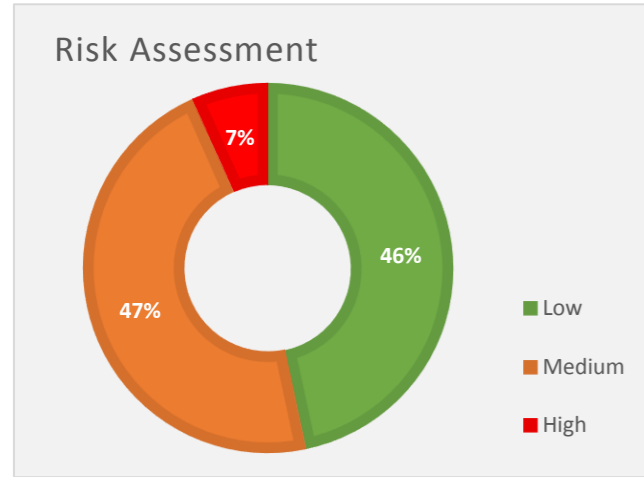


Committee Risk

Owner: Richard Bullen

Medium Overall Risk



Risk Count	Risk Area	Key Risks	Risk Assessment	Updates to note
13	Administration	<p>Work volumes being higher in terms of work coming in than completed, and failure to meet the KPI targets. A situation which worsened over the holiday period</p> <p>Work not being received and allocated in a timely manner.</p> <p>Issues with post being received/sent and records updated in an accurate and timely manner.</p> <p>Not making the best use of bulk upload processing to improve efficiencies.</p> <p>A complete manual adjustment process is required for cases of flexible retirement in relation to the CARE screen for the ongoing active at the first year end following retirement</p>	High	<p>As part of the 2022/2023 budget approval, the backlog has been outsourced to Hymans.</p> <p>A new work allocation system has been launched for member services (with employer services to follow), which is forward-looking and enables tasks which are about to go out of date to be prioritised.</p> <p>Weekly KPIs are now circulated and analysed, and weekly insights have been launched for the member services team (employer services to follow), which show staff productivity. Officers are reviewing work allocations with a view to recovering the lost output. Embedding the use of bulk processing is required to support this.</p> <p>The year end process concerning flexible retirees needs to be updated.</p>

8	Financial Management	<p>The employer contribution rate schedule is not accurately maintained and the Fund is unable to determine if it is receiving the correct contributions. The Fund pays incorrect pensions, lump sums and other one off payments to pensioner members.</p> <p>The Fund does not have sufficient cash available to pay pensions, private market capital calls or other liabilities as they fall due. This could lead to penalties, lost investment return and reputational damage</p>	Low	<p>Officers have set up an Employer Contribution and Data Management Working Group to mitigate the risk of the schedule not being maintained. Internal audit currently completing an audit, due to be presented to members in the next meeting cycle. Cashflow modelling takes place to ensure sufficient funds are available.</p>
7	Fund Governance	<p>Members and senior officers do not maintain their knowledge and understanding leading to poor decision making and poor governance.</p> <p>A review of the Fund's forthcoming procurement and contract management arrangements needs to be completed</p>	Low	<p>Focus on the tPR's anticipated new Single Code of Practice Statement most affected by regulations, starting with internal controls and effective governance;</p> <p>Brunel's governance review is ongoing. WPF has actively engaged with Brunel to make Wiltshire's expectations clear;</p> <p>Officers have responded to the Fair Deal Consultation and continue to monitor developments to help ensure it is prepared to make any changes. Focus on the Fund's procurement and external service delivery is crucial to performance.</p>
6	Systems Management	<p>Poor KPI reporting providing incorrect data which could lead to poor decisions being made.</p> <p>Old user accounts and inaccurate profiles which aren't being removed on a timely basis and being attributed to team members, means users could access/perform tasks that they shouldn't be completing.</p> <p>Ineffective controls of mortality screening could result in the paying of benefits that should have ceased.</p>	Low	<p>Insights, a new software tool provided by the Fund's database manager has enabled more accurate and timely reporting. A re-tender exercise is being considered in respect of the Fund's current mortality screening and training provider</p>
5	Investment	<p>Investment performance by managers is poor or misaligned with expectations leading to risk of funding level, achievement of investment strategy and poor benchmarking.</p> <p>BPP need to operate effectively to ensure funds are well managed, investments made timely and delivering their objectives.</p> <p>BPP has been set up to deliver cost savings, if mismanaged this could lead to higher costs and poor investment returns.</p>	Medium	<p>Fund is working with Brunel on pooling arrangements. The Fund is currently benefitting from net fee savings, but costs are under constant pressure to rise with high budget increases being proposed. A key person departure raises concerns about resourcing.</p>

5	Compliance with Regulations	<p>Anticipated changes in legislation could impact the Fund adversely, specifically regarding compliance and resourcing.</p> <p>Poor internal controls leading to data protection requirements not being fulfilled, particularly in relation to breach recording & where required, escalating the reporting of breaches.</p>	Low	<p>Regular updates to the Committee and Board enable all stakeholders to monitor any potential changes in legislations. This work is supported by adviser guidance. Fund processes and procedures are in place concerning data protection, including the dovetailing of those procedures with the Council's Information Governance arrangements</p>
5	Performance	<p>Employers not performing their roles ineffectively, such as not sending timely and accurate information in the required format.</p>	Low	<p>Training is given to extra employers as part of the Fund's Employer training strategy</p>
5	Employer Management	<p>Employers not engaging with the Fund highlighted through poor data, poor timeliness of submissions and not complying with the regulations. This can lead to poor decision-making effecting scheme members</p> <p>Contacts have inadequate knowledge, skills and experience to administer the Scheme correctly and effectively.</p> <p>Employers are not set up, maintained or leave the Fund correctly, due to the starting funding position, unitisation adjustments, pooling or cessation arrangements are either not timely or incorrect.</p> <p>Employers not joining the Fund in line with legislation e.g. unsigned admission agreements, resolutions not being passed and not keeping track of mergers/demergers.</p>	Medium	<p>As mentioned under Performance the Fund offers training to employers to mitigate the risks highlighted. With increased academisation of Schools, MAT breakups and cross fund movements if all schools were to convert then the number of employers in the Fund could jump from 180 to between 400 and 500</p> <p>Implementation of the Stabilisation Policy limits increases security for employers. The Fund also works closely with their Actuarial advisers to ensure new sets up are managed correctly. In addition, officers need to maintain the Fund's unitisation database.</p>
6	Data Management	<p>Information is posted through i-Connect or employer spreadsheets late which can delay processing. There's risk that cessations are not advised resulting in delays to the start of this process.</p> <p>TUPE issue within Altair where a Heywood change has impacted the valuation reporting function. This has affected cessation reporting too. An</p> <p>Employer asset and liability allocations should be monitored to avoid throwing out an employer's funding position.</p>	Medium	<p>To enable the i-Connect onboarding process officers are working closely with the outstanding employers, particularly where they are major employers who will have an impact on the Fund.</p> <p>Currently the TUPE & cessation reporting issue is being investigated by Heywood</p> <p>Assignment of the responsibility to a specific officer as well as accurate transaction coding and Altair reporting should be implemented</p>

4	Stakeholder Engagement	Inaccuracy of communications by the Fund could result in reputational damage. There is a risk that as a Fund we are delivering poor customer service to our members, with slow response times and disclosure breaches.	Medium	Peer review arrangements are in place prior to publication and a strategy to maintain the compliance and content on MSS & the website is being implemented
3	Funding	No Medium or High "Funding" risks currently identified.	Low	
2	Resourcing	The Fund is not appropriately resourced and staff all adequately trained to enable the service to be delivered in a sustainable and reliable way.	Medium	Key people in the team are seeking to transfer specialist knowledge to colleagues by documenting procedures and notes. In addition, a training strategy is under review for the department. In the event of a knowledge gap, however, we can call on our external consultants and independent advisors for help in the short-term; Following a recent restructure, there are currently several vacancies in the team which will need to be recruited to.
2	Climate risk	Failure to manage the risks in the investment portfolios, and/or to take advantage of the investment opportunities which arise from transition to a low carbon economy could cause the Fund to suffer material negative financial impacts.	Medium	The Fund has a climate change policy (within the responsible investment policy), decarbonisation targets, and has assessed alignment of all portfolios. The Fund already reports against the requirements of the Task Force on Climate-related Financial Disclosures (TCFD).
1	Projects	Projects managed by designated Project Manager. Key projects currently being managed are the Backlogs project, the rectification project and McCloud. The first two have been outsourced to 3rd party administrators. Regular updates are provided to the management team Committee and Board in respect of the McCloud	Medium	As part of the oversight of Evolve Payroll Programme periodic strategic updates are received from the s151 Officer to assess level of risk; Significant retrospective legislation changes related to the McCloud case could lead to increased contribution rates for employers and higher levels of administration resource.
0	Other External Risks	No "other" risks currently identified.	Low	