Part D: Risk Register

Identification of Risks:

These are the risks that threaten the achievement of the Pension Fund's objectives. Risks have been analysed between:

- Funding, including delivering the funding strategy;
- Investment;
- Governance
- Operational; and
- Regulatory.

Key to Scoring

	Impact	Financial	Reputation	Performance				
5	Most severe	Over £100m	Ministerial intervention, Public inquiry, remembered for years	Achievement of Council priority				
4	Major	Between £10m and £100m	Adverse national media interest or sustained local media interest	Council priority impaired or service priority not achieved				
3	Moderate	Between £1m and £10m	One off local media interest	Impact contained within directorate or service priority impaired.				
2	Minor	Between £100k and £500k	A number of complaints but no media interest	Little impact on service priorities but operations disrupted				
1	Insignificant	Under £100k	Minor complaints	Operational objectives not met, no impact on service priorities.				

Likelihood

4	Very likely	This risk is very likely to occur (over 75% probability)
3	Likely	There is a distinct likelihood that this will happen (40%-75%)

2	Possible	There a possibility that this could happen (10% - 40%)
1	Unlikely	This is not likely to happen but it could (less than 10% probability)

Category Persion Per	Ref	Risk	Risk	k Cause	Impact	Risk	Controls in	Current Risk Rating			Further Actions	Date for	Target Risk Rating			T 7	
Strategy not aligned with Pension Liability Profile Investment Strategy not aligned with Pension Liability Profile Investment Strategy not aligned with Pension Liability Profile Investment Liabilities and asset attributes not understood and matched. Investment Liabilities and asset attributes not understood and matched. Investment Liabilities and asset attributes not understood and matched. Investment Liability Profile Investment Strategy not aligned with Pension and matched. Investment Strategy not aligned with Pension Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of cash reserves. Investment Strategy not aligned with Pension of Cash reserves. Investment Strate			Category					Impact	Likelihood	Score	Required		Impact	Likelihood	Score		
Investment Strategy not aligned with Pension Liabilities and asset attributes not understood and matched. Investment Liability Profile Investment Strategy not aligned with Pension Understanding and matched. Investment Strategy not aligned with Pension Liability Profile Investment Strategy not aligned with Pension Class of key pensions. Investment Strategy not aligned with Pension Class of key pensions. Investment Strategy not aligned with Pension Class of key staff and change of investment approach. Investment Strategy not aligned with Pension Class of key financial sasset diasses Investment Strategy not aligned with Pension Class of key financial sasset alasses Investment Strategy not aligned with Pension Class of key financial sasset diasses Investment Strategy not aligned with Pension Class of key financial sasset aliability analysis included in Investment Strategy not aligned with Pension Class of key financial sasset aliability analysis included in Investment Strategy not aligned with Actuary. Gain greater understanding of employer changes. Review asset allocation. Investment Strategy not aligned with Actuary. Gain greater understanding of employer changes. Review Actuary. Since flow Monthly cash flow monitor of proved Management Reports to benchmark, and monitor opt outs, 50:50 requests etc. Investment Strategy not aligned with Actuary. Gain greater understanding of employer changes. Review Actuary. Since flow Monthly cash flow flow Monthly cash flow flow monitoring to aligned with Actuary. Since f	1	Strategy not aligned with Pension	Financial	Liabilities and asset attributes not understood	Pension deficit not	ce Mana	Asset allocation Review after	4	2	8	flow Model with Actuary. Gain greater understanding of employer changes. Review	June 2017	4	1	4		\rightarrow
Strategy not aligned with Pension Under Pension Closed. Short Term—Insufficient Punds to Pay Pensions. Under performance of asset managers or asset classes varies to key financial valuation Actual results Varies to key financial assumptions in Valuation Valuation Valuation Valuation Under performance of aligned with Pension Closed. Under performance of asset chases varies to key financial assumptions in Valuation Valuation Valuation Under performance of asset classes varies to key financial assumptions in Valuation Valuation Valuation Under pension deficit not closed. Under performance of asset classes varies to key financial assumptions in Valuation Valuation Valuation Valuation Valuation Under pension deficit not closed. Valuation Valuat	2	Strategy not aligned with Pension	Financial	Liabilities and asset attributes not understood	Insufficient Funds to Pay	ce Mana	flow monitoring and retention of cash	4	2	8	Develop cash flow Model with Actuary. Gain greater understanding of employer changes. Review	June 2017	4	1	4		→
performance of asset classes sased asset classes set of asset allocations. Actual results varies to key financial assumptions in Valuation set of assumptions in Valuation set of assumptions in valuation set of assumptions at point of valuation. Asset allocation to mirror risk. Sensitivity analysis included in set of asset allocation to mirror risk. Sensitivity analysis included in set of asset allocation to mirror risk.	3	Strategy not aligned with Pension	Financial	understanding of Scheme Member	Pension deficit not closed. Short Term – Insufficient Funds to Pay	ce Mana	flow monitoring and retention of cash	3	2	6	Improved Management Reports to benchmark, and monitor opt outs, 50:50 requests	June 2017	3	1	3		→
varies to key financial assumptions in Valuation Forces Pension deficit not closed. Pension deficit not closed. Mana ger valuation. Asset allocation to mirror risk. Sensitivity analysis included in	4	performance of asset managers or	Financial	staff and change of investment	Pension deficit not	cial Mana	review Meeting, and Diversification of asset allocations.	3	2	6			3	2	6		→
report.	5	varies to key financial assumptions in	Financial		Pension deficit not	ce Mana	assumptions at point of valuation. Asset allocation to mirror risk. Sensitivity analysis included in Valuation	3	2	6			3	2	6		→ ·
Loss of Funds Financial Poor Control Long Term - Finan Review of 3 1 3 1 3 →	6	Loss of Funds	Financial	Poor Control	Long Term -	Finan	Review of	3	1	3			3	1	3		\rightarrow

	through fraud or misappropriatio n.		Processes within Fund Managers and/or Custodian	Pension deficit not closed	cial Mana ge	Annual Internal Controls Report from each Fund Manager. Clear separation of duties.										
7	Employer Default - LGPS	Financial	Market Forces, increased contribution rates, budget reductions.	Deficit Falls to be Met By Other Employers	Pensi on Servi ces Mana ger	All new employers set up with ceding employing under-writing deficit, or bond put in place.	3	2	6	Review all employers where there is no statutory covenant. Meeting held with actuaries	June 2017	2	2	4	June 2017	→
8	Inaccurate or out of date pension liability data – LGPS and FSPS	Financial & Administrative	Late or Incomplete Returns from Employers	Errors in Pension Liability Profile impacting on Risks 1 and 2 above.	Pensi on Servi ces Mana ger	Monitoring of Monthly returns	4	3	12	Develop improved management reporting to highlight data issues at an earlier point in time. Develop escalation issues to ensure data issues are resolved at earliest point, including new charges, and improved training/guidance. Actions in progress	March 2017		1	3	Mar 2017	→
9	Inaccurate or out of date pension liability data – LGPS and FSPS	Administrative	Late or Incomplete Returns from Employers	Late Payment of Pension Benefits.	Pensi on Servi ces Mana ger	Monitoring of Monthly returns. Direct contact with employers on individual basis.	3	2	6	Develop improved management reporting to highlight data issues at an earlier point in time. Develop	March 2017	3	1	3	Mar 2017	→

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										escalation issues to ensure data						
										issues are						
										resolved at						
										earliest point,						
										including new						
										charges, and						
										improved						
										training/guidance.						
										In progress						
10	Insufficient	Administrative	Budget	Breach of	Servi	Annual	4	3	12	Need to address		4	1	4		
	resources to		Reductions	Regulation	ce	Budget	-			backlog of work		'		•		*
	deliver				Mana	Review as				which is						
	responsibilities-				ger	part of				impacting on						
	LGPS and					Business				ability of staff to						
	FSPS					Plan.				meet statutory						
										deadlines.						
										External						
										resources to be						
										employed.						
11	Insufficient	Governance	Poor Training	Breach of	Servi	Training	4	2	8	Develop Needs	June 2017	4	1	4	June	\rightarrow
	Skills and		Programme	Regulation	ce	Review				Based Training					2017	
	Knowledge on				Mana					Programme.						
	Committee – LGPS and				ger											
	FSPS and															
12	Insufficient	Administrative	Poor Training	Breach of	Servi	Training Plan.	3	1	3			3	1	3		^
12	Skills and	Administrative	Programme	Regulation	ce	Control	3	'	١			3	'	3		
	Knowledge		and/or high	and Errors in	Mana	checklists.										
	amongst –		staff turnover	Payments	ger	0.100.1010.										
	LGPS and		0141110101		90.											
	FSPS Officers															
13	Key System	Administrative	Technical	Inability to	Pensi	Disaster	4	1	4			4	1	4		↑
	Failure – LGPS		failure	process	on	Recovery										
	and FSPS			pension	Servi	Programme										
				payments	ces											
					Mana											
					ger											
14	Breach of	Administrative	Poor Controls	Breach of	Pensi	Security	3	1	3			3	1	3		\rightarrow
	Data Security –			Regulation	on	Controls,										
	LGPS and				Servi	passwords										
1	FSPS				ces	etc.										
1					Mana											
15	Foilure to Mari	Carrage	In ability: 4-	Direct	ger	F. II	5	1	_			-	1	-		
15	Failure to Meet Government	Governance	Inability to	Direct	Servi	Full	5	1	5			5	1	5		\rightarrow
	Requirements		agree	Intervention by Secretary	ce Mana	engagement in Project										
			proposals with other	of State		Brunel										
	on Pooling		with other	UI State	ger	וטוטוט			1	1]	1		1	l	

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			administering authorities.												
16	Failure of Pooled Vehicle to meet local objectives	Financial	Sub-Funds agreed not consistent with our liability profile.	Long Term - Pension deficit not closed	Servi ce Mana ger	Full engagement in Project Brunel	4	1	4		4	1	4		→
17	Significant change in liability profile or cash flow as a consequence of Structural Changes	Financial	Significant Transfers Out from the Oxfordshire Fund, leading to loss of current contributions income.	In sufficient cash to pay pensions requiring a change to investment strategy and an increase in employer contributions	Servi ce Mana ger	Engagement with One Oxfordshire project to ensure impacts fully understood	4	2	8	Work with Fund Actuary to Understand Potential Implications to feed into project and investigate potential changes to investment strategy that can be implemented within required timescales	4	1	4	Mar 2017	→
18	Insufficient Skills and Knowledge on Committee – LGPS and FSPS	Governance	Change in Committee membership post May 2017 elections.	Breach of Regulation	Servi ce Mana ger	New Member Induction Programme	4	2	8	Assessment of need post election and induction programme reviewed to ensure meets requirements.	4	1	4	June 2017	New