

## Risk Assessment

In order to ensure identified risks can be consistently assessed, a common set of risk assessment criteria has been developed. Using this criteria, the following was determined for each individual risk:

- Gross risk: The likelihood and impact of the risk materialising without any mitigating controls being applied; and
- Residual risk: The likelihood and impact of the risk materialising with mitigating controls being applied.

Risks are evaluated on a scale of 1 to 4 with the highest value being the most likely to occur/ most severe impact. The risk assessment criteria developed with the Head of Fund is presented below:

				LIKELIHOOD OF RISK OCCURRING			
				1	2	3	4
				in 20 years /5%	1 in 5 years /20%	1 in 2 years /50%	1 in 1 years / 95– 100%
				Unlikely could occur once in 20 years	Possible could occur once in 5 years	Likely could occur in next 24 months	Happening Happening already or highly likely
FINANCIAL IMPACT		<b>Financial impact</b>	<b>Qualitative impact</b>				
	4	>£150m	<input type="checkbox"/> Critical impact on operational performance (>10% of membership affected recovery time > 1 year ); <input type="checkbox"/> Critical breach in laws and regulations that could result in material fines or consequences; <input type="checkbox"/> Critical impact on the reputation of the Fund which could threaten its future viability, adverse national media coverage; <input type="checkbox"/> Affect such that it undermines the ability to achieve key Fund goals and objectives (survival).	4	8	12	16
	3	£75m - £150m	<input type="checkbox"/> Significant impact on operational performance (5 – 9% of membership affected/ recovery time 8 – 12 months); <input type="checkbox"/> Significant breach in laws and regulations resulting in significant fines and consequences; <input type="checkbox"/> Significant impact on the reputation or Fund (some national media coverage); <input type="checkbox"/> Potential to have high impact on Fund goal and objectives.	3	6	9	12
	2	£5m – £75m	<input type="checkbox"/> Moderate impact on operational performance (1 – 4% of membership affected/ recovery time 3 – 7 months); <input type="checkbox"/> Moderate breach in laws and regulations resulting in fines and consequences; <input type="checkbox"/> Moderate impact on the reputation or brand of the organisation (some media coverage); <input type="checkbox"/> Potential to have moderate impact on Fund goal and objectives.	2	4	6	8
	1	<£5m	<input type="checkbox"/> Minor impact on operational performance (<1% of membership affected/ recovery time <3 months); <input type="checkbox"/> Minor breach in laws and regulations with limited consequences; <input type="checkbox"/> Minor impact on the reputation of the organisation; <input type="checkbox"/> Comparatively less impact on Fund goal and objectives.	1	2	3	4

Risk register

Risk Ref	Risk Title	Risk Description	Risk Drivers	Owner	Inherent Risk			Controls*	Residual Risk			Risk actions			
					Impact	Likelihood	Inherent Rating		Impact	Likelihood	Residual Rating	Action Details	Owner	Target Date	
INVESTMENT & FUNDING RISK															
I1	Investment Strategy	Inappropriate investment strategy leading to volatility and underperformance. A decline in the market value of investments relative to liabilities or an increase in the Fund's risk profile could have a negative impact on the value of the fund, particularly where the assets to liabilities profile is mismatched, leading to underfunding.	<ul style="list-style-type: none"><li>The investment strategy is not appropriate to meet the Fund's funding requirements.</li><li>Investment strategy does not change to reflect changes in circumstances, leading to a reduction in funding level or missed opportunities to enhance or protect the funding level.</li><li>Falling share prices and values of illiquid assets, therefore decreasing in the assets held by the fund.</li></ul>	Head of Fund	4	2	H	<ul style="list-style-type: none"><li>The Investment Advisors undertake a full review of the Fund's investment strategy following each triennial funding valuation to ensure investment strategy remains appropriate for the Fund's objectives. Advisors are also involved in any agreed ad hoc review between valuations.</li><li>LCC Pension Committee review and approve Investment Strategy.</li><li>Quarterly performance reporting against strategy performed by the Investment Panel and results reported to the Pension Committee.</li><li>LPPL advise on strategy with LCC engaging external contractors / advice to validate / assess advice.</li></ul>	4	1	M	<ul style="list-style-type: none"><li>The Investment Strategy has been reviewed and will be presented to the Dec Committee.</li><li>LPP have advised the Investment Panel accordingly on the strategy.</li></ul>	Investment Panel/Head of Fund	Mar 2018	
			<ul style="list-style-type: none"><li>Poor / inappropriate investment advice received from LPPL. Investment beliefs and preferences of individuals in LPPL might conflict with what is in the pure best interests of the Scheme.</li><li>Poor / inappropriate investment advice received from external investment advisors.</li></ul>	Head of Fund	4	2	H	<ul style="list-style-type: none"><li>LPPL advise on strategy with LCC engaging external contractors / advice to validate / assess advice.</li><li>Decisions are made in consultation with External Advisors who attend specific Investment Panel and Pension Committee meetings during the year and are consulted as required to advise on investment strategy decisions.</li></ul>	4	1	M	The Investment Panel were advised accordingly by LPP regarding the strategy at the meeting in June.	Investment Panel/Head of Fund	Mar 2018	
I2	Construct, Implement and Perform	The portfolio fails to deliver the required return within risk tolerances / the translation of the strategy into the investment portfolio is sub-optimal / failure of the investment support infrastructure resulting in inefficient implementation or losses.	<ul style="list-style-type: none"><li>Failure to achieve target returns over the mid term i.e. 5 years.</li><li>Incorrect assumptions about expected returns, volatilities and correlations.</li><li>Model specifications are incorrect, input data is inaccurate, outputs are misinterpreted.</li><li>Failure to establish risk parameters for each component of the portfolio and for the total portfolio e.g. VAR, FX hedging and derivatives.</li></ul>	Head of Fund	4	2	H	<ul style="list-style-type: none"><li>LPPL attendance at Investment Panel provides a view of activity. &gt; LPPL is in the process of establishing investment risk monitoring roles in-house.</li><li>LPP continue to build capability within both the investment and investment risk teams;<ul style="list-style-type: none"><li>A Head of Investment Strategy has been appointed with responsibility for the overall strategy. A team of analysts focus on specific asset classes who input into the overall IS team output as required;</li><li>Strategic asset allocations are established by agreement and performance is monitored and reported by regularly;</li><li>Models are subject to 4 eyes review and proposals are reviewed by LPPI's investment committee;</li><li>LPPI's risk management is governed by a Risk Committee which includes independent members with relevant industry experience. Risk from the asset portfolio are measured using industry standards systems (Ortec,</li></ul></li></ul>	4	2	H	<ul style="list-style-type: none"><li>The Investment Panel have met with LPP to discuss risk monitoring and reporting.</li></ul>	Investment Panel/Head of Fund	Mar 2018	

					Inherent Risk				Residual Risk			Risk actions		
								Bloomberg). A portfolio management system is being considered in order to provide comprehensive STP.						
			<ul style="list-style-type: none"> <li>External mandates are not aligned to the Fund's return and risk requirements.</li> <li>Decisions are not implemented accurately, efficiently and in line with appropriate authorities.</li> <li>Investment performance is poor, not reported in a timely manner and / or frequently monitored.</li> <li>Investment manager SLA's are not in place and/or are not frequently monitored.</li> <li>Cost reduction achieved from utilising internal investment managers offset by poor internal investment manager performance.</li> </ul>	Head of Fund	4	3	H	<ul style="list-style-type: none"> <li>Quarterly performance reporting against strategy performed by the Investment Panel and results reported to the Pension Committee.</li> </ul>	4	2	H	Quarterly reporting on cost reduction v's performance will be reported to Pension Fund Committee.	Head of Fund	Mar 2018
13	Custody of Fund assets	Failure to ensure the security and safe custody of Fund assets leading to a loss of assets and / or income and breach of the Pensions Act.	<ul style="list-style-type: none"> <li>The Fund's assets are not adequately safeguarded, with due record-keeping and accurate income and taxation processing; and</li> <li>Inadequate records and reporting of investment positions, transactions and returns.</li> </ul>	Head of Fund	4	3	H	<ul style="list-style-type: none"> <li>Contractual protection via Custody agreement.</li> <li>Assets are held in separate named LCC client account.</li> <li>Monthly LCC reconciliation of Fund assets with those reported by Northern Trust.</li> </ul>	4	2	H	Review of Fund's custody arrangements to be undertaken taking into account LPP's arrangements with its custodian and depositary.	Head of Fund	Mar 2018
14	Actuarial Valuation and Monitoring of Funding	Asset / liability mismatch leads to insufficient assets to fund liabilities resulting in increased deficit and inability to make benefit payments, meaning cash injections required from employers.	<ul style="list-style-type: none"> <li>Models used in the actuarial valuation process, including liability projections and calculations, are incorrect or misinterpreted resulting in poor funding decisions (e.g. poor cash flow data being shared).</li> <li>Inappropriate assumptions or methodology used in the valuation process leading to inconsistent long term objectives.</li> <li>Increases in commodity prices push up the level of inflation - Inflation increases pension payments but assets do not grow at required level.</li> <li>A significant allocation in a particular type of asset will lead to an over exposure in that area and therefore vulnerability to significant changes (increasing the funding gap).</li> </ul>	Head of Fund	4	3	H	<ul style="list-style-type: none"> <li>Assumptions used are market consistent and take into account Fund specifics, such as investment strategy and Fund mortality experience.</li> <li>An overall level of prudence is built into the assumptions to reduce the risk of adverse experience.</li> <li>The Pension Fund Committee monitors the funding level on a quarterly basis allowing the Committee to understand if the funding level is reducing.</li> <li>Funding advice and modelling is delegated to professionals specialising in LGPS scheme actuarial services (Mercer).</li> </ul>	4	1	M	LPP to undertake further work on funding level and cash flow analysis as part of the work on Investment Strategy advice.	Investment Panel	Mar 2018
15	Cash-Flow Management	Insufficient funds to meet payments from the Fund: Benefits are not paid on time.	<ul style="list-style-type: none"> <li>Inadequate liquidity due to type of investments resulting in the inability to meet payments as they fall due and / or a need to liquidate assets at an unfavourable point of time; and</li> <li>Poor cash management results in the inability to meet payments as they fall due, un-invested cash balances, or overdrafts, implying loss of income or unnecessary costs being incurred.</li> </ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"> <li>The Fund portfolio includes liquid and tradeable assets in order to ensure a shortfall would be covered.</li> <li>Rental income received by the Fund covers the shortfall in contributions received allowing payroll to be met on a monthly basis;</li> <li>Investment Panel with support from LPP have reviewed the Investment Strategy against the next 5 years cash requirements for the Fund.</li> </ul>	2	2	M	<p>LPP to undertake further work on funding level and cash flow analysis as part of the work on Investment Strategy advice.</p> <p>The Investment Panel will make recommendations to Pension Fund Committee to revise the Investment Strategy asset allocations to ensure there is enough liquidity in the portfolio.</p>	Investment Panel	Dec 2017

16	Admitted Bodies Arrangements	The Admitted body is unable to make good any shortfall of their share of the overall deficit requiring LCC to make additional contributions on their behalf.	<ul style="list-style-type: none"><li>Admitted bodies are unable to pay cessation debt on exit leading to an unfunded shortfall that will be required to be covered by LCC and/or other admitted bodies.</li></ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"><li>LPPL monitor employer's risk profiles with reference to the size of their liability.</li><li>The Pension Fund Committee review the covenant on an annual basis;</li><li>LPP Employer Risk Team are assessing the financial strength of all scheme employers participating in the Lancashire Fund;</li><li>The implementation of a robust new 'Admission &amp; Termination Policy'.</li></ul>	2	1	L	<p>A covenant review is being carried out.</p> <p>The draft 'Admission &amp; Termination Policy' is currently out for consultation with employers. The final policy will be recommended to Pension Fund committee in March for an April implementation.</p>	Head of Fund	Mar 2018
MEMBER RISK														
M1	Benefit Payments	Pensions payments and lump sums are incorrectly processed.	<ul style="list-style-type: none"><li>Administrator SLA's are not in place and/or performance is not reported or frequently monitored.</li><li>Misapplication of the Fund's rules leads to incorrect or untimely benefit calculations or payments.</li><li>System changes at the administrators leading to inaccurate benefit payments.</li><li>Pensions are paid late or not at all, causing distress to members or reputational impact to the Fund.</li></ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"><li>Administrator reporting against SLA reviewed on a quarterly basis.</li><li>Complaints process monitored by the Head of Fund.</li><li>Documented processes and procedures in place with supervisor review performed for each benefit calculations.</li><li>Timeliness of monthly payroll monitored.</li><li>The Local Pension Board (LPB) provide scrutiny of breaches, complaints, KPIs, and assurance statements provided by LPPL and auditors.</li></ul>	2	1	L	<ul style="list-style-type: none"><li>Review of SLA's with LPP to ensure they are measuring the right indicators.</li></ul>	Head of Fund	On going
M2	Member Comms	Fund and individual communications are inadequate, inappropriate or not made in a timely manner.	<ul style="list-style-type: none"><li>Fund and individual communications are inadequate, inappropriate or not made in a timely manner leading to members making badly informed decisions/lose out on potential benefits resulting in legal claims being made against the Trustee.</li></ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"><li>Formal monitoring of member complaints and appeals process.</li><li>Administrator reporting against SLA reviewed on a quarterly basis.</li><li>LPB has a role and expertise reviewing and making recommendations to improve communications.</li></ul>	2	1	L	<ul style="list-style-type: none"><li>Review of SLA's with LPP to ensure they are measuring the right indicators</li></ul>	Head of Fund	On going
M3	Data quality	Member experience negatively impacted through inconsistent and/or inappropriate approaches in treatment and management of member data.	<ul style="list-style-type: none"><li>Data is not maintained, leading to incorrect or no benefits being paid.</li></ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"><li>LPPL member data quality checking procedures in place.</li><li>Administrator reporting against SLA reviewed on a quarterly basis.</li><li>LPB provide scrutiny of KPIs and assurance statements from LPPL.</li></ul>	2	1	L	<ul style="list-style-type: none"><li>Review of SLA's with LPP to ensure they are measuring the right indicators.</li></ul>	Head of Fund	On going
M4	Contributions	Inaccurate / untimely contribution payments	<ul style="list-style-type: none"><li>Contributions are calculated incorrectly or not paid over within the statutory deadline.</li></ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"><li>Administrator reporting against SLA reviewed on a quarterly basis.</li><li>Contribution reconciliations are performed by LCC. Reasonableness checks are performed by LPPL.</li></ul>	2	1	L	<ul style="list-style-type: none"><li>Review of SLA's with LPP to ensure they are measuring the right indicators.</li></ul>	Head of Fund	On going

					Inherent Risk				Residual Risk			Risk actions		
O1	LCPF Committees and Fund Governance	Fund governance arrangements are inappropriate / ineffective, leading to: <ul style="list-style-type: none"> <li>opportunities being missed;</li> <li>risks not being managed;</li> <li>ineffective or inefficient decision making;</li> <li>increased reputational risk; and</li> <li>Inability to adequately challenge LPPL.</li> </ul>	<ul style="list-style-type: none"> <li>The Pension Fund Committee and its sub-committees do not have the appropriate skills, knowledge and experience (both technical and board related skills) and support to discharge oversight responsibilities.</li> <li>The Pension Fund Committee, sub-committees and the Executive structure is inappropriate, and do not have clear and aligned roles, responsibilities and delegated authorities, leading to ineffective or inefficient decision making or lack of oversight.</li> <li>Fund objectives are unclear, not understood or not fully bought into resulting in: <ul style="list-style-type: none"> <li>opportunities being missed;</li> <li>risks not being managed; and</li> <li>ineffective or inefficient decision making.</li> </ul> </li> </ul>	Head of Fund	3	4	H	<ul style="list-style-type: none"> <li>Monthly Committee training is delivered to Committee members and officers.</li> <li>Induction process in place for new Committee members.</li> <li>Committee composition comprises a range of relevant skills and experience including officer membership to provide ongoing support and technical expertise.</li> <li>Where required, external technical expertise is drawn upon via Committee attendance by external advisors (e.g. Investment advisors).</li> <li>Committee Terms of Reference are in place to clearly communicate Committee responsibilities.</li> <li>Committees operate a conflicts of interest policy and process.</li> <li>The delegation of authorities and authority levels has been documented and approved by the Pension Committee.</li> <li>The Head of Fund and the Pension Committee agree the annual business plan including Fund objectives. An update on the plan is presented at each Committee meeting and is monitored on a monthly basis by the Head of Fund.</li> <li>LPB scrutiny of governance structure of LCPF should be mitigating factor</li> </ul>	3	2	M	<ul style="list-style-type: none"> <li>New Strategic plan for the Fund to be produced and presented at Dec committee meeting.</li> </ul>	Head of Fund	Dec 2017
O2	Reliance on key persons and expertise	Failure to maintain an adequately resourced operation to support the execution of the Fund's objectives.	<ul style="list-style-type: none"> <li>Skills and knowledge of LCC officers are lost with only a limited market from which to seek their replacement.</li> <li>Skills and knowledge within LPPL are lost with only a limited market from which to seek their replacement.</li> <li>A lack of Councillor continuity impacting composition and effectiveness of the Pension Committee;</li> <li>Unavailability of LPP's Responsible Investment Manager.</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>Committee composition comprises a range of relevant skills and experience including officer membership to provide ongoing support, continuity and technical expertise.</li> <li>LPB scrutiny of PFC decisions should be mitigating factor;</li> <li>LCPF send representatives to the LAPFF business meeting;</li> <li>LCPF officer now overseeing work on RI.</li> </ul>	3	3	H	<ul style="list-style-type: none"> <li>Induction training for new committee members has taken place.</li> <li>Monthly workshops will be delivered.</li> <li>Increased resource in Officer Team to ensure succession planning.</li> <li>LCPF have recruited a new officer to support internal capacity.</li> </ul>	Head of Fund	Ongoing
O3	Risk Management	Risk Management arrangements within the Fund are inappropriate / ineffective resulting in risks being missed or not appropriately managed.	<ul style="list-style-type: none"> <li>Inappropriate oversight and monitoring impacts on the effective management of risks, ineffective or inefficient decision making and missed opportunities.</li> <li>The risk appetite of the Fund is not articulated, understood and embedded across the Fund.</li> <li>Risk management information and assurance mechanisms are inaccurate, incomplete, untimely or not actioned.</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>Risk identification and assessment exercise completed in Q4 2016. Assurance requirements for key risks identified as part of this process with subsequent action plans being developed. This process will help build the foundation of the Fund's risk management framework.;</li> <li>Recruitment of a new Governance and Risk Officer;</li> <li>Risk Management training for Members &amp; Board delivered;</li> <li>Regular meeting with LPP Corporate Risk Specialist.</li> <li>LPB scrutiny of risk register and risk management processes as well as PFC decision-making should be mitigating factor</li> </ul>	3	2	M	<ul style="list-style-type: none"> <li>New Governance and risk officer appointed.</li> <li>A risk framework will be developed and reported to committee in December.</li> </ul>	Head of Fund	Ongoing
O4	Compliance	Compliance breaches (i.e. Fund rules, legislation, regulation) which may result in	<ul style="list-style-type: none"> <li>Failure to identify sufficiently early and mitigate applicable regulatory changes.</li> <li>Fund fails to comply with corporate governance guidance (e.g. Stewardship</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>A comprehensive breaches policy and guidance/procedures is in place. This document sets out the policy and procedures to</li> </ul>	3	3	H	<ul style="list-style-type: none"> <li>Internal audit plan to include a review of governance</li> </ul>	Head of Fund	Ongoing



					Inherent Risk				Residual Risk			Risk actions		
		reputational or financial impact to the Fund or its members.	<p>Code) incurring reputational damage.</p> <ul style="list-style-type: none"><li>LPPL and its approved persons fail to observe applicable FCA regulations and fail to maintain their authorised status leading to financial loss for the shareholders.</li><li>Breach of the LPPL Shareholder agreement (e.g. failure to meet as a Board and breach of ABC laws) leading to financial loss and reputational damage.</li><li>MiFID II regulations come into effect from the 3<sup>rd</sup> Jan 2018. Although compliance with the EU directive sits with LPP, non-compliance and subsequent implications with the FCA could impact LCPF reputation.</li></ul>					<p>be followed by certain persons involved with the Lancashire County Pension Fund, the Local Government Pension Scheme managed and administered by Lancashire County Council, in relation to reporting breaches of the law to the Pensions Regulator.</p> <ul style="list-style-type: none"><li>The Head of Fund performs a review of the Myners Principles with the Committee and Board on periodic basis. This review is considered within the annual governance statement.</li><li>The Fund has published its annual update on how it has implemented the Code. The assessment is reviewed by the Committee and the Board.</li><li>The Head of Fund, Committee and Board, on an annual basis, assess, review and publish the Fund's Governance Compliance Statement.;</li><li>LPP - Work currently underway to ensure compliance to the new MiFID II requirements;</li><li>LPP's dedicated Compliance function conducts regulatory horizon scanning for early detection of applicable regulatory changes;</li><li>LPP's dedicated Compliance function conducts a compliance monitoring programme which assesses LPPs performance of its FCA regulated functions. The results reported to LLP I's Risk Committee and Board. Initial and on-going regulatory training and awareness covers the obligations of both the firm and the individual;</li><li>LPP's policies are monitored and performance against policies reported internally by the responsible departments, by the Operations Risk Specialist, by Compliance and subject to review by Internal Audit.</li><li>LPB scrutinise both regular compliance documents and statutory statements.</li></ul>				<p>arrangement.</p> <ul style="list-style-type: none"><li>Governance review of LPP structure will be started in July 2017;</li><li>A review of the Fund's governance is to be carried out once the LCC Management Restructure is completed.</li></ul>		
O5	Cost Management	Unnecessary costs incurred and budget variances realised.	<ul style="list-style-type: none"><li>LCC does not run effectively: Inefficient use of advisors, third parties or inefficient controls use up resources which should be used to meet benefits.</li></ul>	Head of Fund	1	3	L	<ul style="list-style-type: none"><li>The Head of Fund (using external support as required) monitors performance of the Fund against the business plan and budget on a monthly basis.</li></ul>	1	2	L	<ul style="list-style-type: none"><li>Regular budget monitoring on the fund and LPP budget to be reported to committee on a quarterly basis.</li></ul>	Head of Fund	Ongoing
O6	Business and IT Continuity	IT systems, business processes or business infrastructures fail (across the Fund) or are inadequate.	<ul style="list-style-type: none"><li>IT systems, business processes or business infrastructures fail (across the Fund) or are inadequate resulting in financial loss, missed opportunities or failure to pay benefits.</li></ul>	Head of Fund	3	2	M	<ul style="list-style-type: none"><li>LCC has in place a business continuity plan which includes LCPF fund staff and their internal operations.</li><li>The fund's IT platform is part of the LCC's BTLS network. All LPP systems are to be transferred to a platform hosted by LPP from Nov 17;</li><li>LPP has a business continuity plan in place which is designed to provide a backup location and architecture to allow for business processes to continue to operate in the event of a failure event.</li></ul>	3	2	M	<ul style="list-style-type: none"><li>LPP internal audit plan includes a review of IT arrangement and transition plan.</li><li>Outcome of this work to be reported to committee.</li></ul>	Head of Fund	Ongoing

					Inherent Risk				Residual Risk			Risk actions		
O7	Data Protection and cyber security	Failure to hold personal data securely (data transfer, data retention and back up).	<ul style="list-style-type: none"> <li>Failure to ensure the confidentiality / security, integrity and availability of membership data, potentially impacting members and/or the reputation of the Fund.</li> <li>Compliance with the EU General Data Protection rules (GDPR) which will come into force on 25<sup>th</sup> May 2018</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>Data protection agreements are in place with third parties.</li> <li>LCC has in place a data protection policy.</li> <li>IT systems are configured with firewall and antivirus solutions.;</li> <li>LPP and LCC are working to implement the requirements of GDPR by 25<sup>th</sup> May 2018.;</li> <li>LPP are in the process of acquiring the ISO27001 accreditation (Information Security;</li> <li>LPP are running an internal project to identify our data footprint and define a roadmap for GDPR compliance</li> <li>LPP has appointed an Information Governance Officer to ensure compliance;</li> <li>All LCC and LPP staff have received relevant Information Governance training;</li> <li>LPB provide scrutiny of data protection arrangements.</li> <li>Agreement between LCC and LPP is being reviewed with regards to GDPR.</li> </ul>	3	(INCREASE FROM 2)	H	<ul style="list-style-type: none"> <li>LPP internal audit plan includes a review of IT arrangements.</li> <li>Outcome of this work to be reported to committee.</li> </ul>	Head of Fund	Ongoing
O8	Fraud Risk	Inadequate Financial Controls / loss of funds through fraud.	<ul style="list-style-type: none"> <li>Key Financial Processes not documented; absence of formal reconciliation regime; absence of adequate controls.</li> </ul>	Head of Fund	2	2	M	<ul style="list-style-type: none"> <li>Assets are held by independent custodian which is responsible for protecting and safeguarding Fund assets.</li> <li>The delegation of authorities and authority levels, which promotes segregation of duties, has been documented and approved by the Pension Committee.</li> <li>The fund has a separate bank account which is operated by LCC and audited on an annual basis. Payment authorisation controls are in place to prevent any losses due to fraud.</li> </ul>	1	1	L	<ul style="list-style-type: none"> <li>Internal audit work includes a review of financial controls.</li> </ul>	Head of Fund	Ongoing

#### TRANSITION RISK

					Inherent Risk				Residual Risk			Risk actions		
T1	Decision Making	Inappropriate or untimely decision making as a result of lack of transparency between LCC and LPPL.	<ul style="list-style-type: none"> <li>Non conformity with Shareholder agreement and Matters Reserved.</li> <li>Lack of relationship management.</li> <li>Lack of assurance and oversight reporting from LPPL to LCC.</li> <li>Non conformity with delegated authorities.</li> <li>Absence of sufficient representation of LCC within LPPL.</li> <li>Absence of review and challenge and oversight of LPPL.</li> </ul>	Head of Fund	4	4	H	<ul style="list-style-type: none"> <li>Shareholder agreement and Matters Reserved in place. Decisions are made in line with this agreement.</li> <li>Legal agreements between LPPL companies are in place and monitored by LCC Officers.</li> <li>The delegation of authorities and authority levels has been documented and approved by the Pension Fund Committee and Full Council.</li> <li>A formal governance structure has been established which enforces decision making and approval at the right levels.</li> <li>LCC representation on the LPPL Board via the Non-Executive Director, providing transparency at Board meetings.</li> <li>LPPL Non-Executive Director approval required for LPPL Board decisions to take effect.</li> <li>LCC Head of Fund holds pre-board meetings to discuss matters with NED, increasing transparency.</li> <li>LPPL attend the Investment Panel to present updates / recommendations / proposals for ratification.</li> <li>LPB provide review and challenge, which is mitigating factor</li> </ul>	4	3	H	<ul style="list-style-type: none"> <li>Internal audit plan to include a review of governance arrangements</li> </ul>	Head of Fund	On going
T2	Change Management	Ongoing programme of change is not managed preventing project delivery, avoidable delays or excessive costs.	<ul style="list-style-type: none"> <li>Change is not fully reflected in processes and controls such that something falls between the cracks.</li> <li>Interdependencies and resource conflicts between projects are not managed effectively.</li> <li>Project fails to deliver to scope, time and budget. Benefits are not realised.</li> <li>Key resources become unavailable.</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>LPP have a detailed business transition plan which incorporates transition of investment, administration and ICT systems. LPP's internal auditors (Deloitte) are reviewing and reporting on these plans. The Head of Fund and Head of Internal Audit review the outcome of the LPP internal audit work and will report to Pension Fund committee and the Local Pension Board as appropriate.</li> <li>An initial cost benefit analysis of the setup of LPPL has been produced. Monitoring mechanisms are to be established.</li> <li>LPB are providing independent scrutiny and challenge to the change management.</li> </ul>	3	3	H	<ul style="list-style-type: none"> <li>Quarterly reporting on administration transition to be presented to committee.</li> <li>Quarterly monitoring of Pension fund and LPP budget to be presented to committee.</li> <li>Regular reporting on the investment transition plan will be presented to committee.</li> </ul>	Head of Fund	On going
T3	Investment Transition	Investment transition is poorly managed resulting in: error; unexpected cost; tax implications; ineffective decision making; and loss of FCA license.	<ul style="list-style-type: none"> <li>Change in legal ownership resulting in significant transactional taxes being incurred in certain territories.</li> <li>Significant transactional costs arising from selling and repurchasing Fund assets.</li> <li>Inaccurate allocation of units within sub funds leading to inaccurate reporting and financial loss to the Fund.</li> <li>Transition managers fail to deliver on their agreements and maintain appropriate level of service leading to financial loss.</li> <li>Lack of information to give clarity of transitional impact to the Pension Committee.</li> <li>The Fund could have a disproportionately higher transactional cost (bid-offer) if there is little overlap between current investment managers and the chosen sub fund investment managers.</li> <li>Significant market movements whilst investment consolidation is ongoing and</li> </ul>	Head of Fund	3	3	H	<ul style="list-style-type: none"> <li>Asset transition work streams consider tax risk specific to each asset class. Professional tax advice is sought;</li> <li>Transition managers are selected and engaged using contracts which document agreed tolerances for friction costs;</li> <li>Unit allocations are calculated by the Transfer Agent and reviewed internally and are reviewed by the depositary bank;</li> <li>Transition manager agreements outline minimum service levels and recourse that LPPI has in event they are not maintained;</li> </ul>	3	3	H	<ul style="list-style-type: none"> <li>Public equity transition complete and details reported to March committee.</li> <li>Details on other asset transitions will be reported when complete.</li> <li>Credit transition completed in September 2017 and will be reported to December committee.</li> </ul>	Head of Fund	March 2018



					Inherent Risk				Residual Risk			Risk actions		
			the funds are out of the market, leading to significant repurchase costs. <ul style="list-style-type: none"> <li>LPPL fails to establish suitable sub funds on transition leading to poor investment performance.</li> </ul>											
T4	Admin transition	Ineffective transition of administration responsibilities and processes leads to poor member experience.	<ul style="list-style-type: none"> <li>The LPPL Administration team does not retain appropriate resource to manage the transition of services and does not maintain performance as a result, leading to poor member experience.</li> <li>Administrator performance is not reported in a timely manner and frequently monitored. Administrator SLA's are not in place and/or are not frequently monitored, leading to poor member experience.</li> <li>System changes at the administrators leading to inaccurate benefit payments and misapplication of Fund rules.</li> </ul>	Head of Fund	4	3	H	<ul style="list-style-type: none"> <li>A detailed transition plan for the LPPL Administration function is being implemented in Apr 18;</li> <li>The LPPL Administration team has retained LCC staff who are experienced in their roles. All LPP staff receive training on scheme rules;</li> <li>Systems changes are planned, and undergo testing before release;</li> <li>Quarterly Administration reporting is reviewed by the Head of Fund who monitors administration performance against defined service level agreements and key performance indicators. No issues in performance levels have yet been identified as a result of transition.</li> <li>LPB are providing independent scrutiny and challenge to the change management.</li> </ul>	4	2	H	<ul style="list-style-type: none"> <li>Quarterly reporting on administration transition to be presented to committee.</li> </ul>	Head of Fund	March 2018
T5	External Drivers	Changes in government thinking, personnel / key stakeholders significantly alter the requirements of pooling, increasing cost.	<ul style="list-style-type: none"> <li>Pool no longer needed and funds abandoned missing the benefits from a level of collective investment and sunk costs.</li> <li>Merger of funds is put back on the table due to pooling target not being met (£25bn).</li> <li>Dilution of shareholder power due to on-boarding of additional funds leading to loss of control over the Partnership.</li> <li>Conflicting interests of shareholders leading to slow and ineffective decision making.</li> </ul>	Head of Fund	4	4	H	<ul style="list-style-type: none"> <li>Active engagement with other funds to consider possibility of pooling (e.g. Berkshire to enter into the Partnership).</li> <li>Shareholder agreement and Matters Reserved in place. Decisions are made in line with this agreement.</li> <li>Close collaboration amongst funds. Clear governance established with Cross pool meetings to share understanding.</li> <li>Legal advice provided.</li> <li>Monitoring of LPPL service performance (investment and administration) to detect degradation in service as a result of increasing demands from multiple funds.</li> </ul>	4	3 (REDUCED FROM 4)	H	<ul style="list-style-type: none"> <li>Continue to engage with other potential partners.</li> <li>Legal advice to be sought for any changes to shareholder agreement and reserved matters.</li> </ul>	Head of Fund	Ongoing