



Clwyd Pension Fund - Control Risk Register

Administration & Communication Risks

Objectives extracted from Administration Strategy (05/2021) and Communications Strategy (09/2019):

- A1 Provide a high quality, professional, proactive, timely and customer focussed administration service to the Fund's stakeholders
- A2 Administer the Fund in a cost effective and efficient manner utilising technology appropriately to obtain value for money
- A3 Ensure the Fund's employers are aware of and understand their roles and responsibilities under the LGPS regulations and in the delivery of the administration functions of the Fund
- A4 Ensure the correct benefits are paid to, and the correct income collected from, the correct people at the correct time
- A5 Maintain accurate records and ensure data is protected and has authorised use only
- C1 Promote the Scheme as a valuable benefit and provide sufficient information so members can make informed decisions about their benefits
- C2 Communicate in a clear, concise manner
- C3 Ensure we use the most appropriate means of communication, taking into account the different needs of different stakeholders but with a default of using electronic communications where efficient and effective to do
- C4 Look for efficiencies and environmentally responsible ways delivering communications through greater use of technology and partnership working
- C5 Regularly evaluate the effectiveness of communications and shape future communications appropriately

Risk no.	Risk Overview (this will happen)	Risk Description (if this happens)	Strategic objectives at risk (see key)	Current impact (see key)	Current likelihood (see key)	Current Risk Status	Internal controls in place	Target Impact (see key)	Target Likelihood (see key)	Target Risk Status	Meets target?	Date Not Met Target From	Expected Back On Target	Further Action and Owner	Risk Manager	Next review date	Last Updated	
1	Unable to meet legal and performance expectations (including inaccuracies and delays) due to staff issues	That there are poorly trained staff and/or we can't recruit/retain sufficient quality of staff, including potentially due to pay grades (including due to Covid-19)	All	Marginal	Significant	High	1 - Training Policy, Plan and monitoring in place 2 - Benefit consultants available to assist if required 3 - Ongoing task/SLA reporting to management/AP/PC/LPB to quickly identify issues 4 - Data protection training, policies and processes in place 5 - System security and independent review/sign off requirements 6 - ELT established 7 - Temporary staff changed to permanent, and further resource increase/recruitment to new posts 8 - Ongoing monitoring of ELT and Ops resource/workload for backlogs 9 - Establishment of aggregation team 10 - Ongoing training within the team 11 - Impact of potential Covid absences being discussed at weekly Covid catch ups and plans in place for ensuring priority work continues unaffected/training of new Lead PO has been undertaken.	Negligible	Low	High	☹️	Current impact 1 too high Current likelihood 1 too high	31/10/2021	Jun 2022	1 - Continue discussions with HR about effective recruitment advertising (KW) 2 - Use internal secondment to officer role and then backfill with new pension assistants (KW)	Pensions Administration Manager	31/05/2022	18/02/2022
2	Unable to meet legal and performance expectations (including inaccuracies and delays) due to employer issues	Employers: -don't understand or meet their responsibilities -don't have access to efficient data transmission -don't allocate sufficient resources to pension matters (including due to Covid-19)	A1 / A4 / A5 / C2 / C3 / C4 / C5	Marginal	Low	Low	1 - Administration strategy updated 2 - Employer steering group established 3 - Greater engagement through Pension Board 4 - Backlog project in place 5 - Establishment of ELT 6 - Increased data checks/analysis (actuary and TPR) 7 - Implemented further APP data checks to identify issues 8 - Updated Admin Strategy to include a compliance declaration 9 - Increased engagement with employers as to how they are managing due to Covid, and ongoing CPF requirements, and also increased monitoring of employer data coming into CPF 10 - Developed and issuing monthly KPI reporting for employers 11 - Reviewed annual SLA communications with employers 12 - I-connect in place for all Fund employers 13 - Monthly meetings with Employers to discuss any ongoing data issues.	Negligible	Very Low	Low	☺️	Current impact 1 too high Current likelihood 1 too high	01/07/2016	Sep 2022	1 - After 2020/21 year end checks consider need to roll out APP training - in house and employers (KM) 2 - Engage directly with employers on data issues (KW/AH)	Pensions Administration Manager	31/05/2022	18/02/2022
3	Unable to meet legal and performance expectations due to external factors	Big changes in employer numbers or scheme members or unexpected work increases (e.g. severance schemes or regulation changes including McCloud, Pensions Dashboards and potential exit cap)	A1 / A4 / A5 / C2 / C3 / C4 / C5	Marginal	Significant	High	1 - Ongoing task and SLA reporting to management/AP/PC/LPB to quickly identify issues 2 - Benefit consultants available to assist if required 3 - Recruitment to new posts 4 - McCloud planning undertaken, including governance structure with Steering Group and PMG 5 - The Pension Administration Manager sits on PLSA working group for Pensions Dashboards 6 - The Fund has volunteered to test the integration of the Administration system and Pensions Dashboard	Marginal	Low	High	☹️	Current likelihood 1 too high	27/08/2018	Mar 2023	1 - Ongoing consideration of resource levels post recruitment of new posts (KW) 2 - Ongoing consideration of likely national changes and impact on resource (KW) 3 - Ongoing consideration of potential exit cap on processes etc (KW/KM) 4 - Ongoing consideration of Pensions Dashboards and impact on resource (KW)	Pensions Administration Manager	31/05/2022	18/02/2022
4	Scheme members do not understand or appreciate their benefits	Communications are inaccurate, poorly drafted, insufficient or not received (including McCloud and potential exit cap)	C1 / C2 / C3	Negligible	Low	Low	1 - Communications Strategy in place and being reviewed to improve engagement 2 - Annual communications survey for employees and employers 3 - Specialist communication officer in team 4 - Website reviewed and relaunched (2017) 5 - Member self service in place 6 - Ongoing identification of data issues and data improvement plan in place 7 - Address tracing exercise undertaken for members who have not set a communication preference 8 - A Member self service activation key has been re-issued to all members who do not have a communication preference set	Negligible	Very Low	Low	☹️	Current likelihood 1 too high	01/07/2016	Sep 2022	1 - Review of and update website during 2022/23 (KM) 2 - Review of success of new website planned for 2022/23 (KM)	Pensions Administration Manager	31/05/2022	18/02/2022
5	High administration costs and/or errors	Systems are not kept up to date or not utilised appropriately, or other processes inefficient (including McCloud and potential exit cap)	A2 / A4 / C4	Marginal	Low	Low	1 - Business plan has number of improvements (I-connect/MSS etc) 2 - Review of ad-hoc processes (e.g. deaths and aggregation) 3 - Participating as a founding authority on national framework for admin system 4 - Procurement of Altair on business plan 5 - Implementation of other Altair modules including Altair Insights (relating to TPR scores) 6 - Increased engagement with Heywood about change in their business model 7 - Increased engagement with Heywood re McCloud software enhancements 8 - IConnect in place for all scheme employers 9 - Ongoing identification of data issues and data improvement plan in place 10 - Ongoing and continued use of member self service	Negligible	Very Low	Low	☹️	Current impact 1 too high Current likelihood 1 too high	01/07/2016	Dec 2022	1 - Review of and update website during 2022/23 (KM) 2 - Review of success of new website planned for 2022/23 (KM) 3 - Carry out CPF tender for pension admin system (KW) 4 - If delays in system upgrades, look for alternative solutions to administer regulatory changes (KW)	Pensions Administration Manager	31/05/2022	18/02/2022
6	Service provision is interrupted	System failure or unavailability, including as a result of cybercrime and Covid-19	A1 / A4 / C2	Marginal	Low	Low	1 - Disaster recover plan in place and regularly checked 2 - Hosting implemented 3 - Implemented lump sum payments via pensioner payroll facility 4 - Regular communications carried out during pandemic with Heywood and FCC regarding areas of risk 5 - First risk review of cyber resilience with Heywood complete.	Negligible	Unlikely	Low	☹️	Current impact 1 too high Current likelihood 2 too high	08/11/2019	Sep 2022	1 - Develop updated business continuity plan for CPF (KW) 2 - Review of cybercrime risk controls (KW/PL) 3 - Develop post Covid-19 approach to working arrangements (KW/PL)	Pensions Administration Manager	31/05/2022	18/02/2022