

Risk Group	Risk Ref.	Previs us	Risk Description	Impact			Total	Likelihood	Total risk score	Mitigation actions
				Fund	Employers	Reputation				
Investment	1	1	Investment markets fail to perform in line with expectations	4	4	4	12	3	36	TREAT-1) The Full actuarial valuation takes place every three years. Moreover, IAS19 data is received annually and provides an early warning of any potential problems. 2) The asset outperformance assumption of 1.6% is achievable over the long term when compared with historical data.
Funding	2	2	Bond yields fall leading to a increase in value of liabilities	4	4	4	12	3	36	TREAT-1) IAS19 data is received annually and provides an early warning of any potential problems. 2) Early consultation with the actuary will take place with regard to the 2013 valuation.
Operational	3	3	Concentration of knowledge in small number of officers and risk of departure of key staff	2	3	3	8	4	32	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 Board will be mindful of the proposed CIPFA Knowledge and Skills Framework when setting objectives and establishing training needs.
Governance	4	4	Changes to LGPS regulations	4	3	1	8	4	32	TREAT-1) Fundamental change to LGPS regulations to be implemented from 1 April 2014. 2) Impact on contributions and cashflows will need to be considered during the 2013 valuation process.
Funding	5	5	Impact of government policy on the employer workforce	3	3	1	7	4	28	TREAT- 1) Hymans Robertson use prudent assumptions on future of workforce. Employers to flag up potential for major bulk transfers. The potential for a significant reduction in the workforce as a result of the pressures that the public sector is under may have an additional impact on the Fund. 2) Need to make worst case assumptions about diminishing workforce when carrying out the actuarial valuation.
Governance	6	6	Failure to take difficult decisions inhibits effective Fund management	3	2	2	7	4	28	TREAT-1) Ensure activity analysis encourages decision making on objective empirical evidence rather than emotion. Ensure that basis of decision making is grounded in ALM Study/SIP/FSS/Governance statement and that appropriate advice is sought.
Funding	7	7	Pay & price inflation is significantly more or less than anticipated	4	4	1	9	3	27	TREAT- 1) Fund employers should monitor own experience. 2) Assumptions made on pay and price inflation (for the purposes of IAS19/FRS17 and actuarial valuations) should be long term assumptions. 3) The fund holds investment in index-linked bonds to mitigate some of the risk.
Investment	8	8	Investment Managers fail to achieve performance targets over the longer term	4	4	4	12	2	24	TREAT- 1) The Investment Management Agreements clearly state SCC's expectations in terms of performance targets. 2) Investment manager performance is reviewed on a quarterly basis. 3) The Pension Fund Board should be positioned to move quickly if it is felt that targets will not be met. 4) Having LGIM as a rebalancing/transition manager facilitates quick changes. 5) The Fund's investment management structure is highly diversified, which lessens the impact of manager risk compared with less diversified structures.
Investment	9	NEW	Inappropriate long-term investment strategy	4	4	4	12	2	24	TREAT- 1) Use of investment consultants to monitor investment strategy. 2) Separate source of advice from Fund's independent advisor. 3) Setting of Fund specific benchmark relevant to the current position of fund liabilities. 4) Overall asset allocation regularly monitored by Pension Fund Board. 5) Fund manager targets set based on market benchmarks or absolute return measures.
Financial	10	9	The effect of a possible increase in employer contribution rates on service delivery	4	4	4	12	2	24	TREAT- 1) Stabilisation of contribution rates for long term secure employers as laid out in the Funding Strategy Statement. 2) Phasing of contribution increases for other employers. 3) Suitable deficit recovery periods.
Operational	11	10	Insufficient attention to social, ethical & environmental risks leads to reputational damage and/or financial loss	1	1	4	6	4	24	TREAT-1) Review SIP in relation to published best practice (e.g. UN Principles for responsible investment) 2) Ensure fund managers are encouraged to engage and to follow the requirements of the published SIP. 3) The Fund is now a member of the Local Authority Pension Fund Forum, which raises officer awareness of ESG issues and facilitates engagement with fund managers.
Investment	12	11	Asset reallocations in volatile markets may lock in past losses	4	4	3	11	2	22	TREAT- 1) LGIM rebalances the Fund's asset allocation on a monthly basis (within tolerance ranges). 2) Pension Fund Board takes a long term view of strategic asset allocation. 3) Pension Fund Board acts on advice from external parties.
Investment	13	NEW	Fall in equity markets leading to deterioration in funding levels and increased contribution requirements from employers	4	3	3	10	2	20	TREAT: 1) About 40% of fund made up of bonds, property funds, diversified growth funds and private equity, limiting exposure to listed equities. 2) The investment strategy is continuously monitored and periodically reviewed to ensure optimal asset allocation reflecting the continued belief that in the long-term equities are the best asset class.
Funding	14	12	Pensioners living longer	2	3	1	6	3	18	TREAT- 1) Hymans Robertson use long term longevity projections in the actuarial valuation process. 2) SCC has joined Club Vita, which looks at mortality rates that are employer specific.
Funding	15	13	Employer bodies transferring out of the pension fund or employer bodies closing to new membership	1	4	1	6	3	18	TOLERATE- 1) Maintain knowledge of employer plans. 2) Impact of any one employer leaving is minimal (other than SCC). 3) Admitted bodies represent approximately 7% of annual contributions paid. 4) Contributions rates and deficit recovery periods reflect the employer covenant.
Operational	16	14	Financial failure of a fund manager leads to increase costs and service impairment	2	3	3	8	2	16	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 LGIM as transition manager.
Financial	17	15	Counterparty risk within the SCC treasury management operation	2	1	4	7	2	14	TOLERATE - 1) A separate bank account for the pension fund has been in operation since 1 April 2011. Since then the fund has held cash investment separate from SCC. 2) Lending limits with banks are set at levels that are appropriate given credit ratings. 3) The current pension fund treasury strategy is based on that of SCC.
Governance	18	18	Change in membership of Pension Fund Board leads to dilution of member knowledge and understanding	1	1	1	3	4	12	TREAT- 1) Succession planning process to be implemented. 2) Ongoing training of Pension Fund Board members. 3) Pension Fund Board new member induction programme. 4) Training to be based on the requirements of CIPFA Knowledge and Skills Framework and the results of the test undertaken in 2012. New Board members to take the test.
Operational	19	19	Inaccurate information in public domain leads to damage to reputation and loss of confidence	1	1	4	6	2	12	TOLERATE- 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 news is well managed.
Financial	20	16	Financial loss of cash investments from fraudulent activity	4	4	4	12	1	12	TOLERATE - 1) Policies & 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 have to provide SAS 70 or similar (statement of internal controls).
Governance	21	NEW	Transition from IAG to Pension Fund Board with full committee status creates operational difficulties due to increased membership and remit	2	1	2	5	2	10	TREAT - 1) Terms of Reference for new Board completed. 2) Pension Board new member induction programme. 3) Additional support from Democratic Services.
Governance	22	19	Failure to comply with legislative requirements e.g. SIP/FSS/Governance Policy/Fol	4	1	4	9	1	9	TOLERATE -1) Publication of all documents on external website. 2) Managers expected to comply with SIP and IMA. 3) Pension Board self-assessment to ensure awareness of all relevant documents. 4) Annual audit review.
Financial	23	21	Inaccurate cash flow forecasts for Treasury Management leads to shortfalls on cash levels & redemptions necessary to ensure that funds available	2	1	1	4	2	8	TOLERATE- 1) Borrowing limits with banks are set at levels that are more than adequate should cash be required at short notice. 2) Cashflow analysis of pension fund undertaken at regular intervals.
Operational	24	23	Poor data quality results in poor information and decision making	2	2	4	8	1	8	TOLERATE - 1) Northern Trust provides 3rd party validation of performance and valuation data. 2) Pension Fund team and pension board members are able to integrate data to ensure accuracy.
Operational	25	24	Poor specification leads to shortfall against expectations	2	3	3	8	1	8	TOLERATE- 1) Ensure all expectations communicated effectively (e.g. consultant RFP) and that contracts are clear.
Financial	26	25	Incorrect, failed or late drawdown payments made (& interest accrued)	4	1	2	7	1	7	TOLERATE- 1) Treasury manager receives drawdown notices as soon as received and incorporates into cashflow planning.
Financial	27	27	An employer ceases to exist with insufficient funding or adequacy of bond	1	1	1	3	2	6	TOLERATE- 1) Admitted body contribution rates are set at a level that is intended to reflect 100% funding. The terms of admission agreements/bonds provide for regular review of bond adequacy.
Financial	28	25	Incorrect, failed or late employee/employer contributions payments received	1	4	1	6	1	6	TOLERATE- 1) Monthly monitoring of pensions contributions against expectation. 2) Reminders sent to employers when they fail to meet payment deadline. 3) Scope to report persistent late payment to OPRA.
Operational	29	29	Financial failure of third party supplier results in service impairment and financial loss	2	2	2	6	1	6	TOLERATE-1) Performance of third parties (other than fund managers) monitored. 2) Review of Northern Trust took place in January 2009, ahead of decision on whether to retain (Jan 2009) - a fee reduction was secured in 2011. 3) Actuarial and investment consultancies are provided by two different providers.
Operational	30	30	Procurement processes may be challenged if seen to be non-compliant with OJEU rules. Unsuccessful fund managers may seek compensation following non compliant process	1	1	4	6	1	6	TOLERATE - Ensure that assessment criteria remains robust and that full feedback is given at all stages of the procurement process.
Operational	31	28	Unauthorised access to offices leads to theft of intellectual property and confidential information	1	1	4	6	1	6	TOLERATE- 1) Clear desk policy. Ensure all sensitive data is locked away. Challenge any unknown visitors.

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