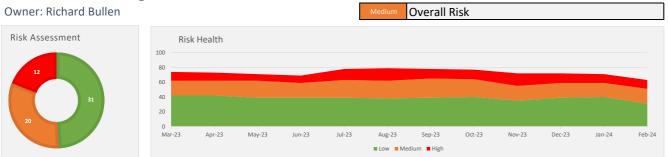
Committee Risk Register



Risk Area	Key Risks		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 exist 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.	High	A new business plan for 2024/2027 is being prepared for March 2024 and a KPI Improvement plan has also been developed. A Service Improvement team supports the Member and Employer Services team and is focused on undertaking work to reduce the internal backlog. A new casework log to be 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 team which show staff productivity. Embedding the use of bulk processing is now better supporting Fund processes.
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 The Fund pays incorrect pensions, lump sums and other one off payments to pensioners. In particular, where the new Oracle system is not operating effectively. Failure to process Treasury Management actions on a timely basis could be caused by changes to external approval limits. It could also impact budgeting and forecasting. A lack of guidance relating to covenant reviews and processes could cause a financial risk to the Fund.	High	Officers maintain an Employer Contribution and Data Management Working Group to mitigate the risk of the schedule not being maintained. An update will be presented to members at each meeting cycle. Officers ensure that the contributions rates are implemented & paid by all employers, and that this requirement is maintained. Covenant guidance has been received and a draft policy is to be circulated to employers for consultation. Officers are working with Wiltshire Council Finance to ensure that the appropriate approval limits are in place. Additionally, a review of finance procedures is taking place enabling Fund officers direct reconciliation against the Fund's bank account. The new Oracle rollout has impacted ledger coding, poor quality recording in the accounts & access issues. Officers are working with the Evolve team to resolved these issues.
Fund Governance	Failure to maintain the implemented risk and control framework and embed it into departmental culture A failure to receive consistent independent auditing of the Fund's internal controls could lead to material risks being created. 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 and internal auditors to ensure that these strategic management issues of the Fund are fulfilled.
Systems Management	The Council's contract with SAP formally expired in December 2023. However, SAP's payroll function is planned to continue until April 2024. The Evolve Project plan is to migrate the payroll and other fund services to Oracle will continue during 2024.	Medium	The migration to new the Oracle payroll database is crucial. In addition, other SAP functions such as HR could also impact the Fund if not properly migrated. Implementation of the Altair payroll to mitigate risks will help and has been successful. However the Fund remains reliant on the Council's Evolve programme to move forward as expected. The expected mitigation is due in April 2024.

Investment	Investment performance by managers is poor or misaligned with expectations leading to risks concerning the funding level, the fulfilment of the investment strategy and poor benchmarking. Failure of BPP to operate effectively and ensure funds are well managed, with investments being made on a timely basis to deliver their objectives.	Medium	The Fund is working with Brunel on pooling arrangements. The Fund is currently benefitting from net fee savings and costs are under constant pressure to rise with high budget increases. The new BPP budget ha been approved. Officers are working with BPP and other authorities in the partnership to update BPP's constitution. A new arrangement with BPP is enabling face to face visits concerning portfol 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. Where required, meetings with Scheme Employers are also held to ensure deadlines are met, where those deadlines involve 3rd party input.						
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 appropriate, by providing full and accurate information of a timely basis. Which as a result require 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 limit progress Scheme Employers are regularly monitored via the Employer Data and Contribution Working Group. Where required, the performance of underperforming employer is escalated. The revised escalation strategy is being updated within the Pension Administration Strategy document.						
Employer Management	Failure of contacts to have inadequate knowledge, skills and experience to administer the Scheme correctly and effectively. 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	The Fund offers training to employers to mitigate the risks highlighted. Implementation of the Stabilisation Policy provides a certain amount of increased security for employers. The Fund also works closely with its Actuarial advisers to ensure new sets up are managed correctly. In addition, officers maintain the Fund's unitisation database. Exercises to update employer contacts, issue scorecards, communicate forums, review historic employer relationship issues and admission agreements are all being undertaken.						
Data Management	Failure to meet strategy deadline due to poor data provision from individual employers, particularly large one. 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.	Medium	To enable the i-Connect onboarding process officers have worked closely with the outstanding employers, particularly major employers to obtain outstanding data. Relevant data quality checks associated with i-Connect submissions have been implemented and passed to accounts to enable financial checks. A clear plan is now in place. However, with the migration to Oracle accounting resource has been assigned to managing this implementation. Assignment of responsibilities to specific officers aids the management of data. Where employers or their payroll providers are not providing data on a timely basis, or correctly, officers are actively contacting those organisations.						
Stakeholder Engagement	Failure to ensure good customer service is maintained due to poor service delivery	Low	Feedback from members indicates a fall in customer satisfaction with the Fund's service. Officers are reinforcing the KPI Improvement Plan as the framework by which to improve the underlying poor customer service. The key issue being the delay in the payment of member benefits.						
Funding	No material risks are current identified in this area	Low							
Resourcing	Failure to appropriately resource the Fund and train adequately 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 recruiting & 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 being developed.						

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. Difficulty 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, all the overall investments 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. The McCloud project is beginning to move forward. The potential failure of the Evolve programme is contributing to risk in this area. Failure to manage the Fun's internal backlog in line with the KPI Improvement Plan	Medium	As part of the oversight of the Evolve Payroll Programme periodic strategic updates are received by the s151 Officer to assess level of risk. Weekly meetings with the Evolve and payroll teams are also undertaken by officers at an operational level. Mitigations relating to the Evolve project involve the implementation of an Altair payroll system and a Plan B to extend the life of the SAP payroll service. McCloud calculation routines have been run and its is anticipated that only about 200 potential members will be effected. The Fund's internal backlog activity is being reviewed & the level of risk reconsidered.
Other External Risks	No "other" risks currently identified.	Low	

Administrative use only

Risk Assessment		63
Low	31	49%
Medium	20	32%
High	12	19%

	Jan-23	Feb-23	Mar-23	B Apr	23 May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24
Low	39	40	42	2	42 39	39	39	38	39	40	35	39	40	31
Medium	18	24	20)	20 23	20	24	24	26	24	20	20	19	20
High	13	9	12	2	11 9	10	15	17	13	13	17	13	12	12