

Ref	Risk Description (Consider Risk Cause & Risk Consequences)	Inherent Risk			Current Controls	Residual Risk			Proposed Improvement Actions	Risk Reduction Target Date	Owner	Status
		Likelihood	Consequence	Priority		Likelihood	Consequence	Priority				
Pensions												
P1	That the Pension Fund's investment strategy is not managed with reference to the long-term growth in the Fund's liabilities	B	1	High - Red	Triennial actuarial valuations provide periodic indications of the growth in assets against liabilities. Employer contributions are set in response to this. An asset-liability study may be commissioned if there is evidence of a clear shift in the balance between assets and liabilities.	C	2	Medium - Red / Amber	Continuing engagement with Fund actuaries to understand impact of financial and demographic factors on the Fund's liabilities. Discussions are taking place with Aon on how the Fund manages the current increases in short-term inflation	31-Mar-23	Marc Falconer	
					The Investment Panel considers whether any changes are required to strategic asset allocation. The investment strategy is summarised in the Investment Strategy Statement					Ongoing		
					The liabilities of admitted bodies are monitored to ensure that large deficits do not accrue, which would be unaffordable should the employer leave the Fund					Ongoing		
P2	Inadequate medium term performance from selecting inappropriate fund managers or asset allocation	B	2	High - Red	Although the Fund remains responsible for setting its own investment strategy it is increasingly using Wales Pension Partnership (WPP) products to deliver its strategy as all listed fund assets have now transitioned to WPP. For the WPP both Link and Russell have been appointed through open tender and management agreements for the specific funds include clear performance targets. The procurement of Private Market Allocator(s) has commenced. Manager performance is reviewed by both this funds Investment Advisory Panel and the WPP OWG and JGC.	C	2	Medium - Red / Amber	Maintain relationships with managers both directly appointed by the Fund and WPP Funds. going forward periods of transition activity into the WPP pool will be limited to Private Market Assets. Consolidation of WPP Funds have now been consolidated into the regular Investment Panel review cycle with both Russell and Link FS presenting to the Panel during the second half of 2021 followed by two presentations to Investment Panel by Russell during 2022 (June & October meetings). Continue to review any impacts of Brexit especially any that will have a long term impact on the investment performance of the Fund. Monitor any impacts on the Fund following the Russian invasion of Ukraine in Feb 2022 and the subsequent decision to dis-invest in Russian stocks Minimal impact on Fund following recent fall in UK Govt. Gilt prices but continue to monitor.	Ongoing	Marc Falconer	
					The Investment Panel advise target ranges for strategic asset allocations.							
					Although the Fund's main objective is long-term growth, the diversification provided by adopting a range of asset classes and fund managers should help to mitigate the impact of poor performance from any particular account or sub-manager.							
P3	Additional risks and costs to the Fund from poorly structured investment arrangements including with WPP sub-funds	B	3	Medium - Red / Amber	The Fund attempts to ensure best value in the following ways: • Regular Reports to the Investment Panel on asset valuation and manager performance. • Use of specialist services considered to reduce costs where appropriate (e.g. for transitions and currency transfers). • Custodian arrangements are reviewed or re-tendered when appropriate.	C	3	Medium - Amber / Green	All listed Assets now invested in WPP sub-funds bringing the benefits of diversification with a multi-manager approach across the board compared to the Fund's legacy assets single manager approach. Monitoring and review processes for assets managed by WPP now incorporated into the regular Investment Panel meetings as well as being standard items on the agenda for the quarterly WPP JGC and OWG meetings. Fund Investments to be further diversified by forthcoming investments into the new WPP Private Credit and (open-ended) Infrastructure sub-funds	Ongoing	Marc Falconer	

P4	Collapse of an Investment Manager involving our portfolio	C	1	Medium - Red / Amber	<ul style="list-style-type: none"> All listed Assets are now managed by WPP so the Fund, will consider the due diligence activity undertaken by Link and Russell on behalf of WPP. All Listed assets are managed through the Fund's custodian to ensure they remain segregated from the manager. The risk that a manager cannot provide a service during windup will be mitigated by the appointment of a Transition Manager to transfer assets efficiently to a new manager. 	C	2	Medium - Red / Amber	<p>The Pool Operator is regulated by FCA and the Pool Custodian will ensure segregation of assets. Consideration to be given for the custodian role to be extended to cover Property and Private Equity assets</p> <p>The diversification benefits of the multi-manager approach adopted by WPP Funds has been highlighted in P3 e.g WPP EM Fund has 6 sub-managers operating under Russell whereas the legacy fund was a single manager.</p> <p>Implications of change of ownership of Link Group and Woodford related investigation of Link by FCA to be kept under review</p>	Ongoing	Marc Falconer	
P5	MIFID II leads to restrictions on the investment products available to the Fund	A	1	High - Red	Collaboration with investment managers, the Pool Operator, other LGPS funds and the LGA to ensure that the Fund is classified as a Professional Investor by all its managers and the Pool.	C	3	Medium - Amber / Green	<p>Training will be the subject of renew attention when the composition of the Pension Committee is confirmed following the May 2022 elections. Focus will be across the board with consideration on provision of training to Officers, Committee and board members as appropriate. Quarterly training provided by WPP is now well integrated into training resources available. Appropriate Training Records to be maintained Officers have returned to in-person conferences</p>	Ongoing	Marc Falconer	
P7	Pension Fund Annual Accounts and Report are not produced in compliance with statutory requirements, in line with accounting standards or in line with audit timetable.	B	2	High - Red	The Fund's Custodian provides assurance on the accuracy of investment records (except for property and private equity). Records of benefits paid, contributions received and other expenses are held on SAP. The Group Accountant liaises with external audit and manages the closure process.	C	4	Low - Green	Regular meetings during the financial year between Accountancy and pensions staff to ensure any issues are identified and resolved before year end.	Ongoing	Marc Falconer	
P8	Failure to adhere to LGPS Regulations	B	2	High - Red	<ul style="list-style-type: none"> Investment regulations are considered when setting the ISS Senior Technical Officer undertakes Altair system checks to ensure compliance with LGPS regulations Team leaders/supervisors, ensure legislative accuracy of calculations Network Groups (Altair/Communications/All wales Pensions Officer Group) Comms & Training Officer – responsible for the update of website and online guides. Inform employers of any changes in regulations. 	C	2	Medium - Red / Amber	Engagement with Local Pension Board to develop reporting processes	Ongoing	Marc Falconer / Karen O'Donoghue-Harris	
P9	Failure to communicate with stakeholders	B	3	Medium - Red / Amber	<ul style="list-style-type: none"> Contact list for employers updated regularly Annual Employers' Forum Annual Trade Union Forum Annual report and accounts Member newsletters Dedicated Communication and Training Officer post established Look to use all available communication channels <p>Completed roll-out of member self service facilities for Active Members for Employers using Iconnect.</p>	C	4	Low - Green	<p>Maintain and update Fund website</p> <p>Roll-out of MSS to Deferred Members to be considered when resources are in place.</p> <p>Engagement with employers through site visits and promotion of Employers' Forum.</p> <p>Seek regular approval of the Pension Administration Strategy and Communication Policy</p>	Ongoing	Marc Falconer / Karen O'Donoghue-Harris	

P10	Withdrawal/default of an employer	B	2	High - Red	<ul style="list-style-type: none"> Outstanding liabilities will be assessed and recovered from any successor bodies or spread amongst remaining employers. Actuarial valuation aims to balance recovery period with risk of withdrawal Applications for admission to the Fund are considered carefully and guarantees put in place if required 	B	3	Medium - Red / Amber	<p>Improve engagement with admitted bodies where withdrawal is a possibility. Refuse new applications for admission except where there is an obligation to protect rights of employees transferred under TUPE</p> <p>Updated FSS now includes drafting to permit the use of Deferred Debt arrangements and other Employer Flexibilities where exit from Pension Fund is being considered.</p>	Ongoing	Marc Falconer	
P11	Timeliness and accuracy of pension payments including risks arising from maintaining two separate data recording systems	B	2	High - Red	<ul style="list-style-type: none"> Monthly Pensions are paid by the Council's Pay Centre Payroll deadline procedures in place Authorisation of benefits following calculations Additional checks by Payroll Review of all payroll amendments Ensure all new monthly pension starter listings match amounts on Altair Run monthly SPA reports When someone hits SPA, update Altair and Payroll with GMP details 	C	3	Medium - Amber / Green	<ul style="list-style-type: none"> Review configuration of systems Recommend purchasing Altair Payroll to replace SAP 	Ongoing	Karen O'Donoghue-Harris	
P12	Pensions continue to be paid to deceased pensioners	B	2	High - Red	<ul style="list-style-type: none"> Monthly ATMOS reviews and Tell Us Once data exchanges match pensioner details with national deaths register Pensioners incorporated into National Fraud Initiative Annual life certificates required from pensioners living overseas Tell Us Once database is being updated monthly via the LGPS NI database. Further targeted checks with credit reference agencies as appropriate 	D	4	Low - Green	<p>Keep current controls under review and adapt or change as required.</p>	Ongoing	Karen O'Donoghue-Harris	
P13	Membership data is not recorded accurately	A	2	High - Red	<ul style="list-style-type: none"> Senior Officers liaise closely with employers to ensure timely and accurate submission of data I-Connect ensures that data from employers is identified by a direct transfer from payroll on a monthly basis Data accuracy checks undertaken by the pension section Data validation checks also undertaken by the Fund Actuary at the triennial valuation. 	B	3	Medium - Red / Amber	<p>Two remaining employers to go live on i-connect</p>	Ongoing	Karen O'Donoghue-Harris	
P14	Breach of GDPR legislation	A	1	High - Red	<p>Information issued to Fund members and published on website; Pensions staff trained on handling personal data; Memo of Understanding issued to Fund employers; contracts with service providers</p> <p>Updated MoU has been sent to Employers</p>	B	3	Medium - Red / Amber	<p>Monitoring and supervision of staff, regular communications to Fund employers</p>	Ongoing	Karen O'Donoghue-Harris	
P15	Failure to complete GMP Reconciliation resulting in inaccurate payments to pensioners	A	2	High - Red	<ul style="list-style-type: none"> Regular update meetings with JLT Prompt resolution of cases referred back to Fund Fund decision made on stalemate cases Agreed Action Plan in place Critical task and timelines agreed Target end date 	C	3	Medium - Amber / Green	<ul style="list-style-type: none"> closely monitor the key tasks that need to be completed As any GMP adjustments are implemented, ensure there is a reconciliation between Altair and SAP. Mercer have provided a draft Project Plan and as a combined group, taking into account the actions that are required it has been decided to complete the actual rectification calculations following the April 2022 Pensions Increase (because there is not sufficient time between now and March 2022 to complete all the tasks without introducing a higher risk. Waiting on updated timeline from Mercer (Oct 22), Officers have been asked to contact Mercer to escalate concern over the delay 	31-Jul-22	Karen O'Donoghue-Harris	

P16	Failure to deliver Annual Benefit Statements by statutory deadline of 31 August	A	2	High - Red	Member Self-Service will allow Active Members to update records and improve compliance.	C	3	Medium - Amber / Green	<ul style="list-style-type: none"> MSS used to enhance the service provided to Scheme members MSS used to upload statements ensuring higher compliance levels Savings on printing and postage costs 	Ongoing	Karen O'Donoghue-Harris	
P17	Cyber security	A	1	High - Red	Access to all systems is password protected, additional password protection for access to Altair all Staff have completed mandatory modules on cyber security ICT have undertaken an independent review of the Fund's cyber security and reported findings to Pension Board & Committee	B	2	High - Red	continue to follow advice from ICT and update procedures as required Staff continue to complete relevant new e-learning modules as well as considering relevant information from external organisations such as TPR.	Ongoing	Karen O'Donoghue-Harris	
P18	Exit Payment Cap	C	3	Medium - Amber / Green	<ul style="list-style-type: none"> Warning still kept on costs estimates for Employers that these are provided under existing regulations and could be subject to change 	C	4	Low - Green	If new regulations are tabled consideration will be given at that time to appropriate controls	Ongoing	Karen O'Donoghue-Harris	
P19	McCloud - huge administrative burden, failure to have correct resources to deal with the additional work	B	2	High - Red	<ul style="list-style-type: none"> Employers warned at Employer forum that they will be required to supply missing data A0N commissioned to run reports to identify affected members LGA templates used to upload missing data Templates issued to all employers Deadline set for return of data 	B	3	Medium - Red / Amber	<ul style="list-style-type: none"> Use third party to assist with project management with external advice provision now included in Business Plan. New staffing structure approval and recruitment process underway continue chase missing data from some of smaller employers Data starting to be uploaded 	Ongoing	Karen O'Donoghue-Harris	
P20	Resource Implications - Pension Section has insufficient resources to respond to the multiple workload pressures facing the section e.g. McCloud, Exit Cap, Dashboards, etc. and recruitment and retention of staff	B	3	Medium - Red / Amber	<ul style="list-style-type: none"> Scenario planning to be incorporated into 21/22 Business Plan to consider mix of additional resources required in particular what activities would require additional internal resources and what activities would be undertaken by external parties. Use of external resources to provide additional short term capacity 	B	2	High - Red	<ul style="list-style-type: none"> continual monitoring of Pension section workload and updates to resource planning including business plan and budgets. recruitment process for 6 additional staff has commenced with 2 senior offices appointed in November 21 and the remaining 4 post being readvertised in April/May 22 after an unsuccessful recruitment to fill all posts in December 21. Following 2 rounds of unsuccessful recruitment a further round of recruitment is taking place. Officers plan on looking at alternate recruitment opportunities to fill the vacant posts (Oct 22). 	Ongoing	Karen O'Donoghue-Harris	
P21	The Fund fails to adequately account for climate change, climate risk and ESG factors with Financial loss to assets held and potential for "stranded assets".	B	2	High - Red	Publication of a Responsible Investment policy and Climate Risk Policy both for the Fund and the WPP Transfer of funds to BlackRock Low Carbon Tracker Fund	B	3	Medium - Red / Amber	<ul style="list-style-type: none"> continued evolution of WPP sub-funds that allows climate risk and other ESG factors to be managed e.g. proposals to introduce a de-carbonisation overlay to UK Opportunities Fund were implemented from June 2022. Development of WPP Sustainable equity sub-fund Continued engagement and challenge to Investment Managers, especially via WPP, on how they manage climate and ESG risks reporting of suitable climate change and ESG metrics continued training focus including with the WPP Voting and Engagement provider WPP re-application for the FRC Stewardship code has been submitted (Oct 22) with outcome of application expected to be know early in 2023. 	Ongoing	Marc Falconer	

in relation to

Risk Matrix and Definitions

High Priority	Red - Significant management action, control, evaluation or improvements required with continued proactive monitoring.
Medium Priority	Red / Amber - Seek cost effective management action, control, evaluation or improvements with continued proactive monitoring.
Medium Priority	Amber / Green - Seek cost effective control improvements if possible and/or monitor and review regularly.
Low Priority	Green - Seek control improvements if possible and/or monitor and review

		IMPACT			
		1	2	3	4
LIKELIHOOD	A	A1	A2	A3	A4
	B	B1	B2	B3	B4
	C	C1	C2	C3	C4
	D	D1	D2	D3	D4
	E	E1	E2	E3	E4

LIKELIHOOD

- A Very Likely
- B Likely
- C Possible
- D Unlikely
- E Very Unlikely

IMPACT

- 1 Major
- 2 significant
- 3 Moderate
- 4 Minor