

# CHB LGPS Detailed risk register EXCLUDING COMPLETED ACTIONS

Report Author: Chris Anastasi

Generated on: 12 January 2021



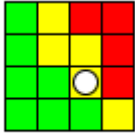
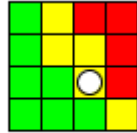

Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CHB LGPS 008 Pension Administration Software	<p><b>Cause:</b> (i) Contract expires and is not replaced. (ii) Contract expires and replacement is delayed.</p> <p><b>Event:</b> Unable to meet statutory obligations of the LGPS or PPS</p> <p><b>Effect:</b> (i) Pensions not paid (ii) sanctions and fine (iii) Complaints and loss of reputation.</p>		16	<p>The current software contract expires on 13 October 2021 following a two year extension. The CoL must complete a procurement exercise to appoint or re-appoint a provider by 14 October 2021.</p> <p>Failure to deliver by 14 October 2021 may result in a delay to processing of benefits and the cessation of the Local Government Pension Scheme (LGPS) administration processes.</p> <p>There is a Framework for LGPS software administered by Norfolk County Council. The framework has already identified and selected the providers that may meet the CoL requirements and provides technical specification of the software.</p>		8	31-Oct-2021	<span style="color: blue;">■</span>

04-Jan-21				<p><u>The procurement process has been completed and applicants notified of the award.</u></p> <p><u>The contract has not yet been signed by either party, and until it has been signed the risk should remain unchanged.</u></p> <p>11-May-2021</p> <p>Matt Mott</p>			Reducing
-----------	--	--	--	---	--	--	----------

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
008a	Papers presented to CoL Boards for approval, stakeholder consulted	<del>Procurement, Digital Services and Project Boards attended in August, September, October and November request to approve process and move to next steps. Return to Board in March 2021 prior to award of contract</del> <u>Chief Officer approval was required to award and commence work as a return to Digital Services and Project Board was not required at this point in time. The Gateway 5 report was provided to the Town Clerks department to distribute to the Boards.</u>	Matt Mott	11-May-2021	31-Oct-2021
008b	Ensure all relevant providers are included in tender as per the framework, seeking timely outcome and value for money	<del>Tender released 8 January and closes to applications on 9 February 2021.</del> <u>The process has been completed and Procurement have written to applicants with outcome. This risk can now be removed from the register</u>	Matt Mott	11-May-2021	31-Oct-2021
008c	Robust checking of software specification questions and accuracy of answers across all areas of the administration.	<del>Providers will be questioned about all areas of software provision such as member record data, workflow and accuracy of core calculations prior to offer and anticipated award in early April</del> <u>This has now been completed and the risk can be removed from the register</u>	Matt Mott	11-May-2021	31-Oct-2021
008d	Removal of single person dependencies	<del>With effect from 9 February members of the Pensions Office will be involved in the evaluation of the applications and determination of award with procurement. This will aid a successful outcome by reducing the single person dependency within the Pensions Office that currently exist with only the Pensions Manager involved in the procurement process, allowing a successful outcome even in the event of officer absence for reason such as illness etc</del> <u>As we move into implementation of the contract and system improvements other members of the Pensions Office will become involved</u>	Matt Mott	11-May-2021	31-Oct-2021
008e	Resourcing - Work with the successful vendor on resource planning at project commencement to ensure all resource requirements are identified from the onset. This will be	<del>As part of the information issued by the Norfolk County Council Framework all onboarding to be considered as a deliverable. Question will be asked of all potential bidders based on this information</del>	Matt Mott	11-May-2021	31-Oct-2021

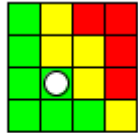
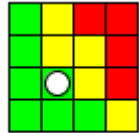

	part of a wider mobilisation plan.	<u>Project Management resource allocated from IT Project office to help manage post tender award to be confirmed and will commence once contract has been signed.</u>			
008f	Ensuring that the pensions administration software is included in the departmental business continuity plans	Updating the business impact analysis details used in the departmental continuity plan as required.	David Clelland	11-May-2021	02-Nov-2021
008g	Include Data migration and Exit management in the requirement to vendors.	All system data identified, Analysis carried out on all data sets. Estimated budget allocated to each data migration event. Decommissioning of On-Premise legacy systems can be carried out under the current support contract.  Contractual obligation for migration support from the Incumbent exists.		11-May-2021	31-Oct-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<b>CHB LGPS 001</b> <b>Insufficient assets</b>	<b>Cause:</b> The asset allocation of the Pension Fund is unable to fund long term liabilities <b>Event:</b> There are insufficient assets to meet liabilities <b>Effect:</b> Reduced income or lower than anticipated growth . Participating employers are required to provide further funding through increased contributions to finance liabilities.	 Likelihood	8	The Financial Investment Board reviewed the investment strategy at its meetings in June and July 2020. The Board maintained the existing asset allocation strategy and reduced the absolute return target from 5.7% p.a. to 5.2% p.a. (which is consistent with the strategy for funding the Pension Fund's liabilities). The review was heavily supported by the Fund's Investment Consultant. The investment strategy remains appropriate in the context of the Fund's funding objectives. The Pension Fund was impacted in the first quarter of 2020 by the downturn in financial markets related to COVID-19. Asset values have recovered since the end of March, and although there is notable uncertainty about the long term impact of the virus on the global economy, some stability has returned to asset prices. The investment strategy review took	 Likelihood	8	31-Mar-2022	

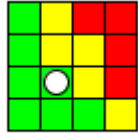
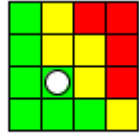

17-Dec-2019 Caroline Al-Beyerty			<p>place after the emergence of the pandemic and as such officers are confident that the current approach remains appropriate in terms of the Fund's funding objectives. As such the current risk score of 8, has been maintained.</p> <p>21 September 2020</p> <p><u>The Pension Fund's absolute return target has been set at 5.2% annually from 1<sup>st</sup> April 2020 by the Financial Investment Board (which is consistent with the strategy for funding the Fund's liabilities). The Fund's investment assets performed strongly in the year to 31 March 2021 with an overall annual return of +27.7%, following the Covid-19 driven downturn in markets in the first quarter of 2020. The Fund is now meeting its absolute return target over all time horizons and has also either outperformed or matched its asset allocation targets. The score for this risk has been maintained to reflect the judgement that the likelihood of this risk materialising is "unlikely".</u></p> <p>25 May 2021</p>				Constant
------------------------------------	--	--	--	--	--	--	----------

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 001a	The Investment strategy of the Pension Fund is reviewed at least every three years by the Financial Investment Board with proper advice from the Investment Consultant.	Following shortly after the completion of the 2019 triennial valuation of the Fund's liabilities, the Financial Investment Board reviewed the Pension Fund investment strategy at its meetings in June and July 2020. This ensured that the investment strategy remained appropriate in the context of the Fund's updated liabilities valuation and the current investment environment.	Caroline Al-Beyerty; Kate	08-Jan-2021	31-Mar-2023

			Limna		
CHB LGPS 001b	The investment performance of the Pension Fund is measured against absolute return targets required to meet long term objectives. This is reported to the Financial Investment Board throughout the year and is supplemented by market insight from the Corporation's Investment Consultant who will assist any strategic decisions required in between the three-year formal strategy reviews.	Individual Fund investment performance is brought to each Financial Investment Board for consideration.	Kate Limna; <u>James</u> <u>Graham</u>	12-Jan- 2021	31-Mar- 2022


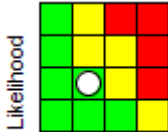
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<p><b>CHB LGPS 004 Pension Scheme Administration</b></p> <p>17-Dec-2019 Caroline Al-Beyerty</p>	<p><b>Cause:</b> (i) Ineffective succession planning. (ii) Inadequately trained staff.(iii) Absences/increased staff turnover.(v) Data Accuracy.(vi) Lack of resources.</p> <p><b>Event:</b> The failure of administrators to accurately calculate and pay the correct level of benefits.</p> <p><b>Effect:</b> (i) Inaccurate benefits paid or delayed. (ii) Increased costs. (iii) Financial penalties/ sanctions.</p>	<p>Likelihood</p>  <p>Impact</p>	<p>4</p>	<p>The Regulations of the Local Government Pension Scheme (LGPS) set out how LGPS pensions should be calculated; the procedures to be followed in certain circumstances (i.e. normal retirement and ill health retirement); the timeframes/deadlines to be adhered to; and the notifications to be provided to Scheme members.</p> <p>In addition, other bodies such as the Pensions Regulator, HM Revenue &amp; Customs, the Office of National Statistics and the Financial Conduct Authority impose rules that work alongside the Scheme Regulations or may even supersede them.</p> <p>If the members of the Pensions Office that are responsible for administration of the LGPS Scheme lack the necessary knowledge and skills payment of benefits may be delayed and may be inaccurate.</p> <p>This may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator.</p> <p><b>4-Feb-2020</b></p>	<p>Likelihood</p>  <p>Impact</p>	<p>4</p>	<p>31-Mar-2022</p>	<p></p> <p>Constant</p>

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 004a	Job descriptions used at recruitment to attract candidates with skills and experience related to LGPS administration. The appraisals process to monitor progress and assess training needs.	Ensuring that candidates with the necessary skills and abilities are employed by the City. Once in post, staff continue to receive relevant training and attend courses, seminars and conferences when appropriate.  Have trained multiple team members for extra duties due to parental leave cover	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 004b	Scheme administrators are trained to use the pensions administration software.	Ensuring that administrators are fully trained to use the pension administration software to enable them to provide accurate and efficient calculations. In addition, administrators should know the correct process to report to the software provider any errors encountered with the system in order that they can be investigated and resolved.	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 004c	Practical disaster recovery/succession plans in place to ensure continuity in the event that key staff leave or are unable to work for a prolonged period of time.	Ensuring that skill sets are not restricted to one staff member alone.  Priority cases and work types are identified to ensure continuation in the event that staff or other resources become unavailable.  Disaster Recovery reviewed in light of COVID 19 and officers having worked from home since 23 March 2020.	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 004e	Accurate and appropriate checking procedures in place at all areas of administration.	All checking procedures reviewed and where necessary amended due to take account of COVID 19 and officers having worked from home since 23 March 2020.	Matt Mott	11-May-2021	31-Mar-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<p><b>CHB LGPS 006 Employer insolvency</b></p> <p>17-Dec-2019 Caroline Al-Beyerty</p>	<p><b>Cause:</b> Processes not in place to capture or review covenant of individual employers.  <b>Event:</b> Employer becomes insolvent or is abolished with insufficient funding to meet liabilities.  <b>Effect:</b> Fund would pick up the liabilities potentially leading to increased contribution rates for other employers.</p>	<p>Likelihood</p>  <p>Impact</p>	<p>4</p>	<p>Since 2013 the LGPS regulations generally require all admission bodies to enter into an indemnity or bond to cover the possibility of an employer becoming insolvent or prematurely leaving the Fund. This would mean the Fund and the remaining employers would have to meet the outgoing employer's liabilities in the Fund.</p> <p>The actuary assesses the value of these risks to the Fund and sets the value for a bond, generally for a three-year period.</p> <p>It is generally a requirement of the City of London for all new admission agreements to have a bond and the responsibility of the admission body to arrange and regularly reassess the bond.</p> <p><b>22-Jan-2020</b></p>	<p>Likelihood</p>  <p>Impact</p>	<p>4</p>	<p>31-Mar-2022</p>	<p></p> <p>Constant</p>

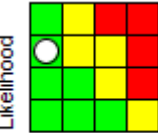
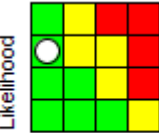



Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 006a	Bond indemnity/guarantee required for admitted bodies and incorporated into admission agreements where appropriate.	Recent admissions to the scheme have provide a bond.	Matt Mott	11-May-2021	31-Mar-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CHB LGPS 007 Cyber security  17-Dec-2019 Caroline Al-Beyerty	<b>Cause:</b> (i) Ineffective procedures. (ii) Inadequately trained staff. (iii) IT system failure (iv) Data Accuracy. (v) Lack of resources. <b>Event:</b> Breach of Corporate IT systems and Cyber security. <b>Effect:</b> (i) Inaccurate benefits paid or delayed. (ii) Increased costs of inefficiencies. (iii) Financial penalties/sanctions. (iv) Breach of Data Protection regulations. (v) Loss/corruption of data	 <p>Likelihood</p> <p>Impact</p>	4	<p>A malicious breach of Corporate IT systems may lead to a failure of the pensions administration system and/or a breach of Data Protection regulations.</p> <p>A failure of the pensions administration system or a breach of the DP regulations may mean a failure or inability to calculate benefits accurately and on time which may lead to financial penalties and sanctions being imposed by the governing industry bodies such as the Pensions Regulator or Information Commissioner's Office.</p> <p><b>11 Feb 2020</b></p>	 <p>Likelihood</p> <p>Impact</p>	4		Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 007a	Pensions administration staff to be aware of the corporate policy regarding cyber security and to follow the guidelines given.	Corporate online training regarding cyber-security to be carried out by all staff and reviewed as required.	Matt Mott	11-May-2021	31-Mar-2022

CHB LGPS 007b	Corporate and departmental specific software to be updated as required to ensure the latest and most secure version is being used..	To ensure the most up-to-date software is being used, staff should update their computers as and when prompted.	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 007c	Ensuring that the pensions administration software is included in the departmental business continuity plans	Updating the business impact analysis details used in the departmental continuity plan as required.	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 007d	Pensions administration staff to be aware of Data Protection legislation	Data Protection reviewed and all staff reminded of the legislation and its importance. Processes amended for home working since 23 March 2020, ensuring the protection of scheme member data.	Matt Mott	11-May-2021	31-Mar-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<b>CHB LGPS 003 Legislative Compliances</b>	<p><b>Cause:</b> (i) Lack of appropriate knowledge or skill. (ii) Lack of training/ appropriately skilled staff.</p> <p><b>Event:</b> The failure to comply with legislative requirements.</p> <p><b>Effect:</b> (i) Inaccurate benefits paid. (ii) Financial loss. (iii) Increase in Appeals. (iv) Fines from Pensions Regulator. (v) Reputational damage</p>	 <p>Likelihood</p> <p>Impact</p>	<p>3</p>	<p>Local Government Pension Scheme (LGPS) regulations determine how LGPS benefits should be calculated; the procedures to be followed in certain circumstances (i.e. normal retirement and ill health retirement); the timeframes/deadlines to be adhered to; and the notifications to be provided to Scheme members.</p> <p>In addition, overriding pension legislation and other bodies such as the Pensions Regulator, HM Revenue &amp; Customs, the Office of National Statistics and the Financial Conduct Authority may impose rules that work alongside the LGPS regulations or may even supersede them.</p> <p>If the members of the Pensions Office that are responsible for administration of the LGPS Scheme lack the necessary legislative knowledge and skills payment of benefits may be delayed or may be inaccurate.</p> <p>This may lead to formal complaints or appeals from scheme members, there representative or scheme employers resulting in financial penalties and sanctions imposed by the governing bodies such as the Pensions Regulator or the Pensions Ombudsman and a loss of reputation.</p>	 <p>Likelihood</p> <p>Impact</p>	<p>3</p>	<p>31-Mar-2022</p>	

17-Dec-2019 Caroline Al-Beyerty				04- Feb- 2020				Constant
------------------------------------	--	--	--	---------------	--	--	--	----------

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 003a	Robust recruitment and training processes.	Ensuring that suitable staff are recruited at the correct salary levels and that appropriate training is provided will help to prevent non-compliance with legislative requirements	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 003b	The governing legislation may change or evolve over time and it is therefore important that staff maintain accurate and up-to-date knowledge of the Regulations.	Regular attendance at seminars, forums, webinars and user groups will ensure that knowledge of the relevant legislation is kept up-to-date and accurate.	Matt Mott	11-May-2021	31-Mar-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CHB LGPS 005 Fraud  17-Dec-2019 Caroline Al-Beyerty	<b>Cause:</b> (i) Not notified of death. (ii) Staff acting inappropriately <b>Event:</b> Fraudulent claim of pension benefits. <b>Effect:</b> (i) Continued payment of pensions following death. (ii) Overpaid pensions. (ii) Financial loss	Likelihood  Impact	2	If the death of a LGPS beneficiary is not reported, their pension may continue to be paid when there is no longer an entitlement.  This may be a deliberate failure to report the death or may be where there is no fraudulent intention, but in either case it will lead to benefit overpayment and a potential financial loss.  <b>4-Feb-2020</b>	Likelihood  Impact	2	31-Mar-2022	  Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 005a	Robust fraud protection/detection processes.	Use of Mortality Screening Service and Tell Us Once Service [Government initiative that allows us to be notified of a death when registered]. Participation in the National Fraud Initiative. Annually sending Life Certificates to Overseas Pensioners.	Matt Mott	11-May-2021	31-Mar-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<b>CHB LGPS 002 Actuarial valuation</b>  17-Dec-2019 Caroline Al-Beyerty	<b>Cause:</b> (i) Inappropriate assumptions used by the Actuary (ii) Inaccurate data supplied to the Actuary. <b>Event:</b> Unsuitable triennial actuarial valuation. <b>Effects:</b> Employer rates unsuitable to maintain long term cost efficiency & solvency.	<b>Likelihood</b>  <b>Impact</b>	1	The latest full actuarial valuation of the Pension Fund, using member data and investment asset information as at 31 March 2019, has been completed. is being finalised. Using updated financial and demographic assumptions, the actuary has been able to generate an accurate picture of the Pension Fund's funding position (assets compared to liabilities) which will be has been used to establish appropriate employer contribution rates for use from 1 April 2020. The next valuation is due to take place in 2022/23.  <b>22 September 2020</b>	<b>Likelihood</b>  <b>Impact</b>	1	31-Mar-2023	  Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB LGPS 002a	Regular meetings with the Actuary to ensure that assumptions are appropriate involving nominated Members of the Finance Cttee, with final report to Finance Cttee.	Nominated Members of the Finance Cttee together with relevant officers met with the Actuary in October and November 2019 to discuss the preliminary triennial valuation results and the robustness of the financial and demographic assumptions used in the valuation process. The final triennial valuation results were will be reported to the Finance Cttee at its meeting on 18 February 2020.	Matt Mott	11-May-2021	31-Mar-2022
CHB LGPS 002c	Robust Year End procedures and updates.	<del>The Pension Fund Accounts and Annual Report for 2016/17, 2017/18 and 2018/19 (covering the most recent triennial valuation period) were finalised on time and audited without qualification. The Pension Fund Accounts and Annual report for 2019/20 were finalised and</del>	Matt Mott	11-May-2021	31-Mar-2022

		<del>audited without qualification. The draft report was published by the statutory deadline of 1 December with the final version being published on 11 December as the audit certificate was not issued until this date. The Pension Fund Accounts for the year ending 31 March 2021 have been drafted to timetable and the Pension Fund Annual Report is currently being prepared by officers with a view to submitting a draft report for external audit in early June. The audited accounts and report will need to be published by the statutory deadline of 1 December 2021.</del>			
CHB LGPS 002d	Checking for errors or inconsistencies in valuation extract report before submission to the Actuary	Officers review data quality prior to submission to the actuary. Additionally, member data is submitted separately from employer level cash flow data, which are held on two distinct management information systems. As a result, errors are more easily identified during the valuation process itself. For example, if the member data demonstrates that a given number of members belonging to a single employer retired during the valuation period then this should also be evident from the benefit payments reported in the cash flow data.	Matt Mott; <u>James Graham</u>	11-May-2021	31-Mar-2022