

### Fire Risk Scoring Matrix

<b>Probability/ Likelihood</b>	<b>VH = 5</b>	5	10	15	20	25
	<b>H = 4</b>	4	8	12	16	20
	<b>M = 3</b>	3	6	9	12	15
	<b>L = 2</b>	2	4	6	8	10
	<b>VL = 1</b>	1	2	3	4	5
		<b>VL = 1</b>	<b>L = 2</b>	<b>M = 3</b>	<b>H = 4</b>	<b>VH = 5</b>
	<b>Impact</b>					

### Risk Priority

15-25	High	Significant Action Plan required
9 – 14	Medium	Action Plan required
1 – 8	Low	Risk can be tolerated

## Joint Risk Scoring Guidance

IMPACT							
Impact Score	Service	Performance	Finance	Reputation	Legal	Safety	Human Rights/ Diversity
<b>5 = Major</b>	Major impact/disruption to critical services. Inability to deliver a number of organisational objectives.	Significant performance impact. Not achieving more than one of the organisation's performance targets	<b>Fire</b> – over £1m	Sustained national media coverage. External Enquiry. Removal of command team member.	Prosecution. Major claims/fines against both organisations	Multiple fatalities or multiple permanent injuries	Unjustified impact or interference.
<b>4 = Serious</b>	Serious impact/disruption on critical services with a noticeable impact on local communities.	Large impact on performance resulting in not achieving one of the organisation's performance targets	<b>Fire</b> - over £500k	Sustained adverse media coverage	Serious claims/fines against both organisations	Single fatality or severe injuries	Serious unjustified impacts or interference.
<b>3 = Moderate</b>	Noticeable impact on non-critical services or short term disruption.	Impact on performance resulting in difficulty achieving performance targets but where corrective action can still be taken	<b>Fire</b> – over £250,000	Some local adverse publicity	Significant litigation/claims. Within insurance cover.	Major injury	Some limited unjustified impact or interference.
<b>2 = Low</b>	Minor disruption to Service Delivery	Small impact on performance targets but can still be managed.	<b>Fire</b> – over £100K	Short term customer dissatisfaction	Minor claims/complaints within insurance cover	Minor or slight injury	Impact of interference manageable with existing resources
<b>1 = Negligible</b>	No noticeable disruption to service. Impact is easily manageable	Minimal/short term impact on performance, not to the extent where key targets are impacted.	<b>Fire</b> – below £5K	Manageable customer dissatisfaction	Unlikely to lead to litigation or a claim.	Unlikely to have any safety impact.	No impact on diversity/human rights

<b>Probability Score</b>	<b>Detailed Description</b>	<b>% Chance</b>	<b>Relative</b>	<b>Frequency</b>
<b>5 = Very Likely</b>	Has regularly occurred with the organisation or there are strong indications that the risk will happen in the future.	80% or more	Certain that it will happen	yearly
<b>4 = Likely</b>	Has previously occurred or there is a strong probability that it will happen in next 12 months within the organisation.	50% - 80%	Highly likely to occur	Every 1 to 2 years
<b>3 = Moderate</b>	Some indication that the risk will happen in the short to medium term.	20% - 50%	More likely not to happen than happen	Every 2 – 5 years
<b>2 = Unlikely</b>	Limited indication at this stage that the risk will happen.	5% - 20%	Unlikely to happen but possible	Every 5 to 20 years
<b>1 = Remote</b>	No indication that the risk will happen. Expected to be a rare occurrence	0% - 5%	Extremely unlikely	Every 20 years or more

## Firefighter Pension Scheme Risk Register

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
Operational disaster (i.e. flood/fire)	1	3	3	↔	All records are stored electronically. Data is backed up regularly and server providers also have business continuity procedures in place.  Business continuity and data security forms part of contract.	Pension Provider	Annual review	
				↔	The majority of pension documents are electronic and all personnel files have been scanned.  Data is regularly backed up, can be accessed from anywhere on the network and server providers also have business continuity procedures in place.  Business Continuity plan to be reviewed on a bi-annual basis.	Head of People & Development and HR Business Support Supervisor	Ongoing	
				↔	Contracts with pension provider are stored electronically and hard copy stored in Legal Dept.	Scheme Manager / Pensions Manager	In line with contract dates	<b>August update</b> Currently awaiting contract extension quote
Member data incomplete or inaccurate	2	3	6	↔	Members have direct access to their own data and information via online portal.  Annual reconciliation of member data to ensure accuracy and identify and resolve any gaps in conjunction with pension provider	Pension Provider	Annual	

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
				↔	Annual data check of common data and any addresses found to be incorrect are investigated using a tracing agency where required	Pension Provider / Pensions Manager	Annual	
				↔	Robust payroll processes in place to ensure accuracy of data sent to pension provider	Pensions Manager / Payroll and Pensions Supervisor	Review Annually	
Administration Failure / Maladministration	2	3	6	↔	Formal agreement in place with pension provider including SLAs.  Provider presents report to the Pension Board at each meeting.	Scheme Manager/ Pensions Manager / Pension Provider	Quarterly	
				↔	Authority Levels and signatory lists clearly documented and up to date	Pensions Manager / Pension Provider	When there is a change in staff or policy	<b>August Update</b> Authorised signatory list reviewed and updated in July. Previous Scheme Manager removed.
				↔	Review Pension Providers audit reports	Scheme Manager/ Pensions Manager	Annually	
				↔	Close management of administration contract through quarterly contract and performance review meetings	Pensions Manager	Quarterly	
				↔	Robust internal controls in place for both the pension provider and CFRS including:	Pensions Officer / Pension Provider /	Ongoing	

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
					<ul style="list-style-type: none"> <li>- Pre-checks to take place by Pension Provider and the Pensions Co-ordinator/Pensions Manager prior to final authorisation by approver (for all calculations)</li> <li>- Provider to have documented controls for all calculations and payments</li> <li>- CFRS to check agreement with all calculations for pension and lump sums and approve payment.</li> <li>- CFRS checks to ensure split pensions are identified and notified to the pension provider at the point of retirement</li> </ul>	Pensions Manager		
				↔	Provider has a training programme in place for their staff, including Fire specific pension scheme rules	Pension Provider	Ongoing	
				↔	Transparent and open monitoring process to ensure lessons are learned from any errors made. Monitored through quarterly performance reviews.	Scheme Manager / Pension Provider	Ongoing	
				↔	Ensure resilience in Pension Provider teams to mitigate the impact of loss of key staff/knowledge of Fire Pension Schemes	Pension Provider	Ongoing	
Data Forecasts and Calculations	3	3	9	↔	Robust business process in place to ensure the Administrator are provided with accurate pensionable pay and service information to enable accurate forecasts to be produced for members	Pensions Manager/ Pensions Officer	Annually	

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
				↔	Administrator to make available suitable forms and guidance to enable clear instructions to be provided by employer	Pension Provider	Ongoing	
<b>McCloud/Sargeant</b> Lack of resources to complete any remedy actions	4	5	20	↔	<ul style="list-style-type: none"> <li>- Ensure additional budget is available for the additional internal resources that will be needed to complete any remedy actions including additional budget which may be required to pay for tasks which may need to be completed by payroll/pension providers on top of the current contract SLAs.</li> </ul>	Scheme Manager / Head of Finance / Treasurer	Ongoing	<b>August Update</b> Costs for phase 3 and 4 remedy software updates and pension provider work were unknown. Quote has now been received and costs are significant.
<b>Cyber Security</b>	1	4	4	↔	<ul style="list-style-type: none"> <li>- Both Cheshire Fire and Rescue Service and the pension provider have access to specialist skills and knowledge to assess and manage the risk of cyber security incidents</li> <li>- All systems are subject to regular back ups to ensure critical data is not lost</li> <li>- Robust IT policies on password, access and acceptable use along with limited access to certain websites to reduce the risk of malware attacks</li> <li>- Documented business continuity plans where security is breached.</li> <li>- Both CFRS and the pension administrator have: <ul style="list-style-type: none"> <li>- robust system controls in place such as firewalls, anti-virus and anti-malware as well as a</li> </ul> </li> </ul>	Head of IT/ Pension Provider	Annually	

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
					<ul style="list-style-type: none"> <li>regular schedule of software updates.</li> <li>- Access to systems and data is limited to authorised personnel only</li> </ul>			
<b>Loss of experienced/ knowledgeable staff</b>	2	4	8	↔	<ul style="list-style-type: none"> <li>- Ensure role holder has the appropriate skills, experience and qualifications</li> <li>- Ensure full induction and training is given to new starter to ensure they receive the necessary grounding in Firefighter Pensions</li> <li>- Provide access to LGA training and LGA conferences to build knowledge</li> <li>- Ensure ongoing support plan is in place to assist new starters to complete pension board and FPS bulletin actions</li> <li>- Provide necessary training and introduction to pension provider to enable role holder to manage contract</li> <li>- Ensure succession plan in place</li> </ul>	Head of People & OD	Ongoing	
<b>Failure to migrate data from unsupported legacy HR system to supported IT platform</b>  Historic HR data needed for pension	1	3	3	↓	<ul style="list-style-type: none"> <li>- Project initiated to migrate data from legacy HR system to a new solution which will ensure continued access to data which is commonly needed for historic pension queries and remedy actions for court/ET cases such as McCloud and Matthews.</li> </ul>	Head of People & Development / Pensions Manager	Ongoing	<a href="#">August Update</a> Data migration has now been completed. Data is now held in a CFRS SQL database and IT are currently writing a suite of reports/queries to enable the team to access the data in a



Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
purposes currently held on unsupported software, no longer accessible on current versions of Windows. In the event of a system failure data may be lost.					<ul style="list-style-type: none"> <li>- Project will ensure that all data is migrated and that any data history such as job and salary changes, can be stored in an easily accessible format.</li> <li>- Data is available in spreadsheet format</li> </ul>			suitable format. Risk has been downgraded. Once work to develop reports has been completed, this risk will be closed.
<b>Matthews remedy</b> Lack of resources/data to complete remedy action	4	5	20	↔	<ul style="list-style-type: none"> <li>- Additional funding has been secured for a temporary pension resource. Once more is known about the timescales for the McCloud and Matthews remedy, a plan will be put in place to recruit to this position</li> <li>- Ensure data on job, salary and absences is available from legacy HR system to allow calculations to be completed</li> </ul>	Head of People & OD / Pensions Manager	Ongoing	<b>August Update</b> Awaiting further updates on volume of data inputs that will be required for this exercise. Consultation response due in late summer
<b>McCloud –</b> Remedying legislation finalised close to October 2023	2	3	6	↓	<ul style="list-style-type: none"> <li>- Monitor XPS/Heywoods via the Pension Board on progress of software updates</li> <li>- Resources in place at XPS to ensure volume of cases can be progressed manually if software is not ready for October 2023</li> <li>- Complete pre-work where possible to speed up remedy if manual calculations are required</li> </ul>			<b>August Update</b> This risk has been downgraded. Final regulations have now been laid and Heywoods have a plan in place for phase 3 implementation by October.

Risk Area - OPERATIONS	Likelihood	Impact	Score	Direction	Control	Owner	Test / Review	Comments/Updates
<p><b>Lack of resource in LGA team</b></p> <ul style="list-style-type: none"> <li>- Current Senior pension advisor leaves in April and other main resource is on maternity leave</li> <li>- Recruitment may be difficult due to a lack of people in the market for pension roles.</li> <li>- If any new advisor does not have specific fire pensions knowledge, this may impact the level and quality of support available to FRAs.</li> <li>- This will be the busiest period for the McCloud and Matthews remedies, therefore LGA support will be in high demand</li> </ul>	3	5	15	↓	<ul style="list-style-type: none"> <li>- LGA responsible for recruiting resource to backfill these roles</li> <li>- Number of sub-committees already in place to carry on work relating to technical aspects of the scheme, communications and governance.</li> <li>- Advisor now in place specifically covering governance</li> <li>- Additional role for a communications officer is also being recruited to</li> <li>- Job role requires the successful candidate to have extensive knowledge of the Firefighters' Pension Scheme and McCloud/Matthews remedies.</li> </ul>	LGA	April/May 2023	<p><b><u>August Update - Amended</u></b></p> <p>The current pensions advisor on maternity leave was successful in obtaining the senior pensions advisor role. However team are still depleted. To date this has not affected the service we have received, however the coming months will be extremely busy as they prepare guidance for Services and members and assess the final position of the remedy legislation. They will also be preparing similar guidance for the Matthews remedy at the same time.</p>

Risk Area – <b>FINANCIAL</b>	Likelihood	Impact	Score		Control	Owner	Test / Review	Comments/Updates
Excessive charges by provider	5	5	25	↑	<p>Contracts are governed by OJEU rules and are often limited to 2 years with the option to extend, meaning providers are regularly reviewed.</p> <p>Contract prices and any adhoc scenarios where additional charges may be incurred are laid out in the contract / framework terms.</p> <p>Where additional charges are required for project work, the provider will supply a full breakdown of the charges.</p>	Scheme Manager / Head of People & Development	Term of the Contract	<a href="#">August 2023 Update</a> Information about Phase 3 and 4 implementation costs for McCloud have now been received and they are significant.
Fraud / Fraudulent behaviour	1	4	4	↔	<p>Only pension forms from authorised signatories will be accepted by the pension provider</p> <p>Pension Provider staff have documented processes and both internal and external audit procedures.</p>	Authorised Signatories/ Provider	Ongoing	
Costs incurred due to failure to apply scheme/tax rules correctly or in a timely manner	2	3	6	↔	<ul style="list-style-type: none"> <li>- Pension provider have a technical team with specialist knowledge of the regulations and tax rules</li> <li>- Pension provider produce employer bulletins outlining tax rules for employers</li> <li>- Employer subscribes to knowledge hub and receives LGA/Home Office bulletins and circulars</li> <li>- Regular updates from the Scheme Advisory Board</li> <li>- Employer subscribes to HMRC pension tax updates</li> </ul>	Scheme Manager / Pension Provider	Ongoing	<a href="#">August 2023 Update</a>  Due to late submission of AFT return by XPS, penalties have been received for the 2021/22 tax year. XPS are currently investigating this with a view to reimbursing these penalties as per the terms of the current contract.

Risk Area – FINANCIAL	Likelihood	Impact	Score		Control	Owner	Test / Review	Comments/Updates
					<ul style="list-style-type: none"> <li>- Access to professional tax advice when necessary</li> <li>- Pension provider submit event reports and AFT reports and manage payover of tax to HMRC</li> </ul>			
<b>McCloud Remedy</b> Possible back claims from members negatively impacted by this case	5	5	25	↔	<ul style="list-style-type: none"> <li>- Finance team to ensure reserves are in place for potential compensation payments and additional administration costs</li> <li>- Pension team to closely monitor costs using LGA provided templates</li> </ul>	Scheme Manager / Pensions Manager / Head of Finance	Ongoing	

Risk Area – FUNDING	Likelihood	Impact	Score		Control	Owner	Test / Review	Comments/Updates
Failure to deduct correct contributions from pay	2	2	4	↔	<ul style="list-style-type: none"> <li>- Monthly reconciliation of pay changes to ensure any pension related changes are applied correctly</li> <li>- Clear policy on application of pensionable pay rules</li> <li>- Bi-annual contribution band checks are completed in April when bandings change and July when pay award is applied</li> <li>- Automate payroll processes where possible. Where not possible, robust process should be in place for any manual workarounds</li> </ul>	Pensions Manager	Monthly  Bi-Annually	

<b>Risk Area – FUNDING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Score</b>		<b>Control</b>	<b>Owner</b>	<b>Test / Review</b>	<b>Comments/Updates</b>
Failure of employer to pay contributions to the scheme	1	3	3	↔	<ul style="list-style-type: none"> <li>- Pension deductions are accounted for by the FRA and therefore contributions are deducted directly from employee pay and accounted for in the pension account.</li> <li>- Finance team conduct monthly reconciliation</li> </ul>	Finance / Treasurer	Monthly	
Failure to manage FPS fund correctly i.e. injury pension accounting	1	3	3	↔	<ul style="list-style-type: none"> <li>- Follow guidance provided by Fire Finance network and Home Office circulars</li> <li>- Training and guidance available for finance team on tax and accounting matters through LGA, CIPFA and PSTAX.</li> <li>- Attend Fire Finance Network meetings for guidance from colleagues in other Services.</li> <li>- Process in place to ensure fund is compensated in cases where abatement is not applied to the member</li> </ul>	Finance / Treasurer	Ongoing	
<b>McCloud Additional pension account outgoings</b> Ruling leading to increased costs to the pension account	5	5	25	↔	<ul style="list-style-type: none"> <li>- Ensure the outcome of this ruling is factored in to any pension account budgeting/accounting and contingency planning is considered.</li> <li>- Calculate potential additional pension and lump sum payments as a result of immediate detriment and remedy to allow accurate valuation for top up grant</li> </ul>	Finance / Treasurer  Pensions Manager	Ongoing	

<b>Risk Area – REGULATORY &amp; COMPLIANCE</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Score</b>		<b>Control</b>	<b>Owner</b>	<b>Test / Review</b>	<b>Comments/Updates</b>
Failure to interpret rules or legislation correctly	2	4	8	↔	<ul style="list-style-type: none"> <li>- Utilise central LGA resource and regional / national groups to assist with interpretation of rules and possible provision of legal opinion</li> <li>- Subscribe to the LGA Knowledge hub to get regular updates and liaise with other FRAs</li> <li>- Access professional tax/legal advice where required</li> <li>- Utilise LGA/Home office bulletins and circulars</li> <li>- Utilise knowledge and expertise of the Pension Provider technical team</li> <li>- Annual training for pension board and members of the pension team</li> <li>- Attendance at FPS AGM</li> <li>- Clear documented process for decision making outlining process to be followed and the responsible parties</li> </ul>	Scheme Manager/ HR Business Support Supervisor/ Pension Board Members/ Pensions Manager	Review as case law arises or as new legislation comes into Force	
Failure to comply with disclosure requirements or communicate with staff	3	4	12	↔	<ul style="list-style-type: none"> <li>- Annual Benefit Statements (ABS) provided to all active scheme members in August each year</li> <li>- Annual Benefit Statements provided to all deferred members on an annual basis</li> <li>- Annual check to ensure all members have received an ABS</li> </ul>	Provider  Provider  Pensions Manager	Annual  Annual  Annual  Annual	

Risk Area – REGULATORY & COMPLIANCE	Likelihood	Impact	Score	Control	Owner	Test / Review	Comments/Updates
				<ul style="list-style-type: none"> <li>- Spot check an ABS for each pension scheme to ensure accuracy of figures</li> <li>- Business processes in place to ensure the relevant legal statements are issued to any staff who are contractually or auto-enrolled.</li> <li>- Business process in place to communicate with members whose contribution banding changes.</li> <li>- Dedicated Intranet page for pension related matters which includes forms, details about the scheme rules, employee guides and information about pension tax.</li> <li>- Any news relating to changes to pension or pension tax is communicated in the Green Bulletin or where the change impacts all staff (i.e. end of contracting out), letters will be sent to all staff</li> </ul>	<p>Pension Provider</p> <p>Pensions Manager</p> <p>Pensions Manager</p> <p>Pensions Manager</p> <p>Pensions Manager</p>	<p>Ongoing</p> <p>Annual</p> <p>Ongoing</p> <p>Ongoing</p>	

<b>Risk Area - McCloud Immediate Detriment</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Score</b>	<b>Risk Impact</b>	<b>Control</b>	<b>Owner</b>	<b>Risk Progress</b>
<p><b>Failure to remove discrimination in the workplace</b></p> <p>The McCloud ruling confirmed that transitional protections associated with the 2015 scheme constitute age discrimination.</p> <p>Home Office advised Services in November 2021 not to offer remedy under ID until all remedying legislation is in place, (expected October 2023) due to possible financial risks for both the Service and member.</p>	4	4	16	<p>Litigation and the potentially significant costs to defend legal claims and pay compensation and plaintiff's legal costs if unsuccessful</p> <p>Financial claims for loss and injury to feelings compensation</p> <p>Employee dis-engagement / Employee relations/welfare issues</p> <p>IDRP complaints</p> <p>Industrial relations issues</p> <p>Reputational damage</p>	<p>Assess potential costs to the pension and operating accounts for immediate detriment</p> <p>Dedicated contact in Legal Services for pension related queries and central support from Bevan Brittan</p> <p>Engagement in fortnightly national pension updates with the LGA</p> <p>Regular dialogue and communication with staff and rep bodies.</p> <p>Dedicated hub on the intranet for all updates.</p> <p>IDRP process available to staff</p>	Scheme Manager / Pensions Manager	<p><a href="#">Risk 2059 – Corporate Risk Register</a></p> <p>Immediate detriment remains paused. Negotiations ongoing between unions and LGA on how the MoU and Framework can be adapted to mitigate the risks raised by HM Treasury and Home Office.</p>
<p><b>Lack of certainty about the financial impact of ID and funding arrangements for recovery of costs</b></p>	5	5	25	<p>Shortfall in funding to pay out increased Firefighters' pension scheme liabilities</p> <p>Shortfall in funding to pay out</p>	<p>Ongoing work to calculate costs for immediate detriment to assist with short-term financial planning</p> <p>Home Office providing grant for FRSs to use towards administration costs. This is</p>	Scheme Manager / Pensions Manager	<p><a href="#">Risk 1006 – Strategic Risk Register</a></p>



Risk Area - McCloud Immediate Detriment	Likelihood	Impact	Score	Risk Impact	Control	Owner	Risk Progress
<p>Until remedying legislation is in place, the full scope of potential liabilities cannot yet be quantified.</p> <p>Until hearings are held later in 2022, the cost of injury to feelings claims cannot be quantified</p> <p>Home Office and HM Treasury have not confirmed whether any costs will be recoverable</p>				<p>compensation/interest/administration costs</p> <p>Uncertainty for financial planning</p> <p>Money already earmarked may have to be redistributed. charges from the pension provider as a result.</p>	<p>currently being used to pay for additional XPS administration and software costs.</p> <p>Regular review and monitoring of costs using LGA provided templates.</p>		
<p><b>McCloud/Sergeant Remedy – Continue with the Immediate Detriment Framework prior to remedying legislation being in place in October 2023.</b></p> <p>The MoU and ID framework was introduced in October 2021. CFRS adopted it on a case- by-case basis, but paused in November 2021 following HO advice not to proceed with ID due to potential risks.</p>	4	4	16	<p>Additional cost to the Service for any compensation, interest and administration payments which will not be recoverable from central government.</p> <p>Member may lose entitlement to tax relief and receive a tax bill – which the Service may have to compensate them for</p> <p>Member’s tax position may have to be recalculated several times.</p>	<p>Ongoing work to assess potential immediate detriment costs to aid with short-term financial planning</p> <p>Legal Services involvement and legal advice through the LGA and Bevan Brittan</p> <p>Additional funding in place for a fixed term pension team resource to assist with workloads</p> <p>Home Office providing grant for FRSs to use towards administration costs.</p>	Scheme Manager / Pensions Manager	<p><a href="#">Risk 2061 – Corporate Risk Register</a></p> <p><a href="#">Immediate detriment remains paused. Negotiations ongoing between unions and LGA on how the MoU and Framework can be adapted to mitigate the risks raised by HM Treasury and Home Office.</a></p>

Risk Area - McCloud Immediate Detriment	Likelihood	Impact	Score	Risk Impact	Control	Owner	Risk Progress
<p>HO advised that funding won't be provided to Services who proceed with ID before legislation is in place. There is a lack of clarity on whether payments of pension / lump sum under the Framework can be paid from the pension account.</p>				<p>Additional work for internal resources and the pension provider for recalculations</p> <p>Pension and lump sum payments not able to be paid from pension account would have to be paid from operating accounts instead.</p>			