

**Appendix 1 – Firefighters’ Pension Scheme Risk Register**

PRR REF	HAZARD STATEMENT	PRIMARY RISK HEADING	SECONDARY RISK DESCRIPTOR	CONTROL MEASURES IN PLACE	CURRENT RISK (after current control measures)				CONTROL MEASURES TO BE IMPLEMENTED	CONTROL MEASURE OWNER	PROJECTED IMPLEMENTATION DATE FOR ALL CONTROL MEASURES	RESIDUAL RISK (after all control measures implemented)			
					L	I	R	ML				L	I	R	ML
1	Failure to administer the scheme in line with regulations and policies	Regulatory	Administration failure	Up to date knowledge through various sources such as SAB and the Home Office. Up to date training. Attendance at regional and national groups. regional fire administrator working group. Information on the scheme is held on the Firefighters section of the WYPF website.	1	4	M	TACT				1	4	M	TACT

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2	Those charged with governance of the Scheme are unable to fulfil their responsibilities effectively.	Regulatory	Reputation	Requires Board members to receive continuing training.	2	2	M	OPS	Proposed creation of a Joint East Midlands Pension Board to provide efficiency and resilience	Scheme Manager	No date available, requires ministerial approval and other matters are occupying ministerial time. Updated approval from each scheme would be sought.	1	2	L	OPS

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3	Policies not being in place and up to date	Regulatory		Policies to be reviewed and updated	3	3	H	TACT	HR action plan includes a review of all policies as part of the HR strategy	Scheme Manager	On-going	2	2	M	OPS

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4	Failure to recognise/manage conflicts of interest	PEOPLE		Declarations of interests at the beginning of each meeting.	1	2	L	OPS				1	2	L	OPS

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5	Potential fraudulent activity by staff/scheme members	PEOPLE	Illegal expenditure, excessive pension benefits	Clear roles and responsibilities for those administering pensions. Duties split between Finance, HR, Warwickshire County Council payroll and WYPF. HR review of processes underway. National Fraud Initiative participation. Review of declarations of interest policy. Internal audit of pensions (CFA and administrator).	1	3	M	TACT				1	4	M	TACT

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6	Changes to the Firefighters' Pension Scheme and lack of expertise in the revised/new provisions.	Business process	Breach of regulation	The use of advisors where deemed applicable to provide relevant information and recommendations on particular areas. Professional Administrator engaged, has many fire clients (WYPF). Regional Adviser engaged. Senior officers and Scheme Manager linked in with LGA, NFCC.	2	3	M	TACT				1	3	M	OPS

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7	Failure to provide adequate information to the Pension Board.	Regulatory	Breach of regulation	Board meetings held quarterly at which key information relating to the administration is provided. Extraordinary meetings can be arranged for urgent items.	1	2	L	OPS				1	2	L	OPS

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8	Failure to include all required information in documents issued to members under disclosure regulations.	Regulatory	Breach of regulation	Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly via relevant websites, seminars and working groups. WYPF is administrator.	1	4	M	TACT				1	4	M	TACT

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9	Failure to communicate adequately with scheme members	PEOPLE	Negative impact on staff. Breach of regulation.	Website regularly updated. Newsletters published. Annual Benefit Statements produced and distributed. Updates on key scheme changes. WYPF engaged as administrator. Regional Pensions Advisor engaged.	2	3	M	TACT	Regular pension roadshows to be arranged inviting all 3 FA's employees to update on age discrimination remedy.	Scheme Manager	Rolling programme	1	3	M	OPS



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10	Records are not accurate or do not reflect changes in circumstances.	PEOPLE	Business process	Records are supported by appropriate documentation, input and output checks are undertaken. Regular reviews of data quality. Check and challenge between LFRS finance and HR, Warwickshire CC and WYPF.	1	4	M	TACT				1	4	M	TACT

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11	Barriers to promotion and retention of experienced / knowledgeable senior staff due to annual allowances tax impact.	PEOPLE	Negative impact on staff	Arrangements in place with Notts/Derbyshire to share relevant pensions expertise/resource to help mitigate.	4	3	H	TACT				3	3	H	TACT

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12	Impact of the McCloud / Sargeant judgements - Age Discrimination Remedy.  Impact of the 'Matthews' Retained second options exercise.	PEOPLE	Breach of regulation and agreements.  Negative impact on staff. Subject of legal proceedings.  (An LFRS employee is named in a 2022 'injury to feelings' claim)	Regional working with Notts/Derbys fire pensions experts. Work with the LGA and NFCC. Work with WYPF. Reference court judgements, legislation, Government guidance and sector agreements. Regular reports to the CFA and LPB.	3	3	H	STRA	Review of capacity to undertake the necessary remedies when known, across LFRS, WYPF and Warwickshire CC.	CFO and Scheme Manager	On-going	2	3	M	STRA

**ASSESSMENTS REMOVED OR ARCHIVED DURING THE CURRENT YEAR**

CRR REF	HAZARD STATEMENT	FINAL RISK ASSESSMENT SCORE				REASON FOR REMOVAL	WHEN REMOVED
		L	I	R	ML		
	Failure to implement the new Fire Pensions Administrator on time	1	3	M	TACT	WYPF appointed	June 2021