

Appendix B – Firefighters’ Pension Scheme Risk Register (updated 01-03-24)

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	<p>Up to date knowledge through various sources such as SAB, LGA, Home Office.</p> <p>Up to date training.</p> <p>Attendance at regional and national groups.</p> <p>Access to the Regional Adviser.</p> <p>Information on the WYPF website.</p>	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	Board members receive briefings, training and informative reports.	2	2	M	OPS	Possible creation of an East Midlands Joint Pension Board.	Scheme Manager	No date available. Updated approval from each scheme would be sought, then requires Government approval.	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	A review of all policies by the Scheme Manager and HR.	Scheme Manager	On-going – is a significant task	2	2	M	OPS

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

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

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6	Changes to the Firefighters' Pension Scheme and associated regulations; and lack of expertise in the revised/new provisions.	Business process	Breach of regulation	<p>Advisors provide relevant information and recommendations on particular areas.</p> <p>Professional Administrator engaged, has many fire clients (WYPF).</p> <p>Regional Adviser engaged.</p> <p>Senior officers and Scheme Manager linked in with LGA, NFCC.</p>	1	3	M	TACT				1	3	M	TACT

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

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8	Failure to include all required information in documents issued to scheme 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, with many fire clients and issues most documents to individual members.	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.	<p>Websites regularly updated.</p> <p>Newsletters published.</p> <p>Annual Benefit Statements produced and distributed.</p> <p>Updates on key scheme changes – focussed communications where specific groups impacted.</p> <p>WYPF engaged as administrator.</p> <p>Regional Pensions Advisor engaged.</p>	2	3	M	TACT	<p>Pension roadshows, inviting all 3 FRAs' employees .</p> <p>(last held online 13 November 2023, with recordings available)</p>	Scheme Manager	On-going	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 and audit 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	Impact of the Sargeant / McCloud judgements - Age Discrimination Remedy. Impact of the 'Matthews' Retained second options exercise. Ensuring compliance with Regulations in force effective from 1 October 2023, with an 18-month implementation period.	People	Breach of regulation, ET decisions and agreements. Negative impact on operational staff morale. LFRS subject to legal proceedings. LFRS incurs costs on 'early' remedy payments, such as irrecoverable tax charges. Insufficient trained and experienced HR and Finance staff, and systems, to collect the necessary data and process calculations.	Regional working with Notts/Derbys and Regional Pensions Adviser. Work with the LGA, NFCC and WYPF. Reference court judgements, legislation, Government guidance and sector agreements. Regular reports to the CFA and LPB, including risk analysis. Two finance staff allocated; overtime worked. Tracing service to engaged to assist contacting former retained personnel (March 2024)	3	3	H	STRA	On-going review of staff and systems capacity to undertake the necessary remedies, across LFRS, WYPF and Warwickshire CC. Breach of regulations reported to LPB 12 March 2024 regards Matthews 'warm up' letters returned as no longer at the address.	CFO and Scheme Manager	On-going	2	3	M	STRA

12	Failure to meet timelines and data requirements for the new national Pensions Dashboard	People	Business process	<p>WYPF is the lead, as administrator.</p> <p>WYPF linked in with national developments – regulations, systems, data requirements, etc.</p> <p>National timelines delayed – a connection deadline of 31 October 2026, with FRAs expected to connect Summer 2025.</p> <p>May be of limited value for many FPS members, who only have a FPS pension.</p>	1	3	M	TACT			On-going, to October 2026.	1	3	M	TACT
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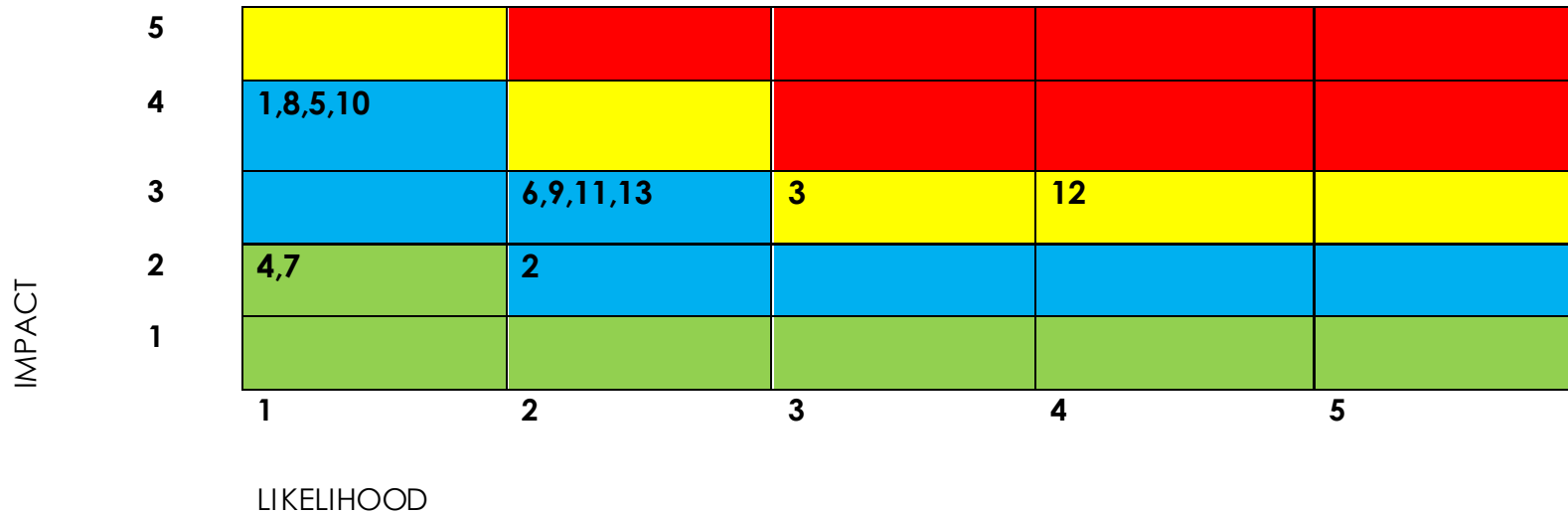
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13	Reputational impact of delayed payments arising from the national Injury to Feelings claim.	People	Business Processes	Home Office taking the lead on making agreed payments and considering further claims. Communication in response to any queries from staff.	2	3	M	STRA				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		

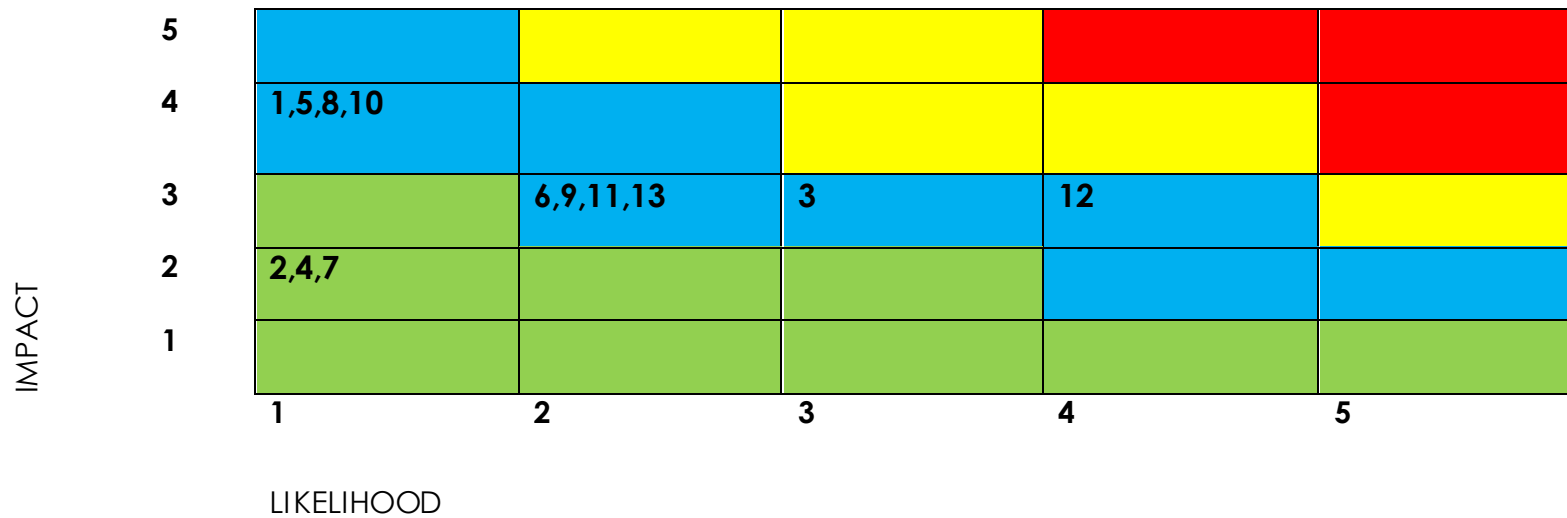
Appendix 2

Risk Assessment Matrix



VERY HIGH	High level risk with the potential to cause catastrophic damage to the reputation, finances or governance of the Service
HIGH	Mid-high level risk possibly requiring significant amendment to policy/procedure and significant financial outlay
MEDIUM	Low –mid level risk possibly requiring new policy and/or some financial outlay
LOW	Low level risk capable of being managed within normal service policy and procedure

Risk Management Matrix



CORPORATE	Those risks likely to require management oversight by the CFA and/or SMT
STRATEGIC	Those risks likely to require management oversight by SMT
TACTICAL	Those risks likely to require management oversight by the HSW&CRM Committee and sub-groups, Group Managers' Team (GMT)and/or individual Directors
OPERATIONAL	Those risks likely to require management oversight by individual Group and Station Managers and/or GMT

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