

# Cambridgeshire Pension Fund



## Pension Fund Committee

**Date:** 10<sup>th</sup> October 2019

**Report by:** Head of Pensions

<b>Subject:</b>	<b>Risk Monitoring – Six month review</b>
<b>Purpose of the Report</b>	<a href="#">To present the Cambridgeshire Pension Fund Risk Monitoring Report</a>
<b>Recommendations</b>	<b>The Committee are asked to review the current risks facing the Fund</b>
<b>Enquiries to:</b>	Michelle Oakensen, LGSS Governance Officer, <a href="mailto:moakensen@northamptonshire.gov.uk">moakensen@northamptonshire.gov.uk</a>

### 1. Background

- 1.1 The Cambridgeshire Risk Strategy and Risk Register were reviewed and approved by the Pension Fund Committee on 28<sup>th</sup> March 2019.
- 1.2 At this time it was agreed that the Pension Fund Board would monitor risks on a quarterly basis and the Pension Fund Committee would review on a bi-annually basis, unless any concerns were raised by the Board prior to this.
- 1.3 This supports the Pension Regulator's Code of Practice 14 – Governance and administration of public service pension schemes with regards to monitoring and reviewing risks. This code of practice can be found at the following link:  
<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-14-public-service-pension-code-of-practice>

### 2. Recommendations made by the Pension Fund Board

- 2.1 At the meeting of the 3<sup>rd</sup> May 2019, the Pension Fund Board reviewed the risk register and the following changes were subsequently applied -

<b>Risk</b>	<b>Current Risk Wording</b>	<b>New Risk Wording</b>
6	Inappropriate Investment Strategy is adopted.	The Investment Strategy's risk reward profile does not match the requirements of the Fund.
24	Adequate controls are not in place for the production of accounts, notices, publications and management reports.	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.

25	A Data Improvement Policy and Plan are not in place and adhered to.	Incorrect/poor quality data held on the Pension Administration and Payroll platforms leading to incorrect information being provided to members and stakeholders.
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- 2.2 At the meeting of the 5<sup>th</sup> July 2019, a short term risk section was introduced to the report to ensure that the detail of the short term risks were captured without compromising the high level intent of the risk register.
- 2.3 The first short term risk identified was to highlight the potential risk that, pending outcome of the McCloud judgement whereby a challenge was successfully made on the application of transitional protection following the introduction of the LGPS 2014 as being age discriminatory, there is a risk to all LGPS Funds that if the government's appeal against the decision is not upheld and communicated prior to 31 August 2019, the 2019 valuation of the Fund and each employers liabilities may be incorrectly valued resulting in the calculation of inappropriate contribution rates being set.
- 2.4 Risk 18, 'actual experience materially differs from actuarial assumptions used at each valuation' covers the high level risk as the liability will be a factor in the 2019 valuation but it was felt appropriate to highlight this to the Board to monitor.
- 2.5 At the meeting of 4<sup>th</sup> October 2019, following an action to review cybercrime, the Board were presented with an amendment to risk 12 and the mitigation. A new risk was also recommended to be added on climate change as detailed below -
- Pension Fund systems and data may not be secure and appropriately maintained has been enhanced by adding including cyber risk.
  - The mitigation of 'training to Officers on cyber resilience' to be enhanced as follows – 'Compulsory online training for LGSS Officers on Cyber Resilience and Data Protection'.
  - A risk was included on climate change to highlight the potential change to the Fund's investments.
- 2.6 In addition, the risk of Brexit and potential asset volatility was added to the short term risk section.
- 2.7 A verbal update at the meeting will be provided as to whether the amendments were adopted and any other risks discussed due to the close proximity of the meetings.

#### 4. Relevant Pension Fund Objectives

Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.

Ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.
Continually monitor and measure clearly articulated objectives through business planning.
Deliver consistent plain English communications to stakeholders.
Seek and review regular feedback from all stakeholders and use the feedback appropriately to shape the administration of the Fund.
Ensure cash flows in to and out of the Fund are timely and of the correct amount.

## 5. Risk Management

- 5.1 The Pension Fund Committee and Pension Fund Board are expected to monitor risk and compliance and act appropriately where there is a cause for concern.
- 5.2 The risks associated with not monitoring risk and acting appropriately have been captured in the Fund's risk register as detailed below.

Risk No	Risk mitigated	Residual risk
9	Failure to understand and monitor risk and compliance	Green
16	Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green

- 5.3 The full risk register can be found in appendix 1.

## 6. Finance & Resources Implications

- 6.1 None.

## 7. Communication Implications

<b>Website</b>	The risk register and risk strategy is on the LGSS Website. The Local Pension Board will be kept up to date with risks at each meeting.
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## 8. Legal Implications

- 8.1 Not applicable.

## 9. Consultation with Key Advisers

- 9.1 None

## 10. Alternative Options Considered

- 10.1 There are no alternative options to be considered

## 11. Background Papers

- 11.1 The Cambridgeshire Pension Fund Risk Strategy –  
<https://pensions.cambridgeshire.gov.uk/app/uploads/2019/04/Cambridgeshire-Risk-Strategy.pdf>

## 12. Appendices

### 12.1 Appendix 1 - The Cambridgeshire Pension Fund Risk Register

<b>Checklist of Key Approvals</b>	
Is this decision included in the Business Plan?	No
Will further decisions be required? If so, please outline the timetable here	No
Is this report proposing an amendment to the budget and/or policy framework?	No
Has this report been cleared by Section 151 Officer?	Sarah Heywood – 23 <sup>rd</sup> September 2019
Has this report been cleared by Head of Pensions?	Mark Whitby – 18 <sup>th</sup> September 2019
Has the Chairman of the Pension Committee been consulted?	Councillor Rogers – 23 <sup>rd</sup> September 2019
Has this report been cleared by Legal Services?	Fiona McMillan – 26 <sup>th</sup> September 2019

## Appendix 1 – Cambridgeshire Pension Fund Risk Register

<b>Risk</b>	<b>Risk</b>	<b>Relevant objectives</b>	<b>Responsible Lead(s)*</b>	<b>Risk Rating</b>
1	Employers unable to pay increased contribution rates.	9	<b>E</b>	12
2	Failure to respond to changes in economic conditions.	15,16	<b>A</b>	12
3	Contributions to the Fund are not received on the correct date and/or for the correct amount	1,8,9,16	<b>A</b>	8
4	Fund assets are not sufficient to meet obligations and liabilities.	2,16,17,19	<b>A</b>	8
5	Information may not be provided to stakeholders as required.	14	<b>ALL</b>	6
6	The Investment Strategy's Risk Reward profile does not match the requirements of the Fund.	16, 17,18	<b>A</b>	6
7	Those charged with governance are unable to fulfil their responsibilities effectively.	2,3	<b>G</b>	6
8	Risk of fraud and error.	2,10	<b>ALL</b>	6
9	Failure to understand and monitor risk compliance.	5	<b>G</b>	6
10	Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed.	8	<b>E</b>	6
11	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	1,2,3	<b>A</b>	4
12	Pension Fund systems and data may not be secure and appropriately maintained.	10,11	<b>E</b>	4
13	Failure to administer the scheme in line with regulations and guidance.	1,2,3,16	<b>ALL</b>	4
14	Failure to recognise and manage conflicts of interest.	2,10	<b>G</b>	4
15	Pension Fund objectives are not defined and agreed.	4	<b>G</b>	4
16	Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	15	<b>G</b>	4
17	Pension Fund investments may not be accurately valued.	2,10,17,18	<b>A</b>	4
18	Actual experience materially differs from actuarial assumptions used at each valuation	9, 17,18	<b>E</b>	4
19	Failure to act appropriately upon expert advice and/or risk of poor advice.	17,18,19,20	<b>ALL</b>	4
20	Failure to assess and monitor the financial strength of an employer covenant to ensure employer liabilities are met.	9,17,18	<b>E</b>	4
21	Unable to deliver pension services due to an inadequate business continuity plan.	8	<b>ALL</b>	4
22	Unable to deliver pension services due to inadequate recruitment and retention processes.	8	<b>ALL</b>	4
23	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	1,2,3,19	<b>A</b>	3
24	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	1,2,10	<b>ALL</b>	3
25	Incorrect/poor quality data held on the Pension Administration and Payroll platforms leading to incorrect information being provided to members and stakeholders.	2,8,10,11	<b>G</b>	3

\*Key

<b>E</b>	Employer Services and Systems Manager
<b>A</b>	Accounting and Investments Manager
<b>G</b>	Governance and Regulations Manager
<b>O</b>	Operations Manager
<b>ALL</b>	All Manager Responsibility

Overall responsibility rests with the Head of Pensions

Agenda Item no. 9

Risk No	Risk	Gross Impact	Gross Likelihood	Gross Total	R A G	Controls	Residual Impact	Residual Likelihood	Residual Total	R A G
1	Employers unable to pay increased contribution rates.	4	4	16	R	<ul style="list-style-type: none"> <li>Provisional contribution rates are consulted on with each scheme employer as part of the valuation process</li> <li>Review of employer covenant, looking at the terms of the admission agreement and bond/guarantor arrangements.</li> <li>Negotiate terms of deficit recovery whilst keeping employer contribution rates as stable and affordable as possible.</li> </ul>	4	3	12	A
2	Failure to respond to changes in economic conditions	4	4	16	R	<ul style="list-style-type: none"> <li>The Fund has established a quarterly Investment Sub Committee dedicated to focus on Investment matters.</li> <li>The Fund receives quarterly performance reports which consider operational and strategic investment issues.</li> <li>A formal review of the strategic asset allocation is undertaken on a triennial basis.</li> <li>The Fund publishes an Investment Strategy Statement which is regularly reviewed.</li> </ul>	4	3	12	A
3.	Contributions to the Fund are not received on the correct date and/or for the correct amount.	4	3	12	A	<ul style="list-style-type: none"> <li>Employer contributions are set as stable as possible and the Fund works with employers closely to ensure pragmatic solutions if an employer is unable to meet monthly contributions.</li> <li>A procedure is in place to identify non-payment and late payment of contributions as defined in the Employee and Employer Late Payment Policy.</li> <li>The Policy includes a reporting process to report late payments to Committee and the Pensions Regulator</li> <li>Internal Audit reviews take place on an annual basis and external audit review the accounts annually.</li> </ul>	4	2	8	A
4	Fund assets are not sufficient to meet obligations and liabilities	4	3	12	A	<ul style="list-style-type: none"> <li>The Funding Strategy Statement is reviewed every 3 years.</li> <li>The Fund Actuary considers asset valuations and the Fund Investment Strategy in setting employer contributions rates.</li> <li>The yearend financial statements record the Funds asset position and is subject to robustly reviewed by external audit, which supports the Funds asset valuation applied to assess fund adequacy.</li> </ul>	4	2	8	A

Risk No	Risk	Gross Impact	Gross Likelihood	Gross Total	R A G	Controls	Residual Impact	Residual Likelihood	Residual Total	R A G
5	Information may not be provided to stakeholders as required	3	3	9	A	<ul style="list-style-type: none"> <li>Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly using resources such as relevant websites, seminars, professional bodies and working groups.</li> <li>Letters are generated through task management for consistency and are checked before being sent out.</li> </ul>	3	2	6	G
6	The Investment Strategy's risk reward profile does not match the requirements of the Fund.	3	3	9	A	<ul style="list-style-type: none"> <li>Investment Strategy in place which is in accordance with LGPS investment regulations.</li> <li>A formal review of the strategic asset allocation is undertaken on a triennial basis.</li> <li>The Fund appoints professional investment advisers to support the Pension Committees investment decisions</li> <li>At each triennial actuarial valuation the Funding Strategy Statement considers alignment of the investment strategy to employer covenant and affordability.</li> <li>Members are encouraged to participate in Skills &amp; Knowledge training with respect to Investments and attend relevant industry conferences. Detailed training records are maintained.</li> </ul>	3	2	6	G
7.	Those charged with governance are unable to fulfil their responsibilities effectively	3	3	9	A	<ul style="list-style-type: none"> <li>Training Strategy in place to facilitate the continual development of both Committee and Board members.</li> <li>New members are provided with relevant documentation to assist them in their roles.</li> <li>The Fund subscribes to relevant professional bodies such as LAPFF and PALSA.</li> </ul>	3	2	6	G

8.	Risk of fraud and error	3	3	12	A	<ul style="list-style-type: none"> <li>• Anti- Fraud and Corruption policy in place.</li> <li>• Fund participates in the National Fraud Initiative and undertakes oversees pensioner existence checks.</li> <li>• Robust processes in place including segregation of duties and authorisation protocols.</li> </ul>	3	2	6	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>R A G</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>R A G</b>
9	Failure to understand and monitor risk compliance	3	2	6	G	<ul style="list-style-type: none"> <li>• Business Continuity plan in place and is updated at least annually.</li> <li>• Active risk register in place, the Committee and Board are updated if there are any risk movements between scheduled reporting timescales.</li> <li>• The Local Pension Board have oversight of risk monitoring to assist the Pensions Committee on decision making.</li> </ul>	3	2	6	G
10	Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed.	3	4	12	A	<ul style="list-style-type: none"> <li>• Employers are made aware of their responsibilities upon admission via the LGSS website and direct employer communication.</li> <li>• Training is provided to employers on a minimum quarterly basis and more often, if required.</li> <li>• The importance of a statutory deadlines is stressed to the employer through all communications and via events such as the employer forums.</li> <li>• Support is also available through the website, dedicated employers help line and templates issued where applicable.</li> </ul>	2	3	6	G

11	Custody arrangements may not be sufficient to safeguard Pension Fund assets	4	2	8	A	<ul style="list-style-type: none"> <li>The Custodian is selected from experienced providers on the LGPS National Framework who have met the quality criteria for the framework.</li> <li>Complete and authorised agreements are in place with external custodian.</li> <li>External custodian's compliance with International Standard on Assurance Engagements (ISAE) No. 3402, Assurance Reports on Controls at a Service Organisation. Officers of the Fund engage in quarterly monitoring of custodian performance with a report presented at the annual meeting of the Pensions Committee.</li> </ul>	4	1	4	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>R A G</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>R A G</b>
12	Pension Fund systems and data may not be secure and appropriately maintained	4	2	8	A	<ul style="list-style-type: none"> <li>System user controls are in place including regular password changes.</li> <li>Access rights are controlled.</li> <li>Data is backed up.</li> <li>Audit trails are in place.</li> <li>Pension system is protected against viruses and other system threats.</li> <li>The pensions administration system is updated to ensure LGPS requirements are met.</li> <li>Hosted pensions server and backup server are at separate Bedfordshire sites.</li> <li>Disaster recovery plans are in place for both Heywood and LGSS.</li> <li>Training to Officers on cyber resilience</li> </ul>	4	1	4	G

13	Failure to administer the scheme in line with regulations and guidance	5	2	10	A	<ul style="list-style-type: none"> <li>• Policies and strategies are in place and are accessible on the Fund website.</li> <li>• Policies and strategies are subject to review at appropriate intervals and subject to stakeholder consultation where necessary.</li> <li>• A Training Strategy is in place for those charged with governance.</li> <li>• Officers attend working groups (such as EMPOG/SECSOG) and consult with professional advisors where appropriate.</li> <li>• Employers are aware of their responsibilities within the Fund and what information is required, in what format and by when.</li> <li>• The Fund subscribes to relevant professional bodies such as LAPFF and PALSA.</li> </ul>	4	1	4	G
Risk No	Risk	Gross Impact	Gross Likelihood	Gross Total	R A G	Controls	Residual Impact	Residual Likelihood	Residual Total	R A G
14	Failure to recognise and manage conflicts of interest	4	2	8	A	<ul style="list-style-type: none"> <li>• Declaration of interests are made at the beginning of all statutory meetings where not held on the County Councillor declaration register.</li> <li>• Conflicts of Interest Policy in place for the Local Pension Board.</li> <li>• Committee and Board members are encouraged to undertake the Pension Regulators Toolkit which includes a conflicts of interest module.</li> </ul>	2	2	4	G
15	Pension Fund objectives are not defined and agreed	4	2	8	A	<ul style="list-style-type: none"> <li>• Objectives are agreed as part of the Annual Business Plan and Medium Term Strategy by the Pensions Committee.</li> <li>• Relevant objectives are referenced on every committee report.</li> <li>• Objectives are referenced in all policy documents and the risk register to ensure appropriate focus.</li> </ul>	2	2	4	G

16	Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	3	2	6	G	<ul style="list-style-type: none"> <li>Committee and Board papers are provided for each scheduled meeting, providing relevant information to inform decision making.</li> <li>Papers are subject to appropriate approvals including that of the Monitoring Officer and Section 151 Officer</li> <li>Yearly effectiveness reviews for Committee and Board members are carried out to identify if any changes need to be made to the information delivered.</li> </ul>	2	2	4	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>R A G</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>R A G</b>
17	Pension Fund Investments may not be accurately valued	3	2	6	G	<ul style="list-style-type: none"> <li>The Fund employs a custodian to independently review the fund asset values applied by Fund Managers and these valuations are applied in the year-end financial statements.</li> <li>The year-end financial statements record the Funds asset position and is subject to robust review by external audit.</li> <li>Officers work closely with the Funds Custodian to ensure accuracy of asset valuations.</li> </ul>	2	2	4	G

18	Actual experience materially differs from actuarial assumptions used at each valuation.	3	3	9	A	<ul style="list-style-type: none"> <li>Assumptions and actual experience are analysed through triennial valuations to ensure assumptions remain appropriate.</li> <li>Early engagement with employers.</li> <li>The Investment Sub Committee receives quarterly performance reports provided by recognised industry professionals which considers both strategic and operational aspects of investment.</li> <li>Officers are in partnership with Fund advisers report asset allocation performance quarterly to the Investment Sub Committee.</li> </ul>	2	2	4	G
19	Failure to act appropriately upon expert advice and/or risk of poor advice	4	2	8	A	<ul style="list-style-type: none"> <li>Pension Committee decisions and oversight by the Local Pension Board.</li> <li>Investment consultants and independent advisors appointed via a robust appointment process.</li> <li>Members are encouraged to participate in Skills &amp; Knowledge training with respect to Investments and attend relevant industry conferences. Detailed training records are maintained.</li> </ul>	2	2	4	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>R A G</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>R A G</b>
20	Failure to assess and monitor the financial strength of an employer covenant to ensure employer liabilities are met.	3	3	9	A	<ul style="list-style-type: none"> <li>Assessment of the strength of individual employer covenants in conjunction with the actuary and what bond/guarantor arrangements are in place</li> <li>Close liaison with Employers in managing exit strategy in line with the Admitted bodies, Scheme employers and Transfer Policy.</li> <li>Ensure individual employers are monitored closely to pre-empt when they are likely to cease and put in arrangements to fund cessation on an appropriate basis.</li> </ul>	2	2	4	G

21	Unable to deliver pension services due to an inadequate business continuity plan	3	2	6	G	<ul style="list-style-type: none"> <li>• Business continuity plan in place which includes the ability for staff to work remotely to meet the demands of the service.</li> <li>• Multi skilling across the service for flexibility.</li> <li>• Updated at least annually to ensure remains relevant and up to date.</li> <li>• Part of the LGSS business continuity plan.</li> </ul>	2	2	4	G
22	Unable to deliver pension services due to inadequate recruitment and retention processes.	3	2	6	G	<ul style="list-style-type: none"> <li>• Establishment reporting undertaken monthly to identify any recruitment/retention issues</li> <li>• Recruitment undertaken utilising all available avenues including agency staff</li> <li>• Staff leaving interviewed to understand reason for cessation</li> <li>• Regular performance reporting across all business processes serves as early warning system</li> <li>• Consultancy contracts in place as a backstop</li> </ul>	2	2	4	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>RAG</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>RAG</b>

23	Investment decisions and portfolio management may not maximise returns or be performed in accordance with instructions provided	3	2	6	G	<ul style="list-style-type: none"> <li>• The Fund is compliant with Investment regulations and best practice guidance.</li> <li>• The Fund appoints professional investment advisers to support the Pension Committees investment decisions</li> <li>• The Funds asset allocation is considered by the Actuary when undertaking the triennial valuation.</li> <li>• Investment performance is closely monitored, in particular the Investment Sub Committee receives quarterly performance reports provided by recognised industry professionals highlighting key issues.</li> <li>• The Fund has an appropriate Investment Strategy Statement in place which also addresses Environmental, Social and Governance (ESG) issues.</li> </ul>	3	1	3	G
24	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	3	2	6	G	<ul style="list-style-type: none"> <li>• Automated extraction of data where viable and agreed procedures for reporting.</li> <li>• Robust authorisation protocols in place.</li> <li>• Internal and External audit reviews.</li> <li>• Contributions are reconciled against employer monthly reports and the bank account, which is subject to both internal and external audit review as part of the year end process.</li> <li>• Membership year end reconciliation and investigate variations from the accounting valuations.</li> <li>• Management and administration are maintained in accordance with the SORP and the Financial Regulations.</li> <li>• Data Improvement Policy and Plan are in place.</li> <li>• Anti-Fraud and Corruption Policy in place.</li> <li>•</li> </ul>	3	1	3	G
<b>Risk No</b>	<b>Risk</b>	<b>Gross Impact</b>	<b>Gross Likelihood</b>	<b>Gross Total</b>	<b>R A G</b>	<b>Controls</b>	<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Total</b>	<b>R A G</b>

25	Incorrect/poor quality data held on the Pension Administration and Payroll platforms leading to incorrect information being provided to members and stakeholders.	3	3	9	A	<ul style="list-style-type: none"> <li>• The Data Improvement Policy and Plan are in place.</li> <li>• The Data Improvement Policy and Plan are reviewed at least annually and material amendments approved by the Pensions Committee. The Local Pension Board have oversight of policy reviews.</li> <li>• The Pension Committee and Local Pension Board receive updates against the plan quarterly.</li> </ul>	3	1	3	G
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