

**DERBYSHIRE COUNTY COUNCIL
PENSIONS AND INVESTMENTS COMMITTEE**

8 May 2019

Report of the Director of Finance & ICT

DERBYSHIRE PENSION FUND RISK REGISTER

1 Purpose of the Report

To consider the Derbyshire Pension Fund (the Fund) Risk Register.

2 Information and Analysis

The Risk Register identifies:

Risk Items

Description of risk and potential impact

Impact and Probability

Risk Mitigation Controls and Procedures

Risk Owner

Target Score

The Risk Register is kept under constant review by the risk owners, with quarterly review by the Director of Finance & ICT. A copy of both the Summary and Main Risk Registers are attached to this report as Appendix 1 and Appendix 2 respectively. Changes from the previous quarter are highlighted in blue font.

Risk Score

The risk score reflects a combination of the risk occurring (probability) and the likely severity (financial impact). A low risk classification is based on a score of 4 or less; a medium risk score ranges between 5 and 11; and a high risk score is anything with a score of 12 and above.

The Risk Register includes a Target Score which shows the impact of the risk occurring once the planned risk mitigation procedures and controls have been completed. The difference between the Actual and Target Score for each Risk Item is also shown to allow users to identify those risk items where the proposed new mitigation and controls will have the biggest effect.

High Risk Items

The Risk Register has the following three High Risk items:

- (1) Fluctuations in assets & liabilities (Risk No 15);
- (2) LGPS Central - performance deterioration / lost cost savings or duplicated costs caused by LGPS Central transition delays (Risk No 30); and
- (3) Impact of McCloud judgement (Risk No 39).

Fluctuations in assets and liabilities

There is an inevitable risk for any pension fund that assets may be insufficient to meet liabilities and fluctuate from one valuation to the next, principally reflecting external risks around both market returns and the discount rate used to value the Fund's liabilities. The Fund was 86.7% funded at 31 March 2016 and the long term target as set out in the Funding Strategy Statement is to eliminate the deficit by 2032. The Fund introduced an annual assessment of the Fund's funding position last year and a further assessment was carried out at December 2018. Whilst the Fund has a significant proportion of its assets in growth assets, the newly agreed Strategic Asset Allocation Benchmark introduced a lower exposure to growth assets with the aim of protecting the improvement in the Fund's funding level following strong market gains since the triennial valuation in March 2016. The very strong performance of the UK bond market at the end of March 2019, on concerns surrounding Brexit, will have had a negative effect on the Fund's liabilities at the 31 March 2019 valuation date.

LGPS Central Ltd

The transition of the Fund's assets into the products offered by LGPS Central Ltd. (LGPSC) is likely to take several years and there is a risk of performance deterioration and/or lost costs savings or duplicated management costs caused by transition delays. The Fund continues to take a meaningful role in the development of LGPSC, and has input into the design of the potential product offering to ensure that it will allow the Fund to implement its investment strategy. A Product Development Protocol is being developed jointly by the Partner Funds and LGPSC to ensure that all parties are involved at every stage of the product development lifecycle.

The transition into the Global Equity sub-fund by other Partner Funds is now complete and the transition process and costs are currently being analysed to see what lessons can be learnt from the first multi-Partner Fund transition.

Investment performance will be monitored closely by Fund officers and will be reported to the Pensions and Investments Committee and to the LGPS Central Joint Committee.

McCloud Judgement

The McCloud case relates to transitional protections given to scheme members in the judges and firefighters schemes which were found to be unlawful by the Court of Appeal on the grounds of age discrimination. The Government has applied to the Supreme Court for permission to appeal. It is anticipated that the outcome of the case could be accepted as applying to all public service schemes.

The LGPS Scheme Advisory Board (SAB) announced a pause in the cost cap management process pending the outcome of the case. The SAB said it may resubmit the existing proposals or review the package, taking into account the cost of any remedy resulting from the McCloud case and the impact of backdating. The SAB has recognised the enormous challenge that would be faced by administering authorities and employers in potentially backdating scheme changes over such a significant period.

The Government Actuary's Department is currently undertaking an initial review to assess the overall impact of the McCloud judgement on the public sector pension schemes. Fund officers will continue to follow closely the developments in the McCloud case and the implications for the LGPS, taking into consideration updates from the SAB, the Local Government Association, the Government's Actuary's Department and the Fund's Actuary.

New & Removed Items

Risk No. 39, the impact of the McCloud judgement, has been added to the Risk Register. The risk relating to the implement of the replacement pensions administration system has been removed from the Risk Register following 'Go Live' on 4 March 2019. The residual risks relating to the implementation, primarily concerned with the additional backlogs caused by the migration, have been included in Risk No. 33 (Failure of pensions administration systems to meet service requirements/information not provided to stakeholders as required).

3 Other Considerations

In preparing this report the relevance of the following factors have been considered: financial, legal and human rights, human resources, equality and diversity, health, environmental, transport, property, and prevention of crime and disorder.

4 Officer's Recommendation

That the Committee notes the risk items identified in the Risk Register.

PETER HANDFORD
Director of Finance & ICT

Derbyshire Pension Fund Risk Register

Date Last Updated20-Apr-19

Objectives

The objectives of the Risk Register are to:

- identify key risks to the achievement of the Fund's objectives;
- consider the risk identified; and
- access the significance of the risks.

Risk Assessment

■ Identified risks are assessed separately and assigned a risk score. The risk score reflects a combination of the risk occurring (probability) and the likely severity (financial impact).

■ A low risk classification is based on a score of 4 or less; a medium risk score ranges between 5 and 11; and a high risk score is anything with a score of 12 and above.

■ The Risk Register also includes the target score; showing the impact of the risk occurring once the planned risk mitigations and controls have been completed.

Summary of Risk Scores Greater Than Eight

Risk Ranking	Main Risk Register No	Identification	
		Risk Area	High Level Risk
1	15	Funding & Investments	Fund assets insufficient to meet liabilities / Decline in funding level/Fluctuations in assets & liabilities
2	30	Funding & Investments	Performance deterioration / lost cost savings or duplicated costs caused by LGPSC transition delays
3	39	Pensions Administration	Impact of McCloud judgement
4	2	Governance & Strategy	PIC / Pension Board members lack of knowledge & understanding of their role & responsibilities leading to inappropriate decisions
5	13	Governance & Strategy	Failure to comply with General Data Protection Regulations (GDPR)
6	14	Governance & Strategy	Failure to communicate with stakeholders
7	18	Funding & Investments	Strength of covenant of new/existing employers
8	25	Funding & Investments	The impact of the EU referendum results in high levels of market volatility or regulatory changes
9	33	Pensions Administration	Failure of pensions administration systems to meet service requirements / Information not provided to stakeholders as required
10	11	Governance & Strategy	Systems failure/Lack of disaster recovery plan/Cyber attack
11	16	Funding & Investments	Mismatch between liability profile and asset allocation policy
12	17	Funding & Investments	An inappropriate investment strategy is adopted / Investment strategy not consistent with Funding Strategy Statement / Failure to implement adopted strategy and PIC recommendations
13	21	Funding & Investments	The LGPS Central investment offering is insufficient to allow the Fund to implement its agreed investment strategy
13	22	Funding & Investments	The Fund is left with insufficient investment skills and experience post the launch of LGPS Central in April 2018 / Over reliance on key employees within Investment Section
14	23	Funding & Investments	The transition of the Fund's assets into LGPS Central's investment vehicles results in a loss of assets/and or excessive transition costs
15	24	Funding & Investments	LGPS Central fails to deliver the planned level of long term cost savings and performance levels deteriorate
16	34	Pensions Administration	Cyber-Liability Insurance relating to the pensions administration system

Appendix 1

Risk Assessment	Impact	Probability
Level 1	Insignificant	Rare
Level 2	Minor	Unlikely
Level 3	Moderate	Moderate
Level 4	Major	Likely
Level 5	Catastrophic	Almost certain

Officer Risk Owners	
DoF	Director of Finance & ICT
HoP	Head of Pensions
PM	Pensions Manager
IM	Investments Manager

Summary of Risk Scores	
Low Risk	7
Medium Risk	29
High Risk	3
Total Risks	39

Risk Score

0 - 4

5 - 11

12 and above

Low Risk

Medium Risk

High Risk

Current score		
Impact	Probability	Current Score
4	3	12
4	3	12
4	3	12
3	3	9
3	3	9
3	3	9
3	3	9
3	3	9
3	3	9
4	2	8
4	2	8
4	2	8
4	2	8
4	2	8
4	2	8
4	2	8

Target Score					Previous Score
Risk Owner	Impact	Probability	Target Score	Actual Minus Target Score	
DoF/HoP/IM	4	2	8	4	12
DoF/HoP/IM	4	2	8	4	12
HoP/PM	3	3	9	3	New
DoF/HoP	3	2	6	3	9
DoF/HoP/IM	3	2	6	3	8
HoP/PM/IM	3	2	6	3	9
HoP/PM	3	2	6	3	9
DoF/HoP	3	2	6	3	9
PM	3	1	3	6	9
Hop/PM/IM	4	1	4	4	8
DoF/HoP/IM	4	2	8	0	8
DoF/HoP/IM	4	2	8	0	8
DoF/HoP/IM	4	1	4	4	8
DoF/HoP	4	2	8	0	8
HoP/IM	4	1	4	4	8
DoF/HoP/IM	4	2	8	0	8
HoP/PM	4	2	8	0	8

Date Last Updated20-Apr-19

Risk Number	Description		Current score			Risk Mitigation Controls & Procedures			Target Score				Previous Score
	High Level Risk	Description of risk and potential impact	Impact	Probability	Current Score	Current	Proposed	Risk Owner	Impact	Probability	Target Score	Actual Minus Target Score	
Governance & Strategy													
1	Failure to comply with regulatory requirements	Failure to match-up to recommended best practice leads to reputational damage, loss of employer confidence or official sanction	4	1	4	DPF maintains current PIC approved versions of a Governance Policy & Compliance Statement, Voting Policy, Communications Policy and Investment Strategy Statement (ISS) / Governance framework includes PIC and Pension Board / Appointment of third party advisor and actuary / Annual Report and Accounts mapped to CIPFA guidance / Fund membership of LAPFF / Internal and External Audit / Member training programme	Regular review / Create central log of governance policy statements for the whole Fund	DoF/HoP	4	1	4	0	4
2	PIC / Pension Board members lack of knowledge & understanding of their role & responsibilities leading to inappropriate decisions	Change of membership, lack of adequate training, poor strategic advice from Officers & external advisors leads to inappropriate decisions being taken	3	3	9	Implementation of Member Training Programme / Attendance at LGA training program / Advice from Fund Officers & external advisors	On-going roll out of Member Training Programme in line with CIPFA guidance	PIC/DoF/HoP	3	2	6	3	9
3	An effective investment performance management framework is not in place	Poor investment performance goes undetected / unresolved	3	2	6	PIC training / Quarterly Committee reports / External Performance Measurement / Pension Board / My Plan Reviews		DoF/HoP/IM	3	2	6	0	6
4	An effective pensions administration performance management framework is not in place	Poor pensions administration performance / service goes undetected / unresolved	3	2	6	PIC training / Quarterly pension administration KPI reporting in line with Disclosure Regulations reviewed by PIC and DoF / My Plan Reviews	Performance benchmarks to be reviewed post the implementation of the new pension administration system	DoF/HoP/PM	3	2	6	0	6
5	An effective PIC performance management framework is not in place	Poor PIC performance goes undetected / unresolved	3	2	6	Defined Terms of Reference / PIC training / Support from suitably qualified Officers and external advisors / Monitoring off effectiveness of PIC by Pension Board		DoF/HoP/PM/IM	3	2	6	0	6
6	Failure to identify and disclose conflicts of interest	Inappropriate decisions for personal gain	3	1	3	Members Declaration of Interests / Officer conflict of interest declarations in respect of investment pooling / Officer disclosure of personal dealing and hospitality	Investment Compliance being incorporated in updated Procedures Manual	DoF/HoP	3	1	3	0	3
7	Failure to identify and manage risk	Failure to prepare and maintain an appropriate risk register results in poor planning, financial loss and reputational damage	3	2	6	Risk Register maintained and reported to PIC and PB on a quarterly basis		DoF/HoP/PM/IM	3	2	6	0	6
8	Pension Fund financial systems not accurately maintained / Member or Officer fraud	Member or Officer fraud, financial loss and reputational damage	3	2	6	Creation and documentation of Internal controls; internal/external audit; FSA regulation; monthly key control account reconciliations; on-going training & CIPFA updates	Updating Procedures Manual	DoF/HoP	3	1	3	3	6

Risk Number	Description		Current score			Risk Mitigation Controls & Procedures			Target Score				Previous Score
	High Level Risk	Description of risk and potential impact	Impact	Probability	Current Score	Current	Proposed	Risk Owner	Impact	Probability	Target Score	Actual Minus Target Score	
9	Pension Fund accounts not properly maintained	Unfavourable audit opinion, financial loss, loss of stakeholder confidence and reputational damage	3	2	6	Compliance with SORP / Compliance with DCC internal procedures (e.g. accounts closedown process) / Dedicated CIPFA qualified Pension Fund Accountant / Support from Technical Section / Internal Audit / External Audit		DoF/HoP	3	2	6	0	6
10	Lack of robust procurement processes leads to poor supplier selection and legal challenge	Breach of Council Financial Regulations & Reputational damage	3	1	3	Database of external contracts maintained / Compliance with Financial Regulations / Procurement due diligence / Procurement advice	Quarterly review of all contracts	DoF/HoP	3	1	3	0	6
11	Systems failure / Lack of disaster recovery plan / Cyber attack	Service failure, loss of sensitive data, financial loss and reputational damage	4	2	8	Robust system maintenance / Password restricted to IT systems / IGG Compliance / Business continuity plan		HoP/PM/IM	4	1	4	4	8
12	Failure to comply with The Pensions Regulator (TPR) governance requirements	TPR breaches result in fines, other sanctions and reputational damage	3	2	6	Dedicated in-house resource responsible for ensuring compliance	Continue to develop and maintain resilience in the in-house team	PM	3	1	3	3	6
13	Failure to comply with General Data Protection Regulations (GDPR)	Breaches in data security requirements could result in reputational damage and significant fines	3	3	9	Privacy Notices and Memorandum of Understanding completed and published. GDPR Plan completed. GDPR requirements included in the Data Improvement Plan. Document Retention Schedule review completed.	Quarterly monitoring of GDPR Implementation Plan	HoP/PM/IM	3	2	6	3	8
14	Failure to communicate with stakeholders	Employers unaware of requirements / Employees unaware of benefits	3	3	9	Communications Policy Statement reviewed and revised in May 2019. Stakeholders receive information and guidance in line with best practice discussed at the national LGPS Comms Forum, delivered by a fully resourced, specialist team. New website and branding from October 2018 helps stakeholders to be clear about the role of the Fund.	Stage 2 of the development of the DPF website will include interactive functionality and access to ABSs and monthly pay information. Registration will enable Fund members to access more information to improve their general understanding and support them with pension planning	HoP/PM/IM	3	2	6	3	9

Funding & Investments

15	Fund assets insufficient to meet liabilities / Decline in funding level / Fluctuations in assets & liabilities	Objectives not defined, agreed, monitored and outcomes reported / Incorrect assumptions used for assessing liabilities / Investment performance fails to achieve expected target / Changes in membership numbers / VR & VER leading to structural problems in fund / Demographic changes / Changes in pension rules and regulations (e.g. auto-enrolment and Freedom & choice)	4	3	12	Actuarial valuations and determination of actuarial assumptions / Funding Strategy Statement / Annual Assessment / Setting of contribution rates / Asset Allocation Reviews / ISS / Monitoring of investment managers' performance / Maintenance of key Policies on ill health's, early retirements, etc	Implementation of the Fund's new Strategic Asset Allocation Benchmark which aims to reduce investment risk following the recent improvement in the Fund's funding level	DoF/HoP/IM	4	2	8	4	12
16	Mismatch between liability profile and asset allocation policy	Inaccurate forecast of liabilities / Inappropriate Strategy	4	2	8	Actuarial reviews / Funding Strategy Statements / Annual Assessment / Review by PIC / ISS / Asset Allocation Reviews / Cash flow forecasting		DoF/HoP/IM	4	2	8	0	8
17	An inappropriate investment strategy is adopted / Investment strategy not consistent with Funding Strategy Statement / Failure to implement adopted strategy and PIC recommendations	Failure to set appropriate strategy / monitor application of strategy	4	2	8	Strategy takes into account Fund's liabilities / ISS set in line with LGPS Regulations / ISS reviewed and agreed by PIC / Quarterly review of asset allocation strategy by PIC / PIC receives advise from Fund Officers and external advisor		DoF/HoP/IM	4	2	8	0	8

Risk Number	Description		Current score			Risk Mitigation Controls & Procedures			Target Score				Previous Score
	High Level Risk	Description of risk and potential impact	Impact	Probability	Current Score	Current	Proposed	Risk Owner	Impact	Probability	Target Score	Actual Minus Target Score	
18	Covenant of new/existing employers	Failure to agree, review and renew employer guarantees and bonds , risk of wind-up or cessation of scheme employer with an unpaid funding deficit.	3	3	9	Employer database holds employer details, including bond review dates. Becomes an annual check of employer issues. A new post has been established to have specific responsibility for employer liaison. Commenced contacting existing employer where bond or guarantor arrangement has lapsed, to renew arrangements. Four members of the team attended an employer covenant training session run by Eversheds. Closer liaison with other Funds on this matter.	Processes are being developed to ensure that new contractors are aware of potential LGPS costs at an early stage. Employer Risk Management Framework is being developed.	HoP/PM	3	2	6	3	9
19	Unaffordable rise in employers' contributions	Employer contribution rates unacceptable	3	2	6	Consideration of employer covenant strength / scope for flexibility in actuarial proposals		DoF/HoP/PM	3	2	6	0	6
20	Employer contributions not received and accounted for on time	Adverse audit opinion / Delays to year end accounts	3	1	3	Monitoring within Pensions Section / Disclosure in quarterly pensions administration performance report / the development and publication of a late payment charging policy	The late payment charging policy is being applied to underperforming employers and the changes levied will be disclosed via P&IC Reports and Employer Newsletters	PM	3	1	3	0	3
21	The LGPS Central investment offering is insufficient to allow the Fund to implement its agreed investment strategy	Failure to provide sufficient and appropriate product categories results in a financial loss	4	2	8	Continue to take a meaningful role in the development of LGPS Central / On-going HoP/IM involvement design and development of the LGPS Central product offering and mapping to the Fund's investment strategy / Participation in key committees including PAF, Shareholders Forum and Joint Committee	LGPS Central Partner Funds have agreed their priorities for determining the timetable for sub-fund launches: Projected level of cost savings; LGPSC/Partner Fund resource; Asset allocation/investment strategy changes; Number of parties to benefit; Net performance; Ensuring every Partner Fund has some savings; Risk of status quo & Surfacing opportunities. Ensure the priorities are regularly assessed and applied	DoF/HoP/IM	4	1	4	4	8
22	The Fund is left with insufficient investment skills and experience post the launch of LGPS Central in April 2018 / Over reliance on key employees within Investment Section	Inappropriate decision making	4	2	8	Staffing assessment post launch of LGPS Central completed by DoF & ICT and positions now recruited	Recruit vacant positions in respect of Assistant Fund Manager and Business Services Assistant	DoF/HoP	4	2	8	0	8
23	The transition of the Funds assets into LGPS Central's investment vehicles results in a loss of assets and/or avoidable or excessive transition costs	Failure to fully reconcile the unitisation of the Fund's assets and charge through of transition costs	4	2	8	Reconcile the transition of the Fund's assets into each collective investment vehicle, including second review and sign-off. All costs and charges reconciled back to the agreed cost sharing principles. All transition costs to be signed off by HoP	Update control procedures now that LGPS Central has been launched and reporting structures have been established	HoP/IM	4	1	4	4	8
24	LGPS Central fails to deliver the planned level of long term cost savings and performance levels deteriorate	Failure to monitor the performance of LGPS Central both in terms of costs charged, cost savings achieved and performance returns	4	2	8	Review and challenge annual budget and changes to key assumptions / Review, challenge and validate LGPS Central product business cases / Establish quarterly monitoring reporting procedures including how performance and cost savings are to be quantified and reported back to the Partner Funds / Reconcile charged costs to the agreed cost sharing principles / Terms of Reference agreed for PAF, Shareholders Forum and Joint Committee	Update control procedures now that LGPS Central has been launched and reporting structures have been established. Continue to take a meaningful role in PAF and support the Chair and Vice-Chair of the PIC to enable them to participate fully in the Joint Committee and the Shareholders' Forum	DoF/HoP/IM	4	2	8	0	8
25	The impact of the EU referendum results in high levels of market volatility or regulatory changes	Failure to identify and mitigate key risks caused by outcome of EU Referendum vote	3	3	9	Continual monitoring of asset allocation and performance by investment staff and quarterly monitoring by PIC. There are no proposed or imminent amendments to the proposed LGPS Investment Pooling as a result of the EU Referendum vote	Monitor regulatory changes and continually monitor asset allocation	DoF/HoP/IM	3	2	6	3	9
26	Maintain liquidity in order to meet projected cash flows	Financial loss from inappropriate sale of assets to generate cash flow	3	2	6	Cash Flow forecasting		HoP/IM	3	2	6	0	6

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	High Level Risk	Description of risk and potential impact	Impact	Probability	Current Score	Current	Proposed	Risk Owner	Impact	Probability	Target Score	Actual Minus Target Score	
27	The introduction of The Markets in Financial Instruments Directive II (MiFID II) in January 2018 results in the investment status of the Fund being downgraded	Fund being unable to access a full range of investment opportunities and assets being sold at less than fair value should an external investment manager not opt-up the Fund to professional status	4	1	4	Opt-up process complete; no issues identified	Monitor ability to maintain opt-up status	HoP/IM	4	1	4	0	4
28	Inadequate delivery and reporting of performance delivery by Internal & External Investment Managers	Expected investment returns not achieved	3	2	6	Rigorous manager selection / Quarterly PIC performance monitoring / Asset class performance reported to PIC / Internal Investments Manager performance reviewed by HoP / My Plan reviews	Updating the Investment Compliance Manual & Procedures Manual	HoP/IM	3	2	6	0	6
29	Investments made in complex inappropriate products and or unauthorised deals	Loss of return/assets	4	1	4	Clear mandate for Internal and External Investment Managers / Compliance Manual / HoP signs off all new investment / PIC approval required for unquoted investments in excess of £25m / PIC quarterly reports / On-going staff training and CPD / My Plans	Updating Investment Compliance Manual & Procedures Manual / Establishment of LGPS Central should improve investment management sustainability	HoP/IM	4	1	4	0	4
30	Performance deterioration / lost cost savings or duplicated costs caused by LGPS Central transition delays	Under-performance of investment returns/expected cost savings not realised	4	3	12	Continue to take a meaningful role in the creation and implementation of LGPS Central / On-going HoP involvement design and development of the LGSP Central product offering and mapping to the Fund's investment strategy	Monitor and challenge LGPS Central transition plans through the Joint Committee and PAF participation / Ensure the Partner Funds priorities for determining the sub-fund launch timetable listed under 21. are regularly assessed and applied / Monitor LGPS Central development cost recharges	DoF/HoP/IM	4	2	8	4	12
31	Custody arrangements are insufficient to safeguard the Funds investment assets	Loss of return/assets	4	1	4	Regular internal reconciliations to check custodian records / Regular review of performance / Periodic procurement exercises		HoP/IM	4	1	4	0	4

Pensions Administration

32	Failure to adhere to HMRC / LGPS regulations	LGPS benefits calculated and paid inaccurately and / or late	3	2	6	Management processes, calculation checking, dedicated technical and training resource, working with the LGA and other Pension Funds re accurate interpretation of legislation, implemented more robust pensions administration system in March 19.	Increased collaboration, ensure any potential replacement system provider is more legislatively aware and proactive	PM	3	1	3	3	6
33	Failure of pensions administration systems to meet service requirements / Information not provided to stakeholders as required	Replacement pensions administration system leads to implementation related work backlogs, diminished performance and complaints	3	3	9	Dedicated Project Team continuing to test calculations, develop process solutions and arrange training for operators.	Options for enhancing the new system's reporting functionality are under considerations with a view to achieving a 'steady state' by September 19.	PM	3	1	3	6	9
34	Insufficient cyber-Liability Insurance relating to the pensions administration system	The contract with the system supplier limits a cyber liability claim to £2m, with a further £3m of cover provided through DCC's insurance arrangements. A catastrophic breach where scheme members' data is used fraudulently could lead to a claim in excess of the insurance cover.	4	2	8	DCC Internal Audit has carried out detailed testing of the supplier's data security arrangements. Combined DCC liability insurance of £5m.	Ongoing feedback to the new supplier on the level of supplier liability insurance.	HoP/PM	4	2	8	0	8
35	Data quality inadequate	Incorrect benefit calculations, inaccurate information for funding purposes	3	2	6	Manipulate data for valuation and accounting returns, apply current and short term measures in the Data Improvement Plan	Ensure sufficient time for accurate migration to the replacement administration system, apply longer term measures in the Data Improvement Plan	PM	3	2	6	0	6

Risk Number	Description		Current score			Risk Mitigation Controls & Procedures		Risk Owner	Target Score				Previous Score
	High Level Risk	Description of risk and potential impact	Impact	Probability	Current Score	Current	Proposed		Impact	Probability	Target Score	Actual Minus Target Score	
36	Delayed Annual Benefit Statements and or Pension Savings Statements (also know as Annual Allowance)	Possible delays caused by late employer returns, systems bulk processing issues and lack of resource / Reputational damage	3	2	6	Improved processes, clear messages to support employers to provide prompt accurate information, more efficient processing of ABSs on replacement system, exercise to trace addresses for missing deferred beneficiaries.	Continue work with employers to ensure better data quality, complete address checking exercise and reduce additional backlogs caused by migration.	PM	3	1	3	3	6
37	Failure to recruit and retain suitable staff / Over-reliance on key staff due	Inadequate benefits package / remote location / lack of succession planning	2	3	6	Knowledge sharing / Targeted internal training sessions / Regular My Plan reviews / the development of more resilient structures / work with the LGA to develop their training	Ensure the replacement system automates the majority of the calculations to reduce the burden on specialist staff. New Staff Development group considering staff training/development needs. Also considering staff rotation further to the implementation of the replacement pensions administration system	PM	2	2	4	2	6
38	Insufficient technical knowledge	Failure to recruit, retain, develop, train suitably knowledgeable staff	3	2	6	Updates from LGE/CLG Pensions Office meetings Quarterly EMPOG meetings/On-site training events	Skills gap audit / formal training programme / new Staff Development group/My Plan reviews	PM	3	2	6	0	6
39	Impact of McCloud judgement	The LGPS Scheme Advisory Board announced a pause in the cost cap process for the LGPS pending the outcome of the the McCloud case (transitional protections). Uncertainty has been created about the level of benefits being earned by members from 1 April 19 (at least). The outcome of the case and the effect on LGPS benefits might not be known for some time. Backdating scheme changes would present an enormous challenge to employers and the administering authority.	4	3	12	Keep up to date with news from the Scheme Advisory Board, the LGA, the Government Actuary's Department and the Fund's Actuary.		HOP/PM	3	3	9	3	0