

	Risk Area	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Review Due	Comment 1
1	Risk Area Disaster Recovery	Risk & Outline								
1.1	Operational Disaster Recovery Plans Brent.	Loss of or unable to access admin systems for: Pensions Payroll Pensioner payroll.	1	10	10	Brent Business Continuity Procedures.	Brent	Annual	2019	Brent disaster recovery plan in place.
1.11		Pension Systems I.T.	1	10	10	Database of all: Advisors Suppliers Contracts.	Brent	Annual	2019	Held as hard copy by the Council's Legal Department.
1.2	Operational Disaster Recovery Plans Capita.	Loss of or unable to access capita admin systems for pensions.	1	5	5	Capita Service Contract.	Capita	Annual	2019	Capita have a disaster recovery plan in place as part of their legal contract with Brent.
1.21		Capita's Pension Admin System (Hartlink).	1	5	5	Capita Service Contract.	Capita	Annual	2018	Capita have a disaster recovery plan for their pension admin system Hartlink (in-house system) as part of their internal procedures. AAF 01/06 and ISAE 3402 assurance reports on Capita's internal controls are reviewed and audited externally annually
1.3	Operational Disaster Recovery Plans LPP.	Loss of or unable to access LPP admin systems for pensions.	1	5	5	LPP Shared Service Agreement.	LPP	Annual	2019	From October 2018 LPP disaster recovery plan in place as part of their Shared Service Agreement with Brent.
1.31		LPP Pensions Admin System (Altair).	1	5	5	LPP Shared Service Agreement.	LPP	Annual	2019	LPP have recovery for their pension admin platform Altair (External provider Aquila/Haywood).
2	Risk Area Business Continuity Planning	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
2.1	Business Continuity.	Capita's Finances (Profit Warning 2018).	1	10	10	Capita Service Contract.	Brent	Annual	2019	Brent aware of the profit warning, assured by Capita that is BAU. Brent monitoring the news about Capita. Update April 2018 a report from Capita explaining the situation with a better forecast, risk score amended to take this into account April 2018.
3	Risk Area Risk Planning	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
3.1	Risk Planning And Monitoring During The Risk Plan Year 2018.	Not monitoring: Risk and the risk plan And amending it as required Or adding new areas of risk as they appear Will lead to the risk plan being: Inaccurate Known risks not being accounted for No plans to address these risks.	1	10	10	Risk Plan.	Brent	Annual	2019	The Risk Register is monitoring and reviewed by the Scheme Manager and the Pensions Board. Areas of risk are where required: Updated Amended New risks added if identified.
4	Risk Area Data Security	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
4.1		External attack, loss of data, locked out of data, poor internal procedures can lead to an increased risk of attack from outside, or internal fraud.	2	10	20	Data Security Procedures.	Brent	Annual	2019	Procedures on data security in place, systems kept up to date with latest security updates.
4.12		Not backing up data regular using secure backup systems.	2	10	20	Data Back Up Procedures.	Brent	Annual	2019	Data is backed up on an incremental basis daily and fully backed up weekly, data kept in secure sites.
4.13	Data Security.	Clean desk policies not being adhered to: Cabinets left open or not locked Documents left out overnight Computer not locked when operator leaves their desk.	2	5	5	Data Security Procedures	Brent	Annual	2019	Possibility of: Sensitive data being seen by unauthorised persons Data theft GDPR breached Brent Councils reputation put at risk.
4.14		Taking laptops away from desk that are not password protected with encryption, using them on public transport.	1	5	5	Data Security Procedures	Brent	Annual	2019	This can lead to: Large losses of sensitive data Unauthorised people seeing sensitive data while on public transport Breach of GDPR Breach of Councils Policies and dismissal from service.
4.2	General Data Protection Regulations.	New General Data Protection Regulations (GDPR) come into effect 25 May 2018, failure to comply with GDPR will lead to: Complaints Data breaches Possible fines Loss of reputation.	1	10	10	Brent GDPR Policies	Brent	Annual	2019	Brent has GDPR policies in place and publishes GDPR privacy notices: Online Yammer In news letters In communications to its members, employers, academy's, maintained schools.
4.21		Sending sensitive data by email ensuring it will be sent to the right recipient and encrypted, or using a secure transition system.	2	8	16	Brent GDPR Policies	Brent	Annual	2019	Sensitive data being sent to an unauthorised person or business. Breach of GDPR.
5	Risk Area Pension Administration	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
5.1	Capita Pension Administration SLA Performance 2018.	Poor performance in the sort term or longer term leads to: Delay in administrative processing Increased administration costs Members benefits being delayed Increase in complaints Places an unwarranted and costly drain on Brent resources.	8	10	80	Capita Service Reviews	Brent	Monthly	Monthly	Monthly SLA reports on service rebate of fees if not 100%. Capita are now having to rebate their fees every month since January 2018. Below SLA performance will continue to end of contract. Backlogs of work occurring that must be cleared for change of administrator. SLA performance is monitored monthly at service meetings.
5.2	Capita Record Keeping And Data Provided to Capita By: Maintained Schools Academy's Employers.	Not meeting record keeping standards "The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014" Failing to meet expected standards in record keeping as set out in our contractual agreements with Capita, employers, maintained schools and academy's. Backlogs being created because of missing or inaccurate data held by Capita. Capita failing to maintain data at the legal record keeping requirements. Missing common and conditional data not provided by employers, maintained schools and academy's. Not being informed of the exact situation by Capita.	8	10	80	Annual Scheme Data Check 2017	Brent	Annual	2018	2017, common and conditional data scores below acceptable score: Legacy 80.11% (Min Required 95%) New 94.03% (Min Required 100%) Record Keeping Plan 2018 to obtain data to improve scores to acceptable standards with data to be updated by end of July 2018 RKP 2018 data improvement is being undertaken to bring member data up to required standards by July 2018 monitored weekly.
5.3	Brent Pensions Record Keeping Planning.	Not having a formal record keeping plan in place to ensure quality and accuracy of the pension data held with plans to rectify any problems highlighted within a reasonable time leads to: Record keeping falling below legal requirements Possible regulatory action Takes resource away from day to day activities of the Plan.	5	10	50	RKP 2018	Brent	Monthly	Monthly	Brent record keeping plan for 2018 RKP2018 created to deal with poor conditional and common data being below requirements as highlighted in the Annual Pension Data Check 2017. RKP2018 to ensure record keeping requirements are up to date for: Capita Maintained schools Academy's Employers To monitor address and post codes updates from Target Professional Services.
5.4	Capita Common Data And Target Professional Addresses and Post Codes.	Below record keeping standards 2014 Capita not receiving condition data from: Maintained schools Academy's Employers As required to by their agreement with Brent as the Administrating Authority.	8	10	80	RKP 2018	Brent	Monthly	Monthly	Common data is reviewed via the RKP2018: Each data element is being monitored weekly. Address & Postcode being done by Target Professional Services- completed June 2018. All other common data types being done by Capita searching their back records.
5.5	Capita Administration Practises.	Changing status of member to allow the pension system to produce a quote and then not returning the status back, Capita's internal procedures fail to identify altered member statuses for calculation purposes not being return to previous status.	5	10	50	Capita Service Contract	Brent	Annual	2018	Can lead to wrong members status which will effect: Membership numbers Valuations Liabilities Member events based on status being amended and not return to actual status.

5.6	Maintained Schools Academy's Employers Supplied Data to Capita.	Failure by Maintained Schools, Academy's, Employers to provide data accurately and on time to Capita results in poor record keeping with data held by Capita failing below required standards.	9	10	90	RKP 2018	Brent	Annual	2019	Capita to inform Brent of non compliers and Capita to talk to employers at Employers Forum March 2018 regarding Plan data, change of administrators to LPP October 2018 will lead to employer data improvement as they will be required to export data monthly to LPP system highlighting data problems by import validation, also reporting from the admin systems of missing files leads to early indication of employers having data problems
5.7		Data supplied by employers incomplete and not sent on time.	8	10	80	Pensions Administration Strategy	Brent	Annual	2019	Plans for more engagement with employers and training from the LPP and other bodies The LPP will engage with employers with training and support Data to send to LPP Platform by file import
5.71	Data Quality Supplied By: Maintained Schools Academy's Employers	Maintained schools, academy's, employers, continue to not provide accurate data on time.	5	10	50	Pensions Administration Strategy	Brent	Annual	2019	PAS to be amended to fine: Employers Academy's Maintained schools For not complying with their legal duties Updating of PAS due Q1 2019 PAS to be updated with fines for not sending in EOY returns on time. Employers confirm legal duties to supply accurate data on time to Capita so that they know that they will need to do this to comply with the law.
5.8		Failure to meet legal obligations to supply accurate data on time.	5	10	50	Pensions Administration Strategy	Brent	Annual	2019	
5.81	Data Incomplete Or Not Sent On Time from: Maintained Schools Academy's Employers.	Not ensuring training and competence standards are in place for: Maintained Schools Academy's Employers Leads to uncertainty that they will provide the data expected on time.	5	10	50	Pensions Administration Strategy	Brent	Annual	2019	List of employers to be provided by Capita in order that Brent can work with: Maintained Schools Academy's Employers To improve data and submissions Employer Working group set up May 2018 to work with employers to discuss what the problems are and what Brent can do to improve things.
6	Risk Area Plan Events	Risk Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
6.1	Pension Plan Events Planning.	Plan events such as: Annual benefits statements Year end reporting to the TPR Auto enrolment Pension increases Plan valuations All require planning in advance to ensure completion on time.	5	10	50	Plan Calendar	Brent	Annual	2019	Plan Calendar to identify events: What work is required What recourses will be used Completion and sign off.
6.11		Pension projects such as GMP reconciliation need to be completed before HMRC cut off 2019. Changes in legislation that needs to be actioned. Change of pension administrators.	5	10	50	Capita Service Contract	Brent	Annual	2019	To allow longer term planning for items such as: GMP reconciliation before HMRC cut off New legislation coming in to effect Ensure Plan events are completed on time.
6.2	Annual Benefits Statements 2018	Failure to have the necessary correct and accurate data will lead to: Statements not being sent by the statutory deadline of 31 August 2018 Possible delay sending statements whilst this data is obtained and systems updated.	5	10	50	Capita Service Contract LPP Shared Service Agreement	Brent	Annual	2019	Data improvement being carried out under RKP 2018 Employer forum to enlist maintained school/academy's/employers to do their part in provided data on time. Capita chasing for data.
6.21		Annual Benefits Statement due by August 2018 dependant on: Common Data Conditional data Data being improved from the RKP 2018 plan Accurate and complete employer data being provided to Capita by employers.	5	10	50	Capita Service Contract	Brent	Annual	2019	Improvement to common and conditional data will be complete by July 2018 EOY 2018 data done June 2018 will improve scheme data.
6.3	Deferred Member Benefit Statements	Incorrect Statuses, no address, missing data to calculate leads to: Statements not being issued statement inaccurate Incorrect valuation and liabilities for the Plan.	5	10	50	Capita Service Contract	Brent	Annual	2019	Member data is being dealt with under the 2018 RK 1123 missing addresses out of 1478 found by Target- will assists in getting more deferred benefit statement out in 2017/2018.
6.4	Year End Return	Failure to complete year end return and submit on time leads to fines	2	10	20	PAS & Plan Calendar	Brent	Annual	2019	All Plan calendar events to be recorded with plan to ensure they are carried out
7	Risk Area Auto Enrolment	Risk Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
7.1	Auto Enrolment.	Failure to process auto enrolment on time leads to: Member complaints Members unable to opt out or in Delayed administration Possible action by the regulator to improve or be fined.	1	5	50	Auto Enrolment Procedures	Brent	2018	2019	Auto enrolment checked monthly for: Enrolment Opt outs Opt Ins Auto Enrol Renewal, as part of Brent procedures for pensions and payroll.
8	Risk Area TPA Transition	Risk Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
8.1	Transition Capita to LPP October 2018.	Capita Data Quality Provided To The LPP via a live data cut February 2018 is below standards it may lead to LPP not being able to administer to Plan efficiently while data is brought up to standards, addition costs for Brent to have the LPP cleanse data.	5	10	50	Brent Monitoring Capita Transition to LPP	Brent	Ongoing	Monthly	Data to be supplied in 3 data cuts: Data extract 1 one February 2018 done LPP report the data supplied is below what was expected Capita have improved the data since then and Target have supplied 1105 addresses Data cut 2 due April 2018 Live Data extract 3 due September 2018, Capita data will be improved by September 2018
8.2	Transition LPP October 2018.	LPP transition does not proceed as planned due to: Poor scheme data from Capita Poor data or missing data supplied to Capita from: Maintained schools Academy's Employers.	2	10	20	LPP Transition Plan	LPP	Ongoing	Monthly	LPP plan to be matched to Capita transition and plan monitored by Brent. Capita and LPP transition plans proceeding as expected.
8.3	LPP Employer Interface And Systems (Altair).	Employer unable to progress their pension duties using new LPP system as not trained, leading to a major disruption in processing employer data.	5	5	25	LPP Transition Plan	LPP	Ongoing	Monthly	Employers training on LPP system (Altair) is planned under the LPP transition plan August to September 2018.
9	Risk Area Regulatory	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
9.1	Anti Fraud Initiatives: Mortality Existence.	Benefits paid to people not entitled to benefits from LGPS.	2	5	10	2018 Anti Fraud Plan	Brent	Annual	2019	Anti Fraud Plan 2018 Checks 2018.
9.2	Pension Board Training.	Pension Board members not having the appropriate degree of knowledge and understanding to perform their duties. Pension Board member not having the right knowledge to make informed decisions and challenge Officers of the Council.	1	5	5	Pension Board Training Plan	Brent	Annual	2019	Regular training is provided via a training programme for Pension Board members All Pensions Board members to complete and pass the TPR public pensions Plan course Further training arranged for July 2018 and next pension Board after that.
9.3	Pension Board Conflict Of Interest.	Conflicts of interest must be declared in the Register of Interests. Failure to declare an interest can lead to serious consequences and pose a risk to the Plan and possibly member.	1	5	5	Conflict of Interest Register	Brent	Annual	2019	The register of interests and other relevant documents are circulated to the Pension Board for ongoing review and published on the Brent Council's website.
9.4	Business Plan.	Failure to have a business plan can lead to statutory requirements not being met and lead to poor planning for the upcoming events in the Plan calendar.	1	5	5	Business Plan reviewed by Pensions Board.	Brent	Annual	2019	Business Plan to be in place Q1 2019.

9.5	Governance.	Failure to have good governance plans in place which are reviewed and monitored can lead to: Poor administration Increased administration costs Poor investment outcomes Increased levels of risk Not understanding what the risks are and having plans to manage the risk Statutory requirements not being met such as: Annual benefits statements Pension saving statements Year end returns.	1	3	3	Multi areas cover governance: Business Plan Pensions Administration Strategy Risk Management Strategy and Risk Register Record Keeping Plan Breaches Policy	Brent	Annual	2019	Governance is monitored by: Scheme Manager Pensions Board Pensions Sub Committee Internal and External Controls.
9.6	Failure to make provision for oversight of the administration of the Plan	Failure to ensure that overall oversight is in place and carried out can lead to: Breaches of the law Poor administration and record keeping, Unauthorised payments, Poor administration being allowed to continue, Failure to meet deadline on time Possible fines Fraud to occur Loss of confidence and reputation for the Council.	1	2	3	The Pension Board assists the Scheme Manager in the provision of oversight of how the Plan is administered.	Brent	Ongoing	2019	The oversight of the plan is carried out by the Scheme manger with assistance from the Pension Board.
9.8	Pension Breaches	Breaches not recorded and failure to report a breach to the regulator can lead to fines and loss of reputation.	1	5	10	Breaches Policy and Log	Brent	Monthly	Monthly	Breaches log to monitor all breaches and report of breached to the regulator.
10	Risk Plan Funding & Accounting	Risk & Outline	Likelihood	Impact	Score	Control	Owner	Test	Next Review	Comment
10.1	The Fund's Assets Insufficient To Meet Long Term Liabilities.	Pension Fund Assets not sufficient to pay: Pension benefits Transfers Death benefits Could lead to raising of pensions contributions Plan has to reduce benefits, Reassess of the funding strategy.	2	10	20	Public Sector Payroll Controls.	Brent	2018	2019	Contributions are checked on a monthly basis Overdue Contributions: Employers Academy's Maintained Schools Are actively chased.
10.12			1	10	10	The Funding Strategy Statement.	Brent	Tri Annual	2019	The next Triennial Review is 2019 and will be reported to the Pension Board and is reviewed to ensure investment strategy is appropriate
10.13			1	10	10	Fund's Funding Level Assessment.	Brent	Quarterly	2019	The actuary Hymans Robertson provides regular reports on funding levels
10.4	Pension Contributions not Paid by: Maintained Schools Academy's Employers On time: Or not at all Refusal to pay.	Effects the Plans abilities to pay out benefits. Braking the law on pension contribution collections. Unnecessary costs for chasing for contributions. Continuing non payment for pension contributions will lead to: Breaches for the payment of pension contribution regulations Being reported for breaches as required by law Delay benefits beginning paid Can lead to delays in accounting for pension contributions.	2	10	20	Monitoring Contribution Payments.	Brent	2018	2019	Procedures in place to deal with pension contributions not being made or late.
10.41			2	10	20	Employer/Academy's/Maintained Schools Forums.	Brent	Annual	2019	Engaging with: Employers Academy's Maintained Schools With working parties and employer forums LPP to provide more support in this area.
10.42			2	10	20	Overdue contributions are actively chased from employers.	Brent	2018	2019	Contributions are monitored on a monthly basis and late or non payers reported. 2019 Revised PAS to include fines for non compliers.
10.5			2	10	20	Annual audit	Brent	2018	2019	Accounts for the year to 31 March 2017 signed off by auditors KPMG LPP.
10.51			1	10	10	Triennial valuations	Brent	Tri Annual	2019	Last triannual was 2016, next triannual valuation 2019.
10.52	Pension Plan Accounting.	Failure to comply with accounting regulations will lead to serious consequences: Possible fines Loss of reputation.	1	10	10	The Funding Strategy Statement.	Brent	Tri Annual	2019	The next triennial review is 2019 and will be reported to the Pensions Committee.
10.53			1	10	10	Fund's Funding Level Assessment.	Brent	Quarterly	2019	This is reviewed in line with the triennial valuation to ensure employers contributions and investment strategy is appropriate. The actuary Hymans Robertson provides regular reports on funding levels.