5

| LIKELIHOOD | | | | | |
|----------------------|------------|---|--|--|--------|
| 5 Very Likely | | | | | |
| 4 Likely | | | Implementation of new financial systems leads to delayed processing, data integrity issues or financial loss | 9 Skills / knowledge gaps lead to inefficiency and poor performance 11 Work volume mismatch with capacity leading to backlogs | |
| 3 Possible | | | 10 Data administration failure / fraud leads to data integrity issues 3 Funding requirements higher due to actuarial assumptions materially different to experience | 5 Investment strategy/implementation affects performance 6 Investment returns impacted by mkt volatility/performance 7 Investment returns impacted by 3rd party performance/default 13 Impact from lack of regulatory/legal compliance 14 Reputational issues due to inaccurate public domain info | |
| 2 Unlikely | | | 2 Employers delay making payments | 1 Employers unable/unwilling to make payments 12 Business interruption/cyber security breach 15 Internal protocols for governance not followed | |
| 1 Rare | | 8 Insufficient liquidity to meet obligations for rebalancing / payments | | 4 Investment performance impacted by insufficient attention to ESG | |
| IMPA | CT Minimal | Minor | Moderate | Major | Severe |

| | | | | with current n controls in pla | ice | | |
|------|--|------------|------------|-----------------------------------|---------|----------|------|
| | | | Likelihood | Impact | Overall | Curr | Prio |
| k ID | Risk Title | Risk Owner | (1-5) | (1-5) | Score | q mvt | q m |
| 9 | Skills / knowledge gaps lead to inefficiency and poor performance | SD | 4 | 4 | 16 | | |
| 11 | Work volume mismatch with operational capacity leading to backlogs | SD | 4 | 4 | 16 | | 1 |
| 5 | Investment strategy and proposed implementation materially affects investment performance | I&S | 3 | 4 | 12 | | |
| 6 | Investment returns impacted by market volatility/ performance | I&S | 3 | 4 | 12 | | |
| 7 | Investment returns impacted by third party or counter party performance/default | I&S | 3 | 4 | 12 | | |
| 13 | Scheme is financially or reputationally impacted by failure to adhere to (changes in) regulatory and legislative compliance requirements | SD | 3 | 4 | 12 | | |
| 14 | Reputational issues due to inaccurate public domain information (external stakeholder relationships / comms) or inefficient service | A&G | 3 | 4 | 12 | | |
| 16 | Implementation of new financial systems leads to delayed processing, data integrity issues or financial loss | A&G | 4 | 3 | 12 | 4 | |
| 3 | Funding requirements higher due to actuarial assumptions materially different to experience | A&G | 3 | 3 | 9 | | 4 |
| 10 | Data administration failure / fraud leads to data integrity issues | SD | 3 | 3 | 9 | | |
| 1 | Employers unable/unwilling to make payments | A&G | 2 | 4 | 8 | | |
| 12 | Business interruption or cyber security breach leads to data integrity issues or financial loss | SD | 2 | 4 | 8 | | |
| 15 | Internal protocols for governance not followed | A&G | 2 | 4 | 8 | | |
| 2 | Employers delay making payments | A&G | 2 | 3 | 6 | | |
| 4 | Investment performance materially impacted by insufficient attention to ESG factors | I&S | 1 | 4 | 4 | | |
| 8 | Insufficient liquidity / lack of cash to meet obligations for collateral rebalancing / payments out | I&S | 1 | 2 | 2 | | |

Accounting and Governance

Investment and Stewardship

Service Delivery

A&G SD

1&5

| Risk ID | Risk Title | Risk Area | Risk sub-ID | FSS x-ref | Causes | Effect | Risk Owner | Likelihood (1-5) | Impact (1-5) | Overall Score | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
|---------|--|---------------------|----------------|--------------|--|---|------------|---------------------|-----------------|------------------|--|--|-------------|
| 1 | Employers unable/unwilling to make payments | A&G - Funding | 1A | C5-1 | Structural changes in an employer's membership or an employer fully/partially closing the scheme. Employer bodies transferring out of the pension fund or employer bodies closing to new membership An employer ceases to exist with insufficient funding or adequacy of bond. | | A&G | 2 | 4 | 8 | TREAT/TOLERATE 1) Administering Authority actively monitors prospective changes in membership. 2) Maintain knowledge of employer future plans. 3) Contributions rates and deficit recovery periods set to reflect the strength of the employer covenant. 4) Periodic reviews of the covenant strength of employers are undertaken and indemnity applied where appropriate. 5) Risk categorisation of employers implemented as part of 2022 actuarial valuation. 6) Monitoring of gill yields for assessment of pensions deficit on a termination basis. 7) Required standard of data from employers | holistic risk position of fund as a whole | Oct-23 |
| | | A&G - Funding | 1B | C2-6 | Shortfall in assets of 'orphaned' employer | Shortfall shared across existing employer population | | | | | TREAT 1) Pension Team monitors and understands aggregate exposure 2) Appropriate cessation debt sought on exit 3) Possibly seek guarantee from alternative employer | | |
| 2 | Employers delay making payments | Service Delivery | 2A | C3-3 | Rise in ill health retirements | Impact on employer organisations leading to delay in payments | g A&G | 2 | 3 | 6 | TREAT 1) Self-insurance implemented across the fund 2) Reactive reposition investment strategy if necessary | | |
| | | Service Delivery | 2B | C3-3 | Rise in ill health retirements | Rise in self insurance costs impact employer organisations leading to delay in payments | | | | | TREAT 1) Pension Fund monitors ill health retirement awards which contradict IRMP recommendations | | |
| | | A&G - Funding | 2C | | Employer issues with affordability and/or cashflow | Delay in payments | | | | | TREAT 1) Pension Team monitors covenant of employers 2) Engagement with employers on delay of receipt of payment notifications - with objective to improve timely application of funds to relevant employer accounts. 3) Review structure of contractors and consider pass- through arrangements | | |
| 3 | Funding requirements higher due to actuarial assumptions materially different to experience | A&G - Funding | 3A | C2-4 | Price inflation is significantly more or less than anticipated | An increase in CPI inflation by 0.1% would increase the liability valuation by 1.4% | A&G | 3 | 3 | 9 | TOLERATE- 1) The assumptions of the Fund actuary are prudent and allow for variations in inflation and interest rate fluctuations. 2) The fund regularly monitors and acts on inflation exposure. | | |
| | | A&G - Funding | 3B | C3-1 | Members living longer | Adding one year to life expectancy would approximately increase the liability by 3-5%. | | | | | TOLERATE- 1) The Fund Actuary uses long term longevity projections in the actuarial valuation process. 2) SCC has joined Club Vita, which allows monitoring of mortality rates that are employer and postcode specific. | | |
| | | A&G - Funding | 3C | C2-4 | Pay increases are significantly more than anticipated for employers within the Fund. | Pension liability increases (for pre-2014 liabilities) | _ | | | | TREAT / TOLERATE- 1) Fund employers should monitor own experience. 2) Assumptions made on pay and price inflation should be long term assumptions, any employer specific assumptions above the actuaries long term assumption would lead to further review. 3) Employers to be made aware of generic impact that salary increases can have upon final salary linked elements of LGPS benefits. 4) Proportion of liabilities linked to final salary diminishing over time. | | |
| | | A&G - Funding | 3D | C2-5 | Actuarial work determines the need for increases to employer contributions | Employers need to pay additional funds into the scheme | | | | | TREAT- 1) Officers to consult and engage with employer organisations in conjunction with the actuary. 2) Actuary will assist where appropriate with stabilisation and phasing in processes. 3) Stabilisation modelling undertaken early in the valuation cycle. | | |
| | | A&G - Funding | 3E | C3-2 | Future member population and/or demographic changes as a result of government policy | Employers need to pay additional funds into the scheme | | | | | TREAT / TOLERATE- 1) The Fund actuary uses prudent assumptions on future of workforce (full replacement assumed for active employers). The fund has regular communciations with employer to allow them to flag up major changes in workforce. 2) Need to consider worst case assumptions about diminishing workforce when carrying out the actuarial valuation. | | |
| | | A&G - Funding | 3F | C4-2 | HM Treasury and Scheme Advisory Board oost management process has an implied increase in employer contributions. | Employers need to pay additional funds into the scheme | | | | | TREAT / TOLERATE - 1) The Fund actuary stabilises employer contribution, which reduces the impact of conditions which could otherwise produce spikes in contribution rates. 2) Communicate with employers and explore the opportunity for the strengthening of their covenant by the provision of additional security to the Fund. 3) Advice from Fund actuary on issues related to Section 13 analysis | | |

| Biek ID | Risk Title | Risk Area | Risk sub-ID | FSS x-ref | Causes | Effect | Risk Owner | Likelihood (1-5) | Impact (1-5) | Overall Score | Voy Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
|---------|---|------------|----------------|--------------|---|---|------------|---------------------|-----------------|------------------|---|--|-------------|
| | | | | | | | | (1-5) | | | Key Existing Management Controls | Final sign off of Responsible Investment Policy. Mercer to | |
| 4 | Investment performance materially impacted by insufficient attention to ESG factors | Investment | 4A | C7 | | Insufficient attention leads to underperformance and reputational damage. | 18.5 | 1 | 4 | 4 | TREAT- 1) Review ISS in relation to published best practice (e.g. Stewardship Code). 2) Ensure fund managers are encouraged to engage and to follow the requirements of the BCPP Responsible investment Policy. 3) The Fund is a member of the Local Authority Pension Fund Forum (LAPFF) and all assets held with BCPP are monitored by Robeco, this raises awareness of ESG issues and facilitates engagement with fund managers. 4) The Fund has approved a Stewardship Code and a share voting policy which provides specific guidance in the voting of company resolutions. 5) The Fund complies with the BCPP Responsible Investment Policy. 6) Fund reviewing a responsible investment approach, assisted by a dedicated Responsible Investment sub-committee. 7) Fund engaging with lobbying groups. 8) Actuarial modelling undertaken (climate change impacts on longevity outcomes in prospect) | Task Force on Climate-Related Financial Disclosure (TCFD) report published each year with increasing amounts of information. New standalone responsible investment policy. Mercer to review net zero strategy. | Oct-23 |
| | | Investment | 4B | | Stranded assets, regulatory fines, failing to adapt to a low carbon economy, in light of IPCC's 2021 report on Climate Change. | Detrimental impact on value of Fund's investments. | | | | | TREAT- 1) Ensure fund managers are encouraged to engage and to follow the requirements of the BCPP Responsible Investment Policy, more specifically its Climate Change Engagement Policy. 2) The Fund is a member of the Local Authority Pension Fund Forum (LAPFF) and all assets held within BCPP are monitored by Robeco, this facilitates engagement with companies who operate in carbon intensive industries. 3) The Fund is also part of the BCPP Climate Change Working Group. 4) Continued review of carbon exposure within current portfolio; all global indexed assets now held in the LGIM Future World Index. 5) Fund reviewing a responsible investment approach, assisted by a dedicated Responsible Investment subcommittee. | (TCFD) report published each year with increasing amounts of information. New standalone responsible | Oct-23 |
| 5 | Investment strategy and proposed implementation materially affects investment performance | Investment | 5A | C2-2 | Mismatching of assets and liabilities, inappropriate long-term asset allocation or investment strategy, mistiming of investment strategy. | Investment returns not at expected level for the risk appetite | 18.5 | 3 | 4 | 12 | TREAT- 1) Active investment strategy and asset allocation monitoring from Committee officers and consultants. 2) Investment strategy reviewed in 2022/3 in light of 2022 valuation 3) Separate source of advice from Fund's independent advisor. 4) Setting of Fund specific benchmark relevant to the current position of fund liabilities. 5) Fund manager targets set and based on market benchmarks or absolute return measures. Overall investment benchmark and out-performance target is fund specific. 6) Individual investment strategies for employer groups. | | |
| | | Investment | 5B | | Implementation of proposed changes to the LGPS (pooling) does not conform to plan or cannot be achieved within time scales. | | | | | | TREAT / TOLERATE 1) Officers consult and engage with DHULC, LGPS Advisory Board, BCPP OOG, consultants, peers, seminars, conferences. 2) Officers engage in early planning for implementation against agreed deadlines. 3) Participation in Cross Pool Collaboration Groups. 4) Recent government guidance continues to endorse pooling. | | |
| | | Investment | 5C | | That the Border to Coast Pensions Partnership disbands or the partnership fails to produce a proposal deemed sufficiently ambitious. | Investment returns not at expected level for the risk appetite | | | | | TOLERATE- 1) Partners for the pool were chosen based upon the perceived expertise and like-mindedness of the officers and members involved with the fund to ensure compliance with the pooling requirements. 2) Ensure that ongoing fund and pool proposals are comprehensive and meet government objectives. 3) Engage with advisors throughout the process. | | |

| | | | Risk | FSS | | | | Likelihood | Impact | Overall | | | |
|---------|---|------------|--------|------|--|--|------------|------------|--------|---------|--|--|-------------|
| Risk ID | Risk Title | Risk Area | sub-ID | | Causes | Effect | Risk Owner | (1-5) | (1-5) | Score | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
| 6 | Investment returns impacted by market volatility/ performance | Investment | 6A | C2-1 | Increased risk to global financial stability. Outlook deteriorates in advanced economies because of heightened uncertainty and setbacks to growth and confidence, leading to tightened financial conditions, reduced risk appetite and raised credit risks. | | I&S | 3 | 4 | 12 | TREAT / TOLERATE- 1) Increased vigilance and continued dialogue with managers as to events on and over the horizon. 2) Continued investment strategy involving portfolio diversification and risk control. 3) Investment strategy review accompanied the 2022 actuarial valuation. | Dynamic asset allocation analysis. Diversification of investments. Q1 2023/24 review of fixed income exposure. | Oct-23 |
| | | Investment | 6B | | Investment markets fail to perform in line with expectations | Investment returns impacted leading to deterioration in funding levels and increased contribution requirements from employers. | | | | | TREAT / TOLERATE- 1) Proportion of asset allocation made up of equities, bonds, property and alternatives, limiting exposure to one asset category. 2) The investment strategy is continuously monitored an periodically reviewed to ensure optimal asset allocation. 3) Actuarial valuation and asset/liability study take place automatically at least every three years. 4) The actuarial assumption regarding asset outperformance is a measure of CPI over gilts, which is regarded as achievable over the long term when compared with historical data. 5) Actuarial calculations assess a likelihood of achieving a set of returns over the long term | | |
| | 1 | | | | | | | | | | | | |
| 7 | Investment returns impacted by third party or counter party performance/default | Investment | 7A | 62-3 | Investment Managers fail to achieve performance targets over the longer term | A shortfall of 0.1% on the investment target will result in an annual impact of c£5m | I&S | 3 | 4 | 12 | TREAT- 1) The Investment Management Agreements clearly stati SCCs expectations in terms of performance targets. 2) Investment manager performance is reviewed on a quarterly basis. 3) The Pension Fund Committee should be positioned to move quickly if it is felf that targets will not be met. 4) Having Border to Coast as an external manager facilitates a smooth transition of assets into the pool and provides an additional layer of investment due diligence. 5) The Funds investment management structure is highl diversified, which lessens the impact of manager risk compared with less diversified structures. | | |
| | | Investment | 7B | | Financial loss of cash investments from fraudulent activity. | Investment returns not at expected level | | | | | TREAT / TOLERATE - 1) Policies and procedures are in place which are regularly reviewed to ensure risk of investment loss is minimised. Governance arrangements are in place in respect of the Pension Fund. External advisors assist in the development of the Investment Strategy. Fund Managers/BCPP have to provide SAS70 or similar (statement of internal controls). 2) The pensions team is currently working to get more direct control of pension fund banking. | | |
| | | Investment | 7C | | Financial failure of a fund manager | Increased costs and service impairment. | | | | | TREAT - 1) Fund is reliant upon current adequate contract management activity. 2) Fund is reliant upon alternative suppliers at similar price being found promptly. 3) Fund is reliant on the scale and risk management opportunity offered by BCPP. | | |
| | | Investment | 7D | | Counterparty poor performance or default | Loss of investment return | | | | | TOLERATE - 1) Lending limits with approved banks and other counterparties are set at prudent levels 2) The pension fund treasury management strategy is based on that of SCC. | | |
| | | Investment | 7E | C5-2 | Poor performance or financial failure of third party supplier | Service impairment and financial loss. | | | | | TOLERATE- 1) Performance of third parties (other than fund managers) monitored. 2) Regular meetings and conversations with Northern Trust take place. 3) Actuarial work and investment work are provided by two different consultancies. | | |

| Pick ID | Risk Title | Risk Area | Risk sub-ID | FSS v-ref | Causes | Effect | Risk Owner | Likelihood (1-5) | Impact (1-5) | Overall | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
|---------|---|---------------------|----------------|--------------|---|--|------------|---------------------|-----------------|---------|---|--|--|
| 8 | Insufficient liquidity / lack of cash to meet obligations for collateral rebalancing / payments out | Investment | 8A | C5-5 | Inaccurate cash flow forecasts or drawdown payments | | I&S | 1 | 2 | 2 | TOLERATE / TREAT: 1) Borrowing limits with banks and other counterparties are set at levels that are more than adequate should cash be required at short notice. 2) Cashflow analysis of pension fund undertaken quarterly. 3) Comply with the Pension Fund Cash Management Strategy. 4) Annual Cash flow analysis on ongoing basis. 5) Ongoing monitoring of requirement for exit credits. | | The second secon |
| 9 | Skills / knowledge gaps lead to inefficiency and poor performance | Service Delivery | 9A | | Lack of capability of the admin system | Inefficiency and disruption. | SD | 4 | 4 | 16 | TREAT/TOLERATE 1) Ensure system efficiency is included in the annual improvement review. 2) Monitor system review and provide extra resource | | |
| | | Service Delivery | 9B | | Gaps in skills and knowledge due to key person/single point of failure and different skill requirements. | Inefficiency and poor performance. | | | | | where business case supports it. TREAT 1) 'How to' notes in place. 2) Development of team members & succession planning needs to be improved. 3) Officers and members of the Pension Fund Committee will be mindful of the proposed CIPFA Knowledge and Skills Framework when setting objectives and establishing training needs. 4) Skills Matrices completed by all staff and standardised Personal Development Plans being introduced. | | |
| | | Service Delivery | 9C | | Lack of productivity | Impaired performance. | - | | | | TREAT 1) Regular appraisals with focused objectives for pension fund and admin staff 2) Productivity outputs are being measured and reported on a monthly basis. 3) Enhance performance management | | |
| | | Service Delivery | 9D | | Concentration of knowledge in small number of officers and risk of departure of key staff. | Poor perfromance and disruption | | | | | TREAT- 1) How to' notes in place. 2) Development of team members & succession planning needs to be improved. 3) Officers and members of the Pension Fund Committee and Local Pension Board will be mindful of the proposed CIPFA Knowledge and Skills Framework and appropriate IPR Codes of Conduct when setting objectives and establishing training needs. 4) Skills Matrices completed by all staff and standardised Personal Development Plans being introduced. | | Oct-23 |
| 10 | Data administration failure / fraud leads to data integrity issues | Service Delivery | 10A | | Incorrect data due to employer error, user error or historic error. | Service disruption, inefficiency and conservative actuarial assumptions. | SD | 3 | 3 | 9 | TREAT 1) Update and enforce admin strategy to assure employer reporting compliance 2) Pension Fund team, Pension Fund Committee and Local Board members are able to interrogate data to ensure accuracy. | | |
| | | Service Delivery | 10B | | Poor reconciliation process | Incorrect contributions. | | | | | TREAT 1) Ensure reconciliation process notes are understood by Pension team 2) Ensure that the Pension team is adequately resourced to manage the reconciliation process 3) Officers to undertake quarterly reconciliation to ensure contributions are paid on time. With a view to moving to monthly reconciliation as employers engage with I-connect. | | |
| | | Service Delivery | 10C | | Unit 4 - Payments made manually outside of monthly payroll has been integrated (SAP & Altair) since Jan 2021 with SCC's banking processes to offer sound financial controls. However, SCC's ERP system is due to change to Unit 4 in 2022-23 and hence the integration between Unit 4 and Altair for monthly and daily payments need to be developed. | | | | | | TREAT Integration between Unit 4 and Altair for monthly and daily payments needs to be developed. | | |

| Risk ID | Risk Title | Risk Area | Risk sub-ID | FSS x-ref | Causes | Effect | Risk Owner | Likelihood (1-5) | Impact (1-5) | Overall Score | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
|---------|--|---------------------|----------------|--------------|--|--|------------|---------------------|-----------------|------------------|---|---|-------------|
| | Work volume mismatch with operational capacity leading to backlogs | Service Delivery | 11A | 710. | Processes do not all have a standardised approach | This could lead to inefficiencies | SD | 4 | 4 | 16 | TREAT 1) Review processes to ensure workflows are in line with regulatory requirements 2) Document processes and ensure guidance and checklists are in place | | Turger Bute |
| | - | Service Delivery | 11B | C5-3 | Failure to follow up on outstanding issues | Inefficiency and damaged reputation. | | | | | Report updates to the Local Pension Board. TREAT Include monitoring of task follow-up times as part of the revised service standards in the Administration | | |
| | | Service Delivery | 11C | | Backlog cases in the administration system are not dealt with in a timely manner and require careful management to see a reduction moving forward. | Inefficiency and poor performance. | | | | | Strategy TREAT 1) Ensure total backlog is recorded accurately (backlog should include cases in Altair). 2) Ensure only completed BAU cases are recorded in Key Performance Indicators. 3) Ensure total number of backlog cases is correctly recorded on the system and presented accurately in the quarterly Administration Performance Report. 4) Continuously work towards improving the accuracy of the reported figures. 5) Backlog to be closely monitored by the management board. | Backlogs across the whole service receiving priority attention as part of Business Plan for 2023/24 Assessment of resource requirements for dealing with backlogs underway | Oct-23 |
| | | Service Delivery | 11D | | Operational capacity impacted by unavailability of key resources through industrial action, illness or other causes | Inefficiency and poor performance. | | | | | TREAT/TOLERATE 1) Assessment of potential impacts ahead of time. 2) Prioritisation of activities with reduced resources. 3) Business continuity plans regularly reviewed. | | |
| 12 | Business interruption or cyber security breach leads to data integrity issues or financial loss | Service Delivery | 12A | | Inability to respond to a significant event | Prolonged service disruption and damage to reputation. | SD | 2 | 4 | 8 | TREAT/TOLERATE 1) Disaster recovery plan to be closely monitored by the management board. 2) Ensure system security and data security is in place 3) Business continuity plans regularly reviewed, communicated and tested 4) Internal control mechanisms should ensure safe custody and security of LGPS assets. 5) Gain assurance from the Fund's custodian, Northern Trust, regarding their cyber security compliance 6) Tolerate consequences of McCloud judgement. | Backlogs across the whole service receiving priority attention as part of Business Plan for 2023/24 Assessment of resource requirements for dealing with ybacklogs underway Business Continuity plans and Cyber security approach to be reviewed during 2023/24 Business Continuity plans and Cyber security approach to be reviewed during 2023/24 | Oct-23 |
| | | Service Delivery | 12B | | Failure to implement proper cyber security policies. | Prolonged service disruption and damage to reputation. | | | | | TREAT 1) Ensure the Fund's memorandum of understanding and privacy notice is compliant with current legislation. 2) Regularly engage with the host authority IT team to ensure security protocols are up to date. 3) Maintain a central registry of key partners' business continuity plans. 4) Ensure staff are aware of their roles and responsibilities under Surrey's cyber security policy. 5) Ensuring members data is remotely and securely backed up. | Business Continuity plans and Cyber security approach to be reviewed during 2023/24 | Oct-23 |
| | | Service Delivery | 12C | | Failure to hold personal data securely. | Personal financial impact and damage to reputation. | | | | | TREAT- 1) Data encryption technology is in place, which allow secure the sending of data to external service providers. 2) Phasing out of holding records via paper files. 3) Any hardcopy pension admin records are locked daily in a secure place. 4) SCC IT data security policy adhered to. 5) SCC carries out Security Risk Assessments. 6) Custodian proactively and reactively identifies and responds to cyber threats. | | |

| | | | Risk | FSS | | | | Likelihood | Impact | Overall | | | |
|---------------------------|--|---------------------|--------|-------------------|--|--|------------|------------|--------|---------|---|---|-------------|
| Risk ID R | Risk Title | Risk Area | sub-ID | x-ref | Causes | Effect | Risk Owner | (1-5) | (1-5) | Score | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
| re bj (d a ci | Scheme is financially or eputationally impacted y failure to adhere to changes in) regulatory and legislative compliance equirements | Service Delivery | 13A | C4-1 | Non-compliance with regulation changes relating to the pension scheme or data protection | Fines, penalties and damage to reputation. | SD | 3 | 4 | 12 | TREAT 1) There are generally good internal controls with regard to the management of the fund. These controls are assessed on an annual basis by internal and external audit as well as council officers. 2) Through strong governance arrangements and the active reporting of issues, the Fund will seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches. 3) Ensure processes are completed in a timely manner and that post 2014 refunds are paid within 5 years. | | |
| | | Service Delivery | 13B | | Failure to identify GMP liability | Data or calculation errors leading to incorrect benefits and ongoing costs for the pension fund | | | | | TREAT 1) GMP to be closely monitored by the management board. 2) Stage 1 reconciliation reviews have been completed. 3) Mercer have been appointed to carry out an interim stage 2 review 4) GMP Reconciliation project is being progressed by Mercer (formerly JLT). 5) Separate updates being issued. | | |
| | | Service Delivery | 13C | | Additional resources required to deal with consequences of McCloud judgement | Backlog of processes; data or calculation errors leading to incorrect benefits and ongoing costs for the pension fund | | | | | TOLERATE/TREAT 1) The Pension Fund Team can allocate additional funds / resources to mitigate the impact and avoid reputational damage. 2) The proposed remedy will require additional resource and members who have already left will be prioritised. | | |
| | | A&G - Funding | 13D | | Additional resources required to deal with consequences of McCloud judgement; additional costs required to pay higher benefits | Backlog of processes; data or calculation errors leading to incorrect benefits and ongoing costs for the pension fund; possible impact on employers with additional contributions required | | | | | TOLERATE / TREAT - 1) Depending on DLUCH's response to the ruling, the actuary may reconsider the funding position, the investment advisers may reposition assets to compensate and the Service Delivery Team may need more resource but ultimately, it is likely to have an impar on employers' contribution rates. | ot e | |
| | | A&G - Technical | 13E | C4-1 & C4-3 | Failure to comply with changes in LGPS and/or HMRC regulations (including any changes related to particular employer participation) | Incorrect benefits and ongoing costs for the pension fund; possible impact on employers with additional contributions required | | | | | TREAT / TOLERATE- 1) Impact on contributions and cashflows will be considered during the 2022 valuation process. 2) Fund will respond to consultations and statutory guidance. 3) Impact of LGPS (Management of Funds) Regulations. 2016 to be monitored. | | |
| | | A&G - Governance | 13F | | Failure to comply with legislative requirements e.g. ISS, FSS, Governance Policy, Freedom of Information requests. | Backlog of processes; data or calculation errors leading to incorrect benefits and ongoing costs for the pension fund | | | | | TREAT- 1) Publication of relevant documents on external website 2) Managers monitored on their compliance with ISS and IMA. 3) Pension fund committee and Local Pension Board sel assessment to ensure awareness of all relevant documents. 4) Annual audit review. 5) Pension team reorganisation has provided additional resource in this area. | i e | |
| | | Service Delivery | 13G | | Additional resources required to deal with consequences of Dashboard implementation | Backlog of processes; data or calculation nerrors leading to incorrect benefits disclosed; system interfaces inoperative or introducing errors | | | | | TOLERATE/TREAT 1) The Pension Fund Team can allocate additional funds / resources to mitigate the impact and avoid processing issues or reputational damage. | Technical team to engage with consultations on proposed framework | d Mar-24 |

| Risk ID | Risk Title | Risk Area | Risk sub-ID | FSS x-ref | Causes E | ffect | Risk Owner | Likelihood (1-5) | Impact (1-5) | Overall Score | Key Existing Management Controls | Planned Enhancements to Controls (Actions) | Target Date |
|---------|---|---------------------|----------------|--------------|---|---|------------|---------------------|-----------------|------------------|--|--|-------------|
| 14 | Reputational issues due to inaccurate public domain information (external stakeholder relationships / comms) or inefficient service | A&G - Comms | 14A | | | namage to reputation and loss of onfidence. | A&G | 3 | 4 | 12 | TREAT- 1) Ensure that all requests for information (Freedom of Information, Member & Public questions at Council, etc) are managed appropriately and that Part 2 items remain so. 2) Maintain constructive relationships with employing bodies to ensure that communication is well managed. 3) Update website information as and when required and at least quarterly. | | |
| | | Service Delivery | 14B | | Poor data processing, manipulation and transfer | ncorrect contributions or benefits | | | | | TREAT - 1) Improve metrics to better measure performance and monitor the pension administration service. | | |
| 15 | Internal protocols for governance not followed | A&G - Governance | 15A | | Failure to take difficult decisions inhibits effective Fund management. | nefficiency and poor performance. | A&G | 2 | 4 | 8 | TREAT- 1) Ensure activity analysis encourages decision making on objective empirical evidence. 2) Ensure that basis of decision making is grounded in ISS/FSS/Governance statement/Responsible investment policy and that appropriate advice is sought. 3) Ensure the Governance Matrix is made visible to all stakeholders in the pension team enabling clear identification of roles and responsibilities. | | |
| | | A&G - Governance | 15B | | Change in membership of Pension Fund In Committee or Local Pension Board leads to dilution of member knowledge and understanding. | nefficiency and poor performance. | | | | | TREAT 1) Ongoing training of Pension Fund Committee and Local Pensions Board members. 2) Pension Fund Committee and Local Pensions Board new member induction programme. 3) Enhance the training for the new and existing Pension Fund Committee and Local Board members. As each bodies members are new to their respective roles. | Knowledge assessment undertaken to inform 2023/24 training plans | Mar-24 |
| | | A&G - Governance | 15C | | Failure to comply with recommendations from the local pension board, resulting in the matter being escalated to the scheme advisory board and/or the pensions regulator. | tamage to reputation and loss of onfidence. | | | | | TOLERATE - 1) Ensure that an cooperative, effective and transparent dialogue exists between the pension committee and local pension board. 2) Officers to carry out annual measurement against TPR code of conduct. | | |
| | | A&G - Governance | 15D | | Procurement processes may be challenged if L seen to be non-compilant with OJEU rules. Poor specifications lead to dispute. Unsuccessful fund managers may seek compensation following non compilant process | amage to reputation and financial loss | | | | | TREAT / TOLERATE - 1) Ensure that assement criteria remains robust and that full feedback is given at all stages of the procurement process. 2) Use the National LOPS or other established procurement frameworks. | | |
| 16 | Implementation of new financial systems leads to delayed processing, data integrity issues or financial loss | A&G - Funding | 16A | | | trolonged financial service disruption, ack of visibility of transactions and nancial loss. | A&G | 4 | 3 | 12 | TREAT 1) Testing of new system to the extent possible. 2) Ensure resources available at cutover. 3) Ensure data has migrated correctly and remains accurate. 4) Reconcilitation of opening position. 5) Monitoring of use/capability of new system. 6) Communication with stakeholders with respect to potential issues. | Engagement with Unit4 leads - Change team deployed | Sep-23 |

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