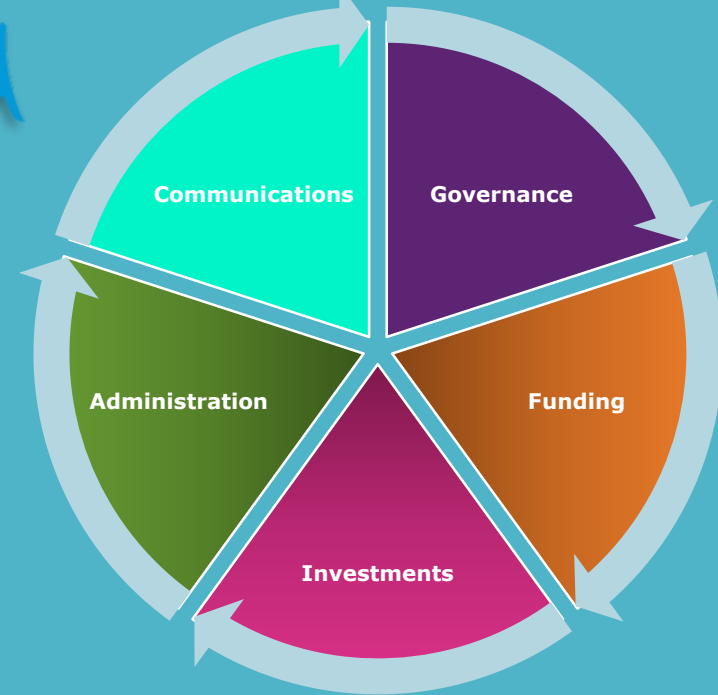


Essex Pension Fund



2020/21

Risk Management

As at 30 November 2020

Risk Strategy

The Risk Strategy for the Essex Pension Fund (the “**Fund**”), was approved by the Essex Pension Fund Strategy Board (PSB) at their 23 September 2020 meeting.

The Risk Strategy explains the Fund’s approach and outlines the principles of risk management. Good Governance is at the heart of the Fund’s approach to Risk Management and by identifying and managing risk through an effective risk management strategy, the Fund can:

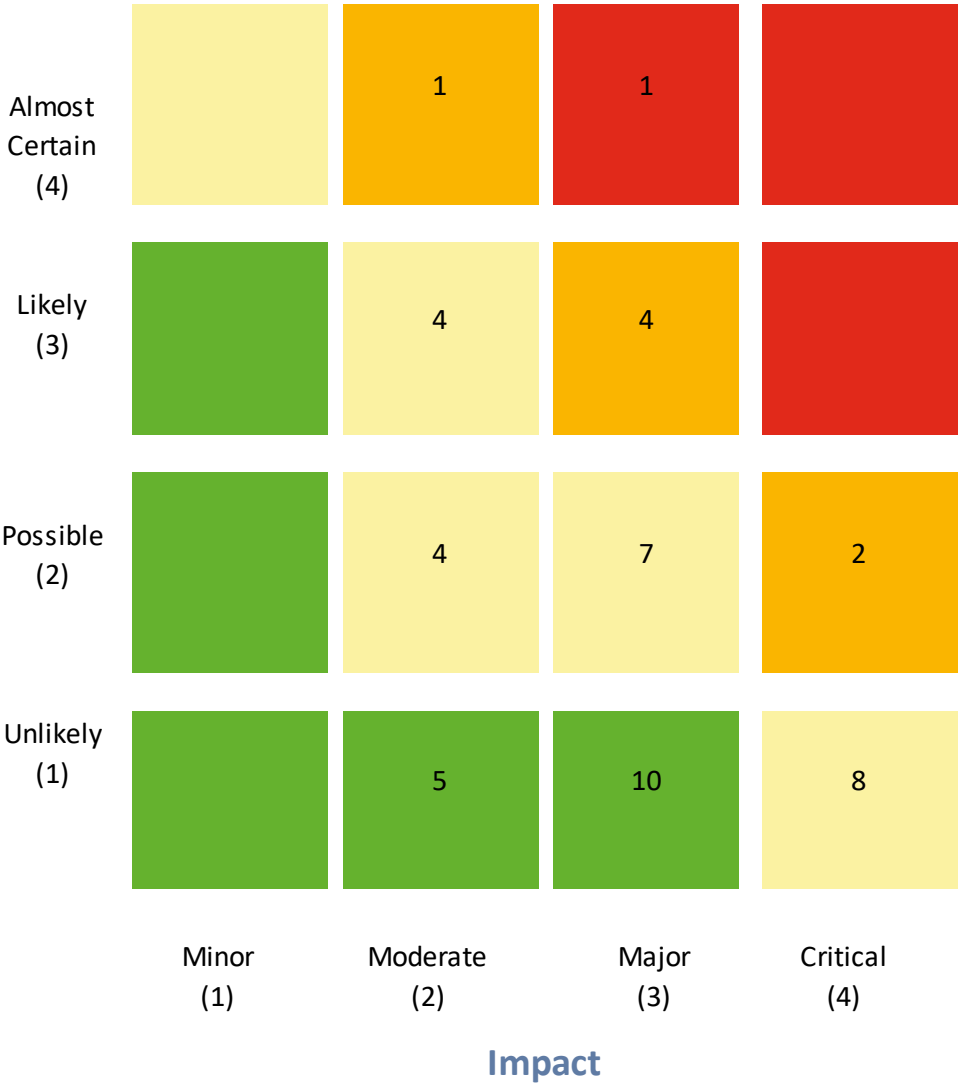
- demonstrate best practice in governance;
- improve financial management;
- minimise the risk and effect of adverse conditions;
- identify and maximise opportunities that might arise; and
- minimise threats, including reputational damage.

The PSB review the Fund’s Risk Register by exception on a quarterly basis and then review the Full Risk Register on an annual basis which is detailed overleaf.

Essex Pension Fund

Current Status

Probability



Essex Pension Fund

Risk No.	Objective at Risk	Risk Event, to include: - the area of uncertainty in terms of the threat - cause / trigger - the event or situation that gives rise to the risk - impact – the effect or impact the risk would have if it occurs	Review period	Current Mitigating Actions / Controls	Current Assessment of Risk			Risk Owner	Mitigation Approach
					Current				
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G1	Act with integrity and be accountable to our stakeholders	JCAD Ref: EPFU0030 Failure of governance arrangements to match up to statutory requirements and recommended best practice leads to financial loss and reputational damage	Quarterly	1. Essex Pension Fund Strategy Board (PSB) is in place (Essex County Council's (ECC's) s101 Committee). 2. Essex Pension Fund Investment Steering Committee (ISC) is in place (ECC's s101 Sub-Committee). 3. Essex Pension Fund Advisory Board (PAB) is in place (is the local Pension Board as required under Public Service Pensions Act (PSPA) 2013). 4. Essex Pension Fund (EPF) routinely monitor the Business Plan, Risk Register and Scorecard. All of which are reported to the PSB at each meeting. 5. EPF work with the Independent Governance & Administration Adviser (IGAA) to seek guidance on work practices. 6. EPF monitor and use Governance networks for best practice i.e. Local Government Association (LGA). 7. Training Policy for both Members and staff. 8. Advice taken from Advisers.	1	4	4	Amanda Crawford - Compliance Manager	Treat
G2	Provide a high quality service whilst maintaining value for money	JCAD Ref: EPFU0031 Failure to disclose material facts, or the disclosure of incorrect or incomplete information, in the Report and Accounts or during the audit leads to incorrect or incomplete published Report and Accounts	Quarterly	1. External audit programme of works. 2. Internal audit programme of works. 3. External audit provide a consistency comment when reviewing the Annual Report and Accounts. 4. Essex Pension Fund (EPF) follow the Chartered Institute of Public Finance & Accountancy (CIPFA) guidance and Code of Practice for the content of the Annual Report and Accounts.	2	2	4	Samantha Andrews - Investment Manager	Treat
G3	Ensure the Pension Fund is managed and its services delivered by people who have the appropriate knowledge and expertise	JCAD Ref: EPFU0007 A lack of expertise, insufficient knowledge and maintenance of the Essex Pension Fund Strategy Board (PSB), Essex Pension Fund Investment Steering Committee (ISC) and Essex Pension Fund Advisory Board (PAB) arising out of high turnover and/or changes within the Local Government Pension Scheme (LGPS) benefit structure, regulations and associated directives/deliverables	Quarterly	1. Training Plan is in place. 2. PSB/ISC/PAB Members have to complete the Chartered Institute of Public Finance & Accountancy (CIPFA) modules 1-8 on a two-year cycle. 3. Immediate induction training for new members. 4. Training plan is reviewed/adapted to reflect changes within LGPS. 5. Essex Pension Fund (EPF) use advisers i.e. Independent Governance & Administration Adviser (IGAA) to provide relevant information and recommendations. 6. Progress made against training plan is recorded and monitored. 7. Mechanisms are in place to recruit vacancies as they arise.	2	2	4	Amanda Crawford - Compliance Manager	Treat
G4	Ensure the Pension Fund is managed and its services delivered by people who have the appropriate knowledge and expertise	JCAD Ref: EPFU0032 Failure of Officers to maintain sufficient level of competence and/or resource to discharge their duties and inefficient retention of staff with over reliance on key officers	Quarterly	1. Essex Pension Fund (EPF) training plans are being implemented through performance plans. 2. EPF staff attend training events, engage with peer groups and are working towards the Chartered Institute of Public Finance & Accountancy (CIPFA) Knowledge and Skills Framework. 3. EPF staff training is recorded and monitored. 4. Teams ensure Standing Operating Procedures (SOPs) are produced to cover key processes. 5. In absence of key officers, EPF utilises external consultants and independent advisers to help in the short-term.	1	3	3	Jody Evans - Interim Director for Essex Pension Fund	Treat
G5	Ensure the Pension Fund is managed and its services delivered by people who have the appropriate knowledge and expertise	JCAD Ref: EPFU0033 Failure to take advice in accordance with statutory requirements over the appointment and terms of appointment of all 3rd party suppliers	Quarterly	1. Formal procurement procedures are being used for all 3rd party suppliers. 2. Essex Pension Fund (EPF) ensure these arrangements are kept under review.	1	4	4	Amanda Crawford - Compliance Manager	Treat
G6	Evolve and look for new opportunities, ensuring efficiency at all times	JCAD Ref: EPFU0008 Insufficient time and focus taken to look for opportunities	Quarterly	1. Management Team regularly attend appropriate conferences/events/forums. 2. Advisers keep Essex Pension Fund (EPF) team up-to-date on opportunities.	3	2	6	Jody Evans - Interim Director for Essex Pension Fund	Treat
G7	Act with integrity and be accountable to our stakeholders	JCAD Ref: EPFU0034 Failure to recognise, disclose, monitor and prevent conflicts of interest	Quarterly	1. Essex Pension Fund (EPF) ensure conflicts of interest are recorded and monitored. 2. Advice provided to members to enable them to recognise potential conflicts. 3. Members adhere to Essex County Council's (ECC's) code of conduct. 4. Members adhere to EPF's Conflict of Interest Policy.	1	3	3	Amanda Crawford - Compliance Manager	Treat
G8	Act with integrity and be accountable to our stakeholders	JCAD Ref: EPFU0009 Failure to effectively manage contracts for the supply of services to the Pension Fund leads to reputational damage and financial loss	Quarterly	1. Essex Pension Fund (EPF) monitor all contracts via performance measures and contract fulfilment checks. 2. EPF liaise with Essex County Council (ECC) Contract Managers to ensure compliance with ECC policy and guidance, seeking support and guidance as and when required.	1	3	3	Amanda Crawford - Compliance Manager	Treat

Essex Pension Fund

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G9	Understand and monitor risk and compliance	JCAD Ref: EPFU0010 Failure to undertake business as usual service due to events outside of Essex Pension Fund (EPF) control resulting in loss of service provision	Quarterly	1. EPF Business Continuity Plan (BCP) in place. 2. EPF BCP regularly tested including call cascades and desk-top exercises. 3. Testing is recorded and monitored. 4. Essex County Council (ECC) also exercise their BCP which includes EPF.	4	2	8	Amanda Crawford - Compliance Manager	Treat
G10	Understand and monitor risk and compliance	JCAD Ref: EPFU0011 New risks are not identified or risk register is not kept up to date	Quarterly	1. Risk is part of Business As Usual (BAU) and is discussed at monthly Essex Pension Fund (EPF) Management Team (MT) meetings. 2. Director for EPF and MT formally review risks each quarter. 3. Changed risks and key risks are reported to the Essex Pension Fund Strategy Board (PSB) at each meeting. 4. Key risks are reported to Essex County Council (ECC) via JCAD on a quarterly basis. 5. This is recorded and monitored.	1	4	4	Amanda Crawford - Compliance Manager	Treat
G11	Continually measure and monitor success against our objectives	JCAD Ref: EPFU0012 Inadequate, inaccurate or misrepresented management information leads to financial loss or reputational damage	Quarterly	1. A risk register is in place. 2. A Scorecard is developed from Key Performance Indicators (KPI's) and Business Plan objectives. 3. Progress in their achievement is reported to the Essex Pension Fund Strategy Board (PSB) at each meeting. 4. This is recorded and monitored.	1	4	4	Amanda Crawford - Compliance Manager	Treat
G12	Ensure compliance with the Local Government Pension Scheme (LGPS) regulations, other relevant legislation and the Pensions Regulator's Codes of Practice	JCAD Ref: EPFU0035 Non compliance with regulations caused by lack of knowledge by staff, changes in government policy / Local Government Pension Scheme (LGPS) reforms and systems not kept up-to-date leading to reputational damage and financial loss	Quarterly	1. Essex Pension Fund (EPF) monitor the current and new regulations and correspondence from Ministry of Housing, Communities and Local Government (MHCLG) and Local Government Association (LGA). 2. EPF ensure systems are monitored for accuracy and compliance. 3. The Systems are updated for any new regulatory requirement. 4. EPF keeps abreast of developments, participating in consultations and collaborating with other Funds. 5. EPF Officers participate in various scheme and industry groups i.e. the Chartered Institute of Public Finance & Accounting (CIPFA). 6. EPF utilise the expertise of their Independent Administration & Governance Adviser (IGAA). 7. Essex Pension Fund Strategy Board (PSB) and Essex Pension Fund Investment Steering Committee (ISC) receive regular reports on scheme developments. 8. Regular review of Distribution Lists i.e. LGA to ensure correct Officers are receiving relevant information.	1	4	4	David Tucker - Technical Hub Manager	Treat

Essex Pension Fund

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G13	Provide a high quality service whilst maintaining value for money	JCAD Ref: EPFU0036 Cyber crime activities impacting on integrity and ability to carry out day-to-day business functions leading to reputational damage and financial loss	Quarterly	1. Essex County Council (ECC) mitigations for Cyber Crime have been collated however they do not have Cyber Crime Insurance. 2. AON have a Member data and Cyber Security Policy and hold insurance that covers Cyber Crime. 3. CIVICA mitigations for Cyber Crime have not yet been provided and Essex Pension Fund (EPF) are waiting for confirmation if they have Cyber Crime Insurance. This is being chased. 4. LINK have a Cyber Security Policy and place and hold appropriate Cyber Crime insurance. 5. Barnett Waddingham have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance. 6. Investment Managers: a) Partners Group have elements of cyber security coverage but do not have a standalone Cyber Security Policy in place or insurance; b) Stafford CP have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; c) Northern Trust have a Cyber Security Policy in place however it is unclear if they hold appropriate insurance. EPF will hasten to confirm; d) GSAM have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; e) M&G have a Cyber Security Policy in place however do not hold insurance; f) AVIVA have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; g) Hamilton Lane have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; h) Stewart Investors have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; i) Alcentra have a Cyber Security Policy in place and hold appropriate Cyber Crime insurance; j) Marathon have a Cyber Security Policy in place and hold insurance that covers Cyber Crime; k) UBS have a Cyber Security Policy in place however it is unclear if they hold appropriate insurance. EPF will hasten to confirm. 7. Tracesmart mitigations have a Cyber Security Policy and hold insurance that covers Cyber Crime. 8. EPF liaise with all control owners at regular intervals to ensure controls remain in place.	1	4	4	Jody Evans - Interim Director for Essex Pension Fund	Treat
G14	Ensure compliance with the Local Government Pension Scheme (LGPS) regulations, other relevant legislation and the Pensions Regulator's Codes of Practice	JCAD Ref: EPFU0028 Regulatory risks impacting on Investments, Funding and Administration: - McCloud, Cost Cap, £95k Cap and Goodwin - MHCLG Consultations likely to impact on the Fund i.e. resources to deliver the required outputs; - Academisation of Schools, the possibility of Multi-academy Trust (MAT) breakups and cross fund movements with potential for further schools to convert to academy status and MATs to breakdown leading to additional governance and administration risk; - Current cost management review where a flawed process will result in better benefits for scheme members that will mean employers having to pay more than they otherwise would have; - Superannuation Contributions Adjusted for Past Experience (SCAPE) rate changes that will significantly increase transfer values paid out (increase of liabilities) and impact on the Funding Strategy via s13 which could mean unforeseen increases to employer contributions; - Increased centralisation of the Local Government Pension Scheme (LGPS) and HM Treasury taking all the assets / structural change; - Guaranteed Minimum Pension (GMP) equalisation resulting in potentially additional costs and/or administration; - National Pensions Dashboard resulting in major changes to data provision; - Separation of the Fund from the Administering Authority; - Government intervention in Fund asset allocation decisions.	Quarterly	1. Regular communications with schools to understand their intentions. 2. Essex Pension Fund (EPF) and their Advisers are actively involved in the development of the LGPS. 3. EPF monitor the current and new regulations and correspondence from Ministry of Housing, Communities and Local Government (MHCLG) and Local Government Association (LGA). 4. EPF keeps abreast of developments, participating in consultations and collaborating with other Funds. 5. EPF utilise the expertise of their Independent Administration & Governance Adviser (IGAA). 6. McCloud working group established and initial communications with Employers have commenced to request that data be retained.	4	3	12	Sara Maxey - Employer Manager	Treat

Essex Pension Fund

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					Likelihood	Impact	Risk Rating		
G15	Ensure compliance with the Local Government Pension Scheme (LGPS) regulations, other relevant legislation and the Pensions Regulator's Codes of Practice	JCAD Ref: EPFU0037 Fraud against the Fund or insufficient checks and controls results in benefits being paid to the incorrect person or paid when they are not due to an existing beneficiary, and/or loss of assets and/or reputational impact on Essex Pension Fund (EPF)	Quarterly	<ol style="list-style-type: none"> The Fund participates in the National Fraud Initiative (NFI) in line with Audit requirements using the Tell Us Once system, with Pensions paid via BACs as standard/extra verification undertaken for overseas and non-BACs cases. Internal and External Audit regularly test that controls are in place and working. Age and status verification checks are conducted prior to all benefits being released. Authorised signature list- plus Essex County Council's (ECC's) version. EPF undertake General Data Protection Regulation (GDPR) training with all staff and adhere to relevant ECC data protection policies. Segregation of duties i.e. two signatures are required for any payments directly out of the Fund (Fund Managers). Other payments are verified by one person raising, one person checking and one person authorising. Custodian asset pool - proper process for transfer of assets through LINK. 	1	4	4	Jody Evans - Interim Director for Essex Pension Fund	Treat
G16	Ensure the confidentiality, integrity and accessibility of the Fund's data, systems and services is protected and preserved	JCAD Ref: EPFU0026 Failure to comply with General Data Protection Regulation (GDPR) and keep data secure, leading to reputational issues or legal/financial penalties	Quarterly	<ol style="list-style-type: none"> Essex Pension Fund (EPF) conduct a System back-up to protect against data loss. EPF ensure data encryption and password protection. Continuous staff training on data protection / GDPR. All information security breaches are reported and any systematic issues identified and corrected. EPF ensure use of file transfer protocol. 	2	4	8	Jody Evans - Interim Director for Essex Pension Fund	Treat

Essex Pension Fund

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					Likelihood	Impact	Risk Rating		
11	To maximise the returns from investments within reasonable risk parameters	JCAD Ref: EPFU0021 The total Fund Investment return does not meet expectations which could lead to underfunding	Quarterly	1. Essex Pension Fund (EPF) Investment Strategy is reviewed and monitored on a regular basis. 2. Monitoring of: investment manager performance; market conditions. Performance of both assets and liabilities is monitored periodically.	3	3	9	Samantha Andrews - Investment Manager	Treat
12	To maximise the returns from investments within reasonable risk parameters	JCAD Ref: EPFU0022 Investment Managers and/or ACCESS Operator underperform or do not have appropriate benchmarks leading to lower investment returns	Quarterly	1. The performance of Investment Managers and/or ACCESS Operator is subject to regular review.	3	2	6	Samantha Andrews - Investment Manager	Treat
13	To ensure the Fund's investments are properly managed before, during and after pooling is implemented	JCAD Ref: EPFU0038 Failure by Essex Pension Fund (EPF) or the ACCESS Operator to take advice in accordance with statutory requirements and best practice over appointing and the terms of appointment of investment managers	Quarterly	1. The Fund procures and utilises an Institutional Investment Consultant and an Independent Investment Adviser. 2. EPF ensure these arrangements are kept under review. 3. ACCESS Escalation Policy in place. 4. Appointed Contract Manager within the ACCESS Support Unit (ASU).	1	3	3	Samantha Andrews - Investment Manager	Treat
14	To ensure the Fund's investments are properly managed before, during and after pooling is implemented	JCAD Ref: EPFU0023 Delays in: - implementation of decisions; - availability of suitable solutions within the Pool; which reduces the effectiveness of the decision which could lead to loss of potential return	Quarterly	1. Essex Pension Fund (EPF) works proactively with Investment Advisers, ACCESS Pool and Investment Managers to scope, propose and implement viable revisions to the Investment Strategy.	3	2	6	Samantha Andrews - Investment Manager	Treat
15	To ensure the Fund's investments are properly managed before, during and after pooling is implemented	JCAD Ref: EPFU0024 Failure of 3rd party service providers to maintain obligations in respect of investments leading to potential loss of return or liquidity, or ability to access or control investment	Quarterly	1. AAF0106 Annual Control Reviews are carried out. 2. Within the Pool environment the Depository has liability for safekeeping of Pool investments. 3. ACCESS Support Unit (ASU) Contract Manager ensures adherence to the Operator Agreement by the 11 ACCESS Funds and LINK. 4. Formal procurement procedures are being used for all 3rd party suppliers. 5. Essex Pension Fund (EPF) ensure these arrangements are kept under review. 6. Fund's assets are not included on Custodian's Balance Sheet. Separate Designated Accounted for each mandate.	3	2	6	Samantha Andrews - Investment Manager	Treat
16	Ensure investment issues are communicated appropriately to the Fund's stakeholders	JCAD Ref: EPFU0039 Failure to communicate and consult on Investment Matters with stakeholders resulting in lack of understanding and potentially poor decisions being made	Quarterly	1. Investment Strategy Statement is subject to stakeholder consultation. 2. Essex Pension Fund Strategy Board (PSB) / Essex Pension Fund Investment Steering Committee (ISC) Members are appropriately trained prior to key decisions being made. 3. Engagement with Employers at triennial valuation.	1	2	2	Samantha Andrews - Investment Manager	Treat
17	To ensure the Fund's investments are properly managed before, during and after pooling is implemented	JCAD Ref: EPFU0040 The implementation of Markets in Financial Instruments Directive (MiFID) II (January 2018) leads to the Fund being categorised by some / all of its service providers as a 'retail client' - the result of which could reduce the range of sub asset classes in which the Fund is able to invest, and may even require disinvestment from the current portfolio	Quarterly	1. The Fund has arrangements to ensure that relevant MiFID II "opt ups" to Elective Professional status for all asset mandates is kept under review. 2. Member attendance and participation at Investment Conferences / Seminars including but not limited to: Local Government Chronicle (LGC) Investment Seminar; ACCESS Investor Day(s); LGC Investments & Pensions Summit; and Baillie Gifford Investment & Training seminar.	1	4	4	Samantha Andrews - Investment Manager	Treat
18	To maximise the returns from investments within reasonable risk parameters	JCAD Ref: EPFU0041 Lack of consideration of all financial and non-financial risks relating to Environmental, Social and Governance (ESG) / Responsible Investment (RI) issues leading to poor investment returns, increased employer contribution rates and reputational damage	Quarterly	1. Use of expert consultants in the selection of Investment Strategy and Investment Managers. 2. Regular monitoring of Investment Managers. 3. Regular reviews of Investment Strategy. 4. Compliance with Stewardship Code. 5. Membership of Local Authority Pension Fund Forum (LAPFF) agreed at Essex Pension Fund Investment Steering Committee (ISC) meeting on 27/11/2019.	1	3	3	Samantha Andrews - Investment Manager	Treat

Essex Pension Fund

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F1	To prudently set levels of employer contributions that aim to achieve a fully funded position in the timescales determined in the Funding Strategy Statement	JCAD Ref: EPFU0013 Failure to set and collect contributions sufficient to achieve a fully funded ongoing position in the timescales determined by the Funding Strategy Statement	Quarterly	1. At each triennial valuation, assess funding position and progress made to full funding. 2. Full annual interim reviews to enable consideration of the position. 3. A specific Scorecard measure is in place on this matter to monitor the % of contributing employers submitting timely payments. 4. Work with Employers to ensure they understand their responsibilities. 5. Year-end reconciliation of Member data.	2	3	6	Sara Maxey - Employer Manager	Treat
F2	To prudently set levels of employer contributions that aim to achieve a fully funded position in the timescales determined in the Funding Strategy Statement	JCAD Ref: EPFU0014 Mortality rates continue to improve, in excess of the allowances built into the evidence based actuarial assumptions, resulting in increased liabilities, reduced solvency levels and increased employer contributions	Quarterly	1. Longevity analysis is conducted by the Actuary at each valuation.	2	3	6	Sara Maxey - Employer Manager	Treat
F3	To prudently set levels of employer contributions that aim to achieve a fully funded position in the timescales determined in the Funding Strategy Statement	JCAD Ref: EPFU0042 Demographic experience of Fund population is not in line with actuarial assumptions resulting in increases required in Employer contributions	Quarterly	1. Essex Pension Fund (EPF) ensures the Employer pay the rates set at each valuation. 2. The Actuary provides a prudent assessment to allow for ill-health cases within the calculations. 3. Any change in demographics are reviewed at subsequent valuations and any underfunding will be addressed.	1	3	3	Sara Maxey - Employer Manager	Treat
F4	To recognise in drawing up the funding strategy the desirability of employer contribution rates that are as stable as possible	JCAD Ref: EPFU0015 Failure to apply and demonstrate fairness in the differentiated treatment of different fund employers by reference to their own circumstances and covenant	Quarterly	1. Essex Pension Fund (EPF) carries out an analysis at each triennial actuarial valuation to assess covenant and affordability on a proportional basis. 2. A risk analysis is conducted at each triennial valuation by the Funds Actuary. 3. Ongoing monitoring of contributions to identify significant change and continuous dialogue with employers.	2	3	6	Sara Maxey - Employer Manager	Treat
F5	To recognise in drawing up the funding strategy the desirability of employer contribution rates that are as stable as possible	JCAD Ref: EPFU0016 Pay and price inflation significantly different from actuarial assumptions resulting in increases required in employers' contributions	Quarterly	1. Essex Pension Fund (EPF) carries out an analysis at each triennial actuarial valuation to ensure that the assumptions adopted are appropriate and monitor actual experience. 2. Discussions with employers over affordability and pay policy are held. 3. Discretions Policy to control discretionary costs.	2	3	6	Sara Maxey - Employer Manager	Treat
F6	To manage employers' liabilities effectively, having due consideration of each employer's strength of covenant, by the adoption, where necessary, of employer specific funding objectives	JCAD Ref: EPFU0017 Failure to: - recognise a weakening (strengthening) in an employer's covenant; - lack of, or inaccurate, information about an employer; leads to an inappropriate funding approach in respect of that employer	Quarterly	1. Essex Pension Fund (EPF) monitors and send reminders of employer's responsibilities. 2. EPF carries out an analysis at each triennial actuarial valuation to assess covenant and affordability on a proportional basis. 3. A risk analysis is conducted at each triennial valuation. 4. Use of bonds and guarantees. 5. Ongoing monitoring of contributions to identify significant change and continuous dialogue with employers.	3	3	9	Sara Maxey - Employer Manager	Treat
F7	To ensure consistency between the investment strategy and funding strategy	JCAD Ref: EPFU0018 Funding strategy is not aligned with Investment Strategy leading to adverse funding outcomes (over / under funding)	Quarterly	1. The Asset Liability Study is undertaken on a triennial basis. 2. The Funding Strategy and Investment Strategy are reviewed and monitored on a regular basis. 3. The Funding Strategy is aligned with the Investment Strategy.	2	3	6	Sara Maxey - Employer Manager	Treat
F8	Maintain liquidity in order to ensure benefits can be met as and when they fall due over the lifetime of the Fund	JCAD Ref: EPFU0043 The Fund has insufficient cash to pay pensions as they fall due	Quarterly	1. Essex Pension Fund (EPF) ensures sufficient investment income is available to supplement contribution income to meet benefit payments. 2. This is reported to the Essex Pension Fund Strategy Board (PSB). 3. A specific Scorecard measure, 3.5.1 to ensure sufficient investment income is available to supplement contribution income to meet benefit payments, is in place on this matter. 4. Limit on illiquid assets and levels of diversification from equities and bonds. 5. Projection of expected cash flows and daily monitoring of cash.	1	3	3	Sara Maxey - Employer Manager	Treat
F9	Adopt appropriate measures and approaches to reduce the risk, as far as possible, to the Fund, other employers and ultimately the tax payer from an employer defaulting on its pension obligations to minimise unrecoverable debt on termination of employer participation	JCAD Ref: EPFU0019 An employer ceasing to exist with insufficient funding, adequacy of bond or guarantee leads to unrecoverable debt and residual liability falls on remaining employers	Quarterly	1. New employers joining the Fund are required to meet the Funds expectations, covenant, security and guarantee as set out in the Funding Strategy. 2. Existing employers are required to meet the Funding Strategy and Actuarial Valuation obligations. 3. Monitoring of bonds and ongoing monitoring of Employer covenant.	3	3	9	Sara Maxey - Employer Manager	Treat
F10	To prudently set levels of employer contributions that aim to achieve a fully funded position in the timescales determined in the Funding Strategy Statement	JCAD Ref: EPFU0020 The adoption of a funding strategy that causes the Fund to fail any of the Government Actuary's Department (GAD) s13 tests or be named in the GAD s13 report that causes reputational damage	Quarterly	1. In consultation with the Actuary, Essex Pension Fund (EPF) determine an appropriate funding strategy that meets s13 requirements.	2	3	6	Sara Maxey - Employer Manager	Treat

Essex Pension Fund

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A1	Deliver a high quality friendly and informative service to all beneficiaries and employers at the point of need	JCAD Ref: EPFU0025 Failure to administer scheme correctly in line with all relevant Regulations and policies owing to circumstances such as, but not limited to: - lack of regulatory clarity; - system issues; - insufficient resources.	Quarterly	1. Essex Pension Fund (EPF) ensure the System complies with the latest regulatory requirements through: - Technical Hub help to translate regulations and ensure new systems meet regulatory requirements; - Robust testing for system changes - Linking to knowledge and information from software supplier and other Local Government Pension Scheme (LGPS) clients using the same administration software. 2. EPF management monitor workload through reporting and align with business plan to ensure sufficient resources. 3. EPF have clear business continuity plans including disaster recovery and management succession planning in place.	3	3	9	Jody Evans - Interim Director for Essex Pension Fund	Treat
A2	Deliver a high quality friendly and informative service to all beneficiaries and employers at the point of need	JCAD Ref: EPFU0044 Excessive costs of administration lead to lack of Value For Money (VFM) and poor reputation	Quarterly	1. Essex Pension Fund (EPF) benchmarks its costs against other Funds and regularly look for efficiency savings for VFM. 2. Costs are monitored and reviewed on a regular basis. 3. Budget and Monitoring processes are in place.	1	3	3	Jody Evans - Interim Director for Essex Pension Fund	Treat
A3	Ensure benefits are paid to the right people at the right time in the right amount	JCAD Ref: EPFU0029 Failure to maintain proper records leading to inadequate data resulting in failure to pay the correct pensions to the right people at the right time	Quarterly	1. Data cleansing exercises take place at least annually or as and when required. Common and Scheme Specific data checks are carried out. 2. Essex Pension Fund (EPF) ensure the System is tested regularly to ensure compliance with regulations. 3. Robust checking and validation of data takes place in calculations and receipt of information from employers. 4. EPF ensures staff are adequately trained by developing and implementing training plans along with encouraging staff to undertake professional qualifications. 5. Payroll is conducted earlier than required to allow issues to be rectified prior to payment. 6. Liaise with Essex County Council (ECC) Supplier and Service team to ensure ECC BACS system is secure, reliable and up-to-date with required software on an ongoing basis. There is reliance on ECC BACS software solution to ensure payroll is completed at the right time.	2	3	6	Holly Gipson and Daniel Chessell - Payroll Manager and Retirement Manager	Treat
A4	Ensure contribution income is collected from, the right people at the right time in the right amount	JCAD Ref: EPFU0045 Failure to collect pension contributions in line with regulatory guidelines leads to loss of income to Essex Pension Fund (EPF)	Quarterly	1. All contributing Employers are provided with deadlines for payments and clear guidelines for providing associated information. 2. EPF monitor receipt of contributions to ensure compliance. 3. EPF follow the Administration Strategy in relation to late payments.	1	2	2	Sara Maxey - Employer Manager	Treat
A5	Deliver a high quality friendly and informative service to all beneficiaries and employers at the point of need	JAD Ref: EPFU0046 Failure to deal with concerns, complaints and Internal Dispute Resolution Procedures (IDRPs) appropriately results in poor customer satisfaction, further time spent resolving issues, potential compensation payments and reputation impact, particularly us escalated to the Pensions Ombudsman	Quarterly	1. A process is in place to ensure concerns and complaints are dealt with promptly. 2. Complaint levels and reasons are monitored and process issues are identified and corrected. 3. Complaint levels, IDRPs are reported through the Scorecard and are reported at each Essex Pension Fund Strategy Board (PSB).	1	2	2	Kelly Armstrong - Contact and Customer Manager	Treat
A6	Deliver a high quality friendly and informative service to all beneficiaries and employers at the point of need	JCAD Ref: EPFU0027 Unable to meet statutory requirements due to poor employer data	Quarterly	1. Administration Strategy is in place which confirms responsibilities, details points of contact with reference to the website for further information, timescales etc. 2. Administration Strategy is reviewed on a regular basis in consultation with Employers where changes are made. 3. Essex Pension Fund (EPF) communicates to Employers regularly on all aspects of provision which includes training sessions and guidance notes. 4. EPF conducts year-end data cleansing.	2	4	8	Sara Maxey - Employer Manager	Treat

Essex Pension Fund

Risk No.	Objective at Risk	Risk Event, to include: - the area of uncertainty in terms of the threat - cause / trigger - the event or situation that gives rise to the risk - impact – the effect or impact the risk would have if it occurs	Review period	Current Mitigating Actions / Controls	Current Assessment of Risk			Risk Owner	Mitigation Approach Treat Tolerate Transfer Terminate
					Current				
					Likelihood	Impact	Risk Rating		
A7	Ensure the Fund employers are aware of and understand their roles and responsibilities, and carry out their functions in line with legislation, guidance and the Fund's agreed policies and procedures	JCAD Ref: EPFU0047 Failure to administer the scheme correctly due to circumstances such as, but not limited to: - Poor employer data; - Unable to clearly articulate what is required from employers; and - Unable to clearly articulate what is required from the Fund itself in order to deliver the Fund's administrative functions	Quarterly	1. Administration Strategy is in place. 2. Administration Strategy is reviewed on a regular basis in consultation with Employers. 3. Essex Pension Fund (EPF) communicates to Employers regularly on all aspects of provision which includes training sessions and guidance notes. 4. EPF ensure all staff adheres to the training requirements set for their posts through regular performance monitoring.	1	3	3	Jody Evans - Interim Director for Essex Pension Fund	Treat
A8	Ensure the Fund employers are aware of and understand their roles and responsibilities, and carry out their functions in line with legislation, guidance and the Fund's agreed policies and procedures	JCAD Ref: EPFU0048 Unable to develop and maintain good working relationships between the fund and our employers due to, but not limited to: - Lack of resource at Essex Pension Fund (EPF) and employers; - Lack of engagement due to other priorities; - Major growth in employer numbers leading to lack of time to build relationships etc.	Quarterly	1. EPF maintain a Communication Plan which is reviewed and monitored on a regular basis. 2. Forums are held for Employers to keep them up-to-date with Fund information on an annual basis. 3. Workshops are carried out to ensure year-end requirements are communicated.	1	2	2	Sara Maxey - Employer Manager	Treat

Essex Pension Fund

Risk No.	Objective at Risk	Risk Event, to include: - the area of uncertainty in terms of the threat - cause / trigger - the event or situation that gives rise to the risk - impact – the effect or impact the risk would have if it occurs	Review period	Current Mitigating Actions / Controls	Current Assessment of Risk			Risk Owner	Mitigation Approach Treat Tolerate Transfer Terminate
					Current				
					Likelihood	Impact	Risk Rating		
C1	Communicate in a friendly, expert and direct way to our stakeholders, treating all our stakeholders equally	JCAD Ref: EPFU0049 Issuing incorrect or inaccurate communications leads to lack of understanding and/or complaints	Quarterly	1. Essex Pension Fund (EPF) ensure they align their practices to the Communication Policy to enable accurate communications. 2. Dedicated resource for communications. 3. Maintain and update EPF website. 4. Monitor feedback from stakeholders and ensure action taken to address complaints. 5. Staff training is provided to EPF staff to ensure they are kept up-to-date with best practice.	1	3	3	David Tucker - Technical Hub Manager	Treat
C2	Deliver information in a way that suits all types of stakeholders including providing more accessibility through greater use of technology	JCAD Ref: EPFU0050 Information delivered in a way that is not appropriate for members or employers, e.g. too complex, not relevant or in an unsuitable format	Quarterly	1. Essex Pension Fund (EPF) ensure communications are suitable for all stakeholders and are clear and concise via continual review. 2. An Annual Survey is undertaken to obtain feedback from Employers and Members on the suitability of our communications. 3. Dedicated and specialist resource for communications. 4. Maintain and update EPF website.	1	2	2	David Tucker - Technical Hub Manager	Treat
C3	Ensure our communications are useful and easy to follow	JCAD Ref: EPFU0051 Communications are not customised to specific needs and/or are overly complicated resulting in lack of understanding by all stakeholders	Quarterly	1. An Annual Survey is undertaken to obtain feedback from Employers and Members on the suitability of our communications. 2. Any required changes are reflected in the Communications Policy. 3. Checks are made regularly to ensure Essex Pension Fund (EPF) complies with the Disclosure Regulation requirements.	2	2	4	David Tucker - Technical Hub Manager	Treat
C4	Aim for full appreciation of the pension scheme benefits and changes to the scheme by all scheme members, prospective scheme members and employers	JCAD Ref: EPFU0052 Poor quality or lack of communications can lead to lack of understanding by all stakeholders	Quarterly	1. An Annual Survey is undertaken to obtain feedback from Employers and Members on the suitability of our communications. 2. Any required changes are reflected in the Communications Policy. 3. Forums are held for Employers to keep them up-to-date with Fund information as and when required. 4. Communications plan developed annually and updated in line with further changes to the scheme. 5. Workshops are carried out to ensure year-end requirements are communicated.	2	2	4	David Tucker - Technical Hub Manager	Treat