

Pension Fund Risk Register 2023/24

Description	Actions in Place	Progress Comment	Risk Category / Rating / DOT	Lead Officer / Committee Member	Date of last review
PEN 01 - Fund assets fail to deliver returns in line with the anticipated returns underpinning valuation of liabilities over the long-term	<ol style="list-style-type: none"> 1. Anticipate long-term return on a relatively prudent basis to reduce risk of failing to meet return expectations. Funding Strategy outlines key assumptions that must be achieved in agreeing rates with employers for a significant chance of successfully meeting the funding target. 2. Analyse progress at three yearly valuations for all employers. 3. Undertake Inter-valuation monitoring. 	<p>With the assistance of Hymans quarterly funding report, the position is kept under regular review and Pension Committee is informed of the impact of prevailing market conditions on the funding level</p> <p>The 2022 initial triennial valuation results show a marginal improvement on the 2019 valuation. Interim valuations currently show an overfunded position.</p> <p>A revised investment strategy has been produced to be robust but now with a tilt to growth.</p> <p>The current position should be viewed with caution as there is still much uncertainty relating to economic growth and inflation, however the objectives of the fund are long term and the portfolio is well positioned to withstand volatility over the long term.</p> <p>Officers are closely monitoring developments and liaising with fund managers and advisors.</p> <p>Member cashflow continues to be monitored.</p>	Strategic risk Likelihood = Significant Impact = Large Rating = C2 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 02 - Inappropriate long-term investment strategy	<ol style="list-style-type: none"> 1. Set Pension Fund specific strategic asset allocation benchmark after taking advice from investment advisers, balancing risk and reward, based on historical data. 2. Keep risk and expected reward from strategic asset allocation under review. 3. Review asset allocation formally on an annual basis. 4. Asset allocation reported quarterly to committee. 5. Officer and advisers actively monitors this risk. 	<p>A separate Officer and Advisor working group regularly monitors the investment strategy and develops proposals for change / adjustment for Pension Committee consideration.</p> <p>The impact of each decision is carefully assessed to ensure that long-term returns are being achieved and are kept in line with liabilities.</p> <p>In May 2021, a new Pension Sub-Group was established to allow Members, advisers and officers to meet regularly and provide a platform for greater oversight and scrutiny of Fund investments.</p> <p>A revised Investment Strategy Statement has been prepared in line with the triennial valuation process.</p>	Strategic risk Likelihood = Low Impact = Large Rating = E2 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 03 - Active investment manager under-performance relative to benchmark	<ol style="list-style-type: none"> 1. The structure includes active and passive mandates and several managers are employed to diversify the risk of underperformance by any single manager. 2. Short term investment monitoring provides alerts on significant changes to key personnel or changes of process at the manager. 3. Regular monitoring measures performance in absolute terms and relative to the manager's index benchmark, supplemented with an analysis of absolute returns against those underpinning the valuation. 4. Investment managers would be changed following persistent or severe under-performance. 	<p>The Fund is widely diversified, limiting the impact of any single manager on the Fund.</p> <p>Active monitoring of each manager is undertaken with Advisors and Officers meeting managers on a quarterly basis and communicating regularly.</p> <p>The LCIV as pool is increasingly managing more assets on the funds behalf as per regulation. The Fund is working closely with LCIV regarding oversight reporting to aid Committee assessment.</p> <p>Comments on whether mandates should be maintained or reviewed are included quarterly and where needed specific performance issues will be discussed and reviewed.</p> <p>Action is taken to remove under-performing managers where appropriate.</p>	Strategic risk Likelihood = Low Impact = Small Rating = E4 (Static)	James Lake / Cllr Mathers	26/03/24

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PEN 04 - Inflation - Pay and price inflation significantly more than anticipated	<p>1. The focus of the actuarial valuation process is on real returns on assets, net of price and pay increases. The actuarial basis examines disparity between the inflation linking which applies to benefits of Deferred and Pensioner members as well as the escalation of pensionable payroll costs which only applies to active members, and on which employer and employee contributions are based.</p> <p>2. Inter-valuation monitoring gives early warning and investment in index-linked bonds also helps to mitigate this risk.</p> <p>3. Employers pay for their own salary awards and are reminded of the geared effect on pension liabilities of any bias in pensionable pay rises towards longer-serving employees.</p> <p>4. Covenant's are in place with security of a guarantee or bond for admission agreements.</p> <p>5. Inter-valuation monitoring gives early warning.</p> <p>6. Investment in index-linked bonds helps to mitigate this risk.</p> <p>7. Contribution rate setting as part of the triennial valuation process considers 5000 scenarios in achieving a fully funded position.</p>	<p>The impact of pay and price inflation is monitored as part of the Council's MTFF processes and any potential impact on pension fund contributions is kept under review and factored into the Council's overall position.</p> <p>The impact of inflation is reviewed through all strategic investment decision making, however inflation risk is diminishing as rates fall. The increase in interest rates to counter inflation has had a positive effect on the Fund valuation.</p> <p>Inflation linked investments form part of the investment strategy and are aimed at balancing this risk and protecting against the impact of inflation.</p> <p>Ongoing monitoring of inflation forms part of business as usual activities.</p> <p>The Fund's cashflow is constantly monitored and additional cash requirements are factored into the Investment Strategy.</p>	Strategic risk Likelihood = Significant Impact = Large Rating = C2 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 05 - Pensioners living longer	<p>1. Mortality assumptions are set with some allowance for future increases in life expectancy. Sensitivity analysis in triennial valuation helps employers understand the impact of changes in life expectancy.</p> <p>2. Club Vita monitoring provides fund specific data for the valuation, enabling better forecasting.</p>	<p>The Fund is part of Club Vita, a subsidiary of the Fund Actuary, which monitors mortality data and feeds directly into the valuation.</p> <p>Results also feed into the quarterly funding position which is reported to and assessed by Committee Members and officers.</p>	Strategic risk Likelihood = Low Impact = Small Rating = E4 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 06 - Poor Performance of Outsourced Administrator leading to poor quality information supplied to both members and the Fund Actuary	<p>1. New partnership in place with HCC.</p> <p>2. Regular service meetings in place.</p> <p>3. Monthly KPI reports are provided to track and monitor performance.</p> <p>4. Critical errors cleared prior to transfer of valuation data to actuary.</p> <p>5. Data Improvement plan will be developed and implemented in 2022.</p>	<p>Regular meetings will take place between HCC & LBH to ensure the new partnership is working in accordance with expectations and that any issues are addressed. Performance against KPI's and other metrics are also discussed.</p> <p>KPI's have been at 100% since partnership inception and all other levels of service, reporting and interaction have been positive and pro-active.</p> <p>HCC attend and report directly at Committee and Board meetings to allow first-hand scrutiny.</p>	Strategic risk Likelihood = Low Impact = Large Rating = E2 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 7 - Cyber Security - Pension schemes hold large amounts of personal data and assets which can make them a target for fraudsters and criminals	<p>1. Council wide policies and processes in place around: acceptable use of devices, email and internet use of passwords and other authentication home and mobile working data access, protection (including encryption), use and transmission of data.</p> <p>2. Risk is on the Corporate risk register with risk mitigation in place.</p> <p>3. All member and transactional data flowing from HCC and Hillingdon is sent via encryption software or via the employer portal.</p> <p>4. Data between the fund, HCC and Hyman's is distributed via upload to an encrypted portal.</p> <p>5. Systems at Hillingdon and HCC are protected against viruses and other system threats.</p> <p>6. HCC are accredited to ISO27001:2013 and signed up to the Pensions Regulator Pensions Pledge. HCC currently undergoing penetration testing to ensure they are PSN compliant.</p>	<p>This risk has been recognised in response to recommendations by the Pensions Regulator and work carried out by Pensions Board</p> <p>A Data Mapping exercise has been carried out to understand data transfers and risks in this area. The results and undergone an Internal Audit assessment with a reasonable assessment level applied. Recommendations from the audit have been implemented.</p> <p>As a result of work with the Pensions Board in gaining assurance in this area the fund will create a policy to ensure a sufficient action plan is in place.</p> <p>The Fund recently participated in the AON LGPS cyber scorecard exercise which is a high level assessment of the Fund's cyber resilience. The results show the Hillingdon Fund is generally either average or above average. No immediate concerns were highlighted.</p> <p>HCC has a number of cyber controls in place, upgraded the member portal security and has produced a cyber compliance statement which sets out for all partners the controls they have in place and detailing areas of improvement. HCC continue with their programme of security updates.</p> <p>HCC apply a policy of continuous improvement as evidenced in their IT improvement road plan. Twice yearly PEN testing is now fully embedded.</p> <p>The latest HCC internal audit report on cyber security has been issued in 2023.</p>	Strategic risk Likelihood = Medium Impact = Large Rating = D2 (Static)	James Lake / Cllr Mathers	26/03/24

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PEN 8 - ESG - Risk of financial loss through the negative impact of ESG matters	<ol style="list-style-type: none"> The fund have an ESG policy in place as part of the ISS. Active equities within fossil fuel sector have been assessed in relation to the Transition pathway analysis tool to identify those companies transitioning to a lower carbon world. Manager selections take into account ESG policy. Managers are expected to be signed up to the stewardship Code. Managers are expected to have signed up to the UN Principles for Responsible Investment (UK PRI) ESG Issues are discussed with managers at review meetings. The Fund submitted its application report for the new 2020 UK Stewardship Code ahead of the April 2022 deadline. The Fund has signed up to support TCFD. 	<p>The Pensions Committee has created a stand alone RI policy which supports principles and implementation of the investment portfolio. The policy is a live document and is regularly.</p> <p>The Fund actively invests in portfolios with an ESG tilt, including the LGIM Future World Global Index and the LCIV Global Alpha Paris Aligned Fund. These actions have considerably reduced the carbon metric of the Fund.</p> <p>The Fund aims to work towards UN SDG 7 & 13 objectives and will start to report on complementing TCFD metrics. The Fund will also collaborate and has signed up to TCFD. The Fund has agreed to being reporting against TCFD.</p> <p>The Fund was granted UK Stewardship Code signatory status in September 2022 and again in August 2023.. The fund however has decided not proceed with the 2024 application. The Fund will respond to a consultation issued by the FRC regarding the Code.</p> <p>In March 2023 the fund joined LAPFF to bolster engagement on ESG issues.</p>	Strategic risk Likelihood = Medium Impact = Medium Rating = D3 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 9 - Liquidity on asset management risk of failure to liquidate assets or meet drawdown calls	<ol style="list-style-type: none"> The fund has an active daily cash management process in place to ensure there is sufficient cash available to meet any drawdown requirements. Cash management includes investing large amounts of surplus cash to balance the investment portfolio or hold in liquid asset classes in anticipation of cash calls. Officers liaise with managers where commitments have been made to keep track of predicted drawdown timescales. The fund is significantly diversified in different asset classes and asset managers to ensure if there is a stop on any one holding then the portfolio will continue to operate as normal. 	<p>There is a detailed cash management process in place. This is signed off daily to ensure liquidity.</p> <p>The fund continues to invest in illiquid asset classes to benefit from illiquidity premium, however this is a relatively small portion of the portfolio and there are other liquid asset classes easily accessible. All trade times are listed in the cash management policy.</p> <p>The Fund has sufficient liquidity should it need to draw on investments or divert income to settle trades.</p>	Strategic risk Likelihood =Low Impact = Large Rating = E2 (Static)	James Lake / Cllr Mathers	26/03/24
Pen 10 - Liquidity on members dealings - risk that the fund is unable to settle member payments	<ol style="list-style-type: none"> The fund has an active daily cash management process in place to ensure there is sufficient cash available to meet all beneficiary payments. The fund is significantly diversified in different asset classes with the option of distribution portfolios. 	<p>There is a detailed cash management process in place. This is signed off daily to ensure liquidity.</p> <p>The fund continues to invest in illiquid asset classes to benefit from illiquidity premium, however this is a relatively small portion of the portfolio and there are other liquid asset classes easily accessible. All trade times are listed in the cash management policy.</p> <p>The Fund has sufficient liquidity should it need to draw on investments or divert income.</p> <p>As part of the Investment Strategy Review options are being discussed to bolster operational income and set out funding streams for any changes in the investment portfolio.</p>	Strategic risk Likelihood =Low Impact = Medium Rating = E3 (Static)	James Lake / Cllr Mathers	26/03/24

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PEN 11 - Failure of the pool in management of funds / access to funds	<ol style="list-style-type: none"> Quarterly review meetings held with the pool. Regular reporting out of the pool informing the fund of manager performance. Swift communications received from the pool with staff turnover and concerns the fund may need to be aware. Independent adviser carried out a review of governance for manager selection and manager monitoring to add assurance and discussion points with the pool. Active Shareholder representation at General meeting and AGM. Pool to attend Committee meetings where required, to provide assurance over progress and activity. 	<p>Aoifinn Devitt has been appointed as new LCIV CIO. It is expected Aoifinn will during 2024 meet the Committee so she may introduce herself and so the Committee may ask any questions.</p> <p>Governance remains high on the agenda and Hillingdon have been key in forging improvements. There has been positive progress by LCIV and promised governance improvements have largely been implemented.</p> <p>The Hillingdon Fund has taken the lead in actively managing its underlying Pool investments with action being taken when necessary.</p> <p>LCIV continue to develop a pipeline of investment offerings based on client demand. The Value Equity offering is due to be available around the end of Q2 2024.</p> <p>New shareholder agreement and articles of association signed by all relevant parties 10 May 2023. The FCA and LCIV auditors have been advised. FCA has approved.</p> <p>Key items to note following the release of the Pooling consultation include the requirement for Pools to be a minimum £50b in size. LCIV are to provide update as they are unlikely to meet this critical mass. LCIV need to create vehicles to allow for the new levelling up and private equity allocations. Note potential conflict with fiduciary duty.</p>	Strategic risk Likelihood = Low Impact = Small Rating = E4 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 12 - Failure of the Fund's governance to comply with statutory requirements and/or The Pension Regulator expectations including: Failure to ensure that Committee members' knowledge and understanding of pension matters is robust and meets statutory requirements Failure to ensure that the Pension Board is effective in carrying out its role	<ol style="list-style-type: none"> Governance Policy Statement, reviewed every 3 years. Policies on range of issues, reviewed regularly. Compliance with CIPFA Code of Practice on Public Sector Pensions Finance, Knowledge and Skills. Programme of training sessions and access to external events. Use of Regulator's on-line toolkit. A knowledge self-assessment framework for Committee and Board members to identify training requirements. The Fund's Annual Report includes details of Committee and Board members' training activities. Fund Governance Adviser in place. Access is provided to CIPFA K&S Framework training modules. 	<p>The Fund has undergone a COP14 Governance review and implementing changes to be either fully or partially compliant. Regular monitoring is required to ensure this is maintained. Updates are presented at Pensions Board.</p> <p>Committee and Board members receive regular training and specific training aligned with decision making where required. Training logs are to be brought to Pensions Committee & Board with a mandatory training plan in place.</p> <p>Mandatory training, in line with the CIPFA K&S Framework, is to be undertaken by all Committee members. A knowledge and skills assessment took place with result being discussed in Q1 2024. A training plan has been developed in line with the assessment and Fund requirements.</p> <p>The fund has a schedule of policies in place to ensure reviews are carried out at the required intervals.</p> <p>Reviewed Pension Board's Terms of Reference were approved by Council and a new Operations Manual has been developed. Maximum tenure and staggered terms are to be put in place to allow for smooth succession planning.</p> <p>The Fund will monitor progress on the Regulator's new combined Code of Practice and implications of Scheme Advisory Board's Good Governance recommendations. Work will begin in terms of a gap analysis against the new code.</p>	Strategic risk Likelihood = Low Impact = Very Large Rating = E1 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 13 - Key officer risk - small team with specialists knowledge in key roles results in the Fund being vulnerable if staff leave	<ol style="list-style-type: none"> The team endeavours to maintain a broad knowledge across the pension function. The Fund has access to specialist support should it be required. The Fund has access to the interim employment market should it be required. 	Succession planning is underway to bolster knowledge.	Strategic risk Likelihood = Medium Impact = Small Rating = D4 (Static)	James Lake / Cllr Mathers	26/03/24
PEN 14 - Failure of employers to deliver accurate and timely employee administration information	<ol style="list-style-type: none"> Training provided to educate and empower employers. Regular updates at Schools' Forum on the importance of accurate and timely information. Regular newsletters and update from Hampshire. Benchmarking and escalation to Head Teachers. Regular meetings with payroll providers on behalf of schools to escalate and manage backlog work.. 	<p>Work continues as described to embed good behaviour.</p> <p>Director of SEND and Education will include pension matters in regular briefings.</p> <p>Board members may begin to visit Head Teachers in person to escalate.</p> <p>24/25 benchmarking to assess progress and highlight delinquent offenders.</p> <p>Consideration to report repeat offender to the Pension Regulator.</p>	Strategic risk Likelihood = High. Impact = Large Rating = B2 (New)	James Lake / Cllr Mathers	26/03/24