# ITEM 8

# NORTH YORKSHIRE COUNTY COUNCIL

# **PENSION BOARD**

# 20 JULY 2017

# PENSION FUND RISK REGISTER

## 1.0 **PURPOSE OF THE REPORT**

1.1 To provide Pension Board members with the opportunity to comment on the Pension Fund risk register.

### 2.0 BACKGROUND

- 2.1 The risk register for the Pension Fund describes the key risks faced by the Fund. It is updated every six months and is formally approved annually by the Pension Fund Committee. It is also reviewed by the Pension Board after each six monthly update.
- 2.2 There are two risks ranked as red, five as amber and three as green on the latest version of the risk register. The assessment of the highest ranked risks is primarily driven by the financial impact each could have, if each risk actually occurred.
- 3.5 One of the red risks is on the LGPS Pooling Arrangements; this is currently considered the key risk of the Pension Fund. It is a major change to the way in which the Pension Fund is managed with a potential risk that the Fund is no longer able to effectively implement its investment strategy.
- 3.6 Pension Fund solvency also remains a red risk, despite the funding level of 104%, due to the unpredictable and volatile nature of global financial markets on which both investment returns and certain market based actuarial assumptions used to value liabilities are based. The potential consequence of the risk occurring is a significant increase in contribution rates for the Fund's employers and/or an extension to the deficit recovery period.

### 3.0 **RECENT EVENTS**

- 3.1 The latest version of the risk register (attached as **Appendix 1 & 2**) was taken to PFC on 6 July 2017 where it was approved.
- 3.2 At the last meeting of the Pension Board it was suggested by officers that the Pension Board could focus on one key risk in detail at each review rather than reviewing all risks. Board members may wish to discuss this and determine an agreed approach to reviewing risks going forward.

### 4.0 **RECOMMENDATION**

4.1 Pension Board Members to provide feedback on the latest Risk Register

4.2 Pension Board members to decide how they would like to review the Pension Fund risks in the future.

		Identity	P	erson							Clas	ssification							Fallb	ack Plan
			Risk	Risk			Р	re				RR			Po	ost				Action
Change	Risk Title	Risk Description	Owner	-	Prob	Obj	Fin	Serv	Rep	Cat	RRs	Next Action	Prob	Obj	Fin	Serv	Rep	Cat	FBPlan	Action Manager
•	44/4 - Pension Fund Solvency	Solvency deteriorates due to liability growth exceeding expectations and / or underperforming investment returns, inappropriate actuarial assumptions, or adverse market conditions requiring a review of employer contributions, additional payments or extended recovery period	CD SR	CSD SR Senior Accountant Pensions	м	м	н	L	М	2	3	31/12/2017	М	М	Н	L	М	2	Y	CSD SR Senior Accountant Pensions CSD SR Pensions Manager
	44/201 - LGPS Pooling Transition	Failure to transition effectively to new pooling arrangements resulting in poorer value for money; lower investment returns; and inability to effectively execute investment strategy.	CD SR	CSD SR Senior Accountant Pensions	м	м	н	L	н	2	8	31/12/2017	м	М	н	L	м	2	Ν	CD SR
	44/8 - Investment Strategy	Failure of the investment strategy to achieve sufficient returns from investments	CD SR	CSD SR Senior Accountant Pensions	L	м	н	L	м	3	4	31/07/2017	L	м	н	L	м	3	Y	CSD SR Senior Accountant Pensions
•	44/20 - Fraud	Internal and/or external fraud as a result of inappropriate pension administration, investment activity and cash reconciliation results in financial loss, loss of reputation	CD SR	CSD SR Senior Accountant Pensions	L	L	н	L	М	3	4	31/12/2017	L	L	н	L	м	3	Y	CSD SR Pensions Manager CSD SR Senior Accountant Pensions
	44/16 - Key Personnel	Loss and unavailability of key personnel, leading to potential knowledge gaps and delays to provision of advice as new personnel take on key roles resulting in reduced performance and complaints.	CD SR	CSD SR Pensions Manager	М	М	L	М	L	4	4	31/12/2017	М	М	L	М	L	4	Y	CSD SR Senior Accountant Pensions CSD SR Pensions Manager
•	44/10 - LGPS Regulations and Employer Related Legislation	LGPS Regulations and Employer Related Legislation not interpreted and implemented correctly resulting in legal challenge	CD SR	CSD SR Pensions Manager	М	L	L	L	М	4	2	31/12/2017	М	L	L	L	L	5	Y	CSD SR Senior Accountant Pensions CSD SR Pensions Manager
	44/11 - Benefit Payments	Incorrect/late benefits and payments to members resulting in criticism, customer dissatisfaction, under/over payments	CD SR	CSD SR Pensions Manager	М	L	L	L	М	4	2	31/12/2017	L	L	L	L	М	5	Y	CSD SR Pensions Manager





		Identity	Р	erson	Classification													Fallback Plan		
				Risk			Р	re				RR			Po	ost				Action
Change	Risk Title	Risk Description	Risk Owner		Prob	Obj	Fin	Serv	Rep	Cat	RRs	Next Action	Prob	Obj	Fin	Serv	Rep	Cat	FBPlan	Manager
	44/7 - Investment Manager	Failure of a pension fund investment manager to meet adequate performance levels resulting in reduced financial returns, re-tendering exercise	CD SR	CSD SR Senior Accountant Pensions	L	М	М	L	L	5	3	31/12/2017	L	М	М	L	L	5	Y	CSD SR Senior Accountant Pensions
	44/14 - IT Systems	Failure of IT Pension system or other IT systems for more than 2 days (or a critical time) resulting in backlog, incorrect payments, increased overtime, criticism	CD SR	CSD SR Pensions Manager	L	М	L	М	М	5	2	31/12/2017	L	М	L	М	М	5	Y	CSD SR Pensions Manager

Key	
	Risk Ranking has worsened since last review.
	Risk Ranking has improved since last review
	Risk Ranking is same as last review
- new -	New or significantly altered risk

Abbreviations		Classifications	
CD SR	Corporate Director Strategic Resources	Prob	Probability
CSD SR	Central Services Directorate Strategic Resources	Obj	Impact on Objectives
FB Plan	Fallback Plan	Fin	Financial Impact
LGPS	Local Government Pension Scheme	Serv	Impact on Services
IT	Information Technology	Rep	Reputational Impact
		RRs	Number of risk reduction actions to be carried out





Likelihood	
	H = > 60% or Probable
Probability	M = 30% to 60% or Possible
	L = < 30% or Unlikely
Impact	
	H = Over 6 priorities adversely impacted
Objectives	M = 3-6 priorities adversely impacted
	L = Below 3 priorities adversely impacted
	H = Substantial/Over 2% increase in contribution rate or loss of major opportunity
Financial	M = Notable/0.5%-2% increase in contribution rate or loss of notable opportunity
	L = Minor/Up to 0.5% increase in contribution rate or loss of some opportunity
	H = Widespread impact, 2/3 services affected, significant project slippage
Services	M = Declining Performance, notable inconvenience
	L = Minor service impact, resolved locally, minor inconvenience
	H = Significant Member/Employer complaints, national media
Reputation	M = Notable Member/Employer complaints, regional media,
	L = Some Member/Employer complaints, local adverse media coverage





Phase 1 - Ide	entification										
Risk Number	44/4	Risk Title	44/4 -	Pension Fund Solvency			Risk Owner	CD SR			CSD SR Senior Accountant Pensions
Description	inappropriat		dverse r	eding expectations and / or und narket conditions requiring a re			Risk Group	Financial		Risk Type	
Phase 2 - Cu	urrent Asses	ssment									
	Current Co	ontrol Measures		recovery period; adopt prudent s on a quarterly basis; regular re				ed every 3 yea	ars; measu	ure liabilities a	against investment
Probability	М	Objectives	М	Financial	Н	Services	L	Reputation	М	Category	2
Phase 3 - Ris	sk Reductio	on Actions									
							Action	Manager	Action by	Completed	%
Reduction	44/6 - Cons	ultation with Actuary re assum	ptions	used and discuss and carry out	actior	n plan (ongoing)	CSD SR S Accountan		Sun-31- Dec-17		0%
		lar review of investment strate ssion to be held in July	egy to m	naximise investments; ongoing	action	linked to triennial valuations,	CSD SR S Accountan		Sun-31- Dec-17		0%
Reduction	44/8 - Discu provided wit	ussion with employers re cost th their new rates for the follow	of the so ving thro	cheme and potential 'one off' co ee financial years and any quer	ontribu ries res	tions; employers have been solved	CSD SR P Manager CSD SR S Accountan	enior		Fri-31-Mar- 17	100%
Phase 4 - Po	ost Risk Red	luction Assessment									
Probability	1	Objectives	М	Financial	Н	Services	L	Reputation	М	Category	2
Phase 5 - Fa	llback Plan										
										Acti	on Manager
Fallback Plan	44/428 - Inc	reased contribution rate from	employ	ers and/or extend recovery per	iod					Pensions	nior Accountant





Phase 1 - Ide	entification										
Risk Number	44/201	Risk Title	44/201	- LGPS Pooling Transition	n		Risk Owner	CD SR		Manager	CSD SR Senior Accountant Pensions
Description	Failure to t lower inves	ransition effective stment returns; an	y to new d inabilit	pooling arrangements re y to effectively execute inv	sulting in p /estment s	poorer value for money; strategy.	Risk Group			Risk Type	CSD SR 32/24
hase 2 - Cu	urrent Asse	essment									
Curre	ent Control	Measures	Pensic	on Fund Committee; furthe	r detail be	ever pooling decisions; NYPF whind the plans received; provo puncil; pooling briefing provid	iding updat	tes to the pens			
Probability	М	Objectives	M	Financial	Н	Services	L	Reputation	Н	Category	2
Phase 3 - Ris	sk Reducti	on Actions									
							Action	n Manager	Action by	Completed	%
Reduction	44/161 - Co and pool le		dvisors c	n the implication of poolin	g; legal ac	dvice coming through at fund	CSD SR Se Accountant		Sun-31- Dec-17		0%
				nd other consultants on re moved into advice on set			CSD SR Se Accountant		Sun-31- Dec-17		0%
		eeping Members u ery quarter with up		e, particularly new membe	ers followir	ng May 17 elections; on PFC	CSD SR Se Accountant		Sun-31- Dec-17		0%
Reduction	44/164 - Ta	ake key decisions	for actio	n to next Full Council			CSD SR Se Accountant		Wed-15- Feb-17	Wed-15-Feb-17	100%
Reduction	44/165 - Pi	rovide Pooling brie	efing at J	anuary Members seminal			CSD SR Se Accountant		Tue-31-Jan- 17	Tue-31-Jan-17	100%
Reduction	44/166 - Ei	nsure Pension Bo	ard and	employers are kept up to	date on pr	ogress	CSD SR Se Accountant		Sat-30-Jun- 18		0%
		nsure that PFC co s we move toward			g decisior		CSD SR So Accountant		Sat-30-Jun- 18		0%
Reduction		ed, NYPF have as		s are set up that we can ir volvement as possible to		and the process of transition and ensure that it is	CSD SR So Accountant		Sat-30-Jun- 18		0%
hase 4 - Po	ost Risk Re	duction Assessr	nent								
Probability	М	Objectives	M	Financial	H	Services	L	Reputation	М	Category	2
hase 5 - Fa	Ilback Plar	ı								1	
<b>F</b> - 111 /										Act	tion Manager
Fallback Plan											





Phase 1 - Ide	entifica	tion									
Risk Number	44/8	Risk Title	44/8 ·	Investment Strategy			Risk Owner	CD SR		Manager	CSD SR Senior Accountant Pensions
Description	Failure	of the investmen	t strate	gy to achieve sufficient retu	Irns fror	n investments	Risk Group	Strategic		Risk Type	
Phase 2 - Cu	Irrent A	ssessment									
Current	Contro	ol Measures	trainiı	egy reviewed through asset ng; Independent Investmen ne review;							s of investment; Member of investment performance; fixed
Probability	L	Objectives	М	Financial	Н	Services	L	Reputation	М	Category	3
Phase 3 - Ris	sk Red	uction Actions		·		· · · · ·					· · · ·
							Action	Manager	Action by	Completed	%
				ne investment strategy and ng arrangements	implem		CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%
Reduction	(includi	ng Brexit); Strate	gy ses	ess of strategy against pre- sion to be held in July 2017 options and potential chang	with PF	C members and our	CSD SR Ser Pensions	nior Accountant	Mon-31-Jul- 17		0%
				and Consultants reports and		professional advice	CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%
Reduction	2018 in	plementation, lik	ely to i	he impact of MiFID II and e nvolve discussions with fun lease of paper in July 2017	d mana	dere and an "ont un"	CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%
Phase 4 - Po	st Risk	Reduction Ass	essme	nt							
Probability	L	Objectives	М	Financial	Н	Services	L	Reputation	М	Category	3
Phase 5 - Fa	llback	Plan									
											Action Manager
Fallback Plan	44/430	- Review the stra	tegy a	nd implement changes as r	ecessa	ry based on the forward as	sessment of f	financial market	S	CSD SR Senio	or Accountant Pensions





Phase 1 - Ide	entificatio	n									
Risk Number	44/20	Risk Title	44/2	0 - Fraud			Risk Owner	CD SR		Manager	CSD SR Senior Accountant Pensions
				esult of inappropriate pens Its in financial loss, loss of			Risk Group	Pers/Capacity		Risk Type	
Phase 2 - Cu	Irrent Ass	essment									
Curre	ent Contr	ol Measures	all th	ird parties have regular au	udits and	Ithorisation procedures and I regulated by FCA; legally b nonitoring; participate in Nat	inding contracts	in place; gove			administration and finance; he delegation of duties; use
Probability	L	Objectives	L	Financial	Н	Services	L	Reputation	М	Category	3
Phase 3 - Ris	sk Reduc	ion Actions									
							Action M	lanager	Action by	Completed	%
Reduction	44/1887 -	Continually review p	proces	ses and procedures includ	ding auth	norisation levels	CSD SR Pensio CSD SR Senio Pensions	ons Manager r Accountant	Sun-31- Dec-17		0%
Reduction	44/1888 -	Ongoing internal au	dit as	sessment and annual revie	ew by ex	ternal auditors	CSD SR Pensio CSD SR Senior Pensions		Sun-31- Dec-17		0%
Reduction	44/1890 - carry out a	Annual independent	t extei endati	rnal audit of pension fund ( ons	(separate	e from County Council) and	CSD SR Pensio CSD SR Senio Pensions		Sun-31- Dec-17		0%
Reduction	44/1894 - audit	Review of external r	mana	ger audit and risk reports;	reports a	are also viewed by internal	CSD SR Senior Pensions	r Accountant	Sun-31- Dec-17		0%
Phase 4 - Po	st Risk R	eduction Assessm	ent								
Probability	L	Objectives	L	Financial	Н	Services	L	Reputation	М	Category	3
Phase 5 - Fa	llback Pla	In									
										A	ction Manager
Fallback Plan	44/434 - F	Review incident and	updat	e procedures/processes a	ccording	ly				CSD SR Pens CSD SR Senic	ions Manager or Accountant Pensions





Phase 1 - Ide	entification										
Risk Number	44/16	Risk Title	44/16	- Key Personnel			Risk Owner	CD SR		Manager	CSD SR Pensions Manager
Description				to potential knowledge gaps a ting in reduced performance a			Risk Group	Capacity/per	formance	Risk Type	
Phase 2 - Cu	Irrent Assessi	ment									
	Current Cont	rol Measures		dure notes; knowledge sharing ehensive training matrix; PFC							ent meetings;
Probability	М	Objectives	М	Financial	L	Services	М	Reputation	L	Category	4
Phase 3 - Ris	sk Reduction	Actions									
							Actio	n Manager	Action by	Completed	%
	44/1901 - Ens management		and trar	nsition arrangements are in pla	ace p	pending any review of	CSD SR S Accountar	Senior nt Pensions	Sun-31-Dec- 17		0%
Reduction	44/1905 - Con	tinue to build resilience to r	neet cu	rrent and anticipated future, d	ema	nds and complexity	CSD SR F Manager CSD SR S Accountar		Sun-31-Dec- 17		0%
Reduction	44/1907 - Car	ry out appropriate induction	and or	going training for new PFC m	emb	ers	CSD SR S Accountar	Senior nt Pensions	Sun-31-Dec- 17		0%
Reduction	44/1908 - Ens meetings/teler	ure inclusion of key person phone calls (on going)	nel with	relevant external advisers or	feed	back from such	CSD SR F Manager CSD SR S Accountar		Sun-31-Dec- 17		0%
Phase 4 - Po	st Risk Reduc	ction Assessment									
Probability	М	Objectives	М	Financial	L	Services	М	Reputation	L	Category	4
Phase 5 - Fa	llback Plan			•	_						
										Actio	on Manager
Fallback Plan	44/441 - Ident	ify temporary cover arrange	ments	plus additional resources whe	re re	quired				Pensions	ior Accountant sions Manager





Phase 1 - Ide	entific	ation									
Risk Number	44/10	Risk Title	44/10	- LGPS Regulations and Emplo	oyer R	elated Legislation	Risk Owner	CD SR		Manager	CSD SR Pensions Manager
Description		Regulations a			interpr	eted and implemented correctly	Risk Group	Performance		Risk Type	Int Fin 30/189
Phase 2 - Cu	urrent	Assessment									
Current C	ontrol	l Measures	speci acros	alist staff; specialist software; ac s MT; LGE advice; nat. technica	dvice o al pens	of staff; regular updates & comm n calculations interpretations; inv ion group provide advice; Truste er to continually strengthen unde	vestment mgt. es knowledge	agreement; awa	reness of overr	iding legislation;	broadening of knowledg
Probability	Μ	Objectives	L	Financial	L	Services	L	Reputation	М	Category	4
Phase 3 - Ri	sk Re	duction Actio	ns								
							Action	n Manager	Action by	Completed	%
Reduction	44/15 <sup>-</sup>	7 - Ongoing st	aff tra	ining programme			CSD SR Pen	sions Manager	Sun-31-Dec- 17		0%
Reduction	impler	mentation, like	ly to ir	nitor the impact of MiFID II and e nvolve discussions with fund ma f paper in June 2018			CSD SR Sen Pensions	ior Accountant	Sun-31-Dec- 17		0%
Phase 4 - Po	ost Ris	k Reduction	Asses	sment							
Probability	М	Objectives	L	Financial	L	Services	L	Reputation	L	Category	5
Phase 5 - Fa	llback	Plan									
										Act	ion Manager
Fallback Plan	44/43	7 - Review exi	sting i	nterpretations, take legal advice	and a	mend procedures as required				CSD SR Senior CSD SR Pensic	Accountant Pensions





Phase 1 - Ide	entificatio	n									
Risk Number	44/11	Risk Title	44/1	1 - Benefit Payments			Risk Owner	CD SR		Manager	CSD SR Pensions Manager
		late benefits and ction, under/ove		nents to members resulting in on nents	critio	cism, customer	Risk Group	Performance		Risk Type	
Phase 2 - Cu	urrent Ass	essment									
Curren	nt Control	Measures	trail;	o date procedures and procedu internal and external audits; P sk checklists; ESS; payment til	ens	ions Administration Strateg					
Probability	М	Objectives	L	Financial L		Services	L	Reputation	М	Category	4
Phase 3 - Ri	sk Reduc	tion Actions									
							Action	Manager	Action by	Completed	%
Reduction	44/1893 - expectatio		unicat	tion with employers, with partic	ula	r regard to customer	CSD SR Pens	sions Manager	Sun-31-Dec-17		0%
Reduction		neetings to ensu		ESS regarding operational arra derstanding of the issues on bo			CSD SR Pens	ions Manager	Sun-31-Dec-17		0%
Phase 4 - Po	ost Risk R	eduction Asses	smei	nt							
Probability	L	Objectives	L	Financial		Services	L	Reputation	М	Category	5
Phase 5 - Fa	llback Pla	an									
										Ac	tion Manager
Fallback Plan	44/435 - (	Correct errors an	d revi	iew and amend existing proced	dure	25				CSD SR Pensio	ns Manager





Phase 1 - Ide	entificat	ion											
Risk Number	44/7	Risk Title	44/7 -	Investment Manager			Risk Owner	CD SR		Manager	CSD SR Senior Accountant Pensions		
				nent manager to meet a endering exercise	dequate pe	erformance levels resulting	Risk Group	Performance		Risk Type			
Phase 2 - Cu	Irrent As	ssessment											
Current Control Measures Qrtly review of investment mgr targets; std terms and conds re termination of contract; ext advisers monitor mgrs perf; qrtly repts to Pension Fund Content Control Measures PFC; Member training; best practice procurement process; diversified portfolio of investments;													
Probability	L	Objectives	М	Financial	М	Services	L Reputation L		L	Category	5		
Phase 3 - Ris	sk Redu	ction Actions											
							Action Manager		Action by	Completed	%		
Reduction	44/1873	- Continue to mo	onitor ar	nd report on investment	returns on	a regular basis	CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%		
Reduction	44/1874 advisers		et/repo	ort to PFC by Fund Mana	igers and a	assess critical analysis by	CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%		
				oriate, a tender exercise me re new investment m		est practice procurement	CSD SR Ser Pensions	nior Accountant	Sun-31-Dec- 17		0%		
Phase 4 - Po	st Risk	Reduction Asse	ssmen	t					•	•	*		
Probability		Objectives	М	Financial	М	Services	L	Reputation	L	Category	5		
-	ł	lon		L		•							
Phase 5 - Fallback Plan										Action Manager			
Fallback Plan	144/429 - Change Fund Manager and redistribute funds, potentially transfer to temporary passive Fund Manager										CSD SR Senior Accountant Pensions		





Phase 1 - Ide	entification												
Risk Number	44/14	Risk Title	44/14 -	44/14 - IT Systems				Risk Owner	CD SR		Manager	CSD SR Pensions Manager	
Description	cription Failure of IT Pension system or other IT systems for more than 2 days backlog, incorrect payments, increased overtime, criticism						tical time) resulting in	Risk Group	Technological		Risk Type		
Phase 2 - Current Assessment													
Current Control Measures Manual payments, DR plan and tested, contracts for server maintenance, backups off site, major external providers have DR plans, manual calculation procedures, administration manuals, annual financial check, contingency plan in place, modern council; modern council working to aid resilience,													
Probability L		Objectives	М	Financial	L		Services	Μ	Reputation M		Category	5	
Phase 3 - Risk Reduction Actions													
	Action Manager Action by										Completed	%	
Reduction	eduction 44/1884 - Regular review of contingency planning arrangements								CSD SR Pensions Su Manager 17			0%	
Reduction	Reduction 44/1898 - Sense check any IT recovery assumptions with Tech & Change run systems								CSD SR Pensions Manager			0%	
Phase 4 - Post Risk Reduction Assessment													
Probability	L	Objectives	М	Financial	L		Services	М	Reputation	М	Category	5	
Phase 5 - Fallback Plan													
										Action Manager			
Fallback Plan	1/4//33 - Recourse to manual calculations and navments. Liaise with software provider to restore system, find alternative supplier										CSD SR Pensions Manager		



