














London Borough of Hammersmith and Fulham Pension Fund Risk Register - Administration Risk													
Risk Group	Risk Ref.	Movement	Risk Description	Impact				Likelihood	Total risk score	Mitigation actions	Revised likelihood	Total risk score	Reviewed on
				Fund	Employers	Reputation	Total						
Admin	1	NEW	After agreeing on changing the fund's pensions administration provider at the same time as bringing back the retained pensions team in house, the pension fund may experience difficulty in finding an appropriately qualified candidate in a competitive recruitment market. A private sector solution may not meet the necessary service requirements.	4	3	3	10	5	50	TREAT 1) A task force of key stakeholders has been assembled. Officers to feed into the internal processes necessary for the setup of an effective retained pensions team 2) Recruitment is underway for the pensions manager of the retained team 3) Officers to receive a handover pack from the departing RBKC retained pensions team. 4) Consultant to assist in recommending an appropriate replacement for the third-party administration provider.	4	40	10/09/2020
Admin	2		COVID-19 affecting the day to day functions of the Pensions Administration services including customer telephony service, payment of pensions, retirements, death benefits, transfers and refunds.	2	4	3	9	3	27	TOLERATE 1) The Pensions Administration team have shifted to working from home 2) The administrators have prioritised death benefits, retirements including ill health and refunds. If there is any spare capacity the administrators will prioritise transfers and divorce cases. 3) Revision of processes to enable electronic signatures and configure the telephone helpdesk system to work from home.	3	27	10/09/2020
Admin	3		Administrators do not have sufficient staff or skills to manage the service leading to poor performance and complaints.	1	3	3	7	4	28	TOLERATE 1) Officers to continue monitor the ongoing staffing changes at Surrey CC. 2) Ongoing monitoring of contract and KPIs	3	21	10/09/2020
Admin	4		Structural changes in an employer's membership or an employer fully/partially closing the scheme. Employer bodies transferring out of the pension fund or employer bodies closing to new membership. An employer ceases to exist with insufficient funding or adequacy of bond placement.	5	3	1	9	3	27	TREAT 1) Administering Authority actively monitors prospective changes in membership. 2) Maintain knowledge of employer future plans. 3) Contributions rates and deficit recovery periods set to reflect the strength of the employer covenant. 4) Periodic reviews of the covenant strength of employers are undertaken and indemnity applied where appropriate. 5) Risk categorisation of employers planned to be part of 2019 actuarial valuation. 6) Monitoring of gilt yields for assessment of pensions deficit on a termination basis.	2	18	10/09/2020
Admin	5		Failure of fund manager or other service provider without notice resulting in a period of time without the service being provided or an alternative needing to be quickly identified and put in place.	5	2	2	9	2	18	TREAT 1) Contract monitoring in place with all providers. 2) Procurement team send alerts whenever credit scoring for any provider changes for follow up action. 3). Officers to take advice from the investment advisor on fund manager ratings and monitoring investment	2	18	10/09/2020
Admin	6		Concentration of knowledge in a small number of officers and risk of departure of key staff.	2	2	3	7	3	21	TREAT 1) Process notes are in place. 2) Development of team members and succession planning improvements to be implemented. 3) Officers and members of the Pension Fund Committee will be mindful of the proposed CIPFA Knowledge and Skills Framework when setting objectives and establishing training needs.	2	14	10/09/2020

Admin	7		Incorrect data due to employer error, user error or historic error leads to service disruption, inefficiency and conservative actuarial assumptions.	4	4	3	11	2	22	<p><b>TREAT</b></p> <p>1) Update and enforce admin strategy to assure employer reporting compliance.</p> <p>2) Implementation and monitoring of a Data Improvement Plan as part of the Service Specification between the Fund and Orbis.</p> <p><b>TOLERATE</b></p> <p>1) Northern Trust provides 3rd party validation of performance and valuation data. Admin team and members can interrogate data to ensure accuracy.</p>	1	11	10/09/2020
Admin	8		Loss of funds through fraud or misappropriation leading to negative impact on reputation of the Fund as well as financial loss.	3	2	5	10	2	20	<p><b>TREAT</b></p> <p>1) Third parties regulated by the FCA and separation of duties and independent reconciliation processes are in place.</p> <p>2) Review of third party internal control reports.</p> <p>3) Regular reconciliations of pensions payments undertaken by Pension Finance Team.</p> <p>4) Periodic internal audits of Pensions Finance and HR Teams.</p>	1	10	10/09/2020
Admin	9		Non-compliance with regulation changes relating to the pension scheme or data protection leads to fines, penalties and damage to reputation.	3	3	2	8	2	16	<p><b>TREAT</b></p> <p>1) The Fund has generally good internal controls regarding the management of the Fund. These controls are assessed on an annual basis by internal and external audit as well as council officers.</p> <p>2) Through strong governance arrangements and the active reporting of issues, the Fund will seek to report all breaches as soon as they occur in order to allow mitigating actions to take place to limit the impact of any breaches.</p>	1	8	10/09/2020
Admin	10		Failure of financial system leading to lump sum payments to scheme members and supplier payments not being made and Fund accounting not being possible.	1	3	4	8	2	16	<p><b>TREAT</b></p> <p>1) Contract in place with HCC to provide service, enabling smooth processing of supplier payments.</p> <p>2) Process in place for Surrey CC to generate lump sum payments to members as they are due.</p> <p>3) Officers undertaking additional testing and reconciliation work to verify accounting transactions.</p>	1	8	10/09/2020
Admin	11		Inability to respond to a significant event leads to prolonged service disruption and damage to reputation.	1	2	5	8	2	16	<p><b>TREAT</b></p> <p>1) Disaster recovery plan in place as part of the service specification between the Fund and Surrey County Council</p> <p>2) Ensure system security and data security is in place</p> <p>3) Business continuity plans regularly reviewed, communicated and tested</p> <p>4) Internal control mechanisms ensure safe custody and security of LGPS assets.</p> <p>5) Gain assurance from the Fund's custodian, Northern Trust, regarding their cyber security compliance.</p>	1	8	10/09/2020
Admin	12		Poor reconciliation process leads to incorrect contributions.	2	1	1	4	3	12	<p><b>TREAT</b></p> <p>1) Reconciliation is undertaken by the pension fund team. Officers to ensure that reconciliation process notes are understood and applied correctly the team.</p> <p>2) Ensure that the Pension Fund team is adequately resourced to manage the reconciliation process.</p>	2	8	10/09/2020
Admin	13		Failure of pension payroll system resulting in pensioners not being paid in a timely manner.	1	2	4	7	2	14	<p><b>TREAT</b></p> <p>1) In the event of a pension payroll failure, we would consider submitting the previous months BACS file to pay pensioners a second time if a file could not be recovered by the pension administrators and our software suppliers.</p>	1	7	10/09/2020
Admin	14		Failure to detect material errors in bank reconciliation process.	2	2	2	6	2	12	<p><b>TREAT</b></p> <p>1) Pensions team to continue to work closely with staff at HCC to smooth over any teething problems relating to the newly agreed reconciliation process.</p>	1	6	10/09/2020

Admin	15		Failure to pay pension benefits accurately leading to under or over payments.	2	2	2	6	2	12	TREAT 1) There are occasional circumstances where under/over payments are identified. Where underpayments occur, arrears are paid as soon as possible, usually in the next monthly pension payment. Where an overpayment occurs, the member is contacted, and the pension corrected in the next month. Repayment is requested and sometimes this is collected over several months.	1	6	10/09/2020
Admin	16		Unstructured training leads to under developed workforce resulting in inefficiency.	2	2	2	6	2	12	TREAT 1) Implementation and monitoring of a Staff Training and Competency Plan as part of the Service Specification between the Fund and Surrey County Council. 2) Officers regularly attend training seminars and conferences 3) Designated officer in place to record and organise training sessions for officers and members	1	6	10/09/2020
Admin	17		Failure of pension administration system resulting in loss of records and incorrect pension benefits being paid or delays to payment.	1	1	1	3	3	9	TREAT 1) Pension administration records are stored on the Surrey CC servers who have a disaster recovery system in place and records should be restored within 24 hours of any issue. 2) All files are backed up daily.	2	6	10/09/2020
Admin	18		Failure to identify GMP liability leads to ongoing costs for the pension fund.	3	2	1	6	1	6	TREAT 1) GMP to be identified as a Project as part of the Service Specification between the Fund and Surrey County Council.	1	6	10/09/2020
Admin	19		Lack of guidance and process notes leads to inefficiency and errors.	2	2	1	5	2	10	TREAT 1) The team will continue to ensure process notes are updated and circulated amongst colleagues in the Pension Fund and Administration teams.	1	5	10/09/2020
Admin	20		Lack of productivity leads to impaired performance.	2	2	1	5	2	10	TREAT 1) Regular appraisals with focused objectives for pension fund and admin staff.	1	5	10/09/2020
Admin	21		Rise in ill health retirements impact employer organisations.	2	2	1	5	2	10	TREAT 1) Engage with actuary re assumptions in contribution rates.	1	5	10/09/2020
Admin	22		Rise in discretionary ill-health retirements claims adversely affecting self-insurance costs.	2	2	1	5	2	10	TREAT 1) Pension Fund monitors ill health retirement awards which contradict IRMP recommendations.	1	5	10/09/2020