

Resources Department  
222 Upper Street  
London, N1 1XR

Report of: Corporate Director of Resources

Meeting of: Pensions committee/ Pensions Board

Date: 24<sup>th</sup> July /31<sup>st</sup> July 2024

## Subject: LGPS – Pensions Risk Register

### 1. **Synopsis**

- 1.1. This report provides the Board with information on the potential risks identified in the administration of Islington Pension Fund. The Pensions Risk Register (PRR) also provides tangible mitigation measures to de-escalate risks preventing them from becoming critical problems.
- 1.2. This report summarises the further development and assessment of those risks that were initially identified on the PRR with the highest risk rating score before mitigation measures.
- 1.3. All risks have been reviewed during the period from February 2024 to April 2024 and if no additional concerns or external actions impact on the designated risk, the trend arrow will be positioned horizontally.
- 1.4. The PRR (Appendix 1) is prefaced by an explanatory table (risk matrix) that sets out how the impact and likelihood ratings of 'low', 'medium' and 'high' rating can be interpreted.

### 2. **Recommendations**

- 2.1. To note the contents of the report and revisions made to the PRR.
- 2.2. To note the risk associated with the failure to apply the correct Pensions Increase for all pensioner dataset due to software calculation issues.
- 2.3. To note the risk associated with the inaccessibility of year end payroll reports as detailed in para 3.5

- 2.4. To note the risk associated with loss of investment returns, bond yields fall.

### **3. Background**

- 3.1. The Pensions Risk Register (PRR) outlines the key objectives of Islington Pension Fund and its administration. It establishes the methodology for implementing proactive risk management to ensure that Islington Pension Fund has sufficient assets to meet its pension liabilities in accordance with the Pensions Regulator code of practice. Appendix 1 sets out the current risks identified by the Pension Fund in collaboration with the Council's Pensions Board.
- 3.2. The PRR is reviewed and movement in risks levels of activities and mitigation factors applied are reported to the Pension Board quarterly and annually to the Pensions committee. There are three activities that have been assessed as high and are reviewed below together with the mitigated actions.
- 3.3. In reviewing and making revisions to the PRR in accordance with the Pensions Regulator code of practice issued under section 90(2)(k) of the Pensions Act 2004, the Pension Fund must have regard to the extent to which the exercise of identifying and evaluating risks and the mitigation satisfy the legal requirements to have appropriate internal controls.

### **Strategy & Finance, People**

#### **Risk – Failure to apply correct Pensions Increase**

- 3.4. Testing of the Pensions Increase (PI) Program commenced in March 2024 and a number of technical issues arose which had to be referred to the software suppliers to help resolve. The Pensions Team identified a number of Pensioners who were not captured as part of the PI program, this led to a much wider exercise to identify all such cases. The mitigated risk score is high and has increased but is subject to constant review. Additional hours of overtime have been approved to mitigate the risk.

#### **Risk – The late provision of payroll reports**

- 3.5. The Pensions Office continue to engage in discussions with the Payroll Consultant to build a new suite of pension reports. This process has been productive but officers continue to work through issues. The impact of late or incomplete reports can mean that Members Annual Benefits Statements could be late or inaccurate. The mitigated risk score is high and has increased but is subject to constant review.

#### **Risk – The late provision of payroll reports from external providers**

- 3.6. The Pensions Office have encountered problems obtaining pay figures from one of our Admitted Bodies in relation to a recent retirement, despite repeated requests. This matter has now been escalated to the organisation's Chief Executive, as part of their

complaints procedure. If this matter remains unresolved it will be reported to the Pensions Regulator. The mitigated risk score is high but is subject to constant review.

### **Risk – Lack of understanding among members of scheme issues/options**

- 3.7 The Pensions Office is planning a full review of our member communication in November 2024 to ensure they meet best practice, with the focus on improving member engagement and understanding of the LGPS, in co-ordination with HR and the trade unions. The communication will include pension surgeries, workplace meetings and more information on our webpages. The mitigated risk score is low and there is no anticipated change following our planned actions.

## **Finance, Strong Financial and Contract Management**

### **3.8 Risk – Loss of investment returns**

The Council has delegated the investment arrangements of the scheme to the Pensions Committee who decide on the investment policy most suitable to meet the liabilities of the Scheme and the ultimate responsibility for the investment policy that lies with it. To mitigate risk there is a clear investment and asset allocation strategy informed by Investment Advisers and the Council's actuary. The mitigated risk score whilst still high remains stable and is subject to constant review.

## **Customer Outcomes & Quality**

### **3.9 Risk – Incorrect information in public domain including Fund website**

Information management and accuracy has become a key component in the Fund's move to increase automation and self service. The ongoing transformation of work and delivery of digital services means greater scrutiny on the pension information on our public platforms. In view of this development the Pensions Office will be changing the reviewing of information on our website from quarterly to every 2 months. The mitigated risk score is low and there is no anticipated change following our planned actions.

## **4. Implications**

### **4.1. Financial Implications**

- 4.1.1. The cost of administering the LGPS is chargeable to the Pension Fund. There are no financial implications arising directly from the report.

## 4.2. **Legal Implications**

- 4.2.1. There are no specific legal implications in this report. The Pensions Regulator code of practice requires the Pension Fund to prepare, review and publish a Pensions Risk Register. This Register must thereafter be kept under review.

## 4.3. **Environmental Implications and contribution to achieving a net zero carbon Islington by 2030**

- 4.3.1. None applicable to this report. Environmental implications will be included in each report to the Pension Board/Committee as necessary. The current agreed investment strategy statement for pensions outlines the policies and targets set to April 2022 to reduce the current and future carbon exposure by 50% and 75% respectively compared to when it was measured in 2016 and also invest 15% of the fund in green opportunities. The link to the full document is <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/finance/financialmanagement/adviceandinformation/20192020/201909101ondonboroughofislingtonpensionfundinvestmentstrategystatement.pdf>

## 4.4. **Equalities Impact Assessment**

- 4.4.1. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 4.4.2. An Equalities Impact Assessment is not required in relation to this report, because there are no adverse impacts in terms of equalities arising from the contents of this report. The LGPS is a statutory public service pension scheme open to all Council employees.

## 5. **Conclusion and reasons for recommendations**

- 5.1. There is a legal requirement for the Pension Fund to regularly review its Risk Register. In identifying and reviewing the Register the Pension Fund must have regard to ensuring effective internal controls that will not lead to a serious loss of confidence in the public service. Members are asked to note the updates to the PRR attached as Appendix 1.

**Appendices:** Appendix 1

**Background papers:** None

**Final report clearance:**

Authorised by: **Corporate Director of Resources**

Date: 16 July 2024

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