

Risk No	Risk Description	Risk Owner	Risk Impact	Initial Impact	Initial Likelihood	Initial Score	Risk Strategy	Target Impact	Target Likelihood	Target Score	Risk Control/Action	Risk Update	2022/23 Impact	22/23 Likelihood	22/23 Score	22/23 RAG Status
PEN 1	Insufficient funds to meet pension obligations resulting in higher employer contribution rates i.e., cash injection	Director of Finance and Support Services	1. Increase in Council Tax. 2. Employers unable to meet Pension obligations. 3. Default by Employers resulting in liabilities being funded by remaining active employers in the Scheme.	4	3	12	Treat	4	2	8	Prudent assumptions based on real returns on assets and bespoke mortality assumptions used when setting employer contribution rates. Modelling work undertaken regularly to monitor fund performance against its assumptions. Modelling work undertaken to understand the impact of contribution rate strategy. Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement. Regularly review investment performance and funding levels. Monitor and review the cash flow of the Fund.	Carry out Asset Liability Modelling as part of the valuation to ensure current Investment Strategy is fit for purpose.	4	2	8	AMBER
PEN 2	Funding level falls below 90% funded resulting in the Fund changing to a higher risk investment strategy	Director of Finance and Support Services	1. Higher volatility of investments returns leading to changes in employer contribution rates and potential increase in Council Tax. 2. Adverse publicity, reputational damage. 3. Employers unable to plan and budget in the medium term. 4. Default by Employers resulting in liabilities being funded by remaining active employers in the Scheme.	4	2	8	Treat	4	1	4	Monitor, maintain and review the investment strategy including parameters for any re-risking. Monitor and review the investment manager performance and processes. Regularly review investment performance and funding levels. Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement. Modelling work undertaken regularly to monitor fund performance against its assumptions.	Prudent assumptions adopted by the Fund Actuary. Carry out Asset Liability Modelling as part of the valuation to ensure current Investment Strategy is fit for purpose.	4	1	4	GREEN

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PEN 3	Employer contribution rates fluctuate between actuarial valuations due to membership experience	Director of Finance and Support Services	<p>1. Increase in Council Tax.</p> <p>2. Default by Employers resulting in liabilities being funded by remaining active employers in the Scheme.</p> <p>3. Employers unable to meet Pension obligations.</p> <p>4. Employers are unable to plan and budget in the medium term.</p> <p>5. Adverse publicity, reputational damage.</p>	4	2	8	Treat	3	2	6	<p>The Pension Fund pools certain employers to help manage fluctuations in contribution rates.</p> <p>The Pension Fund has also adopted a policy of stabilisation for large, secure employers i.e. contribution rates move within a threshold level reviewed at the Valuation.</p> <p>Strain costs are monitored and each employer has an ill health budget. Ill health insurance is offered to all employers.</p> <p>Regularly review investment performance and funding levels</p> <p>Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement.</p>	<p>Prudent assumptions adopted by the Fund Actuary.</p> <p>Carry out Asset Liability Modelling as part of the valuation to ensure current Investment Strategy is fit for purpose.</p> <p>Likelihood is reduced as in penultimate year of valuation cycle.</p>	3	1	3	GREEN
PEN 4	Employer no longer actively participating in the Scheme but deficit/surplus exists.	Director of Finance and Support Services	<p>1. Employers unable to meet Pension obligations.</p> <p>2. Default by Employers resulting in liabilities being funded by remaining active employers in the Scheme.</p> <p>3. Adverse publicity, reputational damage.</p>	4	3	12	Treat	4	1	4	<p>Covenant review at least every three years and contributions set on the basis of an employers ongoing participation in the fund and their security.</p> <p>Admission Agreements are regularly reviewed and enhanced by external advisers to reflect best practice and current Regulations and set out the employer obligations clearly.</p> <p>Bond / Guarantee Agreements in place which clearly set out level of a funding guarantee from another scheme employer, external body or government agency.</p> <p>Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement.</p> <p>Membership changes are monitored regularly and employer costs, such as early retirement and ill health early retirement, are charged to an employer as appropriate.</p>	<p>Prudent assumptions adopted by the Fund Actuary.</p> <p>Admission process amended to reflect exit credit policy.</p>	4	2	8	AMBER

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PEN 5	Declining membership numbers from some employers	Director of Finance and Support Services	<p>1. Employers unable to meet Pension obligations</p> <p>2. Benefit payments are higher than contribution income</p> <p>3. Default by Employers resulting in liabilities being funded by remaining active employers in the Scheme</p>	4	3	12	Treat	4	3	12	<p>Membership numbers are monitored regularly and employers with low membership are contacted.</p> <p>Guarantee Agreements also in place which clearly set out level of a funding guarantee from another scheme employer, external body or government agency.</p> <p>Monitor, maintain and review the Investment Strategy Statement and Funding Strategy Statement.</p> <p>Regularly review investment performance and funding levels.</p> <p>Monitor and review the cash flow of the Fund.</p>	<p>Prudent assumptions adopted by the Fund Actuary.</p> <p>Improvements in data quality will provide more robust review and challenge. Increase in cost of living placing pressure on members prioritising expenditure.</p>	4	3	12	AMBER
PEN 6	Failure to comply with Government expectations on asset pooling or new arrangements agreed via ACCESS	Director of Finance and Support Services	<p>1. The Secretary of State takes over investment functions of the Fund and directs its investment strategy and to invest in specific assets.</p> <p>2. Impairment of the Fund's ability to meet its pension obligations.</p> <p>3. Adverse publicity, reputational damage.</p>	5	2	10	Treat	5	1	5	<p>Continued strong involvement in the work of the ACCESS Group at officer and at Fund Chairman level.</p> <p>Involvement in the procurement work and the Pool's governance work.</p> <p>Engagement with external advisers.</p>	<p>All liquid assets are now invested via the ACCESS ACS.</p> <p>Consultation on pooling expected in the summer.</p>	5	2	10	GREEN
PEN 7	New arrangements agreed via ACCESS do not meet the needs of West Sussex Pension Fund	Director of Finance and Support Services	<p>1. The fund is unable to implement it's ISS or choose best in class or appropriate managers.</p> <p>2. The fund takes on more risk than necessary.</p> <p>3. The funding level of the fund reduces.</p> <p>4. Negative impact on officer time and resources.</p>	5	3	15	Treat	5	2	10	<p>Continued strong involvement in the work of the ACCESS Group at officer and at Fund Chairman level.</p> <p>Involvement in the procurement work and the Pool's governance work.</p> <p>Engagement with external advisers.</p> <p>Regular review of the funds investment strategy.</p>	<p>All liquid assets are now invested via the ACCESS ACS.</p> <p>Consultation on pooling expected in the summer.</p>	5	2	10	GREEN

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PEN 8	Pension Fund accounts not accurately maintained	Finance Manager - Pension Fund	<p>1. Adverse Audit opinion.</p> <p>2. Benefits paid incorrectly.</p> <p>3. Investment decisions made on incorrect information resulting in higher risk.</p> <p>4. Adverse publicity, reputational damage.</p> <p>5. Under/overstatement of investments.</p> <p>6. Negative impact on officer time and resources.</p>	4	3	12	Treat	3	3	9	<p>Detailed reconciliations are carried out on a regular basis.</p> <p>Plan to close down accounts with timetable.</p> <p>Ensure staff are trained appropriately.</p> <p>Maintain a good working relationship with the Actuary and auditors.</p> <p>Involvement with CIPFA resulting in best practice being adopted.</p> <p>Quality assurance of the accounts included within the timetable.</p>	<p>Accounts team established with good level of experience.</p> <p>Audit team stable.</p>	4	3	12	AMBER
PEN 9	The Pension Fund does not provide a clear and suitable investment strategy-for selection of investments	Director of Finance and Support Services	<p>1. Volatility of investment returns and/or net performance impacting the funding level.</p> <p>2. The fund is unable to implement its investment strategy or choose best in class or appropriate managers.</p> <p>3. The fund takes on more risk than appropriate.</p> <p>4. Negative impact on officer time and resources.</p> <p>5. The funding level of the fund reduces.</p>	5	2	10	Treat	5	1	5	<p>Monitor, maintain and review the Investment Strategy Statement.</p> <p>Investment performance is monitored quarterly against the performance of the fund-specific benchmark and the returns assumed in the actuarial valuation.</p> <p>Investment Managers held to account at Committee meetings.</p> <p>The Fund adopts a detailed procurement process which clearly outlines the managers obligations.</p> <p>Contractual requirements within the investment documentation clearly set out the required benchmark and targets.</p> <p>The Fund takes appropriate advice from professional advisors.</p>	<p>Carry out Asset Liability Modelling as part of the valuation to ensure current Investment Strategy is fit for purpose.</p> <p>Monitoring implementation against current investment strategy.</p> <p>Risk reworded to reflect change in investment style to funds.</p>	5	2	10	GREEN
PEN 10	Failure to comply with changes to LGPS Regulations and/or HMRC Rules	Head of Finance	<p>1. This could potentially create additional liabilities and administration difficulties for employers and the administering authority.</p> <p>2. The Pensions Regulator can fine the Fund for breach of regulations.</p> <p>3. Actuary impaired in making an assessment of an employers liabilities.</p> <p>4. Adverse publicity, reputational damage.</p>	4	3	12	Treat	4	2	8	<p>All consultation papers issued by the DHLUC, Revenue & Customs, and other bodies are commented on where appropriate.</p> <p>Officers to review all relevant regulation changes.</p> <p>Input from Actuary as needed.</p>	<p>A number of consultations are expected in the summer along with the Pension Regulator combined code of practice which will assist with understanding of obligations.</p>	4	2	8	GREEN

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PEN 14	Level of expertise and ongoing development of the Pensions Committee and Pension Advisory Board does not comply with guidance.	Finance Manager - Pension Fund Governance	<ul style="list-style-type: none"> 1. Poor decision making. 2. Fined by The Pension Regulator. 3. Non engagement of Committee and Board members. 4. Inability to invest due to loss of Professional Investor status. 	3	2	6	Treat	3	1	3	<ul style="list-style-type: none"> Maintain and implement Training Strategy which draws on guidance. Monitoring PC, PAB and Officer completion of LOLA and Toolkit. 	<ul style="list-style-type: none"> Training provision reviewed and amended to reflect membership of Committee. External training purchased. Training strategy approved by PC. There are new members of the committee. 	4	4	16	RED
PEN 15	Pension Board Members and Pensions Committee Members do not declare conflicts of interest.	Finance Manager - Pension Fund Governance	<ul style="list-style-type: none"> 1. Breach of regulations. 2. Fined by The Pension Regulator. 	3	1	3	Treat	2	1	2	<ul style="list-style-type: none"> Clear conflict of interest and disclosure requirements are maintained for the Pension Fund and the Pension Board in line with WSCC overriding policies. Members of the Pension Board and Pensions Committee are asked to make declarations at the start of and during each meeting as appropriate. 	<ul style="list-style-type: none"> Review of Good Governance recommendations and development of Fund Conflict of Interest Policy. 	4	1	4	GREEN
PEN 16	Inaccurate and/or incomplete data retained by the Pension Fund. Legislation specifies the records that must be kept and failure to comply is a breach of the law.	Director of Finance and Support Services	<ul style="list-style-type: none"> 1. Pay incorrect pension amounts. 2. Impact on investment decisions. 3. Additional time and cost within the team and with external advisers. 4. Fined by the Pension regulator or fined by the Information Commissioner. 5. Actuary impaired in making an assessment of an employers liabilities due to quality of data (and through to their contribution rates). 6. Members make decisions based on incorrect or incomplete information. 7. Adverse publicity, reputational damage. 	4	4	16	Treat	2	2	4	<ul style="list-style-type: none"> All employers are provided with Administration and Employer Guides setting out their roles and responsibilities whilst participating in the Scheme. Escalation in place where employers fail to supply the correct data. Internal auditors undertake work on systems and processes. Review procedures and controls and implement changes where appropriate. Maintain and implement a Data Improvement Plan. End of year returns from employers provides a control whereby data is checked annually. 	<ul style="list-style-type: none"> Positive feedback from Hymans on improvements in data. Preserved refund project being scoped by administration team. 	4	3	12	AMBER

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PEN 19	Pensions team not resourced appropriately	Head of Finance	1. Key work deliverables are not completed. 2. Key staff leaving due to work load. 3. Lack of continuity and knowledge transfer.	4	4	16	Treat	3	3	9	Develop succession plan to manage key person risk. Document tasks and develop process notes where required. Review of Pensions Team work plan and resources. Regular team meetings to understand workload pressures and transfer knowledge. Develop training plan for officers.	There is currently a vacancy with work being prioritised and managed across team members.	3	4	12	AMBER
PEN 20	Knowledge and understanding of Officers may not comply with the requirement to have the appropriate knowledge and understanding.	Finance Manager - Pension Fund Governance	1. Poor decision making/recommendations. 2. Fined by The Pension Regulator. 3. Non compliance with County Council e.g. Standing Orders, Procurement Requirements. 4. Inability to invest due to loss of Professional Investor status. 5. Non engagement of officers in required decision making.	4	2	8	Treat	3	2	6	Maintain and implement Training Strategy which draws on guidance. Training requirements identified at yearly appraisals. Regular meetings between line managers and team members. Monitoring PC, PAB and Officer completion of LOLA and Toolkit.	Training provision reviewed and amended to reflect needs of officers. External training purchased. Training strategy approved by PC.	4	3	12	AMBER
PEN 21	Contractual requirements not met by investment managers	Pension Fund Strategist	1. Impairment of investment outcomes. 2. Breach in legislation. 3. Poor provision of financial data provided to Pension Fund Team resulting in poor audit opinion.	4	4	16	Treat	4	2	8	Regular communication with all contracting entities and foster good working relationships. Service levels set out clearly in contract and monitored. Continued strong involvement in the work of the ACCESS Group at officer and at Fund Chairman level. Compliance with procurement requirement and standing orders for provision of services to the Fund. Maintain and manage contract register.	Greater reliance on one contract managed outside of WSPF control.	4	3	12	AMBER

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PEN 22	Contracts expiring or becoming invalid	Finance Manager - Pension Fund Governance	1. No valid legal agreement in place with suppliers. 2. Breach in legislation. 3. Breach of County Council Standing Orders. 4. Potential challenge from suppliers.	3	3	9	Treat	3	2	6	Maintain and manage contract register. Engaging with procurement and legal to ensure compliance. Compliance with procurement requirement and standing orders for provision of services to the Fund.	One contract due to expire in June 2022.	3	2	6	GREEN
PEN 23	Role of government policy on the management and benefits of the Scheme.	Head of Finance	1. Changes in legislation. 2. Changes to benefit structure.	4	4	16	Tolerate	3	4	12	Keeping up to date with Government progress. Maintain links with experts and advisers.	Awaiting changes to regs on Exit Cap, McCloud etc.. Expecting consultation in the summer.	4	4	16	RED
PEN 25	Increase in number of employers admitted to Fund	Pension Fund Strategist	1. Increase in the workload across the team. 2. Delays resulting in impact on members and benefit payments. 3. Additional complexity to be managed for BAU processes.	3	3	9	Treat	3	3	9	Work planning to ensure new admissions are anticipated and communicated appropriately. Clear processes in place for the monitoring of contributions. Liaising with Actuary regularly to ensure employers are admitted appropriately. Guidance published and reviewed relating to the Scheme requirements.	Government white paper setting out requirement for all schools to become academies by 2030. There is understood to be 200 schools that will need to convert over the next 8 years which will have a significant impact on the number of employers in the Fund.	4	5	20	RED
PEN 26	Employers do not pay contributions, pay incorrect amount, pay contributions late or do not provide required information	Finance Manager - Pension Fund	1. Default by employers increasing obligation on the remaining employers in the Fund. 2. Increase in number of bonds/guarantees in place. 3. Reporting to the Pensions Regulator. 4. Benefits calculated incorrectly. 5. Employer contribution rates calculated incorrectly. 6. Increased liabilities which are not funded.	3	2	6	Treat	2	1	2	Clear employer guide in place setting out responsibility of employers regarding provision of information and contributions. Clear admin strategy that can be reported on so that issues can be dealt with at an early stage. Regular monitoring and reconciliation of contribution payments received with clear escalation process. Identify issues to relevant parties including the Fund Actuary.	Improvement in processes to ensure early identification of employer admissions and cessations.	2	2	4	GREEN

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PEN 27	There is a risk of a successful cyber attack directly from external threats; or indirectly as a consequence of members or staff falling prey to social engineering or phishing attacks. The potential outcome may lead to service disruption, financial or data loss.	Director of Finance and Support Services	<ol style="list-style-type: none"> 1. The Fund suffers significant financial loss or cost. 2. The Fund's reputation is damaged. 3. Member's and employer's trust in the Council is undermined. 4. Partners will not share data or information with the Fund. 5. Punitive penalties are made on the Fund. 	4	4	16	Treat	3	3	9	<p>Staff awareness of personal and business information security practices and identification of cyber-security issues including evolving threats.</p> <p>Have processes in place which assist with identifying cyber-attack early, that it is reporting & monitoring is effective, and recovery can be prompt.</p> <p>Robust arrangements in place with all data processors of the Fund's data.</p>	<p>Officers are taking appropriate advice in considering how risk can be managed/mitigated.</p> <p>Liaising with internal IT team and external providers to understand procedures in the event of cyber attack.</p>	5	5	25	RED
PEN 28	New County Council financial system does not meet Pension Fund requirements	Finance Manager - Pension Fund Governance	<ol style="list-style-type: none"> 1. Potential loss of historical information (payroll and contributions). 2. Replacement system does not meet Fund requirements. 	4	3	12	Tolerate	3	2	6	<p>Early engagement.</p> <p>Consider alternative archiving of key information.</p> <p>Be clear in requirements of the Fund with regards to reporting standards required.</p>	<p>Team feeding in to wider project.</p> <p>Concern over timeframes and resource required to deliver.</p> <p>Working to understand archive options.</p>	4	3	12	AMBER
PEN 29	The benefits payable each month are more than the contributions received each month (cash flow negative)	Pension Fund Strategist	<ol style="list-style-type: none"> 1. On a short term basis the Fund is not able to pay benefits or has to borrow money. 2. Inability to meet liabilities. 3. Need to recall monies from Investment Managers resulting in a loss of investment returns or sale of assets. 	4	3	12	Treat	3	2	6	<p>Cashflow monitor and projections implemented and reviewed on a monthly basis.</p> <p>Work with Actuary to ensure long term planning of cash flow.</p> <p>Regular meetings with Treasury Management team to discuss cash balances.</p>	<p>Review employer covenant as part of valuation and take appropriate action.</p> <p>Investments made into income generating assets.</p> <p>Size and pattern of contributions to feed into cashflow monitor and projections.</p> <p>Review Deferred Contribution policy as part of FSS review.</p>	3	3	9	GREEN
PEN 30	Freedom of Information requests not dealt with appropriately	Finance Manager - Pension Fund Governance	<ol style="list-style-type: none"> 1. Breach of contract with Fund Managers where information is provided. 2. Challenge against statutory obligations if information is not provided. 3. Referral to Information Commissioners Office. 	4	3	12	Treat	4	2	8	<p>Liaise regularly with Fund Managers regarding requests.</p> <p>Liaise with legal advisers.</p> <p>Keep accurate records of what has been responded to and reasons why information is provided/withheld.</p>	<p>Review processes following investment in ACS and other investment asset classes to ensure compliance with regulations.</p> <p>Reviewing practices and processes to maximise efficiency.</p>	4	2	8	GREEN

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PEN 31	Policies are not updated in adherence to new guidance issued	Finance Manager - Pension Fund Governance	1. Policies are not compliant. 2. Challenge from stakeholders. 3. Referral to the Pensions Regulator.	3	3	9	Treat	2	2	4	Register of policy documents maintained to manage review expectations. Policy documents compliance review included as a standing item of the Pension Advisory Board agendas.	Carry out review of policy register in line with best practice. Review County Council policies to ensure currency.	2	2	4	GREEN
PEN 32	Pressure from stakeholders and/or changes in Regulation or guidance results in change to investment strategy due to potential Environmental, Social or Governance factors.	Director of Finance and Support Services	1. Fund Manager investments restricted resulting in impaired investment outcomes. 2. Fund challenged regarding fiduciary duty.	4	4	16	Tolerate	3	4	12	Requirement for active engagement by Fund Managers and regular dialogue regarding rationale behind investment decisions. Regular dialogue with Fund Managers regarding investment process. Training for all decision makers regarding obligations and responsibilities. Keep up to date with Scheme Advisory Board and Government guidance.	TCFD consultation anticipated in summer which will impact on actions taken and additional reporting requirements for Committee. Public Service Pensions and Judicial Offices Bill accepted in the Lords stating that the Secretary of State can issue guidance that LGPS Funds may not make investment decisions that conflict with the UK's foreign and defence policy. Levelling Up white paper includes references to LGPS funds having plans for up to 5% of assets to be allocated to projects which support local areas. Full impact is difficult to quantify until further information/guidance is received from Government and Scheme Advisory Board.	4	5	20	RED
PEN 33	Conflict of interest between the County Council and the Fund	Director of Finance and Support Services	1. Advice and decisions taken in best interests of Council or Fund which may differ. 2. Employers do not understand the difference between the Council and the Fund.	4	3	12	Treat	3	2	6	Be clear in requirements of the Fund and roles and responsibilities of all entities.	Specific Pension Fund Conflict of Interest Policy will be required following implementation of SAB Good Governance project. Consultation on guidance expected in the summer.	3	2	6	GREEN

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PEN 34	Reliance on external payrolls (including outsourced providers)	Principal Pensions Consultant	1. Incorrect or insufficient information is provided by employers payroll providers. 2. Contribution income and remittances are not received. 3. Missing historical data due to changes in payroll providers/systems.	3	4	12	Treat	3	2	6	Provide clear guidance regarding what the requirements are for a payroll provider/system. Provide clear guidance regarding what an employers responsibilities are	Known change to two major employer systems being monitored.	5	3	15	AMBER
PEN 35	Changes to employer circumstances	Principal Pensions Consultant	1. Delays in implementing changes. 2. Reduced opportunity to manage the employers circumstances or exit. 3. Wrong contact information is held.	4	4	16	Treat	3	3	9	Liaise with employers regularly. Monitor active membership of all employers. Work with Actuary to ensure managed exits.	Merger of large employers within the Fund upcoming which will be complex regarding data.	4	4	16	RED
PEN 38	Insolvency of an employer resulting in unpaid liability	Pension Fund Strategist	1. Employers not paying contributions or paying reduced contributions for either resourcing or finance reasons. 2. Impact on cashflow 3. Employers exiting the Fund with little or no warning.	4	4	16	Treat	4	3	12	Communication with advisors to understand options regarding contribution regulations. Implement cashflow monitor and projections and review on a monthly basis. Covenant review discussions.	Review employer covenant and take appropriate action. Liaising with Legal to understand actions following insolvency.	4	3	12	AMBER
PEN 41	Partnership expectations not met in delivery of administration	Head of Finance	1. Failure to deliver high quality admin service to all stakeholders. 2. Processes and procedures do not ensure that the Fund receives income due. 3. Processes and procedures do not ensure that payments are made correctly and timely. 4. Failure to account appropriately.	4	3	12	Treat	4	2	8	Regular review through partnership meetings. Close working between teams.	Engagement with administration team to understand business priorities and development of service.	4	3	12	AMBER
PEN 42	Delay to admissions of employers to the Fund	Principal Pensions Consultant	1. Members not admitted to the Fund in a timely manner. 2. Contributions not received on time resulting in increased workload to recover. 3. Inability to complete processes in a timely manner. 4. Delays resulting in impact on members and benefit payments.	4	3	12	Treat	4	2	8	Work planning to identify new admissions. Clear processes in place for the admittance of new employers. Liaising with Actuary regularly to ensure employers are admitted appropriately.	There is currently a vacancy with work being prioritised and managed across team members.	4	3	12	AMBER

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PEN 43	Fund not able to implement changes required as a result of McCloud judgement	Pension Fund Strategist	1. Not calculating members benefits in line with regulations. 2. Impact on funding. 3. Investigation by tPR. 4. Reputational damage.	5	3	15	Treat	3	3	9	Project team set up by admin team. Communication with employers letting them know requirements and to flag any issues.	Data has been collected from employers and pension administration software provider has adapted system. Awaiting Government consultation on remedy.	5	3	15	AMBER
PEN 44	Employers do not hold required information for the Fund to be able to complete the changes required as a result of the McCloud Judgement	Pension Fund Strategist	1. Not calculating members benefits in line with regulations. 2. Impact on funding. 3. Investigation by tPR. 4. Reputational damage.	5	3	15	Treat	3	3	9	Project team set up by admin team. Communication with employers letting them know requirements and to flag any issues.	Data has been collected from employers and pension administration software provider has adapted system. Awaiting Government consultation on remedy.	5	2	10	GREEN
PEN 45	Insufficient resources for the Fund to be able to complete the changes required as a result of the McCloud Judgement	Pension Fund Strategist	1. Not calculating members benefits in line with regulations. 2. Impact on funding. 3. Investigation by tPR. 4. Reputational damage.	5	3	15	Treat	3	3	9	Project team set up by admin team. Communication with employers letting them know requirements and to flag any issues.	Data has been collected from employers and pension administration software provider has adapted system. Awaiting Government consultation on remedy.	5	3	15	AMBER
PEN 46	County Council not resourced appropriately to support Pensions functions	Finance Manager - Pension Fund Governance	1. Key work deliverables are not completed. 2. Key staff leaving due to work load. 3. Lack of continuity and knowledge transfer. 4. Manual intervention with regards to reporting to Custodian and Actuary. 5. Reputational risk due to impact on IAS 19. 6. Accuracy of data within accounts.	4	4	16	Treat	3	2	6	Document tasks and develop process notes where required. Understanding of single point of failure. Communication between CC teams. Monitor regular tasks to ensure completion. Agree escalation route with managers.	Reviewing practices and processes to maximise efficiency.	4	4	16	RED

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PEN 48	New County Council financial system implementation impacts workload and resources	Finance Manager - Pension Fund Governance	1. Delay to implementation of financial system conflicts with valuation and/or end of year work. 2. New system doesn't meet the Pension Fund needs due to lack of resource to fully test.	3	4	12	Tolerate	3	3	9	Engagement with team working to implement new system to ensure Pension Fund needs are understood which will reduce workload later in the year. Document processes so that non Pension Team member can test. Work load and resource planning to cover whole team.	Delay to implementation, concern over timeframe and resource given valuation work and resource required.	4	4	16	RED
PEN 49	Global events have an adverse impact on the pension fund investment portfolio and the Fund's cashflow.	Pension Fund Strategist	1. Pressure on rental income as tenants request rent free/reduced rent periods following pandemic. 2. Ability to make changes to investments may be impacted.	4	4	16	Treat	3	4	12	Communication with Fund Manager to understand their approach. Discuss options with investment advisors. Monitoring liabilities.	This risk replaces PEN 40 which was specific to the potential impact of the pandemic on the Pension Fund investment portfolio. Fund remains in surplus despite volatile markets.	3	3	9	GREEN