





Schemes at risk

Pension schemes in the UK hold millions of member records and have billions of pounds in assets. Both move around regularly. This makes them a prime target for cyber-attacks.

Pension schemes, sponsors and regulators have now woken up to this threat, and most schemes are considering how they deal with cyber risk alongside the range of other risks that they face.

The challenge for trustees is that this is a new area for them, the risks are constantly evolving and the actions are not immediately obvious.

Where to start

With so many moving parts in a pension scheme, depending on who trustees speak to, different actions may be recommended. It is hard to know where to start:

- Penetration testing of adviser systems
- Questionnaires to understand adviser controls
- Security of trustees working on personal devices, or using personal emails
- Insurance protections
- Incident response planning

In practice, the place to start depends on the circumstances of the scheme and sponsor, as well as factors such as previous experience and actions already taken in this area.

The danger of leaping straight into actions is that there may be bigger priorities that have not been considered, or quick wins that can have an immediate impact.



Planning a workshop

Aon's recommended approach to cyber risk is that trustees initially run a cyber resilience workshop, to identify the scheme's key threats and practical actions. These workshops are particularly valuable when opened up to include the sponsor, the IT department and trustees' advisers.

The purpose of the workshop will be to contribute towards the following actions:

Determine scheme critical information and assets (ie hardware, software, data and scheme assets); who has access to these, and how information is relayed between

· Identify the context

- who has access to these, and h information is relayed between different providers to create a network mapping (this may overlap with GDPR work).
- Define the threat profile Identify threats facing the scheme, liaising with service providers and the sponsor to understand their cyber security processes and identifying any potential weaknesses.
- Evaluate performance of current controls to manage cyber threats, prioritise risks and improvement opportunities, including

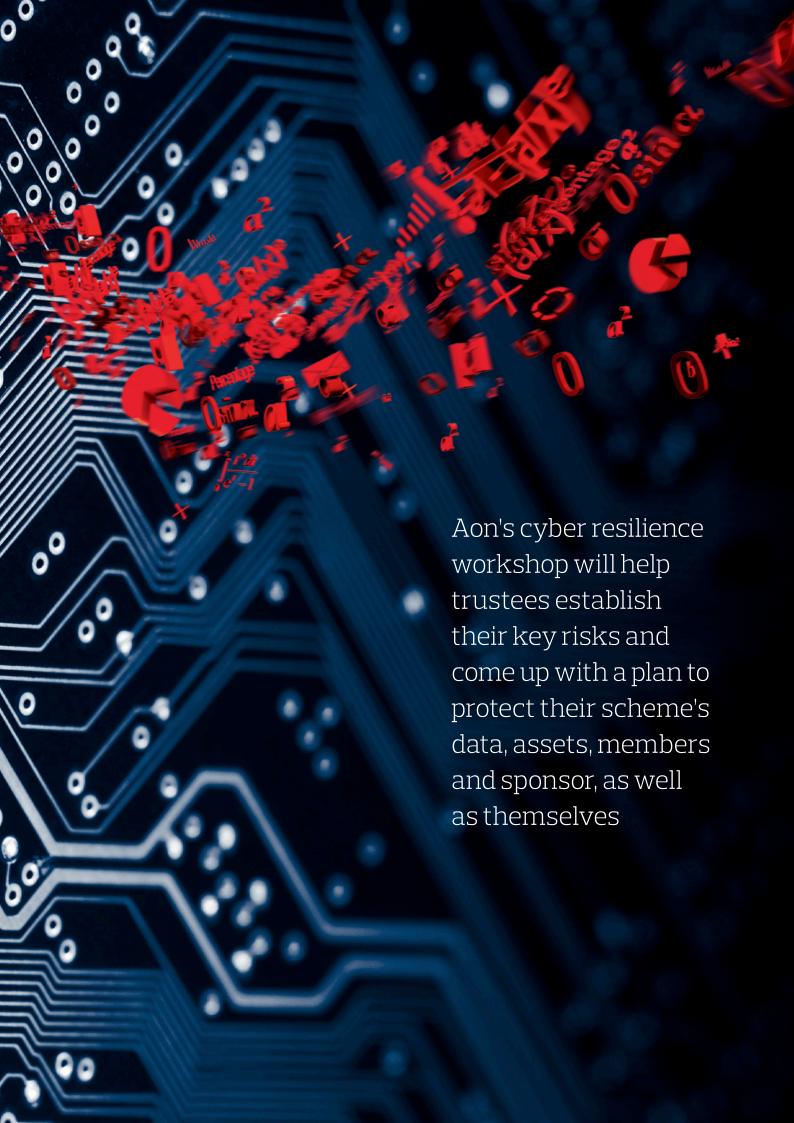
• Evaluate cyber resilience

- prioritise risks and improvement opportunities, including understanding current level of insurance and opportunities to transfer any residual risks.
- Define incident response plan Support the development of an appropriate incident response protocol and framework.

The outputs from the exercise will identify opportunities for enhancing the risk management framework and recommend areas for further analysis and risk improvement.

More details on the workshop are shown on the next page





Workshop structure

Although the pension scheme is the responsibility of the trustee board, the stakeholders and those involved in the scheme are extensive, including the trustees, the members, the employer and a range of advisers. Rather than approach all of these stakeholders individually, an effective way to initiate a cyber risk project is to run a workshop with as many of the relevant people as possible, to understand the existing situation and where the key risks are likely to be. This can be done with one of our cyber specialists and an Aon retirement adviser who specialises in cyber for pension schemes, with the aim being to help establish clear objectives for the project.

The format of a typical workshop is as follows:

Pre-workshop

Prior to the workshop, we will obtain high level details of the scheme and how it operates in order to tailor the workshop to meet your circumstances. We also ask the attendees to do some pre-work, in particular for any third party or company representative to be aware of the following types of information:

- Knowledge of the cyber security policies, staff training and verification of individuals and/or instructions when transferring funds or providing member specific information.
- The level of insurance protection offered to the schemes and the trustees.
- How trustees are advised of any cyber incidents at a third party and, at a high level, knowledge of incident response plans.

Workshop

The workshop will typically last three hours and would take the following format:

- Overview of the cyber landscape and how this then translates into the pension scheme environment.
- Breaking out into groups and identifying how the trustees and other stakeholders are equipped to deal with specific scenarios.
- Discussion on the issues raised in the role play; this will be centred around the themes from the Aon Cyber Resilience Solutions Framework.
- Agreeing the next steps and specific actions.

For some schemes, we have extended the workshop to cater for the sponsor to present a short session on their cyber position or any incidents which may have impacted their operations. We can accommodate any additional items into the workshop to ensure that all attendees get the most out of the day.



We envisage that the action plan may include steps to further investigate a range of areas, such as:

- Intricacies of the network mapping
- Current insurance provisions
- Cyber and data security policies and processes by all stakeholders
- Incident response planning

Robust framework

At the heart of our workshops is the Aon Cyber Resilience Framework (ACRF). The ACRF has been developed over many years by Aon working in conjunction with corporate clients and insurers, tackling cyber risk in businesses around the globe.

It is a tried and tested approach which ensures that all relevant aspects of cyber risk are considered, in a rigorous fashion, rather than diving into one specific area and risk missing a key issue.

Although developed for use with corporate clients, it is equally applicable to pension schemes, and our workshops use a version that is adapted specifically for pension schemes.

Aon Cyber Resilience Framework (ACRF)



Identify critical assets, vulnerabillities and risks, to assess organisational preparedness



- Member data
- Financial transactions
- The reputation of the sponsor
- In-house administration or payroll
- Data mapping and GDPR

Quantify the financial impact from cyber risk to inform risk reduction and transfer strategies



- Financial impact
- Reputational impact
- Operational impact

Uncover, test and remediate application, network and endpoint vulnerabilities



- · Suppliers' systems
- Sponsor's systems
- · Physical security
- Trustees' own arrangements
- Staff training as well as IT

Prepare, optimise and enhance security, governance, incidence detection and protocols



- · Existing mitigations
- Future mitigations
- Prioritisation
- · Risk register
- Monitoring

Explore risk transfer solutions to minimise balance sheet risk



- Indemnification and exoneration
- Trustee liability insurance
- Cyber policies or extensions
- Contracts
- Policy wording and exemptions

Limit business disruption, minimise economic loss and expedite the claims management process



- Incident response plan
- Critical contact details
- Rapid response support

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