

Appendix - Leicestershire Pension Fund Risk Register July 2022

In the Fund's register there are six risk groups. Each risk sits within a risk group.

Risk Groups

1. Investment Risk
2. Liability Risk
3. Employer Risk
4. Governance Risk
5. Operational Risk
6. Regulatory Risk

Investment Risk

Risk no	Risk Area	Service	Risk	Causes (s)	Consequences	Risk Owner	List of current controls	I	L	Current Risk Score	Risk Response; <i>Tolerate</i> <i>Treat</i> <i>Terminate</i> <i>Transfer</i>	Further Actions / Additional Controls	I	L	Residual Risk Score	Action owner
1	Investments	Invs	Market investment returns are consistently poor, and this causes significant upward pressure onto employer contribution rates	Poor market returns most probably caused by poor economic conditions and/ or shocks e.g. CV19.	Significant financial impact on employing bodies due to the need for large increases in employer contribution rates	Chris Tambini	Ensuring that strategic asset allocation is considered at least annually, and that the medium-term outlook for different asset classes is included as part of the consideration	5	2	10	Treat	Making sure that the investment strategy is sufficiently flexible to take account of opportunities and risks that arise but is still based on a reasonable medium-term assessment of future returns.	4	2	8	Bhulesh Kachra
2	Investments	Invs	Market returns are acceptable, but the performance achieved by the Fund is below reasonable expectations	Poor performance of individual managers including LGPS Central, poor asset allocation policy or costs of transition of assets to LGPS Central is higher than expected	Opportunity cost in terms of lost investment returns, which is possible even if actual returns are higher than those allowed for within the actuarial valuation. Lower returns will	Chris Tambini	Ensuring that the causes of underperformance are understood and acted on where appropriate Shareholders' Forum, Joint Committee and Practitioners'	3	3	9	Treat	After careful consideration, take decisive action where this is deemed appropriate. It should be recognised that some managers have a style-bias and that poorer relative	2	2	4	Bhulesh Kachra

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					ultimately lead to higher employer contribution rates than would otherwise have been the case		<p>Advisory Forum will provide significant influence in the event of issues arising.</p> <p>Appraisal of each LGPS Central investment product before a commitment to transition is made.</p> <p>Where appropriate specialist transition manager being appointed, with independent specialist oversight.</p> <p>Transitions are phased over time to allow capacity to be managed and lessons learned</p>					<p>performance will occur. Decisions regarding manager termination to consider multiple factors including performance versus mandate and reason for original inclusion.</p> <p>The set-up of LGPS Central is likely to be the most difficult phase. The Fund will continue to monitor closely how the company evolves</p> <p>Programme of LGPS Central internal audit activity, which has been designed in collaboration with the audit functions of the partner funds</p> <p>Each transition's approach is independently assessed with views from 8 partners sought.</p>				
3	Investments	Invs	Failure to take account of ALL risks to future investment returns within the setting of asset allocation	Some assets classes or individual investments perform poorly as a result of incorrect assessment of all	Opportunity cost within investment returns, and potential for actual returns to be low. This will lead to	Chris Tambini	Ensuring that all factors that may impact onto investment returns are taken into account when	3	4	12	Treat	Responsible investment aims to incorporate environmental (including Climate change), social and	3	3	9	Bhulesh Kachra

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			policy and/or the appointment of investment managers	risks inherent within the investment.	higher employer contribution rates than would otherwise have been necessary.		<p>setting the asset allocation.</p> <p>Only appointing investment managers that integrate responsible investment (RI) into their processes.</p> <p>Utilisation of dedicated RI team at LGPS Central and preparation of an annual RI plan , Climate Risk Report and Climate Stewardship Report. The Fund also produces an annual report as part of the Taskforce on Climate-related Financial Disclosures.</p> <p>The Fund is also member of the Local Authority Pension Fund Forum (LAPFF) and supports their work on shareholder engagement which is focused on promoting the highest standards of corporate governance and</p>					<p>governance (ESG) factors into investment decisions, to better manage risk and generate sustainable, long-term returns.</p> <p>Annual refresh of the Fund's asset allocation allows an up to date view of risks to be incorporated and avoids significant short term changes to the allocation.</p> <p>Asset allocation policy allows for variances from target asset allocation to take advantage of opportunities and negates the need to trade regularly where investments under and over perform in a short period of time.</p> <p>The Fund is in the process of developing a Net Zero Climate Strategy to take into account the risk and opportunities</p>				

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							corporate responsibility.					related to climate change.				

Liability Risk

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4	Liability	Invs	Assets held by the Fund are ultimately insufficient to pay benefits due to individual members	Ineffective setting of employer contribution rates over many consecutive actuarial valuations	Significant financial impact on scheme employers due to the need for large increases in employer contribution rates.	Chris Tambini	Input into actuarial valuation, including ensuring that actuarial assumptions are reasonable and the manner in which employer contribution rates are set does not bring imprudent future financial risk	5	2	10	Treat	Actuarial assumptions need to include an element of prudence, and Officers need to understand the long-term impact and risks involved with taking short-term views to artificially manage employer contribution rates. The 2019 valuation assessed the contribution rates with a view to calculating monetary contributions	4	2	8	Bhulesh Kachra

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												<p>alongside employer percentages of salaries where appropriate. Regular review of market conditions and dialogue with the schemes biggest employers with respect to the direction of future rates. Planning for the 2022 valuation has commenced with the actuary.</p> <p>GAD Section 13 comparisons.</p> <p>Funding Strategy Statement approach to increase the fund to over 100% funded.</p>				

Employer Risk

Risk no	Risk Area	Service	Risk	Causes (s)	Consequences	Risk Owner	List of current controls	I	L	Current Risk Score	Risk Response; <i>Tolerate</i> <i>Treat</i> <i>Terminate</i> <i>Transfer</i>	Further Actions / Additional Controls	I	L	Residual Risk Score	Action owner
5	Employer	Pens	<p>If the pensions fund fails to receive accurate and timely data from employers, scheme members pension benefits could be incorrect or late</p> <p>This includes data at year-end</p>	<p>A continuing increase in Fund employers is causing administrative pressure in the Pension Section. This is in terms of receiving accurate and timely data from these new employers who have little or no pension knowledge and employers that change payroll systems so require new reporting processes</p>	<p>Late or inaccurate pension benefits to scheme members</p> <p>Reputation</p> <p>Increased appeals</p> <p>Greater administrative time being spent on individual calculations</p> <p>Failure to meet statutory year-end requirements</p>	Ian Howe	<p>Training provided for new employers</p> <p>Guidance notes provided for employers</p> <p>Amended SLA and communication and administration guide distributed to employers making IConnect a statutory requirement by 31/3/2022)</p> <p>Year-end specifications provided</p> <p>Employers are monthly posting</p>	3	3	9	Treat	<p>Inform the Local Pension Board annually</p> <p>Continued development of wider bulk calculations</p> <p>Implemented automation of certain member benefits using monthly data posted from employers</p> <p>Pensions to develop a monthly tracker for employer postings</p>	3	2	6	Ian Howe
6	Employer	Pens	<p>If contribution bandings and contributions are not applied correctly, the Fund could receive lower contributions than expected</p>	<p>Errors by Fund employers payroll systems when setting the changes</p>	<p>Lower contributions than expected.</p> <p>Incorrect actuarial calculations made by the Fund.</p> <p>Possibly higher employer contributions set</p>	Ian Howe	<p>Pension Section provides employers with the annual bandings each year.</p> <p>Pension Section provides employers with contributions rates (full and</p>	4	2	8	Treat	<p>Pension Officers check sample cases at year-end</p> <p>Pension Officers to report major failings to internal audit before the annual audit process</p>	4	1	4	Ian Howe

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					than necessary		50/50) Internal audit check both areas annually and report their findings to the Pensions Manager					Major failings to be reported to the Pensions Board				
7	Employer	Invs	Employer and employee contributions are not paid accurately and on time	Error on the part of the scheme employer CV19 may reduce some employer's income so they are unable to make payment	Potentially reportable to The Pensions Regulator as late payment is a breach of The Pensions Act.	Ian Howe	Receipt of contributions is monitored, and late payments are chased quickly. Communication with large commercial employers with a view to early view of funding issues. Internal Audit review on an annual basis and report findings to the Pensions Manager	2	4	8	Treat	Late payers will be reminded of their legal responsibilities.	2	3	6	Declan Keegan

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8	Governance	Pens	If the Funds In House AVC provider (The Prudential) does not meet its service delivery requirements the Pension Fund is late in making payment of benefits to scheme members	<p>The Fund must offer AVCs as per the Regulations</p> <p>Prudential implemented a new administration system in November 2020</p> <p>Covid lockdown restrictions and home working</p>	<p>Failure to meet key performance target for making payments of retirement benefits to members</p> <p>Complaints</p> <p>Reputational damage</p> <p>Members may cease paying AVCs</p>	Ian Howe	<p>Written to all active scheme members with AVCs</p> <p>Reported it to the Chair of the Pension Boards and Senior Officers</p> <p>Reported to the LGA and other Funds</p> <p>Discussed with the Prudential</p> <p>Weekly list of outstanding cases sent to the Prudential for priority</p>	3	3	9	Treat	<p>Reported the delayed payment of benefits (due to the Prudential's delays) as a material breach to the Pensions Regulator</p> <p>Prudential attended a meeting with the Local Pension Board</p> <p>Prudential working through an improvement plan</p> <p>Prudential engage with Fund Officers positively to quickly resolve issues</p> <p>A national meeting with LGPS Funds and the Prudential is being organised to develop continued improvements</p>	3	1	3	Ian Howe
9	Governance	Pens/Invs	Sub-funds of individual employers are not monitored to ensure that there is the correct balance between risks to the Fund and fair treatment of the employer	<p>Changing financial position of both sub-fund and the employer</p>	<p>Significant financial impact on employing bodies due to need for large increases in employer contribution rates.</p> <p>Risk to the Fund of insolvency of an individual employer. This will</p>	Ian Howe/ Declan Keegan	<p>Ensuring, as far as possible, that the financial position of each employer is understood. On-going dialogue with them to ensure that the correct balance between risks and fair treatment continues.</p>	5	2	10	Treat	<p>Dialogue with the employers, particularly in the lead up to the setting of new employer contribution rates.</p> <p>Include employer risk profiling as part of the Funding Strategy Statement</p>	4	2	8	Ian Howe and Declan Keegan

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					ultimately increase the deficit of all other employers.							<p>update. To allow better targeting of default risks</p> <p>Investigate arrangements to de-risk funding arrangements for individual employers.</p> <p>Ensure that the implications of the independent, non-public sector status, of further education, sixth form colleges, and the autonomous, non-public sector status of higher education corporations is fully accounted for in the Funding Strategy</p>				
10	Governance	Invs	Investment decisions are made without having sufficient expertise to properly assess the risks and potential returns	The combination of knowledge at Committee, Officer and Consultant level is not sufficiently high	Poor decisions likely to lead to low returns, which will require higher employer contribution rates	Chris Tambini	Continuing focus on ensuring that there is sufficient expertise to be able to make thoughtfully considered investment decisions	3	3	9	Treat	On-going process of updating and improving the knowledge of everybody involved in the decision-making process	2	2	4	Bhulesh Kachra

Operational

Risk no	Risk Area	Service	Risk	Causes (s)	Consequences	Risk Owner	List of current controls	I	L	Current Risk Score	Risk Response; <i>Tolerate</i> <i>Treat</i> <i>Terminate</i> <i>Transfer</i>	Further Actions / Additional Controls	I	L	Residual Risk Score	Action owner
11	Operational	Pens	If the Pension Fund fails to hold all pensioner data correctly, including Guaranteed Minimum Pension (GMP) data, individual member's annual Pensions Increase results could be wrong.	From 2018 the pensions section has had responsibility for GMPs creating the need to ensure that this is accounted for in the pensions increases	Overpaying pensions (i.e. for GMP cases pension increases are lower) Reputation	Ian Howe	Checking of HMRC GMP data to identify any discrepancies. Internal Audit run an annual Pensions Increase result test and provide an annual report of findings	3	3	9	Treat	Officers run the HMRC GMP check on a case by case basis and input the results into member records at retirement	2	1	3	Ian Howe
12	Operational	Pens	If the Pensions Section fails to meet the information/cyber security and governance requirements, then there may be a breach of the statutory obligations.	Pensions database now hosted outside of LCC. Employer data submitted through online portal. Member data accessible through member self-service portal (MSS). Data held on third party reporting tool (DART). Greater awareness of information rights by service users.	Diminished public trust in ability of Council to provide services. Loss of confidential information compromising service user safety. Damage to LCC reputation. Financial penalties.	Ian Howe	Regular LCC Penetration testing and enhanced IT health checks in place. LCC have achieved PSN compliance. New firewall in place providing two layers of security protection in line with PSN best practice.	5	2	10	Treat	Work with LCC ICT and Aquila Heywood (software suppliers) to establish processes to reduce risk, e.g. can Aquila Heywood demonstrate that they are carrying out regular penetration testing and other related processes take place. Liaise with Audit to establish if any further processes can be put in place in line with best	5	1	5	Stuart Wells

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												practice. Good governance project and the expected TPR new code of practice to include internal audit reviews of both areas. Report the findings to the Board.				
13	Operational	Pens	If immediate payments are not applied correctly, or there is human error in calculating a pension, scheme members pensions or the one off payments could be wrong	Human error when setting up immediate payments or calculating a pension System failures Unable to meet weekly deadlines	Reputation Complaints/appeals Time resource used to resolve issues Members one off payments, not paid, paid late, paid incorrectly Over or under payments	Ian Howe	Benefit Team Tracker process Benefits checked and authorised by different Officers Additional Assistant Team Manager resource provided Training provided to new staff Benefits are checked by a colleague Figures are provided to the member so they can see the value and check these are correct	5	2	10	Treat	A more automated one-off payment process in place Officers re-engineered the retirement process Monitor the structure of the Pension Section to resource the area sufficiently Officers requested further system security checks on immediate payments (bank account checks) Officers to develop an Insights report to identify discrepancies between administration and payroll sides of the	5	1	5	Ian Howe

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												system Ongoing officer training notes Continued develop the workflow tasks Funds over and under payment policy				
14	Operational	Pens	If all the transfers out checks are not completely fully there could be future bad advice challenges brought against the Fund's pension administration There are some challenges being lodged from Claims Management Companies on historic transfers out	Increasing demand for transfers out from members Increased transfer out activity from Companies interested in tempting people to transfer out their pension benefits Increased complexity on how the receiving schemes are set up Increased challenges on historic transfers	Reputation Future bad advice claims brought against the Fund IDRP appeals (possible compensation payments) Increased administration time and cost	Ian Howe	TPR checks Follow LGA guidance Queries escalated to Team Manager then Pensions Manager	3	3	9	Treat	Escalation process to Internal Legal Colleagues to check IFA, Company set up, alleged scam activity Further escalation process to external Legal Colleagues Signed up to The Pension Regulator's national pledge "To Combat Pension Scams" National changes potentially forthcoming for checks on the receiving scheme's arrangements Internal audit review of both transfers in and out of the Fund.	3	2	6	Ian Howe
15		Pens	Failure to identify	Late or no	Overpayments or	Ian	Faraday monthly	3	3	9	Treat	Moved to 6 monthly	3	1	3	Ian

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	Operational		the death of a pensioner causing an overpayment, or potential fraud or other financial irregularity	notification of a deceased pensioner. Fraudulent attempts to continue to claim a pension	financial loss Legal cases claiming money back Reputational damage	Howe	reporting process of UK registered deaths Life certificates for overseas pensioners Defined process governing bank account changes					checks, (from one check every 2 years) National Fraud mortality screening for overseas pensioners Targeted review of status for pensioners where the Fund does not hold the current address e.g. care of County Hall or Solicitors				Howe

Regulatory

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16		Pens	The resolution of the McCloud case and 2016 Cost Cap challenge could	Mr McCloud winning his appeal on age discrimination on	Ultimate outcome on both McCloud and the cost cap are currently	Ian Howe	Guidance from LGA, Hymans, Treasury	3	3	9	Treat once details are	Employer bulletin to employers making them aware of the current situation on	2	3	6	Ian Howe

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	Regulatory		increase administration significantly resulting in difficulties providing the ongoing pensions administration service	public sector pension schemes and the protection afforded to older members during the move to career average benefits, followed by Government losing their right of appeal. The Unions challenge on the 2016 cost cap, could result in possible benefit recalculations if the challenge is successful	unknown but likelihood is; Increasing administration Revision of previous benefits Additional communications Complaints/appeals Increased costs						confirmed	McCloud Await proposed resolution from the employment tribunal Assisting the LGA on the employer McCloud data template (missing hours April 2014 to date) and the wider project No statutory deadline to be set for completion of the work Team set up in the Pension Section to deal with McCloud casework Data being received from the employers and loaded into the administration system System provider to resolve current data loading issues Internal Audit review to ensure guidance received is followed in relation to any members affected by the				

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												judgement. Internal Audit review of progress to date. Report to the Board on McCloud and further updates will be provided				
17	Regulatory	Pens	The implication of the national dashboard project could increase administration resulting in difficulties providing the ongoing pensions administration service	National decision to implement pension dashboards thereby enabling people to view all their pension benefits via one single dashboard	Increased administration Data cleaning exercise on member records Increased system costs Additional communications Timing of the national exercise (April 2024) potentially conflicts with McCloud (October 2023)	Ian Howe	Initial data cleaning started Contract made with the system provider on building the data link	3	3	9	Treat once final details are confirmed	Work with LCC's internal IT Team Security checked on the required link to allow the access to secure member pension data GDPR requirements	3	2	6	Ian Howe

Risk Impact Measurement Criteria

Scale	Description	Departmental Service Plan	Internal	Operations	People	Reputation	Financial per annum / per loss
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Scale	Description	Departmental Service Plan	Internal Operations	People	Reputation	Financial per annum / per loss
1	Negligible	Little impact to objectives in service plan	Limited disruption to operations and service quality satisfactory	Minor injuries	Public concern restricted to local complaints	Pension Section <£50k Investments Losses expected to be recovered in the short term
2	Minor	Minor impact to service as objectives in service plan are not met	Short term disruption to operations resulting in a minor adverse impact on partnerships and minimal reduction in service quality.	Minor Injury to those in the Council's care	Minor adverse local / public / media attention and complaints	Pension Section £50k-£250k Minimal effect on budget/cost Investments Some underperformance, but within the bounds of normal market volatility
3	Moderate	Considerable fall in service as objectives in service plan are not met	Sustained moderate level disruption to operations / Relevant partnership relationships strained / Service quality not satisfactory	Potential for minor physical injuries / Stressful experience	Adverse local media public attention	Pension Section £250k - £500k Small increase on budget/cost: Handled within the team/service Investment Underperformance by a manager requiring review by the Investment Sub-committee
4	Major	Major impact to services as objectives in service plan are not met.	Serious disruption to operations with relationships in major partnerships affected / Service quality not acceptable with adverse impact on front line services. Significant disruption of core activities. Key targets missed.	Exposure to dangerous conditions creating potential for serious physical or mental harm	Serious negative regional criticism, with some national coverage	Pension Section £500-£750k. Significant increase in budget/cost. Service budgets exceeded Investment Underperformance of significant proportion of assets leading to a review of the Investment or Funding strategy

Scale	Description	Departmental Service Plan	Internal Operations	People	Reputation	Financial per annum / per loss
5	Very High/Critical	Significant fall/failure in service as objectives in service plan are not met	Long term serious interruption to operations / Major partnerships under threat / Service quality not acceptable with impact on front line services	Exposure to dangerous conditions leading to potential loss of life or permanent physical/mental damage. Life threatening or multiple serious injuries	Prolonged regional and national condemnation, with serious damage to the reputation of the organisation i.e. front-page headlines, TV. Possible criminal, or high profile, civil action against the Council/Fund, members or officers	Pension Section >£750k Large increase on budget/cost. Investment Employer contributions expect to increase significantly above Funding Strategy requirement

Risk Likelihood Measurement Criteria

Rating Scale	Likelihood	Example of Loss/Event Frequency	Probability %
1	Very rare/unlikely	EXCEPTIONAL event. This will probably never happen/recur.	<20%
2	Unlikely	Event NOT EXPECTED. Do not expect it to happen/recur, but it is possible it may do so.	20-40%
3	Possible	LITTLE LIKELIHOOD of event occurring. It might happen or recur occasionally.	40-60%
4	Probable /Likely	Event is MORE THAN LIKELY to occur. Will probably happen/recur, but it is not a persisting issue.	60-80%
5	Almost Certain	Reasonable to expect that the event WILL undoubtedly happen/recur, possibly frequently.	>80%

Risk Scoring Matrix

Impact

5 Very High/Critical	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5
	1	2	3	4	5
	Very Rare/Unlikely	Unlikely	Possible/Likely	Probable/Likely	Almost certain

Likelihood of risk occurring over lifetime of objective (i.e. 12 mths)