Cybercrime - Checklist for Pension Schemes



Cybercrime is a growing area of concern for pension schemes, and one which both trustees and sponsors need to pay attention to.

Using Aon's experience of advising on pension scheme risks, combined with our expertise on cyber risk consulting and forensic testing through Stroz Friedberg, we have compiled a checklist of the areas trustees and their sponsors should consider when evaluating their pension scheme against the threat of cyber-attacks.

Stroz Friedberg, an Aon company, is a specialised risk management firm and global leader in cyber security.

For more information visit strozfriedberg.com

As data controllers trustees are ultimately responsible for what happens to scheme data and should be asking questions to understand their schemes exposure to cyber risks.



Asses

Identify critical assets, vulnerabilities and risks to assess organizational preparedness to improve risk exposure

In constructing this

checklist we have used the Aon Cyber

Resilience Solutions

Framework:



Toct

Uncover, test, and remediate application, network, and endpoint vulnerabilities



Improve

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



Quantify

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



Transfer

Explore risk transfer solutions to minimise balance sheet risk



Respond

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





Assessing vulnerabilities

Has the scheme undertaken an evaluation of the threats posed by cyber-risk, including consideration of both the likelihood and impact of loss of data, financial transactions, corporate reputation, systems downtime etc?

Are the vulnerabilities identified recorded on the scheme's risk register?



Quantify the financial impact from cyber risks

Has the potential impact of those vulnerabilities been quantified, so that they can be understood and managed, whether that be through risk reduction or insurance strategies?

Have these potential impacts been shared with the sponsor, so that they are also aware of the potential impact of such risks (eg financial, reputational) on their scheme and business?



Testing applications, networks and endpoint risk

For each party involved with the pension scheme, have the questions in the Appendix been considered, with satisfactory responses?

The parties should include third parties as well as any internal departments which the scheme is reliant upon, and the trustees themselves. Some thought will need to be given to how to apply these questions to individual trustees.



Improve procedures, governance and preparedness

Has the scheme identified and documented (perhaps in the risk register) any measures that need to be taken to improve cyber security and put in place actions to achieve these?

Are these measures monitored and reported on to ensure that they are not overlooked?



Transfer risk to insurance market

Have the trustees considered the extent to which cyber risks are covered by any insurance contract they or their sponsor has, such as trustee indemnity insurance?



Respond to a cyber attack

Has the scheme considered the need for its own incident response plan, independently of the plans that third parties might have?

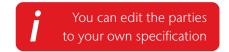
Has the scheme considered the possibility of retaining a third party to provide rapid response support in the event of a cyber-attack?

Actions

If any of the answers to the above questions are unsatisfactory or if you need help with understanding the implications of the answers you are not alone. Aon can support both trustees and sponsors with identifying potential mitigation and risk transfer actions that meet your needs and risk appetite. Please contact your Aon consultant or Paul McGlone or Vanessa-Jane Jaeger for further information.

Although considerable thought has gone into creating this checklist, no checklist is ever complete as cyber security resilience is a continuous process. If trustees or sponsors have further concerns about cyber risk then they should seek specialist advice.

Appendix Questions for suppliers, trustees and sponsor





The following should be considered for all parties involved with the pension scheme.

Have the trustees assessed the activities undertaken by each party and the cyber risks that they are therefore exposed to?										
Does the party have a cyber security or equivalent policy which provides an overall framework for how they manage the risks?										
Is the IT infrastructure and security in place sufficient for the role that they undertake?										
Have staff been trained so that they know how to use the relevant systems in a way that doesn't generate risks?										
Have the arrangements in place (policy, infrastructure and people) been subject to regular testing with satisfactory results?										
Does the organisation have an incident response plan which would be put into effect if a cyber-attack were to take place?										
Does the contract with the party include suitable obligations around cyber risks?										
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