mark Fox	Completed  July 2024
<b>ADM16</b> Risk of fraud by paying pensions to ineligible individuals or fraudulent arrangements	Governance	<ul style="list-style-type: none"> <li>WYPF run annual pensioner existence exercises.</li> <li>Pension transfer documentation includes the "pension scam" literature from TPR.</li> <li>WYPF administration processes to ensure proper checks on the receiving arrangement before making payment.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF to regularly update the LBB Pensions Team the results of the pensioner existence exercise.</li> <li>The LBB Pensions Team to review all transfer payments every six months.</li> <li>WYPF have confirmed that they will be signing up to TPR Pensions Pledge, which is a new initiative to raise awareness of the risks of scams.</li> <li>LBB Pensions Team to consider issuing communications on pension scams to members.</li> </ul>	WYPF  Mark Fox  WYPF /Mark Fox	Ongoing – quarterly  Ongoing – Biannually  September 2024

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<b>ADM17</b> Effect of new pensions legislation and LGPS regulations	Statutory Duty	<ul style="list-style-type: none"> <li>The LBB Pensions Team to monitor and review updates to pensions legislation to determine the impact on members benefits.</li> <li>The LBB will work with other stakeholders and bodies ensure relevant communication is sent to appropriate parties.</li> </ul>	<ul style="list-style-type: none"> <li>WYPF to provide updates of any new relevant regulations that will affect the Barnet Fund through monthly reports and regular meetings.</li> <li>The LBB Pensions Team to attend quarterly meetings of the London Pension Officers Group (LPOG) to share best practice on LGPS regulations.</li> <li>LBB Pensions Team hold monthly training sessions on pensions related subjects.</li> <li>The LBB Pensions Team attend training sessions to complete CPD required by professional bodies</li> </ul>	<p>WYPF</p> <p>Mark Fox</p> <p>LBB Pensions Team</p> <p>LBB Pensions Team</p>	<p>Ongoing – when applicable</p> <p>Ongoing - Quarterly</p> <p>Ongoing - Quarterly</p> <p>Ongoing – when applicable</p>
<b>ADM18</b> Failure to produce audited annual report and accounts within deadline	Statutory Duty	<ul style="list-style-type: none"> <li>The LBB Pensions Team will ensure all working papers and data is in place when preparing the accounts, so that when the audit commences, the process is more efficient.</li> <li>The LBB Pensions Team to agree an audit program with the Auditors and ensure that this is adhered to.</li> </ul>	<ul style="list-style-type: none"> <li>The Auditors and the LBB Pensions Team to maintain regular communication throughout the audit.</li> <li>Ensure that the Auditors are employing suitably qualified staff to undertake the audit.</li> </ul>	<p>Adam McPhail</p> <p>Adam McPhail</p>	<p>Ongoing – when applicable</p> <p>Ongoing – when applicable</p>

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<b>ADM19</b> Employer unable to pay contributions	Financial	<ul style="list-style-type: none"> <li>The Pension Fund recently approved an updated contribution review policy, which sets out the process that can be followed by an employer if they are unable to pay pension contributions to the Fund (such as paying reduced pension contributions).</li> </ul>	<ul style="list-style-type: none"> <li>The revised contribution review policy has been sent to all employers, along with Q&amp;As on what an employer should consider if it wants to request a reduced contribution rate.</li> </ul>	David Spreckley	Ongoing – when applicable
<b>ADM20</b> Business Continuity for the Barnet Pensions Team	Business Continuity	<ul style="list-style-type: none"> <li>Review of the internal resources required by LBB to manage the Barnet Pension Fund undertaken by senior LBB management.</li> </ul>	<ul style="list-style-type: none"> <li>Feb 24 – LBB Management Team to be asked to confirm that there is appropriate business continuity planning for the LBB Pensions Team. Updates to be provided to both Local Pensions Board and Pension Fund Committee.</li> </ul>	David Spreckley	Ongoing – when applicable