Committee Risk Register

Owner: Richard Bullen

Medium	Overall Risk

Risk Assessment

Risk Health
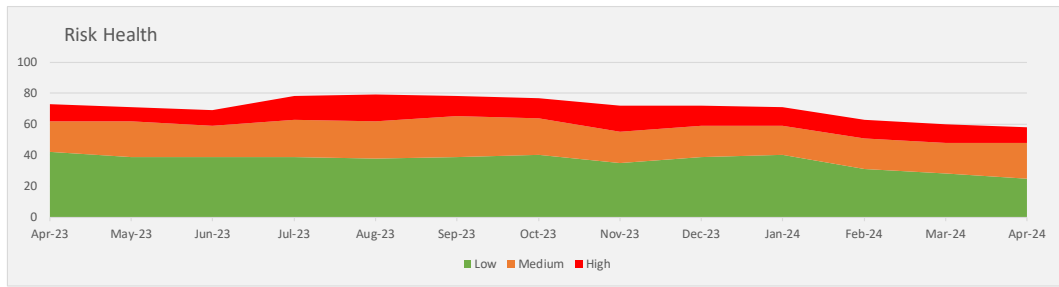
Risk Area	Key Risks	Risk Assessment	Updates to note
Service Delivery	A failure exists where levels of post and work volumes remain high creating a concern over the failure to meet the KPI targets. This includes the internal backlogs which staff are seeking to reduce. A failure exists where the late payment of benefits to members occurs, which in turn impacts the Fund's KPI targets. A failure to address casework backlogs in accordance with the KPI Improvement Plan. Inappropriate impact on service delivery due to network or system downtime: & Failure to meet customer service levels in line with external accredited standards	High	Regular KPI meetings are held by management to ensure work is processed in accordance with the KPI Improvement Plan. A casework log has been introduced "Principals and Precedent" to record a consistent treatment of complex cases. Weekly KPIs are now circulated and analysed and weekly insights reports have been published to the teams which show staff productivity. Embedding the use of bulk processing is better supporting Fund processes and output. Officers are working with key system providers and receiving quarterly report in order to monitor system downtime. The CSE accreditation has been postponed until the KPI Improvement Plan has achieved a larger impact.
Financial Management	Failure to maintain an accurate employer contribution rate schedule, the Fund being unable to determine if it is receiving the correct contributions, or identify ceasing employers at an early stage is a key risk Failure to pay correct pensions, lump sums and other one off payments to pensioners. Failure to process Treasury Management actions on a timely basis, impacting budgeting and forecasting too. Failure to receive guidance relating to covenant reviews and processes could cause a financial risk to the Fund.	Medium	Officers maintain an Employer Contribution and Data Management Working Group to mitigate the risk of the contribution not being paid. An update is presented to members periodically. Officers ensure that the contributions rates are implemented & paid by all employers, and that this requirement is maintained. A covenant strategy is being implemented following approval of the Covenant policy. Officers are now able to access Oracle information to manage ledger coding & the recording of financial movements in the accounts. This has improved the Fund's ability to monitor payments on a timely basis and financial data integrity generally, however there is still much work to be completed and the Annual Accounts has fallen behind schedule.
Fund Governance	Failure to maintain the implemented risk and control framework and embed it into departmental culture A failure to manage key procurements and ensure the completion of these procurements as a result of poor resources, knowledge and experience. This concern extends to the sourcing of existing contracts.	Medium	Officer training on the risk and control framework has been completed and regular meetings are held to reinforce the concept. Officers are working with both the procurement team to ensure that these strategic management issues of the Fund are fulfilled.
Systems Management	Failure to maintain the Fund's cyber security in accordance with strategic requirement and the Fund's Business Continuity Plan.	Medium	Fund officers are holding meeting with the Council's Security Management. The review of its cyber security arrangements includes cyber insurance.
Investment	Failure of BPP to operate effectively and ensure funds are well managed, with investments being made on a timely basis to deliver their objectives. Failure to maintain sufficient and appropriately skilled resource to undertake RI and stewardship strategy tasks.	Medium	The Fund is working with Brunel on pooling arrangements. Officers are working with BPP and other authorities in the partnership to update BPP's constitution, manage large budget increases and consider the Shareholder rep. amendments. A Central Govt. response on the future of pooling is being submitted by Fund officers concerning the strategic direction of BPP A new arrangement with BPP is enabling face to face visits concerning portfolio discussions
Compliance with Regulations	Anticipated changes in legislation could impact the Fund adversely, specifically regarding compliance and resourcing. Failure to achieve statutory requirements & deadlines due to work volumes	Low	Regular updates to the Committee and Board enable all stakeholders to monitor any potential changes in legislations. This work is supported by adviser guidance. Project planning and holding of regular management meetings to ensure deadlines are achieved.
Performance	Failure to deliver good customer service by maintaining performance in line with the KPI Improvement Plan. This includes poor operational performance, communication and implementation of new software and working practices Failure of Scheme Employers to perform appropriately, by providing full and accurate information of a timely basis. Which as a result requires escalation measures to be taken.	Medium	Weekly and Monthly meetings are held to ensure performance is maintained in line with the KPI Improvement Plan. Objectives are set to keep the plan on track. Note: Resource levels may limit progress. Scheme Employers are regularly monitored via the Employer Data and Contribution Working Group. Where required, the performance of underperforming employers is escalated. The revised escalation strategy is being updated within the Pension Administration Strategy document.
Employer Management	Failure of contact maintenance which requires ongoing improvement. Failure of employers not being set up, maintained or leaving the Fund correctly. This can effect the starting position for funding, unitisation adjustments, pooling or cessation arrangements due to untimely or incorrect information.	Medium	Exercises to update employer contacts, issue scorecards, attend communication forums, review historic employer relationship issues and admission agreements are all being undertaken. New employer processes are now embedded however, ongoing resource issues are hampering progress. Officers are seeking to improve the tracking information in relation to new set up and cessation.

Data Management	Failure to meet statutory deadlines due to poor data provision from individual employers, particularly large ones. This can heavily impact the Fund's data management. Failure to implement and maintain internal controls particularly in relation to i-Connect. Controls & checks by employers may impact data accuracy and timeliness, noting that information is posted through both i-Connect & employer spreadsheets and can be provided late. Failure to obtain good data in respect of TUPE transfers or external payroll changes.	Medium	To enable the i-Connect onboarding process officers continue to work with the outstanding employers, particularly major employers to obtain outstanding data. Relevant data quality checks associated with i-Connect submissions have been implemented and also passed to accounts to enable financial checks. With the migration to Oracle accounting resource has been assigned to managing this implementation and the Fund's employer services and project teams are working together to acquire essential data from Wiltshire Council. Where other employers or their payroll providers are not providing data (including TUPE data) on a timely basis, or correctly, officers are actively contacting those organisations. However, officers have highlighted a resource concern to actively contact employers
Stakeholder Engagement	No material risks are current identified in this area	Low	
Funding	No material risks are current identified in this area	Low	
Resourcing	Failure to appropriately resource the Fund and adequately train staff to enable the service to be delivered in a sustainable and reliable way. In addition, key departures leading to a loss of crucial knowledge in the team. Failure to maintain an approved Committee training plan could increase the risk around a lack of knowledge and understanding in key areas	High	Key people in the team are seeking to transfer specialist knowledge to colleagues by documenting procedures and notes. In addition, a training strategy is in place for the department. However, in the event of a knowledge gap, we can call on our external consultants and independent advisors for help in the short-term; Whilst key vacancies have been filled staff have also left leading to a cycle of recruitment & replacement which can effect the overall knowledge base. The Board/Committee are following their approved training plans and a new training plan for 2024/25 is awaiting approval.
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. Failure in receiving updated climate data reporting could lead to poor decision making	Medium	The Fund has a climate change policy (within the responsible investment policy), decarbonisation targets, and has assessed alignment of all portfolios. The Fund reports against the requirements of the Task Force on Climate-related Financial Disclosures (TCFD). BPP hold stock in the name of the Fund which is not in accordance with the Fund's climate change flightpath. However, the investments overall are close to the SAA. Officers continue to liaise with BPP and other Fund's in the group to ensure that the SAA of the Fund's climate change flightpath remains on track
Projects	Failure of projects to be managed effectively, the key project currently being managed is McCloud. Regular oversight is provided by the management team, Committee and Board to avoid projects failing.	Low	McCloud calculation routines have been run and its is anticipated that only about 200 potential members will be effected.
Reputational risk	Failure to manage the Fund's reputation due to factors such as government policy, press attention, poor service delivery, controversial investments, failure to achieve our climate targets, failure to achieve statutory reporting requirements, breaches of law and regs, and other factors beyond the Fund's control.	Medium	Officers are monitoring the Fund's public image to manage signs of increased scrutiny on the LGPS and its potential impact on Fund's reputation
Other External Risks	No "other" risks currently identified.	Low	