

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Pension Fund Committee

Date: 13/05/2024

Subject: Pension Administration Cyber Security

Report author: Eleanor Dennis, Head of Pensions

Responsible Director: Sukvinder Kalsi, Director of Finance

SUMMARY

This paper sets out the new cyber security policy for the London Borough of Hammersmith & Fulham setting out roles and responsibilities in the event of data breaches in particular by the Funds pension administration provider LPPA. The Pension Fund Committee is asked to consider the contents of this report and agree the recommendation.

RECOMMENDATIONS

1. To agree that this report Appendix 1 and 2 are not for publication on the basis that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information) as set out in paragraph 3 of Schedule 12A of the Local Government Act 1972 (as amended).
 2. To approve the policy and delegate finalising the policy to the Head of Pensions.
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Wards Affected: None

| Our Values | Summary of how this report aligns to the H&F Values |
|--|---|
| Being ruthlessly financially efficient | Ensuring good governance for the Pension Fund should ultimately lead to better financial performance in the long run for the Council and the council tax payer. |

Financial Impact

None

Digital Services Implications

The Digital services implications are detailed in the exempt appendix 1.

Legal Implications

This report recommends that the Committee approves a Cyber Security Policy. The policy has been drafted by retained external legal advisers, Eversheds Sutherland. The policy should be read alongside the Council's existing corporate Cyber Security Policy and standard LBHF cyber security provisions which are included in all contracts. The policy should be adapted to include both.

Once approved, the Council will instruct Eversheds to take the necessary steps to agree a variation to relevant existing contracts so as to ensure that suppliers such as LPPA are contractually bound to comply with the policy.

Angela Hogan, Chief Solicitor (Contracts and Procurement) 29th April 2025

Background Papers Used in Preparing This Report

None

DETAILED ANALYSIS

Proposals and Analysis of Options

- 1 The Fund's Pension Regulator's general code gap analysis exercise and the recent occurrence of a data breach in October 2024, identified that a Fund cyber security policy was required.

- 2 This cyber security draft policy in exempt Appendix 2 has been compiled to incorporate good practice, risk management and to ensure that incidences involving member data are dealt with promptly and in accordance with LBHF policies and the law, with clear roles and responsibilities for the Fund and its administrator.

- 3 Once finalised the policy will be used in the event of all data breaches and cyber security incidences.

Reasons for Decision

Non Applicable

LIST OF APPENDICES

Exempt Appendix 1 – Hammersmith & Fulham Pension Fund Cyber Security Policy

Exempt Appendix 2 – Draft Hammersmith & Fulham Pension Fund Cyber Security Policy