



Pension Fund Risk Register

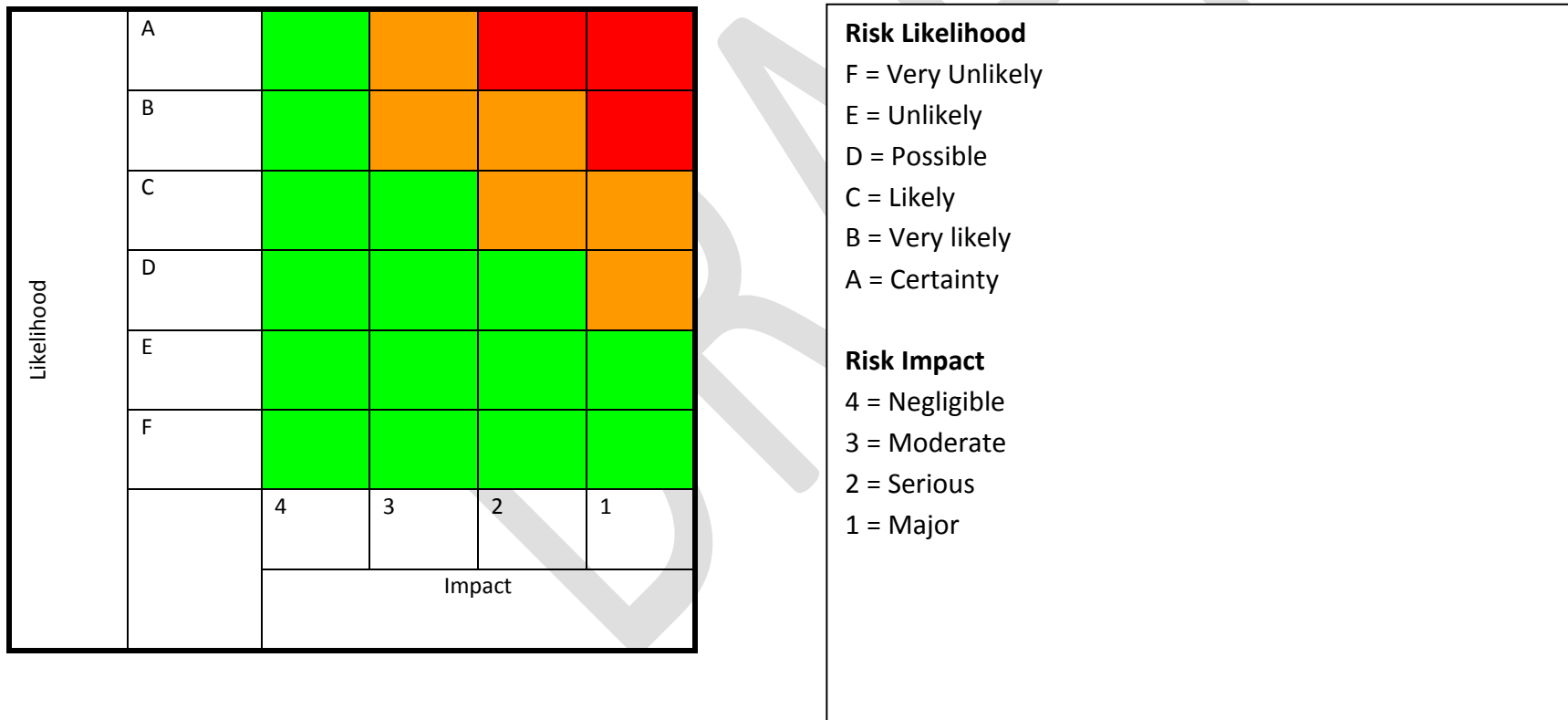
Havering

WIP

July 2019

Generic Pension Fund Risk Register

The pension fund uses a 4 x 6 matrix to plot risk likelihood and impact and has set its risk appetite. The green shaded area on the matrix shows the risks where there is good control and the Council is comfortable with the risk. Risks in the amber and red zones are those over which closer control is needed.



Pension Fund Risk Register oneSource – Havering – (excluding Bexley – Newham) - as at July 19 Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
1	S151 Officer/ Director of Exchequer and Transational Services Lower Level: PM/CMO PFM/CMO CMO PFM/CMO	<p>Risk of Inaccurate three yearly actuarial valuation</p> <p>Cause:</p> <ul style="list-style-type: none"> Inappropriate assumptions used by actuary in calculations for valuation Poor quality data provided from LB of Havering Personal data not maintained to a high standard (gaps/incorrect) Actuary's own assumptions are not robust or reflective 	<ul style="list-style-type: none"> Deficit position worsens Employers pay/ continue to pay inappropriate contribution percentages Increase in employer contributions Potential for Council Tax increases More investment risk may be taken to bridge a gap that doesn't actually exist Potential for a more risk adverse 	<ul style="list-style-type: none"> Valuation completed by a qualified professional actuary – next valuation being completed in 2019. Robust, open procurement process in place for appointment of actuary Some assumptions for valuation are in compliance with regulation Actuarial assumptions are open to challenge by officers and GAD Valuation results are checked for 	D/3	None identified at this point	

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			<p>Investment Strategy when more risk is required.</p>	<p>consistency across LGPS funds by GAD via the S13 report</p> <ul style="list-style-type: none"> ▪ Local Government benchmarking/comparisons of assumptions ▪ Annual review of actuary performance undertaken by Pensions Committee ▪ Internal controls in place to ensure accuracy and completeness of data. ▪ Monitoring of contributions due and received 			

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2	S151 Officer/ Lower Level as follows: PFM PFM PFM PFM	Risk of Incorrect / Inappropriate Investment Strategy Cause: <ul style="list-style-type: none"> ▪ Lack or poor professional investment advice given ▪ Poor governance ▪ Investment advice is not taken ▪ Lack of 	<ul style="list-style-type: none"> ▪ Pension deficit not reduced ▪ Potential for financial loss ▪ Growth opportunities are not maximised ▪ Could generate inefficiencies and unintended risks if not fully 	<ul style="list-style-type: none"> ▪ Robust, open procurement process in place for appointment of Investment Advisor ▪ Investment Advisor performance is annually reviewed by the Pensions Committee ▪ Close working relationship is 	D/2	<ul style="list-style-type: none"> ▪ Pensions Committee ▪ Training / Awareness - working towards full compliance with CIPFA Knowledge and Skills framework 	<ul style="list-style-type: none"> ▪ Induction carried out for new Pension Fund Committee members July 18. ▪ Knowledge and Skills Training is on-going for Pension Committee and Local Pension

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	PFM PFM PFM	understanding and awareness (Pension Committee) <ul style="list-style-type: none"> ▪ Lack of clear risk appetite ▪ Based upon inaccurate actuarial valuation ▪ Concentration risk by asset, region and sector 	understood. <ul style="list-style-type: none"> ▪ More investment risk may be taken to bridge a gap that doesn't actually exist ▪ Potential for a more risk adverse Investment Strategy when more risk is required. ▪ Potential for Council Tax increases ▪ Loss of investment 	encouraged between actuaries and investment advisor in the development of the investment strategy <ul style="list-style-type: none"> ▪ Investment strategy continually assessed as part of the quarterly monitoring process by the Pensions Committee ▪ Liabilities analysed during inter-valuation period ▪ Knowledge and skills training of LPB and Committee Members 		<ul style="list-style-type: none"> ▪ Consider using a further independent advisor for challenge to investment advice 	Board members. <ul style="list-style-type: none"> ▪ Independent advisor was appointed for a one off exercise following adoption of investment strategy in January 17 to undertake a health check and add robustness on the investment strategy.

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			opportunities and adverse performance				
3	S151 Officer/ Lower Level as follows: PFM PFM PFM	<p>Risk of failure of investments to perform in-line with growth expectations</p> <p>Cause</p> <ul style="list-style-type: none"> ▪ Poor Fund Manager selection ▪ Underperformance by fund manager ▪ Poor investment advice provided to LB of Havering or not taken 	<ul style="list-style-type: none"> ▪ Deficit reduction targets are not met ▪ Potential for losses to be incurred ▪ Increased employer contributions ▪ Reputational risk from poor investments ▪ The fund's assets are not 	<ul style="list-style-type: none"> ▪ Robust, Fund Manager selection process ▪ Diverse portfolio to reduce negative effects from market volatility ▪ Fund performance and asset class split is reviewed quarterly by investment advisor/Pensions Committee and officers. ▪ Fund Managers (including LCIV) attend Pension Committee to 	D/3	<ul style="list-style-type: none"> ▪ Pensions Committee Training/Awareness – working towards full compliance with CIPFA Knowledge and Skills framework 	<ul style="list-style-type: none"> ▪ Induction carried out for new Pension Fund Committee members July 19. ▪ CIPFA Knowledge and Skills Training is on-going. ▪ Process in place to fund new illiquid

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	PFM	<ul style="list-style-type: none"> Negative financial market impacts 	<p>sufficient to meet its long term liabilities</p> <ul style="list-style-type: none"> Economy downturn could result in general fall in investment values 	<p>present quarterly performance reports and challenge by the Committee and Fund Advisor.</p>			<p>mandates. Officers working closely with investment advisor to ensure timings.</p> <p>Further Actions 2019</p> <ul style="list-style-type: none"> Continued monitoring of the LCIV
	PFM	<ul style="list-style-type: none"> External factors / increased market volatility (i.e. 2008), uncertainty of Brexit 					
	PFM	<ul style="list-style-type: none"> Delays in the implementation of the strategy will reduce the effectiveness of the strategy and may impact growth 					
	PFM	<ul style="list-style-type: none"> Delays in compliance with capital calls on new illiquid mandates could result in penalty payments 					

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4	<p>S151 Officer /Director of Exchequer and Transactional Services.</p> <p>Lower Level as follows:</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p>	<p>Risk of failure to comply with legislative requirements</p> <p>Cause:</p> <ul style="list-style-type: none"> ▪ Lack of appropriate skills/knowledge of The Pensions Regulator, (TPR), MHCLG and CIPFA Guidance, Financial Regulations and accounting standards ▪ Unaware of legislative changes ▪ key person dependency ▪ Poor/inaccurate interpretation of the 	<ul style="list-style-type: none"> ▪ Reputational damage ▪ Potential for financial penalties from the TPR ▪ Potential for costly legal challenges ▪ Impact on employer contributions, delayed due to non-compliance. ▪ Adverse external audit report 	<ul style="list-style-type: none"> ▪ Financial requirements are subject to external and internal audit. Favourable External audit reports since 2015. Internal audit took place in September 2018. ▪ Experienced personnel in place ▪ Continual personal development for all Committee/LPB members and Officers ▪ Induction carried out for new Pension Fund Committee and Local Pension Board members 	E/3	None identified at this point.	

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	PFM/CMO	regulations <ul style="list-style-type: none"> ▪ Failure/inability to administer the pension scheme appropriately 		<ul style="list-style-type: none"> ▪ Legislative changes are reported to the Pensions Committee where required ▪ Local Pension Board in place to oversee adherence to the regulations ▪ Active participation in Legislative Consultations where appropriate ▪ External and in house training provided where required ▪ Member of the CIPFA Pensions Network ▪ Participate in the CIPFA Pensions 			

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				<p>Network/ Peer forums to share knowledge & awareness</p> <ul style="list-style-type: none"> ▪ Statutory policy documents reviewed annually to ensure compliance with legislation ▪ Access to specialist pension media sources. 			
5	S151 Officer /Director of Exchequer and Transactional Services. Lower level as follows: PFM/CMO	<p>Risk of inability to manage/govern the Pension Fund and associated services:</p> <p>Cause:</p> <ul style="list-style-type: none"> ▪ Ineffective / lack of succession planning 	<ul style="list-style-type: none"> ▪ Negative impacts upon service provision ▪ Time delays ▪ Potential for breach of legislation ▪ Financial 	<ul style="list-style-type: none"> ▪ Bond or guarantee reviews in place and reviewed every three years as part of valuation process • Attendance at local forum meetings • Attendance at Annual 	D/3	<ul style="list-style-type: none"> • Succession planning required for key personnel • Review / update procedure manuals 	<ul style="list-style-type: none"> • Succession planning in progress • Contract Monitoring officer working to prepare procedure

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	PFM/CMO	<ul style="list-style-type: none"> Loss of corporate knowledge/expertise 	<ul style="list-style-type: none"> penalties/ other sanctions 	<ul style="list-style-type: none"> Pension Managers conference 		<ul style="list-style-type: none"> Option being assessed for joint administration with Newham to build resilience 	<ul style="list-style-type: none"> manual. LPP appointed in Havering in November 17 (already in Newham) are working with Havering to provide seamless administration service.
	PFM/CMO	<ul style="list-style-type: none"> Long term sickness absence 	<ul style="list-style-type: none"> Reputational Damage 	<ul style="list-style-type: none"> Members of Local Authority Pensions Web 		<ul style="list-style-type: none"> Introduce employer covenants checks 	<ul style="list-style-type: none"> LPP risk officer employed by LPP. Contract Monitoring officer is in place and
	PFM/CMO	<ul style="list-style-type: none"> Increase in staff turnover 	<ul style="list-style-type: none"> Increased costs due to "buying in" external expertise 	<ul style="list-style-type: none"> Participates in the CIPFA Pensions Network/ Peer forums to share knowledge & awareness 		<ul style="list-style-type: none"> Strengthen the process for Bond reviews. 	
	PFM	<ul style="list-style-type: none"> LCIV monitoring and resourcing 	<ul style="list-style-type: none"> Employer defaults 	<ul style="list-style-type: none"> Attendance at accounting seminars/training 		<ul style="list-style-type: none"> Ensure GDPR practice undertaken 	
	PFM/CMO	<ul style="list-style-type: none"> No knowledge base to store experiences/information 	<ul style="list-style-type: none"> Qualified opinion on the accounts by external auditor 	<ul style="list-style-type: none"> Guidance from external agencies (some will be at a cost) 			
	PFM/CMO	<ul style="list-style-type: none"> Lack of resource (Staffing/financial) 	<ul style="list-style-type: none"> Loss of infrastructure 	<ul style="list-style-type: none"> Pension Fund uses the service of an external 			
	PFM/CMO	<ul style="list-style-type: none"> ICT failure/Disaster Recovery 					
	PFM/CMO	<ul style="list-style-type: none"> Cyber Security Risk 					

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	<p>PFM/CMO</p> <p>PFM/CMO</p>	<ul style="list-style-type: none"> ▪ Implementation of Oracle Cloud causes system issues ▪ Poor pension fund administration including outsourced 	<ul style="list-style-type: none"> ▪ Ransomware risk ▪ Failure of all ICT services ▪ Pension Fund Accounts system malfunction ▪ Inaccurate data provided by the pension fund employers and payroll providers give rise to inaccurate data 	<p>custodian to verify asset values and performance</p> <ul style="list-style-type: none"> • ICT/ Disaster Recovery in place • Constant security upgrades to computer systems. Internal Audit for oneSource Cyber Security carried out in Oct 2018.LPP have gained a certificate of Cyber Essentials from March 19 – March 20. • Oracle expertise aware of Pension fund 		<ul style="list-style-type: none"> • Use protected portals to send personal information • Internal Firewalls recommended • Pension Fund Staff to interact regarding the progress of the Oracle Cloud Implementation • Development of workflow/process 	<p>reviews the administration work of LPP including the process for bonds and to ensure guarantees are in place.</p> <ul style="list-style-type: none"> • LPP works with the Contract Monitoring Officer to develop/improve workflow processes

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	CMO	service by LPP <ul style="list-style-type: none"> Poor administration by the employers, payroll providers in the fund 	and financial reputational consequences such as actuary to set	system requirements. Systems tested at each stage of implementation.		management	<ul style="list-style-type: none"> LPP also working to provide a quarterly risk report
	CMO	<ul style="list-style-type: none"> Poor monitoring of employer financial status 	contribution rates with a high margin of error.	<ul style="list-style-type: none"> Pension Fund accounts subject to external audit. 		<ul style="list-style-type: none"> Establishment of a statutory Local Pension Board to assist the administering authority in effective and efficient governance of the Havering Pension Fund 	
	PFM/CMO	<ul style="list-style-type: none"> Poor communications with stakeholders 	<ul style="list-style-type: none"> Higher employer contributions due to poor investment performance 	<ul style="list-style-type: none"> Service is subject to external auditor report of LPP processes 			
	PFM	<ul style="list-style-type: none"> Inappropriate investment accounting – including reliance on third party providers. 	<ul style="list-style-type: none"> Employer failure to pay scheme contributions on time 	<ul style="list-style-type: none"> Formal agreement in place with administrator, including SLA's 		<ul style="list-style-type: none"> Development of Training Matrix 	
	PFM/CMO	<ul style="list-style-type: none"> Excessive charges by suppliers 	<ul style="list-style-type: none"> Poor Communication 	<ul style="list-style-type: none"> Authority levels clear 			
	PFM/CMO	<ul style="list-style-type: none"> Employer goes into default, deficit on 		<ul style="list-style-type: none"> The Council has in place a complaints system to address 			

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		<p>termination, change of status, financial risk.</p>	<p>with stakeholders giving rise to disaffection and actions against the Council</p> <ul style="list-style-type: none"> ▪ Insufficient assets to meet short term liabilities 	<p>complaints via the website</p> <ul style="list-style-type: none"> • Continuous pension training for LPB, Pensions Committee members and staff • Contract Monitoring Officer in place to review the administration work of LPP • Monthly reconciliations to monitor cash flow carried out. • Ee's and Er's contributions reconciled monthly – late payments chased • Fee Invoices checked 			<ul style="list-style-type: none"> • Local Pension Board established in 2014 and members are continuing with training and development <div style="background-color: #FFDAB9; padding: 5px;"> <ul style="list-style-type: none"> • Training matrix in place, however cannot be fully applied until all CIPFA K&S questionnaires </div>

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				prior to payment <ul style="list-style-type: none"> • Monitor audited accounts of third party providers to ensure consistent asset valuation. • Monitor investment managers performance – Fund Managers present at Pension Fund Committee meetings • Union Representative at the Committee 			are completed by Local Pension Board and Pensions Committee members.

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6	S151 Officer /Director of Exchequer and Transactional Services Lower Level as follows: PFM/CMO CMO PFM/CMO PFM/CMO CMO	<p>Risk of failure to on board or exit employers/members effectively</p> <p>Cause:</p> <ul style="list-style-type: none"> Delays in internal processing of documentation Member data incomplete Poor communications with stakeholders Lack of understanding by employers with regard to their responsibilities Lack of signed admission 	<ul style="list-style-type: none"> Delays in collection of contributions from the employers/members Impacts cash flow Potential for litigation Employer contribution assessment can become out of date Potential breach of regulations Incorrect records of new members External Audit 	<ul style="list-style-type: none"> Escalation to Heads of Service Script in place to deliver to new Academy employers, with feedback process in place (minuted) Database maintained on all contact details for LGPS communications. Monthly schedules maintained by the Pensions Administration Team Tracing agencies used to locate pension fund members Electronic file of required documents forwarded to new employers 	D/2	<ul style="list-style-type: none"> Review of internal processes (particularly legal input) Completion of TUPE Process Manual Completion of Admission Policy and an employer manual Template admission agreement awaiting legal clearance 	<ul style="list-style-type: none"> Internal Audit for the Pension Fund requested – discussions in place TUPE manual completed in November 2017 Admission policy and manual completed in November 2017 includes legal input Still in progress lead by the risk officer in LPP <p>Further Actions 2018</p>

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		agreements from Employers	<p>Opinion on internal controls</p> <ul style="list-style-type: none"> ▪ Employer's liabilities may fall back onto other employers and ultimately local taxpayers. 	<ul style="list-style-type: none"> ▪ Actuarial assessment completed for all new admission requests to assess the level of risk. ▪ Bonds and suitable guarantees put into place to protect the Fund in case of default. ▪ Funding level of each employer is assessed as part of the triennial valuation and contribution rates set accordingly. 			<ul style="list-style-type: none"> ▪ To ensure appropriate admin controls are in place via the internal audit process, ▪ LPP to send a client friendly copy of their audit report once the version goes through their own audit committee before they will release anything to us. Sarah Hughes is aware.

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7	<p>S151 Officer Director of Exchequer and Transactional Services. Lower Level as follows:</p> <p>CMO</p> <p>PFM/CMO PFM/CMO</p> <p>PFM/CMO</p>	<p>Risk of Pension Fund Payment Fraud</p> <p>Cause:</p> <ul style="list-style-type: none"> ▪ Pension overpayments arising as a result of non-notification in change of circumstances ▪ Internal staff fraud ▪ Staff acting outside of their levels of authorisation ▪ Conflict of interest 	<ul style="list-style-type: none"> ▪ Financial loss ▪ Reputational damage of Pension Administration team and Council ▪ Litigation / investigation ▪ Internal disciplinary ▪ Reputational damage 	<ul style="list-style-type: none"> ▪ Participate in the National Fraud Initiative (bi-annually) ▪ Process is in place to investigate return of payment by banks. ▪ All pension calculations are peer checked and signed off by senior officer ▪ Segregation of duties within the Pensions Administration Team ▪ Segregation of duties between Payroll and Pensions Administration Team ▪ Address checked for deferred pensions prior to payment ▪ Internal audit checks carried out 	E/1	<ul style="list-style-type: none"> • Consider implementation of a monthly mortality check • Investigating usage of external agencies (i.e. Western Union) (for overseas payments) • Implement internal audit process to report on the effectiveness of the internal controls 	<ul style="list-style-type: none"> • We are registered for the "Tell us Once" service supersedes a monthly mortality check • Upon review, the service has not been required to date • Internal audit working on the scope of the audit at present.

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				<ul style="list-style-type: none"> ▪ Signed up for DWP database Tell us Once – DWP inform Havering of deaths relating to contributors to the LGPS fund ▪ Pension Fund bank account checked monthly ▪ Register of interests completed at all board meetings 			<p>Further Actions 2018</p> <ul style="list-style-type: none"> • LPP to investigate the cost/use of ATMOS – a mortality screening application. • To Review the usage of external agencies for overseas payments

Acronyms

CIPFA	Chartered Institute of Public Finance and Accountancy
DWP	Department for Work and Pensions
GAD	Government Actuary’s Department
ICT	Information and Communications Technology
LCIV	London Collective Investment Vehicle
LGPS	Local Government Pension Scheme
LPB	Local Pension Board
MHCLG	Ministry of Housing, Communities and Local Government
PFM	Pension Fund Manager – Finance – Debbie Ford
CMO	Contract Monitoring Officer/Scheme Manager – Caroline Berry

DRAFT