

Pension Fund Risk Register April 2019

Objectives

- 1. The objectives of the Risk Register are to:
 - identify key risks to the achievement of the Fund's objectives
 - · assess the significance of the risks
 - consider existing controls to mitigate the risks identified
 - Identify additional action required.

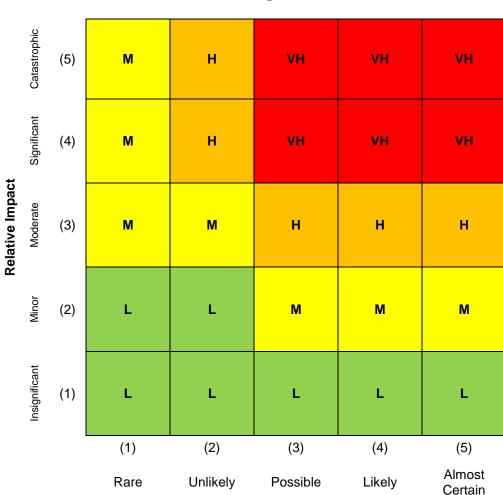
Risk Assessment

- 2. Identified risks are assessed separately and for each the following is determined:
 - the likelihood of the risk materialising
 - the severity of the impact/potential consequences if it does occur.
- 3. Each factor is evaluated on a sliding scale of 1 to 5 with 5 being the highest value i.e. highest likelihood/most severe impact/consequences. The risk evaluation tables below have been used in order to assess specific risks and to introduce a measure of consistency into the risk assessment process. The overall rating for each risk is calculated by multiplying the likelihood value against the impact value.

LIKELIH	LIKELIHOOD:						
1	Rare	0 to 5% chance					
2	Unlikely	6 to 20% chance					
3	Possible	21 to 50% chance					
4	Likely	51 to 80% chance					
5	Almost certain	81%+ chance					

IMPACT		
1	Insignificant	0 to 5% effect
2	Minor	6 to 20% effect
3	Moderate	21 to 50% effect
4	Significant	51 to 80% effect
5	Catastrophic	81%+ effect

 Having scored each risk for likelihood and impact, the risk ratings can be plotted onto the following matrix to enable risks to be categorised into Low, Medium, High and Very High Risk.



Risk Rating Matrix

Relative Likelihood

5. This initial assessment gives the inherent risk level. Existing controls are then identified and each risk is re-assessed to determine if the controls are effective at reducing the risk rating. This gives the current (or residual) risk level. The current risk rating scores and categories are then used to prioritise the risks shown in the register in order to determine where additional action is required in accordance with the following order of priority:

Red = Very High Priority

Take urgent action to mitigate the risk.

Orange = High Priority

Take action to mitigate the risk.

Yellow = Medium Priority

Check current controls and consider if others are required.

Green = Low Priority

No immediate action other than to set a review date to re-consider your assessment.

NOTTINGHAMSHIRE PENSION FUND RISK REGISTER - SUMMARY

Pick Description		Inherent Risk			Current Risk		
Risk Description		Rating Ch		ange Rating		Change	
Risk Gov4 Inadequate resources are available to manage the pension fund.	20	VERY HIGH	+	12	HIGH	+	
Risk Inv3 Fund assets are assessed as insufficient to meet long term liabilities.	16	VERY HIGH	1	9	HIGH	+	
Risk Adm1 Standing data & permanent records are not accurate.	16	VERY HIGH	‡	9	HIGH	+	
Risk Adm2 Inadequate controls to safeguard pension fund records	15	VERY HIGH	‡	6	MEDIUM	+	
Risk Inv4 Significant variations from assumptions used in the actuarial valuation	12	HIGH	+	9	HIGH	#	
Risk Inv1 Inappropriate investment strategy is adopted.	12	VERY HIGH	1	6	MEDIUM	1	
Risk Inv5b Custody arrangements	12	VERY HIGH	+	6	MEDIUM	+	
Risk Inv6 LGPS Central incurs net costs or decreases investment returns	12	VERY HIGH	‡	9	HIGH	+	
Risk Gov5 Failure to adhere to relevant legislation and guidance.	12	HIGH	+	6	MEDIUM	+	
Risk Gov3 An effective performance management framework is not in place.	9	HIGH	+	6	MEDIUM	#	
Risk Gov1 Pension Fund governance arrangements are not effective	9	HIGH	+	6	MEDIUM	+	
Risk Gov2 Pension Fund objectives are not defined and agreed.	9	HIGH	+	6	MEDIUM	+	
Risk Inv2 Fund cash is insufficient to meet its current obligations.	9	HIGH	#	6	MEDIUM	#	
Risk Inv5a Fund manager mandates	9	HIGH	#	6	MEDIUM	+	
Risk Inv5d Financial Administration	9	HIGH	+	6	MEDIUM	#	
Risk Adm3 Failure to communicate adequately with all relevant	9	HIGH	+	6	MEDIUM	#	

APPENDIX Cii

stakeholders.						
Risk Inv5c Accounting arrangements	6	MEDIUM	+	4	LOW	1
Risk Inv5e Stewardship	6	MEDIUM	+	4	LOW	1

		Governance)				
Risk description: G	ov1 - Pension F			nents are not	effective		
	Likelihood:	Impact:		Risk Rat	na:		
Inherent Risk:	3	3	9		HIGH	=	
Current Risk:	2	3	6	M	EDIUM •	Į	
Current Controls:	administering Pension Fund		ension fur	nd to the Nottir	nghamshire		
		PS Regulations the Pension Board	ne Admini	stering Author	ty has		
		reference of the P			J		
		reference of the P					
	The Fund publishes a Governance Compliance Statement which details the governance arrangements of the Fund and assesses compliance with best practice. This is kept regularly under review.						
	continuing trai	cy is in place which ining and encoura ment Pension Sch	ages all ne	ew Members to	attend the		
	Pension Board	d Members are al	so require	ed to undertak	e training		
	Officers of the Council attend meetings of the Pension Fund Committee and the Pension Board.						
	 The Fund has a formal contract for an independent adviser to give advice on investment matters. They are contracted to attend each Pension Fund Committee meeting. 						
	The Administering Authority has a formal contract for an independent adviser to give advice on LGPS regulations to the Pension Board						
Action Required:	Continue to monitor via existing processes.						
Responsibility:	Group Manager Group Manager Pension Manage	(Legal Services)		Timescale:	On-going		

Governance Risk description: Gov2 - Pension Fund objectives are not defined and agreed						
	Likelihood:	Impact:	Risk Rating:			
Inherent Risk:	3	3	9	HIGH	1	
Current Risk:	2	3	6	MEDIUM	1	
Current Controls:		•	tlined in the Fundi Statement (ISS).	0,		

	approved by the Pension Fund Committee and reviewed on a regular basis.				
Action Required:	Continue to monitor via existing processes.				
Responsibility:	Pension Fund Committee; Group Manager (Financial Services)	Timescale:	On-going		

	Governance							
Risk description: G	ov3 - An effectiv	e performance r	nanageme	nt framewor	k is not in			
place.								
	Likelihood: Impact: Risk Rating:							
Inherent Risk:	3	Impact:	12		HIGH	-		
Current Risk:	2	3	6		EDIUM	+		
Current Controls:	Committee. TI	Investment performance is reported quarterly to the Pension Fund Committee. The Fund's main investment managers attend each quarter and officers receive regular updates from the Fund's other investment						
	Committee. TI	Poor investment performance is considered by the Pension Fund Committee. The Pension Fund Committee's actions are monitored by the Pension Board						
	 A Fund strategic benchmark has been implemented to improve monitoring of decisions regarding asset allocation and investment management arrangements. 							
		Performance of the administration function is managed through an Administration Strategy						
Action Required:	Consider performance monitoring framework for Fund Administration.							
Responsibility:	Group Manager Pension Manage		es);	Timescale:	On-going			

Governance							
Risk description: Gov4 - Inadequate resources are available to manage the pension fund.							
	Likelihood: Impact: Risk Rating:						
Inherent Risk:	5	4	20	VERY HIGH	1		
Current Risk:	4	3	12	HIGH	1		
Current Controls:	The pension fund investments are managed by the Pensions & Treasury Management team.						
	Pension admir	nistration is mana	aged by the Pensi	on Team Manage	r		

	within the BSC					
	Operating costs are recharged to the pension fund in accordance with regulations.					
	Staffing levels and structures are kept ur	Staffing levels and structures are kept under regular review.				
	Pension Costs and resources monitored against the CIPFA Benchmarking club					
Action Required:	Continue to monitor via existing processes.					
Responsibility:	Group Manager (Financial Services); Group Manager (BSC) Pension Manager Senior Accountant - Pensions & TM	Timescale:	On-going			

		Governance						
Risk description: G	ov5 - Failure to a	adhere to relevar	nt legislati	ion and guid	dance.			
	Likelihood:	Impact:		Risk Rating:				
Inherent Risk:	4	3	12	12 HIGH				
Current Risk:	3	2	6	N	MEDIUM	+		
Current Controls:		 An established process exists to inform members and officers of statutory requirements and any changes to these. 						
		 An Administration Strategy was introduced in 2017 to monitor the Administration of the Fund, along with monitoring Employer compliance. 						
		ources are put in padminister the sch		plement LGF	PS changes	while		
		of relevant profess other requirement n dates.						
	Any breaches Regulator.	in statutory regul	ations mus	st be reporte	d to the Pen	sion		
Action Required:	Review Resources against statutory requirements							
	Continue to m	onitor requiremer	its via app	ropriate soui	ces.			
	 Continue to m guidance. 	onitor resources t	o ensure a	adherence to	legislation a	and		
Responsibility:	Group Manager (Financial Services); Group Manager (BSC); Senior Accountant - Pensions & TM Pension Manager							
		Investments						
Risk description: In	v1 - Inappropria	te investment st	rategy is a	adopted.				

	Likelihood:	Impact:		Risk Rati	ng:				
Inherent Risk:	3	4	12	VER	Y HIGH	1			
Current Risk:	2	3	6	ME	EDIUM	1			
Current Controls:	regulations an Fund Committ The Strategy t	 The investment strategy is in accordance with LGPS investment regulations and is documented, reviewed and approved by the Pens Fund Committee. The Strategy takes into account the expected returns assumed by th actuary at the triennial valuation. 							
	benchmark.								
	_	 A regular review takes place of the Fund's asset allocation strategy by the Pension Fund Working Party. 							
	An external adviser provides specialist guidance to the Pension Fund Committee on the investment strategy.								
Action Required:	Continue to monitor via existing processes.								
Responsibility:		(Financial Servic nt - Pensions & 1	•	Timescale:	On-going)			

Investments						
Risk description: I	nv2 - Fund cash i	s insufficient to	meet its c	urrent obliga	tions.	
	Likelihood: Impact: Risk Rating:					
Inherent Risk:	3	3	9	-	IIGH	1
Current Risk:	2	3	6	ME	DIUM	1
Current Controls		w is monitored da ension Fund Com			account is	
		nts are produced net cash inflow	for the pen	sion fund and	these sho	w the
	Regular asses actuarial valua	ssment of Fund as ations.	ssets and li	abilities is car	ried out th	rough
	• The Fund's In	vestment and Fur	nding Strate	egies are regu	ılarly revie	wed
Action Required:	Continue to m	onitor via existing	processes	S.		
Responsibility:		ttee; (Financial Service Int - Pensions & T	es);	Timescale:	On-going	J
		Investments				
Risk description: Inv3 - Fund assets are assessed as insufficient to meet long term liabilities.						
	Likelihood:	Impact:		Risk Rati	ng:	

Inherent Risk:	4	4	16	VER	Y HIGH	‡		
Current Risk:	3	3	9	ŀ	HGH	1		
Current Controls:	Fund assets are kept under review as part of the Fund's performance management framework.							
	•	Regular assessment of Fund assets and liabilities is carried out through Actuarial valuations.						
	The Fund's In	vestment and Fur	nding Strategies a	are regi	ularly revie	wed.		
		dviser provides sp the investment s	_	to the	Pension Fu	und		
Action Required:	Continue to m	onitor via existing	processes.					
	Review cash flow projections prepared by actuaries on a regular basis.							
Responsibility:	Pension Commit	Pension Committee Timescale: On-going						
		(Financial Service ant - Pensions & T						

	Investments						
Risk description: Inv4 - Significant variations from assumptions used in the actuarial valuation occur							
	Likelihood: Impact: Risk Rating:						
Inherent Risk:	4	3	12 HIGH				
Current Risk:	3	3	9	HIGH	1		
Current Controls:	 Actuarial assu actuaries 	mptions are revie	wed by officers a	and discussed v	vith the		
	Sensitivity and	alysis is undertake	en on assumption	ns to measure in	mpact		
	Valuation are	undertaken every	3 years				
	Monitoring of obusiness plan	cash flow position	and preparation	of medium terr	n		
	Contributions profile.	made by employe	ers vary accordin	g to their memb	er		
Action Required:	Continue to m	onitor via existing	processes.				
	Review cash flow projections prepared by actuaries on a regular basis.						
Responsibility:		(Financial Service nt - Pensions & T	, .	scale: On-go	ing		

Investments							
Risk description: Inv5 - Inadequate controls to safeguard pension fund assets.							
Inv5a - Investment	managers						
Likelihood: Impact: Risk Rating:							
Inherent Risk: 3 3 9 HIGH ₩							

Current Risk:	2	3	6	М	EDIUM	\		
Current Controls:	 Complete and authorised client agreements are in place. This includes requirement for fund managers to report regularly on their performance. Mandate managers attend Pension Fund Committee on a quarterly basis. 							
		 Investment objectives are set, and portfolios must be managed in accordance with these 						
		 AAF 01/06 (or equivalent) reports on internal controls of service organisations are reviewed for mandate managers. 						
		In-House Fund has a robust framework in place which is regularly tested by internal audit						
		rs maintain an ap e level of risk to P			ent framew	ork		
Action Required:	Continue to m	onitor via existing	processe	S.				
Responsibility:		(Financial Service nt - Pensions & T	,,			9		
Inv5b - Custody arr								
	Likelihood:	Impact:		Risk Rati	_			
Inherent Risk: Current Risk:	3	3	12 6		RY HIGH EDIUM	= 1		
Current Controls:	Complete and custodian. AAF 01/06 (or	authorised agree	ments are	in place with	the externa			
	external custo Regular recon	ciliations carried	out to ched	ck external cu	stodian rec	ords.		
	Where assets are custodied in-house, physical stock certificates are held in a secure cabinet to which access is limited.					" •		
			′ ' '	s limited.	erillicates a	re		
Action Required:	held in a secu		h access i		erillicates a	re		
Responsibility:	held in a secuContinue to mGroup ManagerSenior Accounta	re cabinet to whic	h access in processe es);		On-going			
•	 held in a secu Continue to m Group Manager Senior Accounta arrangements	re cabinet to which onitor via existing (Financial Service Int - Pensions & T	h access in processe es);	S. Timescale:	On-going			
Responsibility: Inv5c - Accounting	• Continue to m Group Manager Senior Accounta arrangements Likelihood:	re cabinet to which onitor via existing (Financial Service of the Pensions & Tensions &	h access i processe es); M	S. Timescale: Risk Rati	On-going			
Responsibility: Inv5c - Accounting Inherent Risk:	held in a secu Continue to m Group Manager Senior Accounta arrangements Likelihood: 3	re cabinet to which onitor via existing (Financial Service ant - Pensions & Tourns of the Impact:	h access in processe es); M	S. Timescale: Risk Rati	On-goinging:			
Responsibility: Inv5c - Accounting Inherent Risk: Current Risk:	held in a secu Continue to m Group Manager Senior Accounta arrangements Likelihood: 3 2	re cabinet to which onitor via existing (Financial Service ont - Pensions & The service of the s	h access in processe es); M	S. Timescale: Risk Rati	On-going ing: EDIUM LOW	+		
Responsibility: Inv5c - Accounting Inherent Risk:	held in a secu Continue to m Group Manager Senior Accounta arrangements Likelihood: 3 2 Pension Fund	re cabinet to which onitor via existing (Financial Service ant - Pensions & Tourns of the Impact:	processe es); M 6 4 gements of	Risk Rati	On-going ing: EDIUM LOW Local Auth	+		
Responsibility: Inv5c - Accounting Inherent Risk: Current Risk:	held in a secu Continue to m Group Manager Senior Accounta arrangements Likelihood: 3 2 Pension Fund Accounting Co The Pension F	re cabinet to which onitor via existing (Financial Service ant - Pensions & Tourns of the control of the contro	processe es); M 6 4 gements of	Risk Rati M conform to the the Pensions A Pensions	On-going Ing: EDIUM LOW Local Auth SORP.	mority		

	those maintair	ned by the externa	al custodia	n and investm	ent manad	gers.	
		•				9010.	
		are carried out r					
	 External Audit 	External Audit review the Pension Fund's accounts annually.					
Action Required:	Continue to m	Continue to monitor via existing processes.					
Responsibility:		Group Manager (Financial Services); Senior Accountant - Pensions & TM Timescale: On-going					
Inv5d - Financial Ad	dministration			L			
	Likelihood:	Impact:		Risk Ratir	ng:		
Inherent Risk:	3	3	9	Н	IGH	#	
Current Risk:	2	3	6	ME	DIUM	#	
Current Controls:	with appropria transactions.	und adheres to the te separation of contents are maderns on cash.	luties and	authorisation li	mits for		
	 Investment tra monitored. 	nsactions are pro	perly auth	orised, execut	ed and		
		due to the fund and by the Pensions N	•	d by Scheme i	ules whic	h are	
	The Pension for regulatory guidents	und maintains a b delines.	ank accou	ınt which is op	erated wit	hin	
Action Required:	Continue to m	onitor via existing	processe	S.			
Responsibility:		(Financial Service nt - Pensions & T	, .	Timescale:	On-going	g	
Inv5e – Stewardshi							
	Likelihood:	Impact:		Risk Ratir			
Inherent Risk:	3	2	6		DIUM	+	
Current Risk:	2	2	4		OW	—	
Current Controls:	•	und aims to be a l RC's Stewardship	•	responsible inv	estor and	plans	
	 The Fund is a member of Local Authority Pension Fund Forum (LAPFF) and National Association of Pension Funds (NAPF), and supports their work on shareholder engagement. 						
	Voting is repor	und has a contract rted to the Pensic he Fund website.	•		•		
Action Required:	Continue to m	onitor via existing	processe	S.			
Responsibility:		(Financial Service nt - Pensions & T		Timescale:	On-goin	g	
				1			

Investments									
Risk description: In	v6 - LGPS Centra	al incurs net costs	or decrea	ises investmei	nt returns				
	Likelihood:	Impact:		Risk Rati	ng:				
Inherent Risk:	3	4	12	VER	Y HIGH	1			
Current Risk:	3	3	9	ŀ	IIGH	1			
Current Controls:	them through PAF	nolders in LGPS (involvement in Sh formance will be	nareholder	•					
Action Required:		tend meetings re onitor via existing		J					
Responsibility:		ommittee (Financial Service nt - Pensions & T	, .	Timescale:	On-going				

Administration								
Risk description: Ad	m1 - Standing dat	a and permane	nt records are r	not accurate.				
	Likelihood:	Likelihood: Impact: Risk Rating:						
Inherent Risk:	4	4	16 VERY HIGH					
Current Risk:	3	3	9	HIGH	1			
Current Controls:	Business products.	cesses are in pla	ace to identify ch	anges to standin	ıg			
		s are undertaken	•	entation; input ar occurs to source	nd			
	Documentation is maintained in line with agreed policies.							
	The Administ compliance.	ration Strategy s	upports the mor	nitoring of employ	/er			
	A change of cannual staten		ent out to membe	ers alongside the	ir			
	Data matchin discrepancies	•	ional Fraud Initia	ative) help to ide	ntify			
	Mortality Screen	eening is being p	erformed					
	<u>-</u>	The Data Improvement Plan presented to Pension Fund Committee is being implemented.						
	• The GMP Re	conciliation Proi	ect including Pay	roll and Pension	ns			

	Data matching exercise with HMRC h	Data matching exercise with HMRC has commenced				
Action Required:	Continue to monitor via existing proce	Continue to monitor via existing processes.				
	Improve monitoring of returns from m	Improve monitoring of returns from major fund employers				
	Implementation of Data Improvement	plan and GDP	R Action Plan			
Responsibility:	roup Manager (BSC) Timescale: On-going					
	Pension Manager	nsion Manager				

	Administration						
Risk description: Adm2 - Inadequate controls to safeguard pension fund records.							
	Likelihood: Impact: Risk Rating:						
Inherent Risk:	3	5	15	VEF	RY HIGH	1	
Current Risk:	2	3	6	M	EDIUM	1	
Current Controls:	• ICT Disaster F	Recovery Plan an	d Security	Plan are agre	ed and in p	olace	
	New back up a	arrangements are	in place				
	Software is re	gularly updated to	meet LGF	PS requireme	nts.		
	Audit trails and	d reconciliations a	are in place) .			
	GDPR plan is	in place					
	Documentatio	n is maintained ir	line with a	agreed policie	S.		
	Physical recor	ds are held secu	ely.				
	Pensions and other related administration staff undertake data management training as required.						
Action Required:	Continue to monitor via existing processes.						
Responsibility:	Group Manager Pension Manage	•		Timescale:	On-going		

Administration								
Risk description: Adm3 - Failure to communicate adequately with all relevant stakeholders.								
	Likelihood:	Impact:	Ris	sk Rating:				
Inherent Risk:	3	3	9 HIGH					
Current Risk:	2	3	6	MEDIUM	#			
Current Controls:	A communication	tions strategy is ir	n place and is reg	ularly reviewed.				
	• The Fund web	site is periodicall	y updated.					
	Member inforr	mation guides are	reviewed.					
	The Fund has an annual meeting aimed at all participating employers.							
	• The Pension F	und Committee h	nas representativ	es of the County				

	Council, City Council, Nottinghamshire Local Authorities, Trade Unions, Scheduled and Admitted Bodies.				
	 Meetings are held regularly with employe 	ers within the F	und.		
	District and City Council employers and other adhoc employer meetings take place as required				
	 A briefing for employers takes place in February or March each year in preparation for year end 				
	Benefit Illustrations are sent annually to c members.	contributing and	d deferred Fund		
	 Annual report, prepared in accordance w published on the website. 	ith statutory gu	idelines, is		
Action Required:	Consider employer risk analyses to safeguard contributions to the Fund.				
Responsibility:	Group Manager (BSC) Pension Manager	Timescale:	On-going		