

Ref	Theme	Commentary	Status	Impact	Likelihood	Score	Direction	Mitigation Type	Update
R04	Comms	Website is not up to date with latest information for Pension Scheme Members	Open	Low	Unlikely	GREEN	<b>Stable</b>	Treating	<p><b>No Update</b></p> <p>Information about the Pension Board and access to meeting dates, agendas and minutes is published and kept up to date.</p> <p>Hampshire Pension Services maintain website with relevant information for members. This is in addition to the national Firefighters Pension Scheme pages.</p> <p>However, signposting between the Hampshire Pension Services site and the West Sussex County Council internal and external sites could be improved.</p>
R24	Comms	Failure to communicate with scheme members resulting in uncertainty and a lack of understanding amongst members regarding the scheme	Open	Medium	Unlikely	AMBER	<b>Stable</b>	Treating	<p><b>No Update</b></p> <p>The development of a Communications Plan has been delayed due to other work priorities. However, it is recognised that shorter term pressures continue to keep members updated on Remedy (McCloud and Matthews). This is heightened given national uncertainty over guidance and required practice. This is being closely considered by pension fund officers and the Scheme Manager.</p>
R11	Cyber	There is a risk of a successful cyber-attack directly from external threats; or indirectly as a consequence of members or staff falling prey to social engineering or phishing attacks. The potential outcome may lead to service disruption, financial or data loss	Open	High	Likely	RED	Stable	Treating	<p><b>No Update</b></p> <p>This is likely to remain a high risk on the risk register, reflecting the general cyber threat. The Pensions Regulator have highlighted the importance of robust cyber security and business continuity plans.</p> <p>Staff awareness of personal and business information security practices and identification of cyber-security issues including evolving threats helps to manage the likelihood and impact of any potential cyber issue. All WSCC staff have recently completed annual refresher training which includes a module on cyber security.</p>
R16	Data	<p>Inaccurate and/or incomplete data retained by the Scheme.</p> <p>Legislation specifies the records that must be kept and failure to comply is a breach of the law and could result in inaccurate or incomplete information being provided to members or the Scheme Manager, payment of incorrect pension amounts and / or complaints.</p>	Open	High	Unlikely	AMBER	Stable	Treating	<p><b>No Update</b></p> <p>Partnership work with administration team to document any issues identified with data held on the system or provided by the employer and agree any data improvement activities. There are currently no data improvement projects scoped.</p> <p>The West Sussex Fire annual return was completed to the deadline set by Hampshire Pension Services and queries resolved <b>and Annual Benefit Statements published.</b></p> <p>The Scheme participates in National Fraud Initiative reporting, monthly mortality screening for pensions in payment and sends Declaration of Entitlement forms annually to pensioners and beneficiaries living overseas.</p> <p>Internal and external audit frameworks consider software, systems and processes. Work is planned relating to the administration software system and pensions payroll and benefit calculations later in the year.</p>

Ref	Theme	Commentary	Status	Impact	Likelihood	Score	Direction	Mitigation Type	Update
									The introduction of Pensions Dashboards may require some additional work to ensure all membership data complies with relevant guidance.
R22	Financial	Pension Fund accounting mistakes including failure to apply scheme / tax rule correctly	Open	High	Unlikely	AMBER	<b>Increasing</b>	Treating	<p><b>No Update</b></p> <p>Timely reporting provided by administration team and uploaded onto appropriate accounting systems. The team continue to provide reporting in line with statutory deadlines.</p> <p>Processes are in place to ensure payment of tax as appropriate.</p> <p>Additional accounting for tax processes will need to be adopted as part of the McCloud and Matthews remedy. These are being shared with the appropriate teams as received. However, it is acknowledged that this is an evolving requirement.</p>
R01	Governance	The Pension Board of the West Sussex Fire and Rescue Authority fails to meet 4 times per year with a quorate	Open	Low	Unlikely	GREEN	Stable	Tolerating	<p><b>No Update</b></p> <p>Under the Constitution the Chair may appoint a Deputy Chair who will lead meetings in the absence of the Chair.</p> <p>There is a minimum requirement of no less than four employer and member representatives for a meeting to be quorate.</p> <p>It would be necessary for any 'substitutes' to meet the knowledge and skills required for members of the Board.</p> <p>Although the Firefighters Scheme Advisory Board have indicated that good practice would be to meet quarterly, the Constitution sets out that the Board shall as a minimum meet twice per year. The Chair of the Board with the consent of the Board membership may call additional meetings to cover any additional or urgent business.</p> <p>The Constitution also sets out all delegations with the Chief Fire Officer in relation to pension matters including those relating to exercise of all discretions and matters relating to individual officers.</p>
R03	Governance	Insufficient administration support for the Pension Board	Open	Medium	Unlikely	<b>GREEN</b>	<b>Stable</b>	Treating	<p><b>No Update</b></p> <p>Chief Fire Officer's Executive Personal Assistant is providing support, allowing time to review exact needs of the LPB.</p> <p>Implementation of Modern Gov system has assisted with administration associated with supporting the Board and compliance.</p>

Ref	Theme	Commentary	Status	Impact	Likelihood	Score	Direction	Mitigation Type	Update
R02	Knowledge & Understanding	Level of Knowledge and Understanding and ongoing development of Pension Board does not comply with guidance.	Open	Medium	Unlikely	AMBER	<b>Stable</b>	Treating	<p><b>Updated</b></p> <p>The Board has established and maintains a training framework to address the knowledge and understanding requirements that apply to Board members which includes how knowledge and understanding is acquired, reviewed and updated.</p> <p>Training is arranged for Board members to meet and maintain the requirements set out in the Board's knowledge and understanding policy and framework.</p> <p><b><i>There has recently been a change of Chair for the Board and support is being provided for the new arrangement.</i></b></p> <p>Recent training opportunities have been shared with the Board and all Board members are encouraged to complete the Pension Regulators modules. These are set out in Appendix B.</p> <p>However, there are several ongoing developments relating to the implementation of the Matthews and McCloud Remedies for the board to keep updated on to support the Scheme Manager.</p>
R09	Knowledge & Understanding	The loss of a key member of the Board or support members of the Board	Open	Medium	Unlikely	AMBER	<b>Stable</b>	Treating	<p><b>Updated</b></p> <p><b><i>There has been a change to the Chair of the Board.</i></b></p>
R07	Matthews	The O'Brien/Matthews judgement may require a reworking of the pension entitlements for all 2006 Special Scheme (RDS) members - work load for Administrator	Open	High	Likely	RED	Stable	Tolerating	<p><b>Updated</b></p> <p>The work required was always considered to be substantial and whilst a resourced project plan was developed which draws on teams across the County Council the timescales for delivery have been extended. This reflects the complexity of the work and is in line with experiences at other Fire Authorities.</p> <p><b><i>The activities continue to be reviewed to ensure that the most effective and efficient approach is taken to providing options to members.</i></b></p>
R08	Matthews	The O'Brien/Matthews judgement may require a reworking of the pension entitlements for all 2006 Special Scheme (RDS) members - risk to budget	Open	Low	Likely	Amber	Stable	Tolerating	<p><b>Updated</b></p> <p>Discussions <b><i>are ongoing</i></b> with the finance team to ensure that future income and costs relating to the Matthew remedy can be identified.</p> <p>The LGA have highlighted that due to the implementation of the Matthews remedy, some FRAs have concerns regarding cashflow. This is because some individuals who are eligible for the remedy will become entitled to their pension, and back dated arrears, immediately – and this may not have been budgeted for. It is recognised that the cashflow impact is likely to be managed through the wider WSCC treasury management arrangements.</p> <p>See comments relating to R17.</p>
R13	McCloud	Unable to implement changes required as a result of McCloud judgement	Open	High	Unlikely	AMBER	Increasing	Treating	<p><b>Updated</b></p>

Ref	Theme	Commentary	Status	Impact	Likelihood	Score	Direction	Mitigation Type	Update
									A resourced project plan has been prepared and is being monitored.  <b>However, giving the evolving landscape there is pressure placed pressure on the team to deliver to milestones.</b>
R14	McCloud	WSCC does not hold required information to be able to complete the changes required as a result of the McCloud Judgement	Open	High	Unlikely	AMBER	Stable	Treating	<b>Updated</b>  <b>Information is being shared between FRA and administrators as required to support the Remedy.</b>
R15	McCloud	Insufficient resources for the Council to be able to complete the changes required as a result of the McCloud Judgement	Open	High	Unlikely	AMBER	Stable	Treating	<b>Updated</b>  Staff recruited by administration partner specifically for McCloud tasks or to backfill positions so more experienced staff can be released for project.  <b>However it is acknowledged that the Remedy work is stretching resource and adjusting priorities.</b>
R25	McCloud	<del>Impact on members as a result of McCloud changes not being implemented until October 2023.</del>	Open	High	Likely	Amber	Stable	Tolerating	<b>Closed</b>  <del>The work on remedy is now being implemented by the team. Consideration to be given to closing this risk.</del>
R18	Resource	County Council not resourced appropriately to support Pensions functions resulting in key work deliverables not being completed and failure to comply with Regulations.	Open	Medium	Unlikely	AMBER	Increasing	Treating	<b>No Update</b>  Review of activities and work deliverables discussed with the Scheme Manager. It is recognised that the project work relating to Matthews and McCloud has short term pressures on the pensions team.  Administration provided via Hampshire Pension Services partnership providing consistency.
R23	Resource	Failure to deduct correct employee contributions or provide information to administration team in a timely way	Open	High	Unlikely	AMBER	Stable	Treating	<b>No Update</b>  Controls in place within payroll team.  Aim to complete all Home Office and other returns on time
R17	Scheme Regs	Role of government policy on the management and benefits of the Scheme resulting in changes in legislation, member benefits and financial cost.	Open	High	Likely	RED	Stable	Tolerating	<b>No Update</b>  Keep informed of developing issues  Participate in Regional Fire Pension Officer Group and LGA updates which receive information from Fire Technical Group and Fire Communication Working Group.  All Fire Bulletins considered by the team.  The Government Actuary Department (GAD) have published their 2020 valuation report. This shows a 8.5% increase in employer contributions from 30.2% to 38.7% This includes assumptions about the McCloud and Matthews Remedy.
R19	Scheme Regs	Policies are not complied with or updated in adherence to new guidance issued resulting in non-compliance.	Open	High	Unlikely	AMBER	Reducing	Tolerating	<b>No Update</b>  Maintenance of register of policy document and review to be developed by the team. Ensure relevant officers and Partners are clear on application of policies.

Ref	Theme	Commentary	Status	Impact	Likelihood	Score	Direction	Mitigation Type	Update
R20	Scheme Regs	Cost Cap mechanism resulting in changes to employer / employee contribution rates and additional administration and communication pressures.	Open	Medium	Likely	AMBER	Stable	Tolerating	<p><b>No Update</b></p> <p>The Court of Appeal has granted permission to appeal against the recent High Court judgment over the Government's proposed method of paying for costs incurred by the McCloud ruling. The court previously dismissed the case, which was brought by the Fire Brigades Union (FBU) and two named claimants. The FBU claimed that the Government was attempting to "shift" the estimated £17bn that it is going to cost in order to reverse the changes onto members of the newer scheme. Although the judicial review was dismissed, the PCS has confirmed that the Court of Appeal has granted permission to appeal the High Court ruling on the claim that pension contributions must be reduced following the valuation that showed that pension costs were higher than necessary.</p>
R21	Scheme Regs	Non compliance with TPR resulting in censure by the Pensions Regulator (TPR) for noncompliance with the requirements of the Public Service Pensions Act 2013 and other primary legislation.	Open	High	Unlikely	AMBER	Increasing	Treating	<p><b>Updated</b></p> <p>The Pensions Regulator's (TPR's) General Code of Practice was laid in Parliament on 10 January 2024, and came into effect in late March.</p> <p>TPR has categorised the new General Code into five areas:</p> <ol style="list-style-type: none"> <li>1. The Governing Body</li> <li>2. Funding and investment</li> <li>3. Communications and disclosure</li> <li>4. Administration</li> <li>5. Reporting to TPR</li> </ol> <p>Within each of these five areas are 51 specific modules that apply to the running of a pension scheme – though not all apply to the Firefighters Pension Scheme. The Code is being considered by the pensions team.</p> <p><b>Compliance is being considered by the pensions team.</b></p>
R06	Service Delivery	FRS Pension sector is small and there are few suppliers or experts in the market place (Scheme Administrators, Payroll, Legal Advisors)	Open	Medium	Unlikely	AMBER	Stable	Tolerating	<p><b>Updated</b></p> <p>The Pensions Team continue to build relationship with current suppliers and work on succession planning.</p> <p><b>An adviser has recently been appointed to support the team on an as required basis.</b></p>
R12	Service Delivery	Partnership expectations not met in delivery of administration	Open	Medium	Very Unlikely	GREEN	Stable	Tolerating	<p><b>No Update</b></p> <p>The transition to Hampshire Pension Services completed five years ago. Engagement with administration team to understand business priorities and development of service. An Annual Meeting has been arranged between the Hampshire Pensions Team and West Sussex Pensions Team.</p>

