

**Summary of Pension Fund Risks**

**Introduction**

The purpose of this document is to assess the risk associated with the RCT Pension Fund and to outline the control measures in place.

**Key to scoring**

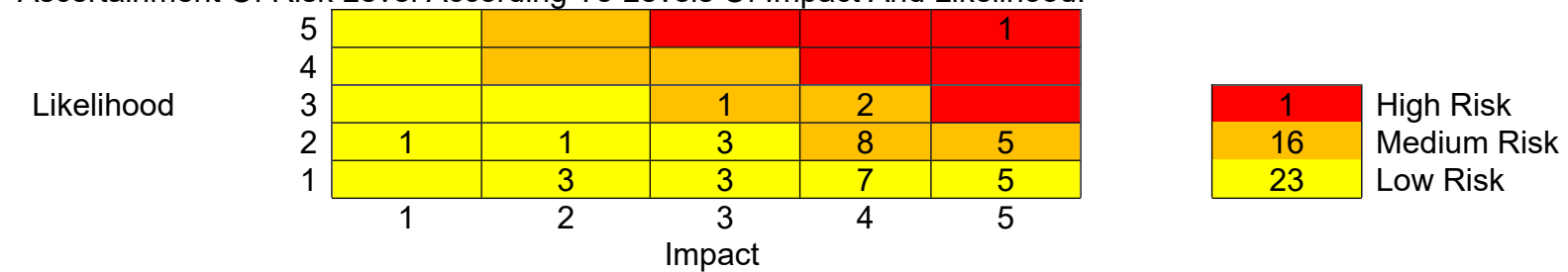
Likelihood Assessment Matrix:

Factor	Score	Indicators
Almost certain	5	99% likely to happen or has happened on a regular basis over the last 12 months
Very likely	4	75% likely to happen or has happened at least once or twice in the last 12 months
Likely	3	50% likely to happen or has happened once or twice in the last 24 months
Unlikely	2	20% likely to happen or has happened once or twice in the last 5 years
Highly unlikely	1	5% likely to happen or hasn't happened within the last 5 years

Impact Assessment Matrix:

Risk	Score
Major	5
High	4
Moderate	3
Minor	2
Trivial	1

Ascertainment Of Risk Level According To Levels Of Impact And Likelihood:



**Overarching Fund Objective – to ensure Fund assets are sufficient to meet Fund liabilities in the short, medium and long term**

Risk Category	Risk Description	IMPACT	LIKELIHOOD	RATING		Control Measure	Comments on changes in risk rating March 2024 qtr
Funding	Long term investment strategy unable to meet the objective of funding liabilities.	5	2	10	MR	<ul style="list-style-type: none"> <li>Monitoring of funding position, reporting on the funding levels produced by the actuaries.</li> <li>Monitoring of the adopted asset / liability model.</li> <li>Monitoring the remedies of the McCloud case and ensuring appropriate provision is made against the Fund's liabilities.</li> </ul>	
	Sub-optimal asset allocation throughout the portfolio.	4	2	8	MR	<ul style="list-style-type: none"> <li>The investment strategy is reviewed and adopted by the Pension Fund Committee.</li> <li>Regular review of the asset allocation strategy by the Committee (with advice from the Advisory Panel), covering both the fund strategy and the asset allocation.</li> <li>Post 2022 valuation review.</li> </ul>	
	Actuarial assumptions are not met. e.g. discount rate, life expectancy assumptions.	4	3	12	MR	<ul style="list-style-type: none"> <li>Agree and set prudent assumptions in conjunction with the appointed Fund Actuary, based on past trends, forecasts, longevity modelling.</li> <li>Adhere to triennial valuations.</li> <li>Monitor performance against assumptions, consider Interim Valuations where necessary.</li> <li>Monthly monitoring of Pension Fund investment valuation given the uncertainty in markets due to economic volatility.</li> <li>Receive regular Actuarial Funding updates.</li> </ul>	
	Increases in Employer contributions.	4	2	8	MR	<ul style="list-style-type: none"> <li>Participate in LGPS Scheme design consultation.</li> <li>Engage with Employers during and between Valuation cycles, particularly during times of organisational change e.g. downsizing, outsourcing.</li> <li>Ensure adequate securities / guarantees are in place where possible and that consequential risk is fully communicated to relevant parties.</li> </ul>	
	Potential for 'Cashflow Negativity'	4	2	8	MR	<ul style="list-style-type: none"> <li>Regularly monitor cashflow impact position as contributions reduce.</li> <li>Ensure sufficient income generation/liquid assets are available.</li> <li>Regularly review Asset Strategy and adjust as necessary.</li> </ul>	

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	Detrimental changes to the maturity of fund membership. As the scheme matures the ratio of pensioner / deferred pensioner to active employees increases.	4	2	8	MR	<ul style="list-style-type: none"> <li>Monitor carefully through the valuation cycle. Ensure the investment strategy reflects current and forecast Fund maturity.</li> <li>Actively participate in pension consultation, giving due consideration to any proposals that may have a disproportional impact on scheme 'opt out' rates.</li> </ul>	
Investments	Financial Market suppressed by economic climate, national / global austerity measures and Geo-political instability.	5	5	25	HR	<ul style="list-style-type: none"> <li>Long-term funding plan with a diverse range of asset classes and Fund Manager styles.</li> <li>Panel clearly understand the impact of market conditions on asset classes and fund manager performance.</li> <li>Panel monitor and scrutinise performance, market conditions and forecasts.</li> <li>Continue to monitor the potential implications of Brexit.</li> <li>Material economic and financial risk of infectious diseases.</li> </ul>	
	Failure to adequately take into account climate change, climate risk and ESG factors resulting in the financial loss.	3	2	6	LR	<ul style="list-style-type: none"> <li>The Fund's Responsible Investment Policy is contained within the Investment Strategy Statement and available on the Pension Fund web-site.</li> <li>Appointment of a voting engagement provider to monitor fund managers voting and engagement held outside the WPP.</li> <li>Appointment of a proxy voting engagement provider by the WPP, who engages with managers and companies on climate change, climate risk and ESG factors.</li> <li>Panel engages and challenges fund managers on how they account for ESG factors.</li> <li>Participation in training and development when available.</li> </ul>	
	Custody arrangements may not be sufficient to safeguard pension fund assets.	4	2	8	MR	<ul style="list-style-type: none"> <li>An agreement is in place between the custodian and Pension Fund.</li> <li>Monthly reconciliations are carried out to check external custodian records.</li> <li>Funds held in the name of the Pension Fund or the WPP, not the Fund Manager nor the Custodian.</li> </ul>	

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	Investment returns fail to meet agreed targets.	4	2	8	MR	<ul style="list-style-type: none"> <li>Regular monitoring of investment returns.</li> <li>Advisory Panel review and challenge of fund manager performance against their benchmarks and targets.</li> <li>Use advisors to support the monitoring and challenge of fund managers.</li> <li>Where performance issues arise, put more targeted review and challenge arrangements in place.</li> <li>Monitor individual fund managers performance and address where necessary by closer monitoring and scrutiny.</li> </ul>	
	Adverse impact of the transition of the Pension Fund's assets into the Wales Pension Partnership pooling	4	2	8	MR	<ul style="list-style-type: none"> <li>Effective governance arrangements of the Joint Governance Committee and Officer Working Group.</li> <li>Key role undertaken by the Joint Governance Committee at transition process.</li> <li>Ensure operator establishes a tax efficient UK collective investment vehicle.</li> <li>Ensure the appropriate 'wrappers' for the investments in illiquid assets.</li> </ul>	
	Investments are not carried out by the fund manager in accordance with instructions given by the Pension Fund.	3	2	6	LR	<ul style="list-style-type: none"> <li>Investment assets and transactions are monitored in-house.</li> <li>Investment management fees are monitored on a quarterly basis.</li> <li>Investment malpractices are reported to the FCA.</li> </ul>	
	Pension fund investments may not be accurately valued.	4	1	4	LR	<ul style="list-style-type: none"> <li>Investments are valued using correct prices obtained by fund managers from independent third party agencies.</li> </ul>	
	Fund managers may not have the appropriate control framework in place to protect pension fund assets.	4	1	4	LR	<ul style="list-style-type: none"> <li>Agreements are in place between fund managers and the Pension Fund.</li> <li>Portfolios are managed in accordance with the investment objectives.</li> <li>Monthly reconciliations are carried out to check portfolios against administering authority records.</li> <li>Third parties provide the Pension Fund with an annual internal control report, which provides assurance.</li> <li>FCA regulated.</li> <li>Fund managers have robust arrangements in place to manage mandates.</li> </ul>	

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	Fund manager mandate restrictions and benchmarks constrain returns.	3	1	3	LR	<ul style="list-style-type: none"> <li>Obtain advice from advisors.</li> <li>Obtain advice from performance measurement company.</li> </ul>	
Governance	On-going pooling arrangements as required by central government.	5	2	10	MR	<ul style="list-style-type: none"> <li>Joint Governance Committee and Officer Working Group has been formally constituted.</li> <li>Establishment of sub groups of the WPP for specialisation.</li> <li>Wales Pension Partnership's CIV proposal approved by FCA on 24<sup>th</sup> July 2018, further submissions approved to allow for the development of additional sub funds.</li> <li>External 'Operator' appointed by WPP.</li> <li>Participation on consultation papers.</li> <li>Engagement with local pension boards.</li> <li>Creation of sub funds continues to be effectively progressed.</li> <li>Pension Board Engagement days held to update Pension Board Chairs and provide feedback.</li> <li>Development of appropriate business plans, policies and procedures.</li> <li>Scheme Member Representative co-opted as a non voting member of the JGC meetings, feeding back to Pension Board Chairs.</li> <li>Assets held outside the Pool are for the Fund's cashflow requirements and illiquid asset transition opportunities.</li> </ul>	Amended to reflect the Chancellor's target that all assets should be pooled by March 2025
	Failure to comply with LGPS Governance Regulation / Pension Regulator Code of Practice.	5	1	5	LR	<ul style="list-style-type: none"> <li>Fund Governance Compliance Statement is reviewed and published annually.</li> <li>The Fund's 'Pension Board' became effective from 1st April 2015.</li> <li>The Fund has a Breaches policy.</li> <li>Review the Investment Strategy Statement annually in accordance with MHCLG (now Department for Levelling Up, Housing and Communities) guidance.</li> <li>Benchmark against regulator on code of practice.</li> <li>Submit Annual Pension Scheme Regulator Return on time.</li> <li>Good governance review currently being considered by Department for Levelling Up, Housing and Communities.</li> <li>Participation on consultation papers.</li> <li>Gap analysis being undertaken following receipt of The Pensions Regulator General Code</li> </ul>	The Pensions Regulator General Code laid in Parliament 10th January 2024 and expected to come into force 27 <sup>th</sup> March 2024.
	Members, officers and advisors do not have the right knowledge or skills.	4	1	4	LR	<ul style="list-style-type: none"> <li>The Pension Fund has adopted the CIPFA knowledge and skills framework.</li> <li>The Pension Fund Skills and Knowledge framework is reviewed at each Investment and Administration Advisory Panel, Pension Committee and Pension Board.</li> <li>The Pension Fund subscribes to relevant professional bodies, e.g. LAPFF.</li> </ul>	

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	Loss of reputation.	2	2	4	LR	<ul style="list-style-type: none"> <li>The Fund holds Annual General Meetings, Communication Forums, seminars and training both directly and through the WPP.</li> <li>The Fund has a dynamic website responding to stakeholder requirements.</li> <li>Knowledgeable and professional staff.</li> <li>Meetings are held regularly with the Fund's employer authorities.</li> <li>Benefit statements are sent out annually to members by 31<sup>st</sup> August.</li> <li>Monitoring the policy on voting decisions and the impact should UK shareholder lose voting rights in EU companies.</li> <li>Annual reports are produced by 1<sup>st</sup> December.</li> <li>The Fund's Responsible Investment Policy is contained within the Investment Strategy Statement and available on the Pension Fund web-site - <a href="https://www.rctpensions.org.uk/EN/GovernanceAndInvestment/Investments.aspx">https://www.rctpensions.org.uk/EN/GovernanceAndInvestment/Investments.aspx</a></li> <li>The Pension Fund's passive equities are invested in a low carbon product.</li> <li>External Audit and Governance and Audit Committee.</li> </ul>	
	Conflicts of Interest arise.	3	1	3	LR	<ul style="list-style-type: none"> <li>Declarations to be made by Advisory Panel Members, Pension Board Members and Pension Committee Members.</li> <li>Director of Legal &amp; Democratic Services maintains a Register of Interests.</li> <li>Fund Governance Policy.</li> <li>Employer / Member Engagement – Communication Policy.</li> <li>Transparency – published audited accounts, Valuation, Annual Report, etc.</li> </ul>	
	Failure to comply with the Myners Statement of Investment Principles.	2	1	2	LR	<ul style="list-style-type: none"> <li>The Statement is reviewed annually by the Advisory Panel and approved by the Pension Committee.</li> </ul>	
Operational	Loss of key staff / expertise.	4	3	12	MR	<ul style="list-style-type: none"> <li>Job descriptions and person specifications.</li> <li>Dynamic training program.</li> <li>Workforce planning arrangements in place.</li> <li>All staff are currently working on a hybrid basis in line with the needs of the service.</li> <li>Training and retaining of specialists in a challenging recruitment market.</li> </ul>	

Risk Category	Risk Description	IMPACT	LIKELIHOOD	RATING		Control Measure	Comments on changes in risk rating March 2024 qtr
	Compliance with data quality regulation and best practice.	5	2	10	MR	<ul style="list-style-type: none"> <li>Data Improvement Plan in place.</li> <li>Good relationships / communication with Employers.</li> <li>Ensure timely notification by Fund Employers of new starters, changes and leavers.</li> <li>Issue annual benefit statements to scheme members for review.</li> <li>Breaches policy in place.</li> <li>Mandatory rollout of I-connect, monthly data submissions.</li> <li>Monthly Data Screening.</li> <li>Common and Scheme Specific Data reviews / scoring.</li> <li>Scheme Member Self Serve validation available.</li> <li>Fund participation in the National 'Tell us Once Service'.</li> <li>TPR Annual Scheme Return and data score.</li> <li>Membership data is hosted in the UK.</li> </ul>	
	Inability to implement the 'McCloud' remedies within expected timelines	5	2	10	MR	<ul style="list-style-type: none"> <li>Project Team established.</li> <li>Investment in team resources.</li> <li>Data retrospection solutions discussed and agreed through the Fund's Employer Comms Forum.</li> <li>Apply and monitor the impact of the remedy regulations (as changed from 01<sup>st</sup> October 2023)</li> <li>Early engagement with Pensions Software Supplier.</li> <li>Sharing best practice through the various LGPS forums.</li> </ul>	
	Inability to comply with Pension Dashboard Staging Dates and Duties	4	1	4	LR	<ul style="list-style-type: none"> <li>Connection deadline for public service schemes is to be agreed and will be prior to October 2026 – Government announced in March 2023 that it intends to legislate to amend the staging timetable.</li> <li>Updates from industry bodies regarding staging deadlines and requirements reviewed.</li> <li>Existing software provider, Heywood, to be used as Integrated Service Provider (ISP).</li> <li>Data cleansing exercises ahead of staging date.</li> <li>Resource to be allocated and processes to be implemented to deal with member queries arising from use of dashboards.</li> <li>Regular progress updates are provided to the Fund's governance groups.</li> </ul>	



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	Cyber security breach of the Fund's pension system and personal data contained.	5	2	10	MR	<ul style="list-style-type: none"> <li>• Third Party supplier – cyber reliance controls.</li> <li>• Controls and environment maintained and regularly reviewed in line with Council's standards. Internal controls include, appropriate password and access conventions, firewalls, virus and malware protection, data encryption requirements.</li> <li>• Annual control review or more frequent depending on environment / service changes.</li> <li>• Designated Information Management Officer, with Security Incident reporting protocol.</li> <li>• Cyber Essential Accreditation.</li> <li>• Public Service Network (PSN) Accreditation.</li> <li>• Information &amp; Security Board.</li> <li>• All Wales Security Forum (WARP).</li> <li>• Cyber Security Principles for Pension Schemes' (Self Assessment).</li> <li>• Cyber Security Risk Assessments undertaken.</li> </ul>	
	Confidential / commercially sensitive data is leaked, stolen or misplaced	5	1	5	LR	<ul style="list-style-type: none"> <li>• The Pension Fund will clearly mark any confidential / commercially sensitive data that it shares.</li> </ul>	
	Failure to meet Service Standards.	3	3	9	MR	<ul style="list-style-type: none"> <li>• Pension Fund Administration Strategy.</li> <li>• Workforce planning, realign to meet one off demands, skills and training review.</li> <li>• Appropriate systems and technology.</li> <li>• Regular monitoring by Fund governance groups.</li> </ul>	
	Failure to implement scheme changes.	4	2	8	MR	<ul style="list-style-type: none"> <li>• Regular updates are received, reviewed and acted upon in a timely manner.</li> <li>• Ensure software is adapted appropriately.</li> <li>• Membership of relevant pensions professional bodies.</li> <li>• Implementation of McCloud remedies</li> </ul>	
	Employer ceases to participate in Fund / Admitted bodies go into administration.	3	2	6	LR	<ul style="list-style-type: none"> <li>• Employer covenants or bonds.</li> <li>• Regular review of covenants.</li> </ul>	



Risk Category	Risk Description	IMPACT	LIKELIHOOD	RATING		Control Measure	Comments on changes in risk rating March 2024 qtr
	Failure to hold and share personal data in accordance with the General Data Protection Regulation (effective 28 <sup>th</sup> May 2018).	5	1	5	LR	<ul style="list-style-type: none"> <li>Administering Authority Information Management Security policies.</li> <li>All Scheme Member correspondence securely imaged.</li> <li>Appropriate Data Protection Registration.</li> <li>Third Party Data Sharing agreements in place.</li> <li>Fund Privacy Notice published.</li> <li>Employer Memorandum of Understanding implemented.</li> <li>Mandatory training undertaken by all staff.</li> <li>Awareness sessions held with the Fund's Governance groups.</li> </ul>	
	Failure to pay pensioners on time.	5	1	5	LR	<ul style="list-style-type: none"> <li>Payroll Timetables maintained.</li> <li>Business Continuity Plan.</li> </ul>	
	Delivery of the Triennial Valuations	5	1	5	LR	<ul style="list-style-type: none"> <li>Data Cleansing exercise.</li> <li>Actuarial 'Employer Covenant' reviews.</li> <li>Employer Engagement : Year End Data Schedules Issued / Timetable / Support.</li> <li>Project Terms of Reference / Timetable agreed with Actuary.</li> <li>Assumptions to be agreed with Actuary.</li> <li>Data to be submitted as per agreed timeline.</li> </ul>	Triennial valuation for 2022 completed.
	Qualification of accounts.	4	1	4	LR	<ul style="list-style-type: none"> <li>Financial information reconciled on a timely basis.</li> <li>Accounts are prepared in accordance with the relevant regulations, guidance and Codes of Practice.</li> <li>Regular dialogue with external auditors.</li> </ul>	
	Operational disaster (fire / flood, etc)	4	1	4	LR	<ul style="list-style-type: none"> <li>Business continuity procedures are in place and tested.</li> </ul>	
	Compliance with Fund 'Dispute' Regulation.	3	1	3	LR	<ul style="list-style-type: none"> <li>Internal Dispute Procedure in place.</li> </ul>	
	Failure by employers to pay contributions into the Fund on time and in accordance with the 2022 'Rates and Adjustments Certificate'.	2	1	2	LR	<ul style="list-style-type: none"> <li>Monitoring of monthly receipts to remittances, with reference to the 2022 'Rates and Adjustment Certificate'.</li> <li>Report any material breaches to Regulator in accordance with the Fund's 'Breaches Policy'.</li> </ul>	

Risk Category	Risk Description	IMPACT	LIKELIHOOD	RATING		Control Measure	Comments on changes in risk rating March 2024 qtr
	Fraud.	2	1	2	LR	<ul style="list-style-type: none"> <li>• Strict internal control mechanisms, segregation of duties, etc.</li> <li>• Internal and External Audit Review.</li> <li>• National Fraud Inspectorate participation.</li> <li>• Whistleblowing policy in place.</li> <li>• Enhanced processes in place to avoid scam pension fund transfers in accordance with TPR guidance.</li> <li>• The Pension Fund is signed up to the Regulator Pledge to carry out due diligence to reduce the risk of fraud.</li> </ul>	
Regulatory	Failure to comply with LGPS regulations and any other new regulations.	4	1	4	LR	<ul style="list-style-type: none"> <li>• There are sufficient fully trained staff.</li> <li>• Regular updates are received and acted upon.</li> <li>• Membership of relevant pensions professional bodies.</li> <li>• Welsh Pension Officer Group participation.</li> <li>• Welsh Pension Fund Treasurers Group participation.</li> <li>• Compliance with MiFID II.</li> <li>• Submit Annual Pension Scheme Regulator Return on time.</li> <li>• MHCLC/LGA guidance issued to Fund Employers around the 'Exit' Regulations (now revoked).</li> </ul>	
	Non compliance of procurement rules	1	2	2	LR	<ul style="list-style-type: none"> <li>• Regular budget monitoring.</li> <li>• Periodic review of suppliers.</li> <li>• Contract Procedure Rules.</li> </ul>	