

## WILTSHIRE COUNCIL

WILTSHIRE LOCAL PENSION BOARD

14 January 2016

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### WILTSHIRE PENSION FUND RISK REGISTER

#### Purpose of the Report

1. The purpose of this report is to present the Pension Fund Risk Register that was noted by the Pension Fund Committee at its meeting on 10 December 2015 (see Appendix).

#### Background

2. The Pension Fund Committee first approved a Risk Register for the Wiltshire Pension Fund at its meeting on 12 May 2009. Members had requested that the highlights, particularly upward/downward movements in individual risks, are reported back to the Committee on a quarterly basis.
3. The significance of risks are measured by interaction of the likelihood of occurrence (likelihood) and the potential impact of such an occurrence (impact). This register uses the Council's standard "4x4" approach, which produces a risk status of Red, Amber or Green (RAG).

#### Key Considerations for the Board / Risk Assessment

4. For clearer identification of the types of risks, they have now been categorised into the following strategic headings of 'Regulatory & Governance', 'Funding & Investments', 'Benefits Administration' and 'Communications'.
5. An additional three new risks are reported since the last report in September 2015, reflecting the latest developments facing the Local Government Pension Scheme. These are outlined below.
6. **PEN020: LGPS Asset Pooling** (medium risk) reflects the Government's proposals and current consultation for the pooling of assets to achieve savings from economies of scale along with stronger governance arrangements for the management of assets. The main risk is the Fund has sufficient resources to move this forward which doesn't detrimentally impact on the service. The Fund also needs to ensure that its proactive in the development of any proposals for collective management of assets to ensure its not impacted detrimentally.
7. **PEN21: Implementation of the Public Sector Exit Cap** (low risk) will require an additional administrative burden on Funds along with a clear communication strategy for its stakeholders as the proposed implementation period is very short.
8. **PEN022: Guaranteed Minimum Pension (GMP) Reconciliations** (medium risk) could, if not undertaken mean the Fund is burdened with liabilities that are not its responsibilities. With the end of contracting out from April 2016, HMRC will no longer provide details of members GMP records. Therefore, Funds need to ensure the data held is as accurate as possible. The Fund has already implemented a project to start this process and appointed two data analysts to provide additional resources.

9. The other medium risks reported in September remain, namely ***PEN008 Failure to comply with LGPS and other regulation*** reflecting the increased obligations now imposed on the Fund from the Pension Regulator (tPR) since it took on responsibility for public sector pension schemes from 1 April 2015 and ***PEN011 Lack of expertise of Pension Fund Officers*** and ***PEN012 Over-reliance on key officers*** which remained at medium as the Fund was still trying to recruit to the post of Employer Relationship Manager, although this post has now been filled.
10. The Pension Fund Committee also considered that there was now increased pressure on member and officer time to digest and produce reports to the Committee. The Committee agreed that this should be added to the Risk Register and officers should make more use of web links where possible to reduce the length of paperwork at meetings. This risk will be added to the next risk register.
11. The Committee resolved to note the attached Risk Register, the measures being taken to mitigate risks and to add the expansion of business items at Committee to the Risk Register.

### **Financial Implications**

12. There are no known implications from the proposals.

### **Legal Implications**

13. There are no known implications from the proposals.

### **Environmental Impacts of the Proposals**

14. There is no known environmental impact of this report.

### **Safeguarding Considerations/Public Health Implications/Equalities Impact**

15. There are no known implications at this time.

### **Proposals**

16. The Board is asked to note the attached Risk Register and measures being taken to mitigate risks.

MICHAEL HUDSON  
Treasurer to the Pension Fund

Report Author: David Anthony, Head of Pensions

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Unpublished documents relied upon in the production of this report: NONE

| Wiltshire Pension Fund Risk Register |  |                         |   | 30-Nov-15   |               |   |        | Current Risk Rating |   |               |   | Target Risk Rating |                               |        |            |   |               |                |                     |
|--------------------------------------|--|-------------------------|---|---|---------------|---|--------|---------------------|---|---------------|---|--------------------|-------------------------------|--------|------------|---|---------------|----------------|---------------------|
| Ref.                                 | Risk   | Risk Category           | Cause   | Impact  | Risk Owner    | Controls in place to manage the risk  | Impact | Likelihood          | x | Level of risk | Further Actions necessary to manage the risk  | Risk Action Owner  | Date for completion of action | Impact | Likelihood | x | Level of risk | Date of Review | Direction of Travel |
| PEN001                               | Failure to process pension payments and lump sums on time                            | Benefits Administration | Non-availability of ALTAIR pensions system, SAP payroll system, key staff, or error, omission, etc.                                 | Retiring staff will be paid late, which may have implications for their own finances. It also has reputational risk for the Fund and a financial cost to the employers if interest has to be paid to the members. | David Anthony | Maintenance and update of ALTAIR and SAP systems, sufficient staff cover arrangements, sufficient staff training and QA checking of work. Adherence to Pension Administration Strategy and regular monitoring of performance.   | 2      | 2                   | 4 | Low           | Regular review of ALTAIR calculations are more thoroughly tested, especially to ensure regulations changes are correctly processed. Audit recommendation (Mar 15) is for clearer documentation of processes and reconciliations, along with closer monitoring of performance. | David Anthony      | Mar-16                        | 2      | 2          | 4 | Low           | 30 Nov 15      | →                   |
| PEN004                               | Inability to keep service going due to loss of main office, computer system or staff | Benefits Administration | Fire, bomb, flood, etc.   | Temporary loss of ability to provide service  | David Anthony | Business Continuity Plan in place. The team have the ability to work from home or remotely if required. The pension system is also hosted by its supplier, which reduces the risk should Wiltshire Council's IT servers fail. The Fund also operates a paperless office.  | 4      | 1                   | 4 | Low           | Business Continuity Plan being reviewed during Dec 2015. All the team now have laptops that would mean they can access ALTAIR remotely if required and all paperwork is scanned.  | David Anthony      | Jan-16                        | 4      | 1          | 4 | Low           | 30 Nov 15      | →                   |
| PEN005                               | Loss of funds through fraud or misappropriation                                      | Benefits Administration | Fraud or misappropriation of funds by an employer, agent or contractor  | Financial loss to the Fund  | David Anthony | Internal and External Audit regularly test that appropriate controls are in place and working. Regulatory control reports from investment managers, custodian, etc, are also reviewed by audit. Due Diligence is carried out whenever a new manager is appointed. Reliance is also placed in Financial Services Authority registration. | 4      | 1                   | 4 | Low           | None  | Catherine Dix      |                               | 4      | 1          | 4 | Low           | 30 Nov 15      | →                   |
| PEN014                               | Failure to provide the service in accordance with sound equality principles          | Benefits Administration | Failure to recognise that different customers have different needs and sensitivities.   | Some customers may not be able to access the service properly or may be offended and raise complaints. At worst case, this could result in a court case, etc.   | David Anthony | The Fund has done an Equality Risk Assessment and has an Equality Implementation Plan in place  | 2      | 1                   | 2 | Low           | None  | David Anthony      |                               | 2      | 1          | 2 | Low           | 30 Nov 15      | →                   |
| PEN021                               | Ability to implement the Public Sector Exit Cap                                      | Benefits Administration | Introduction of exit cap will require an additional burden on the administration team.  | Changes need to be communicated to individuals and employers and systems adapted once the revised regulations have been approved  | David Anthony | Currently monitoring the progress of the current consultations and responding where appropriate. Briefings being provided to team and stakeholders.   | 1      | 4                   | 4 | Low           | Discussions with employers on how to implement. Training for the team on how to implement. Project to amend systems and letters to accommodate changes  | Craig Payne        | Apr-16                        | 1      | 3          | 3 | Low           | 30 Nov 15      | ↑                   |
| PEN022                               | Reconciliation of GMP records  | Benefits Administration | From 1 April 2016 SERPS will cease and HMRC no longer provide GMP data on members. Fund will be unable to check accuracy of its GMP | If GMP records for members is inaccurate there is the potential for incorrect liabilities being paid by the Fund.   | David Anthony | Project has been set up and 2 Data Analysts employed to assist with resources.  | 2      | 4                   | 8 | Medium        | To review resources available against scope of project. Need to agree approach for correcting errors.   | Mark Anderson      | Apr-16                        | 1      | 3          | 3 | Low           | 30 Nov 15      | ↑                   |

| Ref.     | Risk   | Risk Category         | Cause   | Impact   | Risk Owner    | Controls in place to manage the risk   | Current Risk Rating |            |   |               | Further Actions necessary to manage the risk  | Risk Action Owner | Date for completion of action | Target Risk Rating |            |   |               | Date of Review | Direction of Travel |
|----------|--|-----------------------|---|--|---------------|--|---------------------|------------|---|---------------|---|-------------------|-------------------------------|--------------------|------------|---|---------------|----------------|---------------------|
|          |  |                       |   |  |               |  | Impact              | Likelihood | x | Level of risk |   |                   |                               | Impact             | Likelihood | x | Level of risk |                |                     |
| PEN003   | Insufficient funds to meet liabilities as they fall due  | Funding & Investments | Contributions from employees / employers too low, failure of investment strategy to deliver adequate returns, significant increases in longevity, etc.  | Immediate cash injections would be required from the scheme employers. This shouldn't be an issue for the Fund but it looks likely that investment income might need to be used within the next 12 months. | David Anthony | Funding Strategy Statement, Investment Strategy, Triennial Valuations, membership of Club Vita, modelling of future cash flows.  | 2                   | 2          | 4 | Low           | The "maturity" profile of cash flows is changing as a result of employers outsourcing and redundancy programmes. The Cashflow profile is now being carefully monitored as benefits paid slightly exceeded receipts (excluding investment income) during the last financial year. Current forecast is that the Fund will remain cash neutral for next 12 months.                                 | David Anthony     |                               | 4                  | 1          | 4 | Low           | 30 Nov 15      | ====>               |
| PEN006 a | Significant rises in employer contributions for secure employers due to increases in liabilities             | Funding & Investments | Scheme liabilities increase disproportionately as a result of increased longevity, falling bond yields, slack employer policies, etc. The current increase in Quantitative Easing by the Government is forcing up the price of gilts leading to a worsening Funding Position. | Employer contribution rates become unacceptable, causing upward pressure on Council Tax and employers' costs.  | David Anthony | Longevity and bond yields are really beyond the control of the Fund although some Funds have considered buying longevity insurance through the use of SWAPS. However, the Fund and each employer must have a Discretions Policy in place to help control discretionary costs (e.g. early retirements, augmented service, etc). Quarterly monitoring in liabilities movements is undertaken providing advance warning to employers. | 2                   | 1          | 2 | Low           | The Stabilisation Policy has limited increases for secure employer. Monitor cashflow profiles to review Fund's maturity. This policy was reviewed at the July 2013 Committee meeting and is to be maintained for the 2013 Valuation. As bond yields are at historical low levels and the Stabilisation Policy takes a long term view, rates will not increase significantly over the long term. | David Anthony     |                               | 2                  | 2          | 4 | Low           | 30 Nov 15      | ====>               |
| PEN006 b | Significant rises in employer contributions for non-secure employers due to increases in liabilities         | Funding & Investments | Scheme liabilities increase disproportionately as a result of increased longevity, falling bond yields, slack employer policies, etc. The current increase in Quantitative Easing by the Government is forcing up the price of gilts leading to a worsening Funding Position. | Employer contribution rates become unacceptable, causing upward pressure on Council Tax and employers' costs.  | David Anthony | Longevity and bond yields are really beyond the control of the Fund although some Funds have considered buying longevity insurance through the use of SWAPS. However, the Fund and each employer must have a Discretions Policy in place to help control discretionary costs (e.g. early retirements, augmented service, etc). Quarterly monitoring as described above. The 2013 Valuation has set rates for the next 3 years.     | 2                   | 2          | 4 | Low           | The rates for the 2013 Valuation were agreed and through the use of stepping in of contribution rate increases where requested the need for large increases was avoided for certain employers. This "contribution relief" policy was reviewed and maintained at the July 2013 Committee meeting for the 2013 Valuation process. Monitor cashflow profiles to review Fund's maturity.            | David Anthony     |                               | 2                  | 2          | 4 | Low           | 30 Nov 15      | ====>               |
| PEN007 a | Significant rises in employer contributions for secure employers due to poor/negative investment returns     | Funding & Investments | Poor economic conditions, wrong investment strategy, poor selection of investment managers  | Poor/negative investment returns, leading to increased employer contribution rates   | David Anthony | Use of expert consultants in the selection of investment strategy and selection of investment managers, regular monitoring of investment managers (1/4ly), regular reviews of investment strategy (annually). There is a monthly review of the % of the Fund held in each mandate and strategy.  | 2                   | 1          | 2 | Low           | The implementation of the Stabilisation Policy limits increases for secure employer. This policy was reviewed at the July 2013 Committee meeting and is to be maintained for the 2013 Valuation. The Fund is currently discussing with its advisers the benefits of a flight path strategy to take risk of the table as funding levels improve.   | Catherine Dix     | Mar-16                        | 2                  | 2          | 4 | Low           | 30 Nov 15      | ====>               |
| PEN007 b | Significant rises in employer contributions for non-secure employers due to poor/negative investment returns | Funding & Investments | Poor economic conditions, wrong investment strategy, poor selection of investment managers  | Poor/negative investment returns, leading to increased employer contribution rates   | David Anthony | Use of expert consultants in the selection of investment strategy and selection of investment managers, regular monitoring of investment managers (1/4ly), regular reviews of investment strategy (annually). There is a monthly review of the % of the Fund held in each mandate and strategy.  | 2                   | 2          | 4 | Low           | The review of employers long term financial stability and the policy for stepping in of contribution rates assists in affordability issues and this "contribution relief" policy was reviewed and maintained at the July 2013 Committee meeting for the 2013 Valuation process. Valuation rates have now been agreed for the next 3 years. The benefits of a 'flight path' strategy as outlined | Catherine Dix     | Mar-16                        | 2                  | 2          | 4 | Low           | 30 Nov 15      | ====>               |

| Ref.   | Risk  | Risk Category           | Cause   | Impact  | Risk Owner    | Controls in place to manage the risk   | Current Risk Rating |            |   |               | Further Actions necessary to manage the risk   | Risk Action Owner | Date for completion of action | Target Risk Rating |            |   |               | Date of Review | Direction of Travel |
|--------|---|-------------------------|---|---|---------------|--|---------------------|------------|---|---------------|--|-------------------|-------------------------------|--------------------|------------|---|---------------|----------------|---------------------|
|        |   |                         |   |   |               |  | Impact              | Likelihood | x | Level of risk |  |                   |                               | Impact             | Likelihood | x | Level of risk |                |                     |
| PEN015 | Failure to collect payments from ceasing employers                                    | Funding & Investments   | When an employer no longer has any active members a cessation valuation is triggered and a payment is required if a funding deficit exists to meet future liabilities | Failure to collect cessation payments means the cost of funding future liabilities will fall against the Wiltshire Pension Fund   | David Anthony | The Pension Fund Committee approved a Cessation Policy in February 2010 to provide an agreed framework for recovery of payments. All new admitted bodies now require a guarantor to join the Fund.   | 2                   | 2          | 4 | Low           | Work is on-going to develop monitoring of admitted bodies who are close to cessation to enable the Fund to have an early dialogue with them to ensure costs are met. A review of the cessation policy may be required as more employers are now facing potential cessation events.   | David Anthony     | Dec-15                        | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |
| PEN016 | Treasury Management   | Funding & Investments   | The Fund's treasury function is now segregated from Wiltshire Council. This includes the investment of surplus cash in money markets.                                 | Exposure to counterparty risk with cash held with external deposit holders could impact of Funding level of the Fund  | David Anthony | The Pension Fund has an updated Treasury Management Strategy on this agenda which follows the same criteria adopted by Wiltshire Council but limits individual investments with a single counterparty to £6m.  | 3                   | 1          | 3 | Low           | The Council uses Sector's credit worthiness service using ratings from three rating agencies to provide a score. Surplus cash is transferred to the Custodian at month end ensuring cash balances are minimal.   | Catherine Dix     |                               | 3                  | 1          | 3 | Low           | 30 Nov 15      | →                   |
| PEN002 | Failure to collect and account for contributions from employers and employees on time | Regulatory & Governance | Non-availability of SAP systems, key staff, error, omission, failure of employers' financial systems, failure to communicate with employers effectively. LGPS 2014    | Adverse audit opinion for failure to collect contributions by 19th of month, potential delays to employers' FRS17 year-end accounting reports and to the Fund's own year-end accounts.  | David Anthony | Robust maintenance and update of ALTAIR and SAP systems, sufficient staff cover arrangements, sufficient staff training and QA checking of work. We constantly work with employers to ensure they understand their responsibilities to pay by 19th of the month. | 2                   | 1          | 2 | Low           | Electronic forms rolled out to all employers to allow collation of membership and contributions detail by member to facilitate monthly reconciliations ahead of year end. Chase letters sent as required.  | Catherine Dix     |                               | 2                  | 2          | 4 | Low           | 30 Nov 15      | →                   |
| PEN008 | Failure to comply with LGPS and other regulations                                     | Regulatory & Governance | Lack of technical expertise / staff resources to research regulations, IT systems not kept up-to-date with legislation, etc   | Wrong pension payments made or estimates given. Investment in disallowed investment vehicles or failure to comply with governance standards. Effect: Unhappy customers, tribunals, Ombudsman rulings, fines, adverse audit reports, etc | David Anthony | Sufficient staffing, training and regulatory updates. Competent software provider and external consultants.  | 2                   | 3          | 6 | Medium        | The Technical & Compliance Manager oversees training plans for the team. The Pension Regulator now has responsibility from 1 April 2015 for Public Sector Pension Schemes. They have recently issued their code of practice which includes a number of new requirements. Work continues to ensure the Fund can comply fully with these requirements but this may lead to areas of non-compliance in the short term. Any "material" non-compliance will be reported to the Regulator. | David Anthony     | Mar-16                        | 2                  | 2          | 4 | Low           | 30 Nov 15      | →                   |
| PEN009 | Failure to hold personal data securely  | Regulatory & Governance | Poor procedures for data transfer to partner organisations, poor security of system, poor data retention, disposal, backup and recovery policies and procedures.      | Poor data, lost or compromised  | David Anthony | Compliance with Wiltshire Council's Data Protection & IT Policies.   | 2                   | 2          | 4 | Low           | It is intended to do a full data protection audit for the Fund. An imaging system has now been implemented which will improve retention of documents and ultimately will lead to a paperless working environment. Annual Data Protection training for the team has taken place.  | David Anthony     |                               | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |

| Ref.   | Risk   | Risk Category           | Cause  | Impact   | Risk Owner    | Controls in place to manage the risk   | Current Risk Rating |            |   |               | Further Actions necessary to manage the risk  | Risk Action Owner | Date for completion of action | Target Risk Rating |            |   |               | Date of Review | Direction of Travel |
|--------|--|-------------------------|--|--|---------------|--|---------------------|------------|---|---------------|---|-------------------|-------------------------------|--------------------|------------|---|---------------|----------------|---------------------|
|        |  |                         |  |  |               |  | Impact              | Likelihood | x | Level of risk |   |                   |                               | Impact             | Likelihood | x | Level of risk |                |                     |
| PEN010 | Failure to keep pension records up-to-date and accurate                  | Regulatory & Governance | Poor or non-existent notification to us by employers and members of new starters, changes, leavers, etc  | Incorrect records held, leading to incorrect estimates being issues to members and incorrect pensions potentially being paid.  | David Anthony | Systems Team constantly working to improve data quality, data validation checks carried out through external partners (e.g. the Fund's actuaries and tracing agencies), pro-active checks done through national fraud initiative.  | 2                   | 3          | 6 | Medium        | From 1 April 2014, the Pension Regulator will require additional checks on data. Data cleansing is taking place to address this. Also, with the end of "contracting-out" in April 2016, HMRC will no longer take responsibility for GMP data. A project is being scoped to ensure records match prior to this.                                      | Martin Downes     | Dec-16                        | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |
| PEN011 | Lack of expertise of Pension Fund Officers and Service Director, Finance | Regulatory & Governance | Lack of training, continuous professional development and continuous self assessment of skills gap to ensure knowledge levels are adequate to carry out roles to the best of their ability | Bad decisions made may be made in relation to any of the areas on this register, but particularly in relation to investments.  | David Anthony | Officers ensure that they are trained and up-to-date in the key areas through attendance at relevant courses and seminars, reading, discussions with consultants and peers, etc. The Technical & Compliance Manager has formulated annual Training Plans and Relevant officers are also reviewed against the CIPFA Knowledge & Skills Framework to ensure adequate expertise exists. | 2                   | 3          | 6 | Medium        | A new Technical & Compliance Manager was appointed in August as was a Fund Development Manager in September. The post of Employer Relations Manager remains vacant and further recruitment is taking place.   | David Anthony     | Dec-15                        | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |
| PEN012 | Over-reliance on key officers  | Regulatory & Governance | The specialist nature of the work means that there are inevitably relatively experts in investments and the local authority pension regulations  | If someone leaves or becomes ill, a big knowledge gap if less behind.  | David Anthony | Key people in the team are seeking to transfer specialist knowledge to colleagues. In the event of a knowledge gap, however, we can call on our external consultants and independent advisors for help in the short-term.  | 2                   | 3          | 6 | Medium        | A new Technical & Compliance Manager was appointed in August 2015, along with a Fund Development Manager in September. The post of Employer Relationship Manager has proved more difficult to recruit to with a further recruitment process now taking place. An interim solution is also being reviewed to try and maintain services to employers. | David Anthony     | Dec-15                        | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |
| PEN017 | Lack of expertise on Pension Fund Committee                              | Regulatory & Governance | Lack of structured training and continuous self assessment of skills gap to ensure knowledge levels are adequate to carry out roles to the best of their ability                           | Bad decisions made may be made in relation to any of the areas on this register, but particularly in relation to investments. There is also a requirement for Fund's to 'Comply or Explain' within their Annual Report on the skills knowledge of members of the Committee | David Anthony | Members are given Induction Training when they join the Committee, as well as subsequent opportunities to attend courses/seminars and specialist training at Committee ahead of key decisions. There is a Members' Training Plan and Governance Policy. Further training and advice can be called on from our consultants, independent advisors and investment managers too.         | 2                   | 2          | 4 | Low           | The CIPFA Local Government Pension Fund Knowledge & Skills Framework require members of the committee to be regularly assessed to identify knowledge gaps and ensure training is provided to address these. The new members training plan for 2015-17 was approved in March 2015.   | David Anthony     |                               | 2                  | 1          | 2 | Low           | 30 Nov 15      | →                   |

| Ref.   | Risk  | Risk Category           | Cause   | Impact   | Risk Owner    | Controls in place to manage the risk   | Current Risk Rating |            |   |               | Further Actions necessary to manage the risk   | Risk Action Owner | Date for completion of action | Target Risk Rating |            |   |               | Date of Review | Direction of Travel |
|--------|---|-------------------------|---|--|---------------|--|---------------------|------------|---|---------------|--|-------------------|-------------------------------|--------------------|------------|---|---------------|----------------|---------------------|
|        |   |                         |   |  |               |  | Impact              | Likelihood | x | Level of risk |  |                   |                               | Impact             | Likelihood | x | Level of risk |                |                     |
| PEN018 | Failure to implement the LGPS 2014 Reforms                      | Regulatory & Governance | Failure to implement the LGPS 2014 in time for April 2014 in terms of systems changes, data requirements, communications and training.  | Unable to meet the new legislative requirements of the scheme and to administer the Fund correctly.  | David Anthony | A communication policy implemented to inform all members of the changes. Implementation Plan is on-going. Systems team in close contact with Software are providers to ensure developments will be auctioned. Review of process has been undertaken by Technical & Compliance Manager to ensure changes are compliant.   | 2                   | 2          | 4 | Low           | The transitional regulations and GAD guidance were only issued in March 2014, a month ahead of "go-live" which meant a number of manual calculations were still required. The latest Altair release was implemented in September which rectified this. All changes and output have been reviewed for compliance. | David Anthony     |                               | 2                  | 2          | 4 | Low           | 30 Nov 15      | →                   |
| PEN019 | Establishment of Local Pension Board & Investment Sub-Committee | Regulatory & Governance | Failure for Wiltshire Council to establish a Local Pension Board, from finding suitable representatives and the officer time required to support this Board and the newly formed pension sub-committee. | Reputational risk from a national perspective and failure to adhere to legislation resulting in action by the Government or the Pension Regulator. Ineffective operation of the Investment sub-Committee leading to bad decision making.   | David Anthony | Local Pension Board, approved by Wiltshire Council on 24 February. Following. Recruitment has taken place and all places filled with first meeting scheduled for 16 July 2015, following induction session on 2 July 2015. These Boards will place additional demands on both Members, in particular the need to undertake training and the pension officers time in the support and provision of information. | 2                   | 2          | 4 | Low           | A review of resources and officer time will be required to ensure no negative impact on the Pension Fund service delivery from the support required to this Board and the newly formed Investment sub-Committee.   | David Anthony     | Jul-16                        | 1                  | 3          | 3 | Low           | 30 Nov 15      | →                   |
| PEN020 | Pooling of LGPS assets  | Regulatory & Governance | The Fund needs to respond to the Government's consultation for significantly ambitious proposals for pooling of LGPS assets   | There is the potential for this project to consume significant resources from the team which may impact on service. However, if not involved in forming proposals the Government may impose of pooling arrangement on the Fund over which it has not control. If implemented incorrectly this could be costly in terms of additional fees and poor investment returns. | David Anthony | The Fund is being proactive in exploring options with other South West Funds on the feasibility of setting up a pooling arrangement. Progress and updates regularly reported to Committee. The amount of resource required to progress this project will be closely monitored.   | 2                   | 4          | 8 | Medium        | The Fund is closely monitoring the Government's consultations and will respond appropriately. This may include the need for additional meetings of the Committee to discuss proposals prior to submission.   | David Anthony     | Feb-16                        | 1                  | 3          | 3 | Low           | 30 Nov 15      | ↑                   |
| PEN013 | Failure to communicate properly with stakeholders               | Communication           | Lack of clear communications policy and action, particularly with employers and scheme members.   | Scheme Members are not aware of the rights and privileges of being in the scheme and may make bad decisions as a result. Employers are not aware of the regulations, the procedures, etc, and so the data flow from them is poor.  | David Anthony | The Fund has a Communications Manager and Employer Relationship Manager dedicated to these areas full-time, including keeping the website up-to-date, which is a key communications resource. The Fund also has a Communications Policy.   | 2                   | 2          | 4 | Low           | Member communication continues to be developed and the current round of pension clinics are being held. The vacant Employer Relationship Manager role has limited the Fund's ability to communicate with employers recently.   | Zoe Stannard      |                               | 1                  | 1          | 1 | Low           | 30 Nov 15      | →                   |