

IWCRMS - Service Area - Full Risk Register (28 risks)

Technical Finance - Technical Finance (Pension Fund)

Financial Management - Technical Finance (Pension Fund)					
Risk: Governance arrangements (G1) (Id: 194) - Assigned To: Joanna Thistlewood					
Description: Failure to have the appropriate governance arrangements in place (including Pensions Regulator requirements) Consequence: non-compliance with legislation or best practice and the inability to determine policy or make decisions/deliver the service impacting on reputation Review Date: 22/04/2024 Closed Date:			Inherent Rating: 14 - High	Current Rating 12 - High (27/02/2024)	Target Rating: 5 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Pension Fund Committee membership - recruitment of employer representative to vacant position	0	30/09/2024	Joanna Thistlewood	Update 9-May-22: no progress to date. defer until after LPB recruitment resolved and year end reporting complete. Update 19-Aug-22: defer until officer structure review complete. update 28-Apr-23: no progress. update 01-Dec-23: no progress.	
SAB Good governance project - gap analysis commissioned to identify areas for improvement to ensure compliance when legislation/regulations updated.	0	30/09/2024	Joanna Thistlewood	update 22-Mar-22: report has been received, but has not yet been considered. To form part of combined action plan following review of governance compliance statement. Update 31-May-22: to be considered following outcome of structure review. Update 19-Aug-22: defer this until the DLUHC consultation is issued to ensure appropriate response. Update 9-Sep-22: expectation that DLUHC consultation will be issued in September, with a view to new regulations in force by April 2023. update 27-Mar-23: consultation and draft regulations not yet issued. rolling quarterly update required. update 1-Dec-23: consultation and draft regulations not yet issued. processes and policies being reviewed in conjunction with draft to ensure future compliance.	

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
TPR General Code laid before parliament 10 Jan 2024, in force 27 Mar 2024. review of relevant sections to be undertaken to ensure full compliance within 12 months.	0	30/09/2024	Joanna Thistlewood	update 1-Dec-23: code has not yet been launched. action deferred until launch, although processes being reviewed to ensure compliance with draft. Update 26-Feb-24: webinars from various advisers attended. Hymans Robertson compliance checker tool has been requested (22/2/24). plan to be created to identify level of compliance and areas for improvement.
New Governance Compliance Officer commenced work on 26 February 2026 - induction plan to be linked with succession planning	0	30/09/2024	Joanna Thistlewood	
Decision matrix has been approved, setting out roles and responsibilities of key parties in making and approving decisions - annual review required.	25	28/06/2024	Joanna Thistlewood	update 23-Mar-23: workplan includes review of this matrix for March 2024 board meeting, but this may be brought forward depending on issuance of government consultation on regulations for Good Governance Project outcomes. update 1-Dec-23: given delays to good governance review, the scheduled review in March 2024 is maintained. Update 26-Feb-4: review of decision matrix to form part of succession planning work.
Policies/Strategies: Update list of required documents, and timetable dates for review within pension fund business plan.	75	22/05/2024	Joanna Thistlewood	Update 9-May-22: no progress on this to date. Update 31-May-22: list of documents to be presented to pension board meeting on 15 June. Proposals for overdue policy reviews to be completed by 31 March 2023. Comms policy at October board meeting (JMT), Breaches (JMT) and Admin strategy (MC) at March meeting. Update 19-Aug-22: on target for October board meeting. Update 28-Nov-22: comms policy reviewed by board 26/10; adopted by committee 23/11; presented for publication on website 28/11. Other policies on schedule for March committee meeting. update 27-Mar-23: review of policies scheduled into work plan for 2023-2025. Breaches policy and Pension Administration Strategy to be considered at April board and May committee meetings. progress reset for 2023-24 actions. update 1-Dec-23: breaches policy, admin strategy and academy funding policy all updated in year. IDRP out for internal consultation. Conflicts policy to be started in December 2023. update 26-Feb-24: IDRP and conflicts policies to be presented to LPB on 6 March, for onward recommendation to PFC on 22 May 24. Future action plan to be linked to TPR General Code compliance checker.

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
succession plan required following resignation of Pension Fund Manager, leaving council in April 2024.	0	19/04/2024	Chris Ward	
guidance sought from advisers to support development and implementation of new policies as required	100	29/03/2024	Joanna Thistlewood	update 1-Dec-23: this forms part of the governance support work currently in place with Hymans Robertson. To date breaches policy, academy funding policy, IDRPs and conflicts policy are completed or in progress Update 26-Feb-24: all policies above will be completed and operational by May 2024 at the latest. Further work to be scheduled for 2024-25 as part of succession planning work.
fund officers receive and circulate briefings from advisers, SAB, LGA, CIPFA, TPR etc to keep up to date with latest legislative and regulatory developments. Standing item on each committee and board meeting agenda	100	29/03/2024	Joanna Thistlewood	update 24-Mar-23: all meetings in 2022-23 had this item on the agenda. Update 1-Dec-23: all meetings to date in 2023-24 have had this on the agenda.
Local Pension Board - elected member employer representative. new nomination required following resignation of Cllr Lilley in May 2023.	25	21/03/2024	Joanna Thistlewood	update 1-Dec-23: included on full council agendas for July 2023, September 2023 and November 2023. No appointment made. Emails sent to all members (by democratic services) and political group leaders (democratic services and pension fund manager). email sent to ~Monitoring Officer and Director of Finance 16 November 2023 - no response to date. Email sent to Hymans Robertson for support/guidance 17 November - response anticipated w/c 4 December. update 12-Feb-24: LPB considered at 6 December meeting, breach recorded on log but not reported to TPR, pending appointment at January 2024 full council meeting. However, no appointment made. Report to PFC 14 February to propose recommending change to ToR to full council in March 2024. Breach log updated, not reported to TPR pending PFC decision.

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Governance Compliance Statement - update for current year activity, identify areas for improvement, develop action plan. To be completed for 2021-22 annual report, presentation at May 2022 pension fund committee meeting.	100	27/10/2022	Joanna Thistlewood	update 31-May-22: GCS delayed in line with delay to external audit of pension fund. Anticipate presentation to October pension board meeting for onward recommendation to November committee. update 19-Aug-22: draft GCS with administration team for comment. on target for October board meeting Update 28/11/22: GCS 2021-22 reviewed by board 26/10; adopted by committee 23/11; presented for publication on website 28/11/22
Local Pension Board - external employer representative nominations sought from 30 external employers (not IWC or related schools) - none received by first due date.	100	13/05/2022	Joanna Thistlewood	21 March 2022: one nomination received on 2 February. Information has been with Director of Finance for review since 17 February (chased 28 Feb, 8 March and 21 March). Update 9-May-22: meeting scheduled between director of finance, chair of LPB and candidate on 12 May 2022. Update 16-May-22: meeting held, candidate has accepted position.
Local Pension Board - IWC Employer Representative Nominations sought from CMT to fulfil this role.	100	19/01/2022	Joanna Thistlewood	7 Dec 2021 - nomination received. To be recommended to full council on 19 January 2022 for appointment 21/3/22: appointment confirmed at full council on 19 January. Member has had introduction meeting with technical finance manager. First meeting of newly created board to be held on 6 April.
Local Pension Board - independent chair 4 applications received for one position. Appointment to be confirmed at 19 January 2022 full council meeting.	100	19/01/2022	Joanna Thistlewood	applications have been with Director of Finance and Chair of pension fund committee for review since 15 November 2021. 21/3/22: DoF and Chair of PFC met with shortlisted candidates held on 7 Feb and 16 Feb. Preferred candidate identified and appointed on 2 March. Pension board introductory meeting to be held on 6 April.

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Local Pension Board - scheme member representative (minimum requirement) expressions of interest sought from all active, deferred and pensioner members of the fund for whom email address held on administration system (10,087 emails sent). Appointment to be confirmed at 19 January 2022 full council meeting.	100	19/01/2022	Joanna Thistlewood	5 expressions of interest (two roles) received. With Director of Finance and Chair of pension fund committee for review since 15 November 2021. update 21 March 2022: 19 January full council meeting delegated appointment to Director of Finance. Director of Finance and Chief Executive met with three candidates between 21 February and 6 March - two people appointed, both have accepted. First meeting on newly formed board to be held on 6 April 2022.
Local Pension Board - scheme member representative (increased membership) expressions of interest sought from all active, deferred and pensioner members of the fund for whom email address held on administration system (10,087 emails sent). Appointment to be confirmed at 19 January 2022 full council meeting if possible.	100	19/01/2022	Joanna Thistlewood	5 expressions of interest (two roles) received. With Director of Finance and Chair of pension fund committee for review since 15 November 2021. update 21 March 2022: 19 January full council meeting delegated appointment to Director of Finance. Director of Finance and Chief Executive met with three candidates between 21 February and 6 March - two people appointed, both have accepted. First meeting on newly formed board to be held on 6 April 2022.

Financial Management - Technical Finance (Pension Fund)

Risk: Knowledge and understanding (G2) (Id: 195) - **Assigned To:** Joanna Thistlewood

Description:

Lack of relevant knowledge and understanding with the Pension Committee, Pension Board and/or officers

Consequence:

non-compliance with legislation for board members. Potential for poor decision making.

Review Date: 29/03/2024 **Closed Date:**

Inherent Rating:

14 - High

Current Rating

8 - Medium

(27/02/2024)

Target Rating:

5 - Low

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
training plan for committee and board members and fund officers to be developed from output of Hymans' KPA.	0	30/09/2024	Joanna Thistlewood	discussions in progress with IWC Learning and Development Team, to link learning plan to council's learning hubv.
pension fund committee members encouraged to complete TPR public service online toolkit modules, with update on progress requested and reported at each pension fund committee meeting.	25	24/05/2024	Joanna Thistlewood	16 February 2022 meeting - only one member had completed toolkit 25 May 2022 meeting - three members (from 7) have provided evidence of completion of all modules. Update 9-Sep-22: discussed at July committee meeting, no further progress. Update 27-Mar-23: no further progress. Update 1-Dec-23: following pension committee meeting on 22 November 2023, link recirculated to all committee and board members on 23 Nov, with request to evidence completion by 31 March 2024.
Pension board members encouraged to complete all TPR public service online toolkit modules within 6 months of appointment.	75	29/03/2024	Joanna Thistlewood	to be reviewed at 6 April board meeting with action plan agreed. update 4-Jul-22: 2 (from 7) board members have provided evidence that they have completed all modules. Update 9-Sep-22: 4 (from 7) members now provided evidence. to be discussed at October board meeting Update 27-Mar-23: no further progress Update 1-Dec-23: following pension committee meeting on 22 November 2023, link recirculated to all committee and board members on 23 Nov, with request to evidence completion by 31 March 2024. New employer rep has until 31 May 2024 to complete (6 months after appointment) Update 26-Feb-24: all board members have been asked to submit evidence of completion of TPR modules before board meeting - 5 out of 6 current members have completed all modules
pension board and committee members induction programme to be developed	0	29/03/2024	Joanna Thistlewood	update 1-Dec-23: to be added to programme of work supported by Hymans Robertson
Hymans Robertson LOLA v2.0 launched September 2023. rolled out to all board members, for completion by 31 March 2024	25	29/03/2024	Joanna Thistlewood	Update 1-Dec-23; no progress from many board members to date. reported to board meeting 12 Dec. Update 26-Feb-24: at 22/2 4 members have started and completed at least 2 modules each. 2 board members have not started any modules.

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Participation in Hymans Robertson Knowledge Progress Assessment 2023 agreed at Pension committee on 22 November 2023.	100	31/01/2024	Joanna Thistlewood	Update 1-Dec-23: participant details sent to Hymans. Completion will be promoted at Board meeting on 12 December, and via email to all committee/board members once access to assessment tool provided. Update 6-Feb-24: by closing date (extended to 19 Jan 24) only 3 committee members (out of 8) and 5 LPB members (out of 6) had completed the survey. Results report presented to PFC 14 Feb 24 and LPB 6 Mar 24, based on those members who did complete the survey.
Hymans Robertson LGPS Online Learning Academy users to be updated to include all board members. Board member to be encouraged to complete all modules within 6 months of access being granted. to be reported and reviewed at each board meeting.	100	29/09/2023	Joanna Thistlewood	update 4-Jul-22: at 1 July, one member has completed three modules, and one other has started two modules. reminder will be issued to all members. update 9-Sep-22: one member has completed all 6 modules; one member has completed 5 modules; one member has started 2 modules (no progress since last report). to be discussed at October board meeting update 27-Mar-23: all but one member has started this programme. to be discussed further on 5 April. update 28-Apr-23: decision taken to upgrade to LOLA v2.0, which will require all board members to restart learning modules from zero progress. launch date tbc.
preferences for the delivery of development activities to be discussed at Committee meeting on 8 Feb 23 and Board meeting on 5 April 23.	100	28/04/2023	Joanna Thistlewood	Update 27-Mar-23: Committee expressed preference for face to face, short, focussed sessions, to be delivered on same day as committee meetings. Also, suggested reference to learning materials be included in reports.
At July committee meeting, members of both committee and board agreed to actively participate in the Hymans National Knowledge Assessment 2022. this will allow assessment of current knowledge, comparison with other LGPS funds, and support development of training policy and individualised learning plans. NKA launching in September 2022	100	30/12/2022	Joanna Thistlewood	update 27-Mar-23: NKA completed and results presented to board and committee in November and December 2022 respectively.

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Financial Management - Technical Finance (Pension Fund)					
Risk: RESILIENCE (Key person risk (G3)) (Id: 196) Assigned To: Joanna Thistlewood					
Description:			Inherent Rating:	Current Rating	Target Rating:
reliance on key people, lack of supporting resource, single points of failure SERVICE CRITICAL ISSUE FEBRUARY 2024 Consequence: Severe disruption if key staff are absent for any period of time. Review Date: 22/04/2024 Closed Date:			15 - Very High	16 - Very High (27/02/2024)	5 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
succession plan required following resignation of Pension Fund Manager, leaving council in April 2024.	0	19/04/2024	Chris Ward		
Governance support from Hymans Robertson commissioned and reported to committee. Fortnightly meetings with fund officers and Hymans Robertson personnel.	75	31/03/2024	Joanna Thistlewood	update 13 Nov-23: underlying assumptions, and high priority items reported to PFC in September 2023. Regular update calls held. progress somewhat delayed due to administration staffing issues. Update 26-Feb-24: Arrangements to be updated for 24-25, linking into succession planning and induction plan for new governance compliance officer.	
work force plan to be developed, using IWC model	0	29/03/2024	Joanna Thistlewood	update 15-Mar-23: no progress on this, subject to outcome of structure review. update 13-Nov-23: no significant progress, although administration team redesign is being progressed following significant number of staff resignations.	
Administration staff resources and technical support programme agreed with Hymans Robertson, for period of three months, to cover gaps following staff resignations, while service redesign work is completed. Following redesign, recruitment to new structure can begin.	75	07/03/2024	Matthew Collier	Update 13-Nov-23: questions on support contract raised by HR, Corporate Information Unit, and Procurement, has delayed the implementation of this contract - which was scheduled to start on 30 October 2023 for a period of three months. Expect to sign contract before 17 November 2023. Update 1-Dec-23: contract signed, support contract in place Update 26-Feb-24: administration service is being fully supported by Hymans Robertson. Review of additional support required/available following resignation of another pension officer - information expected w/c 26 Feb.	

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
Recruitment of three trainee posts to pensions administration team, to replace three resignations.	100	28/04/2023	Matthew Collier	recruitment complete - new staff start on 9 May 2023		
commission external review of pension fund structure to ensure most effective and appropriate structure is in place - linking into Good Governance Project.	100	31/08/2022	Joanna Thistlewood	update 9-May-22: further competition launched via procurement portal to National LGPS Framework providers on 3 May. Deadline for submission of responses 24 May 2022; evaluation to be complete by 7 June, with award shortly thereafter and work to commence as soon as possible after award. update 30-May-22: 4 tender submission received by deadline - evaluation in progress. update 01-Jul-22: unable to identify preferred provider, so procurement process suspended 10 June 2022. Reworking of further competition documentation to be deferred until after award of custodian contract, so early August 2022,		
Financial Management staffing restructure changes Technical Finance Manager role to Pension Fund Manager, with 100% focus on Pension Fund. New cost centre to be created to separate Pension Fund Finance costs from mainstream Accountancy team.	100	01/04/2022	Joanna Thistlewood	update 9-May-22: structure now implemented, cost centre created and budget transferred. costs to be monitored via Finance Mini Service Board monthly.		
Financial Management - Technical Finance (Pension Fund)						
Risk: Professional advice (G5) (Id: 198) - Assigned To: Joanna Thistlewood						
Description: Actuarial or investment advice is not sought, or is not heeded, or proves to be insufficient in some way Consequence: inappropriate funding strategy and/or investment strategy being adopted, resulting in significant reduction in fund investments, resulting in higher contributions. Review Date: 10/04/2024 Closed Date:				Inherent Rating: 13 - High	Current Rating 6 - Low (27/02/2024)	Target Rating: 6 - Low

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Investment consultancy contract management - awarded Jul 2018 for five years plus up to two years - extended to July 2024. one more extension possible before required re-procurement. Decision required for re-procurement or extension by December 2023, for enactment July 2024.	25	30/09/2024	Joanna Thistlewood	NEW National LGPS Framework for investment management consultancy services launched November 2022. need to join framework before extension decision considered Update 26-Feb-24: Agreement at PFC meeting 14 Feb 24 to extend existing contract for final time to expire in July 2025. New National LGPS Framework has been joined and documentation downloaded. Procurement activity to begin January 2025.
Actuarial consultancy contract management - awarded May 2018 for six years plus one Decision required for re-procurement or extension by December 2023 - noting that 2025 is a valuation year	50	09/04/2024	Joanna Thistlewood	have joined the "new" National LGPS Framework for Actuarial Benefits and Governance Consultancy Services 2021. Update 26-Feb-24: Procurement documentation for re-tender of current contract issued 21 Feb 24, responses expected by 21 March 2024. Evaluation panel (JMT, JEC, MC) will complete evaluation by 9 April 2024. New contract begins 1 May 2024, for 9 years +1 (optional extension unlikely to be taken due to timing of valuation)
triennial valuation 2022 to consider combined funding and investment implications when identifying future contribution rates. Reporting to each pension fund committee during financial year 2022-23 (May'22 - assumptions; Jul'22 - draft council results; Nov'22 - draft employer results; Feb'23 - draft final report)	100	31/03/2023	Joanna Thistlewood	Update 30-May-22: assumptions report agreed at committee meeting 25-May-22 Update 9-Sep-22: all membership/contribution data has been submitted, no issues at whole fund level. anticipate whole fund results by end September, meeting with DoF to discuss on 3 October. Employer results expected by end October 2022; briefing session for employers on 8 November, with individual meetings offered for 22 Nov. update 28-Apr-23 - 2022 valuation report published on fund's website 31 March 2023.

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
Investment consultancy contract management - awarded Jul 2018 for five years plus up to two years. Decision required for re-procurement or extension by December 2022, for enactment July 2023.	100	27/03/2023	Joanna Thistlewood	Current National LGPS Framework for investment management consultancy services is available for contract award until October 2022 update 27-Mar-23: pension fund committee agreed at 8 February 23 meeting to extend investment consultancy contract to 1 July 2024.		
Financial Management - Technical Finance (Pension Fund)						
Risk: Internal controls failure (G6) (Id: 202) - Assigned To: Joanna Thistlewood						
Description: inadequate controls over payment requests and/or management override of controls Consequence: increased potential for fraud, errors in processes, audit qualification of accounts, Review Date: 29/03/2024 Closed Date:				Inherent Rating: 9 - Medium	Current Rating 12 - High (27/02/2024)	Target Rating: 6 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
succession plan required following resignation of Pension Fund Manager, leaving council in April 2024.	0	19/04/2024	Chris Ward			
Internal audit plan for 2023-24 proposes full reviews of accounts payable and bank and cash, along with follow-up review on accounts receivable; also includes full review of both treasury management and key finance controls.	0	19/03/2024	Joanna Thistlewood	Dec 23 Audit and Governance Committee reported most work not yet started.		

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Administration staff resources and technical support programme agreed with Hymans Robertson, for period of three months, to cover gaps following staff resignations, while service redesign work is completed. Following redesign, recruitment to new structure can begin.	75	07/03/2024	Matthew Collier	Update 13-Nov-23: questions on support contract raised by HR, Corporate Information Unit, and Procurement, has delayed the implementation of this contract - which was scheduled to start on 30 October 2023 for a period of three months. Expect to sign contract before 17 November 2023. Update 1-Dec-23: contract signed, support contract in place Update 26-Feb-24: administration service is being fully supported by Hymans Robertson. Review of additional support required/available following resignation of another pension officer - information expected w/c 26 Feb.
2022-23 internal audit plan contains full review of Accounts Payable, Accounts Receivable, Bank and Cash systems. updates to be provided at relevant pension board meetings as reviews are completed.	100	31/08/2023	Joanna Thistlewood	update 28-Apr-23: as reported at 20 March 2023 audit committee meeting, 2022-23 internal audit of accounts payable returned highest level of assurance; accounts receivable report still in draft and bank and cash audit still in progress. Follow up review on pensions administration provided reasonable assurance. update 26-Feb-24: Audit and Governance Committee December 2023 received IA annual report for 22-23, showing reasonable assurance for all IWC business areas impacting pension fund .
External audit of pension fund accounts provides assurance that internal controls are operating effectively, and that management override of controls has not occurred. 2021-22 external audit work commences in June 2022 (interim audit) with final fieldwork scheduled for September/October 2022. Results to be presented to audit committee, pension committee and pension board as they become available.	100	31/05/2023	Joanna Thistlewood	update 9-May-22: external audit timetable delayed, so interim audit cancelled, and final audit fieldwork not commencing until December 2022. accounts to be finalised for March 2023 audit committee. update 4-Jul-22: 2021/22 audit plan to be presented to July Audit and Pension Fund committee meetings. update 9-Sep-22: no significant changes to planned risks focus as part of 2021-22 external audit plan update 24-Mar-23: IWC audit not yet finalised but auditors confirm "unqualified opinion" for PF accounts with no matters to draw to attention. update 28-Apr-23: IWC external audit still not complete. update 1-Dec-23: IWC 2021-22 audit completed shortly September 2023.
2022-23 draft accounts to be completed by 31 May 2023 for inclusion in draft IWC accounts for publication.	100	31/05/2023	Joanna Thistlewood	

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
2021-22 Financial management internal controls for pension fund mirror those for the council. Reviewed annually as part of the council's internal audit programme.	100	25/11/2022	Joanna Thistlewood	2021-22 internal audit reporting to March Audit committee: Accounts payable (reasonable assurance), accounts receivable and bank and cash audits still in progress. July audit committee: all 2021-22 internal audit reviews completed with reasonable assurance.
2021-22 Pension Administration controls subject to council's internal audit programme.	100	31/03/2022	Joanna Thistlewood	2021-22 internal audit report presented to December 2021 audit committee - reasonable assurance. Resolution of the two medium risk exceptions raised are in progress, driven by i-connect project implementation.

Financial Management - Technical Finance (Pension Fund)

Risk: mismatch between investment and funding strategies (G7) (Id: 203) **Assigned To:** Joanna Thistlewood

<p>Description: lack of co-ordination between investment strategy and fund strategy, not considering investment and funding risks together</p> <p>Consequence: inaccurate calculation of required investment return and/or inappropriate employer contribution rate setting, resulting in significant reduction to funding level and unaffordable cost of scheme for employers.</p> <p>Review Date: 29/03/2024 Closed Date:</p>	<p>Inherent Rating: 9 - Medium</p>	<p>Current Rating 9 - Medium (27/02/2024)</p>	<p>Target Rating: 9 - Medium</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
triennial valuation 2025 to consider combined funding and investment implications when identifying future contribution rates. Initial planning to begin Q4 2024.	0	30/09/2024	Joanna Thistlewood	

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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
strategic asset allocation to be updated following 2022 valuation completion, to ensure required investment returns can be achieved.	75	28/03/2024	Joanna Thistlewood	<p>modelling scenarios for investment strategy review agreed by DoF by 27 May 22. development session on investment strategy scheduled for end of October, for decision at November PFC.</p> <p>Update 24-Mar-23: report presented to November 2023 PFC, but not discussed. To be included on 24 May 2023 PFC agenda for decision.</p> <p>Update 1-Dec-23: Strategic review completed and new target asset allocation agreed by committee in May 2023. Process underway to select new managers to implement revised strategy with appointment to be completed by December 2023. Update to Investment Strategy Statement and implementation of changes will commence in 2024.</p> <p>Update 26-Feb-24: investment manager selection completed. Private Debt investment closed 29 Dec 23, Infrastructure investment set to close 29 Feb 24.</p>
<p>triennial valuation 2022 to consider combined funding and investment implications when identifying future contribution rates.</p> <p>Reporting to each pension fund committee during financial year 2022-23 (May'22 - assumptions; Jul'22 - draft council results; Nov'22 - draft employer results; Feb'23 - draft final report)</p>	100	31/03/2023	Joanna Thistlewood	<p>Update 30-May-22: assumptions report agreed at committee meeting 25-May-22</p> <p>Update 9-Sep-22: all membership/contribution data has been submitted, no issues at whole fund level. anticipate whole fund results by end September, meeting with DoF to discuss on 3 October. Employer results expected by end October 2022; briefing session for employers on 8 November, with individual meetings offered for 22 Nov.</p> <p>update 28-Apr-23 - 2022 valuation report published on fund's website 31 March 2023.</p>

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Financial Management - Technical Finance (Pension Fund)					
Risk: disclosure of information legislation (G8) (Id: 204) - Assigned To: Joanna Thistlewood					
Description: failure to comply with disclosure of information legislation Consequence: data breaches Review Date: 27/09/2024 Closed Date:			Inherent Rating: 9 - Medium	Current Rating 5 - Low (27/02/2024)	Target Rating: 3 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Council staff are required to complete data protection training on an annual basis - monitored through annual PMP	0	27/09/2024	Joanna Thistlewood	update 9-May-22: pension finance staff and administration staff have completed mandatory training in this area. update 24-Mar-23: annual recertification of data protection training required. update 26-Feb-24: given staffing issues within administration, completion of annual refresher training has not been highest priority. For finance staff, this has been determined as low priority.	
All councillors have been assigned the Data Protection Awareness course as required learning	0	27/09/2024	Joanna Thistlewood	at 22-Mar-22 no councillors have completed this training. update 2-Sep-22: reiterated importance at July committee meeting. One committee member has completed all courses. no further progress by committee members update 26-Feb-24: no progress to date	
Hymans Robertson staff providing support for administration tasks have been provided with IWC policies, privacy notices etc. All correspondence between Hymans and pension fund is dealt with through Hymans' secure portal and/or Altair system	25	28/06/2024	Matthew Collier		
Financial Management - Technical Finance (Pension Fund)					

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Risk: Pension Fund accounts (G9) (Id: 205) Assigned To: Joanna Thistlewood					
Description:			Inherent Rating:	Current Rating	Target Rating:
incorrect production of Pension Fund Accounts, failure to maintain appropriate accounting records. capacity issues for staff to complete all required accounting work (1 day per week resource allocated) Consequence: audit qualification of accounts. reputational risk Review Date: 31/05/2024 Closed Date:			9 - Medium	9 - Medium (27/02/2024)	1 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
External audit of pension fund accounts provides assurance that internal controls are operating effectively, and the management override of controls has not occurred. 2022-23 external audit work commences in November 2023. Results to be presented to Audit and Governance Committee, Pension Committee and Local Pension Board as they become available.	75	30/09/2024	Joanna Thistlewood	Update 1-Dec-23: audit fieldwork well underway, with no issues identified to date. Draft annual report and accounts published on pension fund website, subject to external audit adjustments and completion. audit plan for 2022-23 to be presented to Audit and Governance Committee on 4 December 2023, and LPB on 12 December. Update 26-Feb-24: 2022-23 external audit of pension fund accounts substantially complete with no identified errors or matter to draw attention. Completion of PF external audit subject to completion of IWC audit - which is in itself subject to government consultation.	

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
External audit of pension fund accounts provides assurance that internal controls are operating effectively, and the management override of controls has not occurred. 2023-24 external audit work interim visits in January 2024. Final audit fieldwork in June 2024. Results to be presented to Audit and Governance Committee, Pension Committee and Local Pension Board as they become available.	75	28/06/2024	Joanna Cooke	The 2023-24 pension fund audit has been completed, but the independent auditor's statement will not be produced until the completion of IWC audit, the scope of which is yet to be finalised by the external auditors.
2023-24 draft annual accounts to be completed by 31 May 2024, for inclusion in IWC draft accounts	0	31/05/2024	Joanna Cooke	
External audit of pension fund accounts provides assurance that internal controls are operating effectively, and that management override of controls has not occurred. 2021-22 external audit work commences in June 2022 (interim audit) with final fieldwork scheduled for September/October 2022. Results to be presented to audit committee, pension committee and pension board as they become available.	100	31/05/2023	Joanna Thistlewood	<p>update 9-May-22: external audit timetable delayed, so interim audit cancelled, and final audit fieldwork not commencing until December 2022. accounts to be finalised for March 2023 audit committee.</p> <p>update 4-Jul-22: 2021/22 audit plan to be presented to July Audit and Pension Fund committee meetings.</p> <p>update 9-Sep-22: no significant changes to planned risks focus as part of 2021-22 external audit plan</p> <p>update 24-Mar-23: IWC audit not yet finalised but auditors confirm "unqualified opinion" for PF accounts with no matters to draw to attention.</p> <p>update 28-Apr-23: IWC external audit still not complete.</p> <p>update 1-Dec-23: IWC 2021-22 audit completed shortly September 2023.</p>

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
2022-23 draft accounts to be completed by 31 May 2023 for inclusion in draft IWC accounts for publication.	100	31/05/2023	Joanna Thistlewood		
attendance at relevant accounting/technical update events (virtual or face to face) to understand any changes in requirements for annual accounting and reporting - CIPFA, audit firms, SAB.	100	31/12/2022	Joanna Thistlewood	update 19-Aug-22: no changes proposed to format or content of accounts or annual report for 2022-23. Update 23-Mar-23: as above.	
Financial Management - Technical Finance (Pension Fund)					
Risk: Communications (A1) (Id: 207) - Assigned To: Joanna Thistlewood					
Description: failure to communicate, or to communicate effectively, with all fund stakeholders Consequence: scheme members and employers cannot make informed decisions. non-compliance with legislation, regulations and/or codes of practice. Review Date: 28/06/2024 Closed Date:			Inherent Rating: 8 - Medium	Current Rating 11 - Medium (27/02/2024)	Target Rating: 2 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Communications policy (dated November 2022) in place. Review every three years - due November 2025. However, need to review due to changes in capacity within admin team (departure of Employer Liaison and Data Quality Officer) and resignation of Pension Fund Manager	0	25/11/2024	Joanna Thistlewood		

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
annual allowances, Pension Savings Statements, to be provided to impacted scheme members before 6 October 2024 for the tax year 2023-24	0	04/10/2024	Matthew Collier	concern re reliance on Hymans Robertson for capacity to deliver
annual benefit statements issued to all active and deferred members by statutory deadline 31 August 2024	0	30/08/2024	Matthew Collier	concern re reliance on Hymans Robertson for capacity to deliver
employer meetings/development sessions are held as and when required. need to programme sessions to cover triennial valuation and related updates	0	29/03/2024	Joanna Thistlewood	update 9-Sep-22: briefing session for employers on what to expect from valuation results scheduled for 8 November 2022. Individual employer meetings offered to discuss results on 22 November. update 24-Mar-23: programme of meetings for 2023-24 to be developed - pension tax changes, breaches, admin strategy, subject to officer capacity Update 1-Dec-23: no progress on this due to officer capacity.
Communications policy (dated February 2019) in place. Review every three years - due Feb 2022.	100	25/11/2022	Joanna Thistlewood	update 30-May-22: agreed that this will be presented to pension board at their 12 October 2022 meeting, for onward recommendation to committee in November. update 9-Sep-22: updates to communications policy with admin team colleague for review. Update 28-Nov-22: updated communications policy reviewed by Board, adopted by pension committee on 23/11, submitted for publication on website 28/11/22
annual allowances, Pension Savings Statements, to be provided to impacted scheme members before 6 October 2022 for the tax year 2021-22	100	06/10/2022	Matthew Collier	All breach letters issued via MSS on Friday 30th September and emails to individuals issued Monday 3rd October to confirm they have been uploaded. Statutory requirement met.
annual benefit statements issued to all active and deferred members by statutory deadline	100	31/08/2022	Matthew Collier	update 16-May 2022: deferred annual benefit statement expected to be issued by 30 May 2022, with active statements following shortly thereafter.
Isle of Wight Council Pension Fund website in place and maintained up to date. Rolling annual mitigation.	75		Matthew Collier	update 26-Feb-24: local resource for updating documents on the website is now shared between Finance and Admin team, with Hymans maintaining the statutory and regulatory updates.

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)

Risk: Data quality (A2) (Id: 208) - **Assigned To:** Matthew Collier

<p>Description: poor quality of data received from employers and maintained on pensions administration system</p> <p>Consequence: errors, incorrect assessment of benefit entitlements, under or over payments, leading to reputational risks</p> <p>Review Date: 29/03/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>9 - Medium</p>	<p>Current Rating</p> <p>8 - Medium</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>3 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
data quality scores, as per TPR guidance, commissioned annually - last received 2020 common data 95%; scheme specific data 96%.	100	30/09/2023	Matthew Collier	<p>update 16-May-2022: we have the ability to run these data scores ourselves now, so will run once data validated for valuation.</p> <p>Update 31-Oct-22: Data scores for 2022 Common Data 95.3%; Scheme Specific Data 93.6%. Further data cleansing exercise is currently being undertaken in house and also with the help of a tracing agent. The improvements will be reviewed in 6 months time.</p> <p>Update Sept-23: Data scores for 2023 above 95%</p>
employers submit monthly data returns via i-connect portal which allows for validation of data before input to administration system	100	01/04/2023	Matthew Collier	<p>update 16-May-22: all employers with exception of one schools payroll provider using i-connect. discussions in place to promote use of system.</p> <p>Update 31-Nov-22: Monthly meetings with Strictly commenced on 13-Oct-22. Next meeting 10-Nov-22. Amended upload spreadsheet returned by strictly 28-Oct-22. Testing to be complete by Friday 4-Nov-22</p> <p>update 02-Feb-23: Strictly will go live on i-Connect 01-Apr-23, Testing continuing on monthly submissions.</p> <p>Update 11-May-23: Strictly now live on i-Connect</p>
employer data regularly submitted through Hymans "brain" to identify potential errors	100	29/07/2022	Matthew Collier	<p>update 16 May 2022: data for 2019-20 and 2020-21 already uploaded to Hymans valuation portal, and validated. Once final part of 2021-22 year end data review complete, that data will be uploaded - expect this to be complete by end July .</p>

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Employer fails to pay contributions (A3) (Id: 209) - Assigned To: Joanna Thistlewood					
Description:			Inherent Rating:	Current Rating	Target Rating:
Persistent failure of scheme employer to pay contributions on time or at all, including employer defaulting on its wider obligations to the Fund Consequence: employer funding level is unacceptable. costs revert to other employers within the fund. Review Date: 29/03/2024 Closed Date:			8 - Medium	5 - Low (27/02/2024)	3 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Monthly monitoring of receipt of employer contributions, together with escalation process where contributions have not been received - rolling annual mitigation	75		Matthew Collier	Update 16-May-22: for 2021-22 year end, only 6 instances of late data returns and 4 instances of late payment.	

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Employer fails to provide data (A8) (Id: 214) - Assigned To: Matthew Collier					
Description: Failure of scheme employer to fulfil its obligations to provide timely and accurate data to the Fund Consequence: delays in assessing entitlements, making payments from the Fund and the associated reputational risk Review Date: 29/03/2024 Closed Date:			Inherent Rating: 8 - Medium	Current Rating 5 - Low (27/02/2024)	Target Rating: 3 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Fund has power to levy additional costs incurred as a result of the poor performance of a scheme employer. rolling annual mitigation.	75	29/03/2024	Joanna Thistlewood	no costs levied in 2021-22. update 28-Apr-23: no costs levied in 2022-23. Updates Pension Administration Strategy to be considered at Pension Fund Committee 24 May 2023 - introduces clearer system for penalties. Update 1-Dec-23: updated Pension Administration Strategy adopted. No penalties levied in 2022-23 or to date in 2023-24.	
Administration strategy has been implemented, setting out roles and responsibilities of the Administering Authority as well as scheme employers, together with expected service standards for both. Review overdue	100	31/05/2023	Matthew Collier	update 30-May-22: agreed that administration strategy will be updated and presented to pension board meeting on 5 April 2023. Update 02-Feb-23: Draft Admin Strategy complete and sent to Pensions Board for review Update 11-May-2023: Admin Strategy Employer consultation period complete and Committee adoption to be agreed on 24-May-23 Committee meeting	

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Ceasing benefits (A9) (Id: 216) - Assigned To: Matthew Collier					
Description: Failure to stop paying pensions where recipient is deceased, or no longer entitled to the benefits Consequence: overpayment of benefits, failure to recover overpayments, increased cost to employer. Review Date: 29/03/2024 Closed Date:			Inherent Rating: 4 - Low	Current Rating 2 - Low (27/02/2024)	Target Rating: 1 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
use of life certificates, where appropriate, for overseas pensioners. rolling annual mitigation.	50	31/01/2024	Matthew Collier	Update 16-May-2022: in discussion with procurement colleagues for Tracing Services contract, which will include UK and overseas mortality screening Update 31-March-2023: Tracing service procured September 2022. Update 13-October-23: UK mortality underway-Overseas will commence by January 2024.	
participation in National Fraud Initiative	100	28/02/2023	Matthew Collier	update 16-May-22: data upload expected in September 2022. All cases will be reviewed and completed by 28 February 2023 update 28-Feb-23: All NFI opened and closed off	
Regular mortality screening, to ensure pensioner deaths are picked up in a timely manner (Tell Us Once). rolling annual mitigation.	75		Matthew Collier	Update 16-May-22: also have links to Registrars to obtain copy death certificates, and subscribe to wills/probate service if death certificate not available. Update 31-March-23: Procurement of Tracing company to help with monthly mortality reports/use of DWP TUO/NFI	

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Assessment of benefit entitlements (A11) (Id: 218) - Assigned To: Matthew Collier					
Description: Incorrect assessment of benefit entitlements from the administration system Consequence: under or overpayment of benefits and the disruption this can cause Review Date: 29/03/2024 Closed Date:			Inherent Rating: 8 - Medium	Current Rating 5 - Low (27/02/2024)	Target Rating: 5 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Ensure sufficient technical skills within the team, to be able to interrogate system output. To be factored into individual training plans as part of PDR process.	50	31/12/2023	Matthew Collier	update 16-May-2022: all pensions administration staff have a bespoke training plan, which is monitored at regular 1-2-1 meetings. Staff will benefit from training from admin software provider, as well as attendance at SAPOG and other dedicated user groups, and participation in webinars etc. Update 31-March-2023: New staff undergo an internal training programme with external training and existing staff undergo ongoing training for regulation changes etc.	
Have appropriate system awareness within the administration team to undertake robust testing of system updates. build into procurement specification for contract revision.	50	30/06/2023	Matthew Collier	update 16-May-22: notification of preferred supplier on administration software contract issued on 11 May, subject to 10 day standstill period. Contract award expected 1 June, for go live date 1 January 2023. Update 31-May-22: contract awarded to incumbent supplier. Update 02-02-23: Working with supplier to implement updates.	
Attendance at appropriate technical and system training sessions in order to maintain and grow knowledge. review and reporting to be factored into PDR process.	50		Matthew Collier	Update 31-March-2023: All staff attend certain User groups and any system updates	
Financial Management - Technical Finance (Pension Fund)					
Risk: CAPACITY (Sufficient resources (A13)) (Id: 220) - Assigned To: Joanna Thistlewood					

IWCRMS - Service Area - Full Risk Register (28 risks)

Description: Insufficient resources (staffing, financial) to deliver responsibilities - LGPS SERVICE CRITICAL FEBRUARY 2024 Consequence: inability to pay benefits, unable to engage with stakeholders, inappropriate decisions, non-compliance with regulatory and best practice requirements Review Date: 28/06/2024 Closed Date:				Inherent Rating: 15 - Very High	Current Rating 16 - Very High (27/02/2024)	Target Rating: 9 - Medium
Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
Governance support from Hymans Robertson commissioned and reported to committee. Fortnightly meetings with fund officers and Hymans Robertson personnel.	75	31/03/2024	Joanna Thistlewood	update 13 Nov-23: underlying assumptions, and high priority items reported to PFC in September 2023. Regular update calls held. progress somewhat delayed due to administration staffing issues. Update 26-Feb-24: Arrangements to be updated for 24-25, linking into succession planning and induction plan for new governance compliance officer.		
Ensure appropriate strategic planning is in place, identifying resource and budgetary needs and putting them in place as required	0	29/03/2024	Joanna Thistlewood	update 13-Nov-23: support commissioned from Hymans Robertson for both governance and administration activities, which should alleviate immediate pressures, but at a significant financial cost.		
succession planning for administration team	25	29/03/2024	Matthew Collier	update 16-May-22: will be factored into output of operational structure review. Update 02-02-23 Due to be reviewed by CMT 7 March 2023. Update 16-03-23 review CMT pushed back to April. Update 11-May-23: Awaiting review by 151 Officer and IWC Directors TBC. Update 01-Oct-23: Director of Corporate services reviewing Pensions Admin Team structure.		
next steps for structure review to be discussed between Chief Executive, Director of Finance and Director of Corporate Resources, including process for onward referral. meeting scheduled for 12 May 2023	0	29/03/2024	Joanna Thistlewood	update 13-Nov-2023: report was reviewed, but action deferred until after completion of Council's structure review. Discussed with Chris Ward/Kerry Hubbleday 13 October; no further progress to report. update 26-Feb-24: no progress		

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Administration staff resources and technical support programme agreed with Hymans Robertson, for period of three months, to cover gaps following staff resignations, while service redesign work is completed. Following redesign, recruitment to new structure can begin.	75	07/03/2024	Matthew Collier	Update 13-Nov-23: questions on support contract raised by HR, Corporate Information Unit, and Procurement, has delayed the implementation of this contract - which was scheduled to start on 30 October 2023 for a period of three months. Expect to sign contract before 17 November 2023. Update 1-Dec-23: contract signed, support contract in place Update 26-Feb-24: administration service is being fully supported by Hymans Robertson. Review of additional support required/available following resignation of another pension officer - information expected w/c 26 Feb.
commission external review of pension fund structure to ensure most effective and appropriate structure is in place - linking into Good Governance Project.	100	31/08/2022	Joanna Thistlewood	update 9-May-22: further competition launched via procurement portal to National LGPS Framework providers on 3 May. Deadline for submission of responses 24 May 2022; evaluation to be complete by 7 June, with award shortly thereafter and work to commence as soon as possible after award. update 30-May-22: 4 tender submission received by deadline - evaluation in progress. update 01-Jul-22: unable to identify preferred provider, so procurement process suspended 10 June 2022. Reworking of further competition documentation to be deferred until after award of custodian contract, so early August 2022,

Financial Management - Technical Finance (Pension Fund)

Risk: Inappropriate long term investment strategy (I2) (Id: 222) - **Assigned To:** Joanna Thistlewood

<p>Description: investment strategy not suitable to match long term liabilities of the fund</p> <p>Consequence: investment returns insufficient, inappropriate investment risk levels, higher employer contributions</p> <p>Review Date: 31/05/2024 Closed Date:</p>	<p>Inherent Rating: 13 - High</p>	<p>Current Rating 5 - Low (27/02/2024)</p>	<p>Target Rating: 5 - Low</p>
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IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
regular monitoring of performance of investments at each pension fund committee meeting, including consideration of long term performance and changes to personnel. rolling annual mitigation.	0	24/05/2024	Joanna Thistlewood	quarterly reporting at each committee meeting - July 2021; November 2021; February 2022; May 2022 Update May 2022: 2022-23 reporting - May 2022; July 2022; November 2022; February 2023. Update Mar 2023: 2023-24 reporting - May 2023; July 2023; November 2023; February 2024. Update 26-Feb-24: 2023-24 reporting complete. 2024-25 reporting - May 2024; July 2024; November 2024; February 2025
2022 valuation to include further Asset Liability Modelling, and review of investment strategy in conjunction with funding strategy, to assess whether current strategy needs further revision.	100	25/05/2023	Joanna Thistlewood	update 9-May-22: triennial valuation modelling will be based on combined investments and funding modelling using Hymans proprietary modelling software. No significant change in investment strategy currently foreseen. update 01-Jul-22: strategy setting workshop scheduled for 14 September 2022. Update 9-Sep-22: development session deferred to 28 October, for decision to 23 November PFC meeting Update 24-Mar-23: revised strategic asset allocation to be discussed at 24 May 23 PFC. update 26-Feb-24: ISS 2024 adopted at PFC 14 Feb 24.
investment strategy options considered as integral part of 2019 triennial valuation exercise - Asset Liability Modelling exercise	100	31/03/2022	Joanna Thistlewood	
2019 valuation prompted introduction of new asset classes - private debt and infrastructure - to reduce exposure to growth assets and provide some income protection.	100	31/03/2022	Joanna Thistlewood	Private debt (5% allocation) through GSAM - first investment made in January 2021. Infrastructure (5% allocation) through Partners Group - first investment in July 2021. investment calls on-going.
Equity rebalancing - switch from 100% active management to introduce passive allocation.	100	31/12/2021	Joanna Thistlewood	reduction in overall equity allocation from 55% to 50%. implement 18.75% allocation to UBS climate aware passive fund £145m - transition completed December 2021

Financial Management - Technical Finance (Pension Fund)

Risk: liquidity risk (18) (Id: 228) - **Assigned To:** Joanna Thistlewood

IWCRMS - Service Area - Full Risk Register (28 risks)

Description: Fund has insufficient liquid assets to meet immediate liabilities Consequence: unplanned disinvestment from assets, resulting in increased charges and loss of investment value. Increase in borrowing costs Review Date: 28/06/2024 Closed Date:				Inherent Rating:	Current Rating	Target Rating:
				5 - Low	5 - Low (27/02/2024)	3 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
cash flow projections maintained using same system and processes as for Isle of Wight Council - daily and monthly in detail, rolling three year forecast.	75	29/03/2024	Joanna Cooke	update 1-Jul-22: high inflation likely at September 2022, will impact on pensions increase for April 2023. Being factored into rolling cash flow, and will be considered in future disinvestment activity. Update 24-Mar-23: cash flow forecast updated for 2023-4. Update 30-Oct-23: cashflow forecast updated to reflect Sept 23 inflation figure which will impact on pension increase from April 24.		
underlying agreement for IWC to lend money to pension fund at market rates to cover unforeseen circumstances. rolling annual mitigation	75	29/03/2024	Joanna Cooke	at 20 Dec, balance of £5m due to be repaid in mid-January 2022. update 9-May-22: balance was repaid as expected. No further borrowing undertake from IWC to date. update 1-Jul-22: no borrowing to date Update 24-Mar-23: no borrowing required in 2022-23. Update 26-Feb-24: no borrowing required in 2023-24.		
investment strategy reviewed in detail at each valuation and kept updated in-between valuations. 2019 valuation increased allocation to income assets out of growth. 2022 valuation ISS to be developed	100	31/05/2023	Joanna Thistlewood	update 24-Mar-23: 2019 valuation changes fully implemented, allocations to private debt and infrastructure are being drawn down, passive global equity allocation fully funded. strategic allocation from 2022 valuation to be presented to 24 May 2023 committee.		
equity rebalancing plan includes provision to hold cash balances to cover future investment calls for private assets and an allocation for operational cash flow.	100	31/01/2022	Joanna Thistlewood	cash disinvestment will not be actioned until suitable MMF accounts have been created. update 21 March 2022: £25m cash disinvestment from Global Equity portfolio actioned on 19 January 2022. £5m used to pay off existing IWC loan (28 Jan); £2.5m for Private debt investment call (24 Jan); £1.5m for Infrastructure investment call (27 Jan); £16m held in 3 x MMF accounts in pension fund name.		

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Other provider risks (I10) (Id: 230) - Assigned To: Joanna Thistlewood					
Description: Other provider risks - associated with unexpected transition costs, credit default, stock lending and custody Consequence: loss of investment value and/or income; reputational risk; illiquidity issues Review Date: 28/06/2024 Closed Date:			Inherent Rating: 5 - Low	Current Rating 5 - Low (27/02/2024)	Target Rating: 5 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
Procurement timetables monitored, to ensure contract extension and/or renewal dates are managed, and reported to committee meetings as appropriate. rolling annual mitigation.	0	28/06/2024	Joanna Thistlewood	update 9-May-22: 2022-23 workplan and committee programme includes considerations for custody, governance and investment consultancy contracts. Update 24-Mar-23: action in 2023-24 to consider extension of current investment consultancy and current governance consultancy contracts, and to begin planning for actuarial retender. Update 26-Feb-24: Actuarial tender launched 21 Feb 24, new contract starts 1 May 2024. Action in 2024-25 to re-procure investment consultancy contract (new contract July 2025) and governance consultancy contract (new contract January 2025).	
annual review of providers performance against service level agreements as part of ongoing contract management. rolling annual mitigation.	0	31/05/2024	Joanna Thistlewood	update 9-May-22: new procurement and contract management report introduced to each pension committee meeting Update 24-Mar-23: review of performance against objectives will be considered as part of extension/re-procurement decisions Update 26-Feb-24: 2023-24 reporting of contract and procurement management at each committee meeting.	
The Pension Committee has the power to replace a provider should serious concerns exist. rolling annual mitigation	75	29/03/2024	Joanna Thistlewood	update 9-May-22: new procurement and contract management report introduced to each pension committee meeting - should ensure issues are identified at a much earlier stage to prevent need to action this mitigation. update 24-Mar-23: no action required in 2022-23. update 26-Feb-24: no action required in 2023-24 to date.	
Financial Management - Technical Finance (Pension Fund)					
Risk: Investment pooling (I11) (Id: 231) - Assigned To: Joanna Thistlewood					

IWCRMS - Service Area - Full Risk Register (28 risks)

<p>Description: ACCESS (investment asset pool) fails to meet Administering Authority's objectives or needs, through lack of appropriate sub-funds, additional costs, etc.</p> <p>Consequence: investments held outside pool, regulatory compliance, potential for government intervention, reputational issues</p> <p>Review Date: 29/03/2024 Closed Date:</p>				<p>Inherent Rating:</p> <p>12 - High</p>	<p>Current Rating</p> <p>9 - Medium</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>5 - Low</p>
Mitigations / Actions	% Complete	Due Date	Assigned To	Update		
<p>implementation of illiquid asset solutions subject to issues with adviser (MJ Hudson). Timing of transition of investments into new real estate solutions subject to market conditions, meaning it could be a very lengthy and potentially very expensive process. Uncertainty about when work on other illiquid classes will commence due to issues with MJH.</p>	25	28/06/2024	Joanna Thistlewood	<p>update 24-Mar-23: UK real estate manager has been identified, but lack of clear understanding about the solution and transition plan is of concern. Update 13-Nov-23: Apex (successor firm to MJ Hudson) have been approved by ACCESS pool to continue work on illiquid solutions. Still no confirmation of on-boarding process for Real Estate solution. Pool has confirmed some Infrastructure funds as "pool-aligned". work has begun on private debt and private equity solutions. In the meantime, fund has selected managers outside of the pool to fulfil its increased allocations to both private debt and infrastructure. A similar approach is being followed by other members of ACCESS pool. Update 26-Feb-24: IWCPF is progressing investment in one of the "pool-aligned" infrastructure funds. alternative investment model being investigated for Private Debt and Private Equity, which may require capital investment from funds. property transition model to be confirmed</p>		
<p>Rolling annual mitigation. Attendance at, and participation in, officer working groups at least monthly - covering investment sub-funds, illiquid asset investments, governance, etc.</p>	75	29/03/2024	Joanna Thistlewood	<p>update 24-Mar-23: JMT active participation in main officer working group, EPT (for operator contract work), and Reporting sub-group (JEC). JMT attended all s151 meetings, and supported IWPF rep at all JC meetings. attendance at other working groups as and when possible. significant burden on single officer Update 13-Nov-23: agreed that JMT will step back from some working groups where activity is not a local priority (NLSG, LSG, EPT, ESG-RI) while maintaining attendance to OWG, S151 and JC meetings. JEC attending reporting subgroup meetings. Update 26-Feb-24: CONCERN re resourcing following departure of Pension Fund Manager. Added involvement required in NLSG with decisions on operating model for private equity/private debt.</p>		

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Rolling annual mitigation. Chair of pension committee or named deputy attendance at quarterly Joint Committee meetings.	75	29/03/2024	Joanna Thistlewood	update 9-May-22: Cllr Andre named as primary attendee for JC meetings, agreed by Cllr Jarman and monitoring officer. 2022-23 meetings: 6 Jun 22, 12 Sep 22, 5 Dec 22, 6 Mar 23 Update 9-Sep-22: Cllr Churchman now primary representative, Cllr Andre named deputy. Update 24-Mar-23: 100% participation in JC meetings. Update 13-Nov-23: 100% elected member participation in JC meetings and related calls to date in 2023-24.
as smallest fund, pressure on local budget from shared costs is greatest of all 11 ACCESS funds. Fund must be included in all governance and investment discussions to ensure our needs are reflected and our cost concerns are heard.	75	29/03/2024	Joanna Thistlewood	update 9-Sep-22: active participation in officer meetings, and representation at Joint Committee meeting ensure our voice is heard. update 24-Mar-23: 100% representation at JC meetings in 2022-23, and active participation in discussions. update 13-Nov-23: 100% representation at JC meetings in 2023-24, and active participation in discussions. Views of smallest fund are considered in working groups even when officers are not present. Update 26-Feb-24: CONCERN re resourcing following departure of Pension Fund Manager
pool operator, Link Fund Solutions, business being sold by Australian parent group. Pool working with advisers (Hymans Robertson and Squire Patton Boggs) to ensure the proposed purchaser (Waystone Group) is suitable for ongoing relationship with underlying authorities	100	13/11/2023	Joanna Thistlewood	update 24-Mar-23: negotiations between LFS and Waystone progressing. Assurance provided by advisers that, assuming negotiations conclude satisfactorily, there should be no significant disruption for the remaining duration of the current operator contract (march 2025) Update 28-Apr-23: confirmation that agreement between LFS and Waystone signed. expectation that regulatory approval will allow transaction to be completed by 30 September 2023. Update 13-Nov-23: successful takeover of Link Fund Solutions business by Waystone Group completed in October 2023. All LFS staff transferred to new organisation, ACCESS-related processes unchanged.
monitoring of government consultations, briefings, and updates from ACCESS Support Unit to ensure that fund is up-to-date with asset pooling developments and best placed to act when required	100	02/10/2023	Joanna Thistlewood	update 9-May-22: DLUHC consultation on (among others) pooling and levelling-up expected to be issued in summer 2022. consultation will be shared with committee and board members for input. Update 24-Mar-23: Spring budget 2023 included details about potential consolidation of pools, fewer in number, larger in size. Consultation expected to be launched shortly, impact to be considered once consultation issued. Update 13-Nov-23: Response to DLUHC consultation submitted at both ACCESS and local fund level. Monitor until such time as government publishes its reply and confirms next steps.

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Pay and price inflation (F1) (Id: 232) - Assigned To: Joanna Thistlewood					
Description: Pay and price inflation significantly more than anticipated Consequence: higher costs of benefits; increase in liabilities; reduction in funding level; more investment risk required; higher employer contribution rate Review Date: 29/03/2024 Closed Date:			Inherent Rating: 9 - Medium	Current Rating 8 - Medium (27/02/2024)	Target Rating: 2 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
triennial valuation process focus on real return of assets, net of price and pay increases	100	31/03/2023	Joanna Thistlewood	update 9-May-22: valuation assumptions discussed with director of finance on 5 May, to be presented to committee on 25 May.	
discussion with employers during planning for triennial valuation will ensure that fund is aware of planned salary increases, and that employers are aware of the implications of such on their employer contribution rates.	100	31/03/2023	Joanna Thistlewood	update 24-Mar-23: link to ongoing engagement with employers	
pension increase for 2023 likely to be much higher than in previous years - estimate CPI will be about 10%. Impact on cash flows - build into cash flow forecasting and monitoring.	100	31/03/2023	Joanna Thistlewood	update 24-Mar-23: April 2023 pension increase confirmed at 10.1%.	
monitoring of position between valuations gives early warning	100	31/03/2022	Joanna Thistlewood	at 31 December 2021, estimated funding level was 103%	

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)					
Risk: Longevity (F5) (Id: 236) - Assigned To: Joanna Thistlewood					
Description: Pensioners living longer, thus increasing cost to the Fund Consequence: higher cost of liabilities; inappropriate investment strategy; cash flow implications; higher employer contribution rates Review Date: 29/03/2024 Closed Date:			Inherent Rating: 8 - Medium	Current Rating 8 - Medium (27/02/2024)	Target Rating: 5 - Low
Mitigations / Actions	% Complete	Due Date	Assigned To	Update	
triennial valuation assumptions on longevity based on ClubVita statistics with adjustment for local specific experience.	100	30/11/2022	Joanna Thistlewood	9-May-22: valuation assumptions discussed with director of finance on 5 May, and to be presented at 25 May 2022 pension committee meeting. update 01-Jul-22: assumptions presented to May committee meeting were agreed. Draft IWC contribution rate meeting held with director of finance, assistant director of finance and actuaries on 21 June 2022 - a way forward has been agreed. to be presented at November committee meeting.	
participation in Hymans Robertson Club Vita, which monitors fund-specific longevity statistics against LGPS wide information	75		Matthew Collier	9-May-22: data for March 2022 valuation submitted to ClubVita on 4 May 22.	

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)

Risk: Freedom and Choice (F8) (Id: 239) - **Assigned To:** Matthew Collier

<p>Description: Transfers out of the Fund into DC schemes due to introduction of 'Freedom & Choice' resulting in change in funding level.</p> <p>Consequence: cash flow implications for payment of transfer out; increased exposure to pension scams; reduction in funding level as assets depleted</p> <p>Review Date: 29/03/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>4 - Low</p>	<p>Current Rating</p> <p>4 - Low</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>2 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
the vast majority of transfers out of the pension fund are to other public service schemes, very little call for F&C withdrawals	50		Matthew Collier	Update 31-Oct-22: The vast majority of our transfers in and out of the scheme are interfund transfers.
transfer out protocols include required checking to ensure appropriate advice has been sought by scheme member before transfer request is agreed.	75		Matthew Collier	Update 31-Oct-22: The process has been reviewed and changed to include the required protocols. Final part is to get Hyman's to review all our transfer letters.

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)

Risk: pandemic (all) (Id: 243) - **Assigned To:** Joanna Thistlewood

<p>Description: Ongoing Covid-19 pandemic or impact of future pandemic type event causing possible disruption to service delivery</p> <p>Consequence: increased deaths; lack of communication with stakeholders; reduction in service standards; non-compliance with legislation, regulations and/or codes of practice.</p> <p>Review Date: 28/06/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>12 - High</p>	<p>Current Rating</p> <p>2 - Low</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>2 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Remote working has been very successful, teams have access to equipment to facilitate such working.	100	31/03/2022	Joanna Thistlewood	
attendance at virtual conferences to maintain knowledge.	100	31/03/2022		
online communications with members - member self service portal; website. rolling ongoing mitigation.	100		Matthew Collier	<p>Update 16-May-22: all communications for retirement options are pointed to MSS portal. statistics on sign up and active usage are available but cannot report on whether documents have actually been opened. Pensioner members have been asked to provide their communication preferences, which is being followed for all communications.</p> <p>Update 31-Oct-22: ALL ABS documents have been uploaded to MSS portal and communications have been sent to ALL pension members who have an ABS to confirm their statement is on the portal.</p>

Financial Management - Technical Finance (Pension Fund)

Risk: Cyber security (NEW 2) (Id: 1276) - **Assigned To:** Joanna Thistlewood

IWCRMS - Service Area - Full Risk Register (28 risks)

<p>Description: A Cyber Security Incident is defined as: A Breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data or confidential information or An event having an actual adverse effect on the security of or unauthorised access to or use of, inability to access, loss or theft of, or malicious infection of network and information systems that reasonably may compromise the privacy or confidentiality, integrity, or availability of confidential information or personal data or the council's operating environment, services, network and information systems</p> <p>Consequence: Complete or significant Loss of data Unlawful release of personal data held by the Council to unauthorised third parties resulting in legal action/fines Loss of Council or individual staff members money through fraudulent transactions as a result of phishing Temporary or permanent disabling of key council ICT systems Other fraudulent activity Other breaches of GDPR</p> <p>Review Date: 29/03/2024 Closed Date:</p>	<p>Inherent Rating: 15 - Very High</p>	<p>Current Rating 13 - High (27/02/2024)</p>	<p>Target Rating: 13 - High</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Pension Fund specific disaster recovery/cyber incident response plan in place to ensure back-up systems are in place within an agreed timescale. Regularly reviewed and updated.	50	28/06/2024	Joanna Thistlewood	update 28-Apr-23: no progress to date update 13-Nov-23: included in high priority work following governance outlook review and support. Hymans have indicated that they can support with training and understanding of specific requirements of TPR code, but work must be carried out by IWC staff or external data risk specialists if needed. Update 26-Feb-24: no further progress.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Review TPR single code of practice requirements for cyber risk considerations and ensure compliant. (NB TPR combined code expected to be launched Sept 2022)	25	28/06/2024	Joanna Thistlewood	Update 15-Mar-23: TPR expect to launch "General Code" in spring 2023. but reviewing cyber processes against expectations set out in draft code issued for consultation. First steps = assessment of IWC and Heywood controls at board meeting on 4 April 2023 update 28-Apr-23: TPR code delayed until July 2023. Board agreed good start, needs further work on evidencing testing of controls in place. Update 13-Nov-23: TPR code still not launched. Hymans Robertson have agreed to support with training and understanding of TPR requirements in advance of launch of code. Update 26-Feb-24: General code laid before parliament 10-Jan-24. Hymans' compliance checker tool has been purchased.
IWC cyber incident response plan has been obtained. To be reviewed for compatibility with pension fund needs, then used to create pension specific plan	0	29/03/2024	Joanna Thistlewood	update 13-Nov-23: no progress to date.
Ensure appropriate training and awareness sessions provided to administration staff, other officers and members of the Pension Committee and Pension Board. monitored as part of annual PDR process and reported in pension fund annual report.	75	29/03/2024	Joanna Thistlewood	update 13-Nov-23: all finance and administration staff have completed required internal training. Hymans have offered to support future training for committee and board members. update 26-Feb-24: no further progress.
compliance with Council data security protocols and building access controls maintained. rolling annual mitigation	100	31/03/2023	Joanna Thistlewood	
Cyber risk assessment tool (AON) to be completed, and action plan developed.	100	30/12/2022	Joanna Thistlewood	update 9-Sep-22: access to tool currently blocked under IWC firewalls; incident reported to ICT 5/9/22 update 15-Mar-23: Cyber risk assessment tool completed and presented to Pension Board 26 October 2022. Actions identified to improve performance.

IWCRMS - Service Area - Full Risk Register (28 risks)

Financial Management - Technical Finance (Pension Fund)

Risk: ESG/RI and Climate Change (NEW 3) (Id: 1277) **Assigned To:** Joanna Thistlewood

<p>Description: The fund fails to consider Environmental, Social and Governance risk factors, including climate change, when considering its investment strategy, funding strategy and reporting requirements. It also fails to engage with its investment managers (including the ACCESS pool) to ensure their climate risk processes align with those of the fund.</p> <p>Consequence: loss of returns through obsolete investments and/or stranded assets; reduction in the creditworthiness of individual investee companies should they fail to address climate change implications, for example moving away from fossil fuels. reduction in funding level, higher employer contribution rates. reputational issues. non-compliance with legislation/regulations/reporting requirements.</p> <p>Review Date: 28/06/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>12 - High</p>	<p>Current Rating</p> <p>12 - High</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>9 - Medium</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Fund has published responsible investment beliefs, set in 2019. To be reviewed to ensure still relevant and expanded where appropriate	0	28/06/2024	Joanna Thistlewood	update 28-4-23: to be reviewed as part of TCFD reporting compliance.
ESG/RI workgroup established to review fund's current beliefs and statements to ensure fit for purpose.	25	29/03/2024	Joanna Thistlewood	2 meetings held to date update 9-May-22: no meetings held since November 2021, due to officer capacity update 13-Nov-23: no further progress.
Membership of LAPFF to improve engagement with investee companies. Reporting of engagement to be improved.	75	29/03/2024	Joanna Thistlewood	Update 28-Apr-23: LAPFF membership renewed for 2023-24. reporting of engagement to be improved. Update 13-Nov-23: membership of LAPFF continues, LAPFF communications shared with committee members as appropriate.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
fund commissioned ESG analysis and carbon footprint report in June 2021, which has informed some manager challenge, and will form baseline for future climate change actions.	0	29/03/2024	Joanna Thistlewood	Update 9-May-22: consideration to be given to commissioning updated report for 2022-23. cost identified as £13k. update 28-4-23: to be reviewed as part of TCFD reporting compliance. Update 13-Nov-23: proposal for work plan has been received from Hymans Robertson, although further work deferred until such time as TCFD reporting for LGPS requirements are confirmed by central government. Indication that these will not come into force until 2024-25 reporting at the earliest.
consider requirements of UK Stewardship code	0	29/03/2024	Joanna Thistlewood	
triennial valuation 2022 will model specific climate scenarios in determining likelihood of achieving funding targets, and setting contribution rates.	100	31/12/2022	Joanna Thistlewood	update 4-Jul-22: assumptions for climate modelling agreed update 15-Mar-23: draft valuation report presented to pension committee on 8 February 2023. this included sensitivity analysis of results in three different climate scenarios.
ACCESS pool developing ESG/RI guidelines which should encompass all current statements from all 11 funds. Continued involvement in the development of those guidelines at officer and elected member level	100	25/11/2022	Joanna Thistlewood	update 9-May-22: ACCESS ESG/RI guidelines were presented to elected member workshop on 27 April, with very few amendments proposed. Should be presented to 6 June 2022 JC meeting for onward recommendation. update 01-Jul-22: ACCESS JC meeting approved guidelines in principle. Next step, to build into local review of current statements. update 15-Mar-23: ACCESS JC formally recommended that guidelines be considered by local funds.
respond to DLUHC "Governance and reporting of climate change risks" consultation (issued 1 Sep. 22); develop action plan to ensure compliance with expected regulations. Reporting required for 2023-24 year, by 1 December 2024.	100	24/11/2022	Joanna Thistlewood	Update 15-Mar-23: consultation response submitted 24 November 2022. Government have not yet issued their response, nor the regulations which enforce the requirements.

Financial Management - Technical Finance (Pension Fund)

Risk: Investment Markets (NEW 4) (Id: 1301) - **Assigned To:** Joanna Thistlewood

IWCRMS - Service Area - Full Risk Register (28 risks)

<p>Description: Investment strategy fails to deliver returns in line with the anticipated returns underpinning the valuation of liabilities and contribution rates over the long term, due to any one or a combination of the following factors:</p> <ul style="list-style-type: none"> - Fall in risk-free returns on Government Bonds - Collapse of investment manager, or its wilful negligence, fraud or default - Active investment manager under-performance relative to benchmark - Systemic failure of several asset classes and/or investment managers - Significant allocation to any single asset category and its underperformance relative to expectation. <p>Consequence:</p> <ul style="list-style-type: none"> - significant reduction in investment values and/or investment income. - loss of assets. - reduction in funding level - potentially higher employer contribution rates - reputational damage <p>Review Date: 28/06/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>9 - Medium</p>	<p>Current Rating</p> <p>5 - Low</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>5 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
<p>Investment managers invited to attend pension committee meetings on a rolling cycle, which can be amended should issues with any manager arise. Managers are invited to present on current performance, actions for mitigations of poor performance (if necessary), views for the future, as well as ESG/RI issues.</p> <p>proposal for managers: May 23 = Partners (Infrastructure); Jul 23 = UBS (passive global); Nov23 = ACCESS/Link (pooling update); Feb24 = Baillie Gifford (DGF)</p>	0	28/06/2024	Joanna Thistlewood	update 26-Feb-24: no investment managers were been invited to committee meetings in November 2023 and February 2024, due to other agenda priorities and officer capacity. Restart planning for 2024-25 attendance.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
quarterly monitoring of interim funding level reported at each pension fund committee meeting linking to review of investment performance	0	28/06/2024	Joanna Thistlewood	
Investment assets are held by custodian, in ringfenced accounts, to protect against investment manager default	0	28/06/2024	Joanna Thistlewood	
Advice will be taken from investment consultants should there be a need to transition assets from one investment manager to another, to ensure that out-of-market exposure and transition expenses are minimised.	0	31/03/2024	Joanna Thistlewood	
investment portfolio diversified across a number of asset managers. independent investment consultants provide review of performance of portfolio as a whole, specific asset classes and individual fund managers at each committee meeting Any significant changes to the structure of the manager (including personnel, acquisitions, other activity) is reported to the committee. rolling quarterly action.	75	29/03/2024	Joanna Thistlewood	update 26-Feb-24: complete for 2023-24.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
pooled investment management agreements determined and monitored through ACCESS Support Unit and Link fund Solutions. monitored by officer working group and reported at each JC meeting. reported to each PFC meeting as part of performance review and reports back from ACCESS.	75	29/03/2024	Joanna Thistlewood	update 26-Feb-24: performance reports included at each ACCESS JC meeting, papers for which are shared in entirety with local committee and board. no issues identified to date
Assets invested on the basis of specialist advice, in a suitably diversified manner across assets classes, geographies, managers, etc. annual rolling review	75	29/03/2024	Joanna Thistlewood	update 24-Mar-23: review of strategic asset allocation following 2022 valuation to be considered at 24 May 23 PFC.
review of investment strategy linked with every triennial valuation to ensure consistency of approach	100	25/05/2023	Joanna Thistlewood	update 24-Mar-23: introduction to strategic asset allocation review presented at Nov22 PFC, high level recommendations to be complete for decision in May 2023. implementation thereafter
triennial valuation only anticipate long term returns on a relatively prudent basis to reduce risk of underperforming	100	31/03/2023	Joanna Thistlewood	update 9-May-22: valuation assumptions discussed at meeting with Director of Finance on 5 May, to be presented at committee meeting on 25 May. final discount rate (asset outperformance assumption) will be confirmed once council's contribution modelling completed. Update 1-Jul-22: meeting on 21 June discussed council's contribution rate and discount factor. no concerns, final decision can be deferred until valuation results further progressed. update 4-Oct-22: discussion of whole fund results with s151 officer included consideration of current significant market volatility. Will also be included in committee report for November. update 24-Mar-23: valuation results reflect long term returns only. Mitigation complete once valuation results published. valuation report published on fund's website 30 March 2023
Financial Management - Technical Finance (Pension Fund)				

IWCRMS - Service Area - Full Risk Register (28 risks)

Risk: Employer engagement (NEW 5) (Id: 1302) - **Assigned To:** Joanna Thistlewood

<p>Description: Administering Authority fails to engage with employers on a regular basis, meaning it is unaware of: - structural changes in employer membership (e.g. large fall in employee members, large number of retirements). - an employer closing to new entrants. - economic circumstances causing financial pressures on the employer. - outsourcing decisions from scheduled body. Employers may be unaware of impacts of changes to scheme regulations, etc.</p> <p>Consequence: - Inappropriate funding strategy set for that employer/group of employers; unaffordable contribution rates. - Employer could approach exit without notice, resulting in either significant unaffordable deficit due to the fund, or significant credit payable to employer. - Admission agreements not prepared and/or inappropriate employer contribution rates agreed. - Failure to commission cessation calculation on a timely basis. - Employer cannot meet its obligations, leading to increased risk/additional cost to other employers.</p> <p>Review Date: 28/06/2024 Closed Date:</p>	<p>Inherent Rating: 9 - Medium</p>	<p>Current Rating 8 - Medium (27/02/2024)</p>	<p>Target Rating: 5 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
The actuary may revise the rates and adjustments certificate to increase an employer's contributions between triennial valuations - policy created in FSS 2023	0	31/03/2026	Joanna Thistlewood	

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Cessation policy included in FSS 2023. Further, more detailed, policies to be developed: Exit credits; flexibilities on exit. Formal documentation of current practice to ensure employers aware of fund policies, and their options when it comes to exit planning	0	31/03/2025	Joanna Thistlewood	
outsourced contracts, whether the Council or one of the fund's scheduled employers is letting authority, tend to have a pass through arrangement whereby employer contribution rate is fixed for the new supplier for the duration of the contract, to give certainty on contract pricing. Engagement with council's procurement team ensures fund is made aware of potential outsourcing from the council. Need to develop engagement with College and academies for this purpose.	0	28/06/2024	Joanna Thistlewood	update 26-Feb-24: very little proactive engagement during 2023-24, reactive engagement with council outsourcing and academy combinations. CONCERN re capacity to deliver this following resignation of Pension Fund Manager.
Regular contact maintained with admitted body employers with membership less than 5 to discuss planning for exit. Engagement as part of valuation process and at least every 6 months, or if membership numbers change.	0	29/03/2024	Joanna Thistlewood	update 26-Feb-24: very little proactive contact during 2023-24.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Admin team to communicate with finance team if membership numbers change significantly during year. use of i-connect for monthly data submission by all employers will highlight significant changes in membership/participation, and will prompt engagement with that employer to determine circumstances.	75	29/03/2024	Matthew Collier	update 26-Feb-24: productive contact throughout 2023-24, but CONCERN re ability to maintain engagement due to capacity issues in Admin and finance/governance teams.
Employer engagement as part of triennial valuation planning, sharing of draft results at early stage, meetings with those "non-standard" employers (community admission bodies, housing associations)	100	30/12/2022	Joanna Thistlewood	update 24-Mar-23: this was completed as part of the 2022 valuation.
The Administering Authority has a close relationship with employing bodies and communicates required standards - e.g. for submission of data. rolling annual mitigation.	75		Matthew Collier	Update: 31-03-23 All data is received via i-Connect and submissions of data & payment monitored monthly and reported to LPB.

Financial Management - Technical Finance (Pension Fund)

Risk: Changes to legislation (NEW 6) (Id: 1304) - **Assigned To:** Joanna Thistlewood

IWCRMS - Service Area - Full Risk Register (28 risks)

<p>Description: Fund is not aware of, or fails to adequately respond to, changes arising from central government and/or HMRC, including:</p> <ul style="list-style-type: none"> - changes from public sector report (McCloud) - changed to a particular type of employer in LGPS (e.g. academies) - Climate risk reporting - TPR General code <p>Consequence:</p> <ul style="list-style-type: none"> - incorrect assessment or payment of benefits - inappropriate information provided to stakeholders - increased complaints - impact on funding strategy for particular type of employer and/or fund as a whole. - impact on investment strategy. - non-compliance with legislation, regulations and/or codes of practice - reputational damage - potential financial penalties. <p>Review Date: 29/03/2024 Closed Date:</p>	<p>Inherent Rating:</p> <p>12 - High</p>	<p>Current Rating</p> <p>9 - Medium</p> <p>(27/02/2024)</p>	<p>Target Rating:</p> <p>5 - Low</p>
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Mitigations / Actions	% Complete	Due Date	Assigned To	Update
McCloud remedy consultation delayed until early calendar year 2023.	25	29/03/2024	Matthew Collier	<p>update 9-Sep-22: Actuaries have factored in assumptions to valuation results, in line with government guidance. Data is being collected from employers - 86% of data requested has been received; 8%" analysed. Project report to each LPB meeting.</p> <p>update 3-Oct-22: Data from employers now 92% received and 81% analysed. Report to LPB on 26th October 2022 confirming these figures. Update 31-Oct-22: Data from employers now 92% received and 88% analysed.</p> <p>update 13-Nov-23: fund is working with administration system providers to implement solution. Fund is in a very strong position with respect to data.</p>
The Administering Authority considers all consultation papers issued by the Government and comments where appropriate. rolling annual mitigation.	75	29/03/2024	Joanna Thistlewood	<p>update 26-Feb-24: response submitted to DLUHC consultation on Next Steps for investment.</p>

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
Take advice from Fund actuary on impact of changes on the Fund and amend strategies as appropriate. rolling annual mitigation.	75	29/03/2024	Joanna Thistlewood	
participation in networking events, webinars, subscriptions to professional organisations, liaison with advisers to ensure kept up to date with latest developments. rolling annual mitigation.	75	29/03/2024	Joanna Thistlewood	update 27-Mar-23: participating throughout 2022-23. restart reprogress for 2023-24 update 26-Feb-24: participating throughout 2023-24. restart progress for 2024-25
business plan for pension fund includes these changes as they become apparent, with resource allocated as required. annual rolling mitigation.	0	29/03/2024	Joanna Thistlewood	update 26-Feb-24: still not formal business plan for pension fund
record of development activity and progress with learning toolkits will be presented at each board and committee meeting, and will be included in annual report, at member level.	75	29/03/2024	Joanna Thistlewood	update 27-Mar-23: included in all meetings 2022-23. renewed focus in 2023-24 update 26-Feb-24: included in all meetings 2023-24. renewed focus in 2024-25, following output of KPA.
Administration staff resources and technical support programme agreed with Hymans Robertson, for period of three months, to cover gaps following staff resignations, while service redesign work is completed. Following redesign, recruitment to new structure can begin.	75	07/03/2024	Matthew Collier	Update 13-Nov-23: questions on support contract raised by HR, Corporate Information Unit, and Procurement, has delayed the implementation of this contract - which was scheduled to start on 30 October 2023 for a period of three months. Expect to sign contract before 17 November 2023. Update 1-Dec-23: contract signed, support contract in place Update 26-Feb-24: administration service is being fully supported by Hymans Robertson. Review of additional support required/available following resignation of another pension officer - information expected w/c 26 Feb.

IWCRMS - Service Area - Full Risk Register (28 risks)

Mitigations / Actions	% Complete	Due Date	Assigned To	Update
training and development plans in place for all pension administration staff, identifying external events as well as in-house training. as part of annual PDR process.	100	30/06/2022	Matthew Collier	update 16-May-2022: all administration staff have bespoke training plans in place, which are monitored as part of regular 1-2-1 meetings.