AgendaPension Board

Friday, 13 November 2020, 10.00 am Online only

Notes:

Due to the current Covid-19 pandemic Worcestershire County Council will be holding this meeting in accordance with the relevant legislative arrangements for remote meetings of a local authority. For more information please refer to: Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020.

Please note that this is a public meeting, conducting remotely by videoconferencing between invited participants and live streamed for general access via a link on the Council's website to the Council's Youtube <u>channel</u>.

The Agenda papers and background papers can be accessed electronically on the Council's website. Members of the public and press are permitted to report on the proceedings.



DISCLOSING INTERESTS

There are now 2 types of interests: 'Disclosable pecuniary interests' and 'other disclosable interests'

WHAT IS A 'DISCLOSABLE PECUNIARY INTEREST' (DPI)?

- Any **employment**, office, trade or vocation carried on for profit or gain
- **Sponsorship** by a 3rd party of your member or election expenses
- Any **contract** for goods, services or works between the Council and you, a firm where you are a partner/director, or company in which you hold shares
- Interests in **land** in Worcestershire (including licence to occupy for a month or longer)
- **Shares** etc (with either a total nominal value above £25,000 or 1% of the total issued share capital) in companies with a place of business or land in Worcestershire.

NB Your DPIs include the interests of your spouse/partner as well as you

WHAT MUST I DO WITH A DPI?

- Register it within 28 days and
- **Declare** it where you have a DPI in a matter at a particular meeting
 - you must not participate and you must withdraw.

NB It is a criminal offence to participate in matters in which you have a DPI

WHAT ABOUT 'OTHER DISCLOSABLE INTERESTS'?

- No need to register them but
- You must declare them at a particular meeting where:
 You/your family/person or body with whom you are associated have
 a pecuniary interest in or close connection with the matter under discussion.

WHAT ABOUT MEMBERSHIP OF ANOTHER AUTHORITY OR PUBLIC BODY?

You will not normally even need to declare this as an interest. The only exception is where the conflict of interest is so significant it is seen as likely to prejudice your judgement of the public interest.

DO I HAVE TO WITHDRAW IF I HAVE A DISCLOSABLE INTEREST WHICH ISN'T A DPI?

Not normally. You must withdraw only if it:

- affects your pecuniary interests OR relates to a planning or regulatory matter
- AND it is seen as likely to prejudice your judgement of the public interest.

DON'T FORGET

- If you have a disclosable interest at a meeting you must disclose both its existence and nature – 'as noted/recorded' is insufficient
- Declarations must relate to specific business on the agenda
 - General scattergun declarations are not needed and achieve little
- Breaches of most of the **DPI provisions** are now **criminal offences** which may be referred to the police which can on conviction by a court lead to fines up to £5,000 and disqualification up to 5 years
- Formal **dispensation** in respect of interests can be sought in appropriate cases.



Pension Board Friday, 13 November 2020, 10.00 am, Online only

Membership: Employer Representatives

Mr R J Phillips (Chairman), Ms P Agar, Mr P Grove and Mr A Lovegrove

Member Representatives

Ms O Fielding, Mr S Howarth, Ms L Whitehead and Ms K Wright

Agenda

Item No	Subject	Page No
1	Appointment of Vice-Chairman The Board Terms of Reference stipulate that the Vice-Chairman should be elected for a four-year period and be a Member representative.	
2	Apologies	
3	Declaration of Interests	
4	Confirmation of Minutes To confirm the Minutes of the meeting held on 18 September 2020 (previously circulated).	
5	Pensions Committee - 9 October 2020 To review the Agenda and Minutes of the Pensions Committee meeting held on 9 October 2020: Local Government Pension Scheme (LGPS) Central update Pension Investment update Business Plan Risk Register Pension fund Audited Annual Report and Accounts 2019/20 Worcestershire County Council Pension Fund Administration Budget Forecast Outturn 2020/21 Training update Forward plan.	
6	The Agenda papers and Minutes have previously been sent to members. Update on Scheme Advisory Board (SAB) To receive a verbal update on the meeting of the SAB held on 2 November 2020.	
7	Business Plan	1 - 24

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To obtain further information or a copy of this agenda contact Simon Lewis, Committee Officer, on 01905 846621,

All the above reports and supporting information can be accessed via the Council's website

Date of Issue: Thursday, 5 November 2020

Item No	Subject				
8	Risk Register	25 - 44			
9	Feedback from events To receive verbal feedback from recent conferences and seminars.				
10	Forward Plan	45 - 48			



PENSION BOARD 13 NOVEMBER 2020

BUSINESS PLAN (including the Administering Authority update)

Recommendation

1. The Chief Financial Officer recommends that the Board reviews the Worcestershire Pension Fund (WPF) Business Plan as at 05 November 2020.

Background and update

- 2. The Business Plan is now reviewed and updated quarterly to deliver an extra management / governance tool to:
 - a) Help officers to manage the Fund's activities; and
 - b) Help the Pension Board and the Pensions Committee to ensure that the ongoing management and development of the Fund is in line with longer term policy, objectives and strategy.
- 3. A brief summary of any significant milestones and any issues that we are encountering with delivering is provided in the commentary at the end of each of the 5 key result area (KRA) sections.
- 4. As this Business Plan cover highlights the key current pensions administration issues, it replaces the former, regular Administering Authority Updates.
- 5. The Board's attention is drawn to the following:
 - We are monitoring the new and proposed public sector exit payments legislation, have added wording to our calculations and have done a number of sample manual calculations to ensure that we are able to cope without our pension administrative system being able to produce calculations in line with the new legislation;
 - b) It was agreed at the last Board meeting that sub-groups would be established to undertake deep dives into specific issues covered in the Business Plan and Risk Register in the future. The following are suggested as possible issues for consideration by these sub-groups: GMPs, McCloud, Pooling, Public Sector Exit Payments and The Pensions Regulator; and
 - c) As detailed in Section 5 in September 2020, there has been a busier than usual month for estimates / actual retirements but we achieved our KPIs for 90% of the cases that we have processed (11 of the 12 processes). The exception was our joiners process where all cases were put on hold, so that

we would be able to provide work for our new member of staff to process right from her first day with us on 9 October. For the 2020 / 2021 year to 30 September we have, by and large, achieved our KPIs with the exception of joiners. We have met all our average turnaround targets for September and the 2020 / 2021 LGPS year to 30 September.

Supporting information

• Appendix - WPF Business Plan 05 November 2020

Contact Points

Specific Contact Points for this report

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Pensions Investment, Treasury Management & Capital Strategy Manager

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Background Papers

In the opinion of the proper officer (in this case the Chief Financial Officer)
There are no background papers relating to the subject matter of this report.



Business Plan

As at 05 11 2020

1 INTRODUCTION

- 1.1 Our Business Plan:
 - a) Outlines our (Worcestershire Pension Fund's) purpose, goals and key result areas / supporting aspirations (i.e. what is regarded as good in our eyes).
 - b) Presents our targets and budget.
 - c) Details our performance against our investment benchmarks and against our administration target turnarounds.
 - d) Summarises the projects we have in place to achieve our large pieces of work.
- 1.2 Our Business Plan is refreshed and tabled at each quarterly **Pensions Committee** meeting.
- 1.3 Our governance arrangements are set out in our annual reports.

2 BACKGROUND

- 2.1 The Local Government Pension Scheme (LGPS) is funded principally by its constituent employers, with members also contributing.
- 2.2 The benefits it provides are a valuable tool for employers in attracting and retaining staff.
- 2.3 Unlike all other public sector pension schemes the LGPS is a funded scheme, with employer and member contributions invested in financial markets / instruments.
- 2.4 Although a Career Average Revalued Earnings (CARE) LGPS linked to a normal retirement age of State Pension age (min 65) was introduced on 1 April 2014, concerns remain over the long-term cost and sustainability of the LGPS.
- 2.5 We are one of 87 funds administering the LGPS in England & Wales. Worcestershire County Council is the statutorily appointed Administering Authority.
- 2.6 We administer the LGPS for our employers who vary considerably in size and type and who have allowed their current and previous employees to become members:

	As at 31 March 2020	As at 30 September 2020
Employers	202	187
Employee member records	23,133	22,400
Pensioner member records	18,917	19,267
Deferred member records	21,585	21,935
Total member records	63,635	63,602

- 2.7 We manage a £3,066m (as at 30 09 2020) pension fund to pay benefits as they are due.
- 2.8 We face increasing complexities in both the governance and administration of the LGPS and expect the following to create pressures on our resources and workloads:
 - a) COVID-19: whilst we have successfully moved to home-working supported by a small postal / scanning service at County Hall and expect to be able to adapt to the new ways of working, our workload and resources have as yet not been tested by a significant

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- increase in member deaths or in staff absence.
- b) The Pension Regulator (TPR) increasing its requirements re record keeping, data cleansing and covenant reviews.
- c) Adopting the national LGPS Scheme Advisory Board's good governance guidance as best practice.
- d) An ever-changing tax / pensions environment: currently there are consultations on <u>McCloud</u>; <u>Fair Deal</u>; <u>reforming local government exit pay</u> (in addition to the <u>new legislation on restricting public sector exit payments</u>); <u>tax relief for low earners</u>; and <u>changes to the valuation cycle</u>.
- e) The Guaranteed Minimum Pension (GMP) rectification project.
- f) New employers (from outsourcing and academy conversions).
- g) Increasing expectations from stakeholders (e.g. member online access and employer access to information).
- h) Central government asset pooling requirements (we are a partner fund in LGPS Central Limited, LGPSC).

3 PURPOSE, GOALS AND KEY RESULT AREAS (KRAs) / ASPIRATIONS

- 3.1 Our purpose is to deliver on the benefit expectations of our members by managing investments to increase our assets and by understanding our liabilities.
- 3.2 Our goals are to:
 - a) Achieve and maintain a 100% funding level over a reasonable period of time to pay all benefits arising as they fall due.
 - b) Maintain a managed risk investment and funding strategy to achieve the first goal.
 - c) Maintain stabilised employer contribution rates.
 - d) Provide a high quality, low-cost, customer-focused service.
 - e) Be open and honest in all decision making.
- 3.3 To help us to achieve our goals we have identified 5 KRAs:
 - Accounting.
 - Administration.
 - Engagement / Communications / Member & Employer Relations.
 - Governance & Staffing.
 - Investments, Funding & Actuarial.
- 3.4 Our 5 KRAs are underpinned by 14 supporting aspirations. A brief summary of any significant milestones and any issues that we are encountering with delivering these is provided in the commentary at the end of each KRA section.
- 3.5 The one-off (shown as shaded) and annually recurring (shown as unshaded) large pieces of work or projects that we are progressing to achieve these 14 supporting aspirations are detailed in the appendix called Operational Plan: Projects.
- 3.6 Our performance on our day to day business as usual activities is detailed in the Investment Targets and Administration KPIs sections of our Business Plan. Any business as usual issues or developments that we are encountering are included in the commentary at the end of each KRA section.
- 3.7 This Business Plan's numbering recommences with section 4 (after the pages with a light background colouring that follow this paragraph). The boldened and underlined five KRAs that follow are in alphabetical order. The (1) to (14) numbering of our 14 supporting aspirations used below is across the five KRAs. This approach is to ease cross referencing with the second and third columns of the spreadsheet that is Appendix 1 of this Business Plan.

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KRA: Accounting

- 1. To ensure the proper administration, accounting and reporting of all our financial affairs.
- 2. To produce clear *Annual Reports / Statement of Accounts* that enable members and stakeholders to understand the latest and future financial position.

Accounting KRA Commentary:

We are on schedule for producing the audited 2020 Statement of Accounts and annual report in line with the revised statutory guidelines due to Covid-19.

Our budgets for 2020 / 2021 to 2022 / 2023 are detailed in section 6 below. The budget position for 2020 / 2021 year to date is a forecast overspend of £0.5m (£0.4m as a result of increased management fees and £0.1m for the ESG audit and Mercer's employer covenant / risk management system). The forecast overspend does not include any increase in administration costs due to McCloud or the new exit payments landscape that are estimated to require an additional two scale 4 staff on 35 hours for two years at a cost of £0.1m.

We are on schedule for all payments and monitoring.

KRA: Administration

- 3. To *provide a lean, effective, customer friendly benefits administration service*, through the calculation and payment of benefits accurately and promptly in line with the targets published Pension Administration Strategy.
- 4. To maintain **an effective administration system** for the **accurate maintenance of the records of all members** and to continually review and cleanse our data, ensuring it meets the Pension Regulator's requirements and supporting employers to provide correct data.
- 5. To *optimise the use of technology to make processes more efficient and effective* and to continually look at developing services in the most cost-effective manner following careful consideration of business cases. This will include an increased drive towards greater self-service provision for employers and employees, as well as less paper.
- 6. To **become a role model of best practice amongst LGPS Funds** being recognised by members and employers as providing an excellent service and to work **collaboratively and in partnership with both internal and external organisations** to provide higher quality services at a lower cost.
- 7. To support a range of projects and business as usual activities such as the actuarial valuation, policy reviews, committee member / officer training, contract reviews, FRS information for employers and performance monitoring for us and our employers to adhere to.

Administration KRA Commentary:

Data quality:

Having measured the quality of our data as at 22 July 2020, we have been working on correcting our 'scheme specific data', focussing on the areas which can affect benefits. So far, we have looked into transfer in details; tranches of original pension / deferred benefit / dependent's pension; leavers; service and benefits crystallisation events. Although the Pensions Regulator does not set a deadline for addressing data issues after a pension fund

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has measured its data quality, we continue this work throughout the year as and when priorities permit, and we will move onto the 'common data' areas once we have finished addressing all of the 'scheme specific data' areas. We have never had to correct any pensions in payment. This year we had service history issues which affected the annual benefit statements for 3 employee members. Normally it is recording issues that don't affect the pension that are flagged up as a result of our annual measuring. We are targeting the end of January for addressing any main issues and the end of June for addressing any contribution / final pay / CARE pay issues resulting from the 31 March 2021 year end contribution posting.

Employer changes:

We are aware of the following employer changes in 2020 / 2021:

- Herefordshire Housing Ltd (that became part of the Connexus Group in July 2017)
 being renamed Connexus Housing Two Ltd as from 1st April 2020.
- Hill and Moor Parish Council wanting to offer the LGPS to their staff.
- Northleigh joining Mercian ET on 1/4/2020 as a new academy.
- St Thomas More joining Our Lady of Lourdes on 1/4/2020 as a new academy.
- Employer 272 (St Matthias C of E Primary School Cromwell Road, Malvern, Worcestershire WR14 1NA) being expected to join Spire C of E MAT (that currently comprises the two St Johns, employers 271 / 292).
- Millbrook Healthcare Ltd becoming a new employer having been awarded HIA contracts which commenced on 1 April 2020.
- Webheath First School Academy changing its name to Shire MAT with Feckenham joining as an Academy from 1 September 2020.
- Part of ContinU Plus (Kidderminster / Hagley Early intervention Family Support) being transferred to Worcestershire Children First from 1 October 2020.
- Babcock terminating with LGPS members being moved into Worcestershire Children First's Learning & Achievement.
- St Weonard's Primary School joining Marches Federation of Academies.
- St Georges First Kidderminster joining Black Pear Trust (MAT).
- Feckenham C of E First School joining Four Stones.
- De Montfort School joining The Shires.
- Worcester Community Trust terminating.
- Community Housing terminating.
- Place Partnership terminating.
- Sidemoor First School becoming an academy.

European pensioners:

We will be sending a letter to our pensioners living in Europe who have a UK bank account to ask them to check out whether their account will still be able to receive payments from us after the UK leaves Europe.

GMP rectification:

We have drafted letters for communicating with members. Our supplier (ITM) will be highlighting extreme cases for us to review. The working assumption is that we will write to affected members in January 2021 and implement the rectification in March 2021.

KPIs:

As detailed in Section 5 in September 2020, a busier than usual month for estimates / actual retirements, we achieved our KPIs for 90% of the cases that we processed in 11 of the 12 processes that we monitor our performance in. The exception was our joiners process where all cases were put on hold, so that we would be able to provide work for our 9 October new member of staff to process right from her first day with us.

For the 2020 / 2021 year to 30 September we by and large achieved our KPIs with the exception of joiners

We have met all of our average turnaround targets for September and the 2020 / 2021 LGPS year to 30 September

Our number of deaths in September was not significantly above normal levels NB the average number of deaths both in scheme year 2019 / 2020 and in scheme year 2020 / 2021 year to date was 15.

In 2020 / 2021 we have had **0 data breaches**, **2 IDRPs** and **0 complaints**.

We have a delegated approach to writing off pension overpayments that is dependent on value.

In 2020 / 2021 we have not yet written off any pension overpayment cases. We are currently chasing 10 cases of pension overpayment for a grand total of £8,620.71.

McCloud:

MHCLG is <u>consulting</u> on amendments to the statutory underpin to remove the unlawful age discrimination identified in the McCloud judgment.

The proposed remedy would apply to all members who were active at 31 March 2012 and have accrued benefits since 1 April 2014 and take the impact of early/late retirement factors into account.

It would wipe out the proposed cost control LGPS benefit improvements.

From April 2022 (this is the last date a protected member can reach their 2008 Scheme NPA) it is proposed that the period of underpin protection will cease and all active LGPS members will accrue benefits in the career average scheme without a continuing final salary underpin.

It is also proposed that active and deferred members are given an additional 12 months to elect to aggregate previous periods of LGPS membership where such a decision would mean they have 'underpin protection.

The LGPC has produced some guidance for LGPS funds about collecting data from their employers to deliver the remedy.

As it is already clear that there will be significant resource implications for employers and LGPS funds, we have added McCloud to our list of projects and estimated the resource implications.

We are consulting with our actuary re advising our employers how to proceed / our timescales / the contribution implications for employers who are not making advance financial provision. Two key issues to address in determining our resource requirements include the volume of calculations / aggregations that will be required and data accuracy / checking / availability (collecting data from employers who have changed payroll).

Public sector exit payments:

New <u>legislation</u> has been laid implementing a £95,000 cap on public sector exit payments with effect from 4 November 2020.

The <u>Reforming local government exit pay consultation</u> that closes on 9 November 2020 proposes reforms to termination payments specific to local government.

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From 4 November 2020 up to the enactment of the MHCLG further reform proposals **there is a position of legal uncertainty**.

We are monitoring the new and proposed legislation, have added wording to our calculations and have done a number of sample manual calculations to ensure that we are able to cope without our pension admin system being able to produce calcs in line with the new legislation.

Remedying survivor benefits for opposite-sex widowers and surviving male civil partners:

The Chief Secretary to the Treasury has made a written <u>statement</u> on remedying survivor benefits for opposite-sex widowers and surviving male civil partners where male survivors remain entitled to a lower survivor benefit than a comparable same-sex survivor. This will require us to re-visit historical deferred and pensioner records.

KRA: Engagement / Communications / Member & Employer Relations

- 8. To *continue to engage with our stakeholders*, maximising self-service and digitisation, seeking feedback, developing approaches which support our goals and developing a *robust engagement strategy* with employers and members.
- 9. To communicate the key benefits of the LGPS, ensuring increased awareness amongst the eligible membership of their benefits. This includes effective communication to members and employers
- 10. To have in *place effective, documented business relationships with all our employers* and to ensure regular reviews are carried out to assess the risk and strength of their covenants.

Engagement / Communications / Member & Employer Relations KRA Commentary:

We are issuing our 2020 pensioner newsletter to 17,311 pensioner members in the week commencing 9 Nov.

We ran an employer forum on Zoom on 8 October 2020 that was attended by 40 including a number from 'the home team'.

Our site has become more popular since its content refresh and since the launch of our standalone 'groovy-green' site:

- a. From 01 04 2017 to 31 /3/2018 i.e. the last full LGPS year before the content refresh (a period of 365 days) there were **28** visits per day to our website.
- b. From 01 04 2018 to 30 11 2018 i.e. the part LGPS year before the content refresh (a period of 244 days) there were **30** visits per day to our website.
- c. From 01 12 2018 to 31 03 2019 i.e. the part LGPS year after the content refresh (a period of 121 days) there were **34** visits per day to our website.
- d. From 01 04 2019 to 30 09 2019 i.e. the part LGPS year pre the new stand-alone site (a period of 183 days) there were **45** visits per day to our website.
- e. From 01 10 2019 to 31 10 2019 i.e. the transition month to the new stand-alone site (a period of 31 days) there were **50** visits per day to our website.
- f. From 01 11 2019 to 31 03 2020 i.e. the part LGPS year after the launch of the new site (a period of 152 days) there were **47** visits per day to our website.
- g. From 01 04 2020 to 30 09 2020 i.e. the current LGPS first half-year (a period of 183 days) there were **63** visits per day to our website.

In Oct 2020 our website had 2,337 visits (**75** visits per day) compared to 1,062 visits (34 visits per day) in October 2019 i.e. +120%. The most popular PDFs in October were: Guide to the LGPS, Employer newsletter, Employee newsletter and Death Grant Nomination form. The two Oct 2020 responses to the feedback available via our website's homepage gave our website a 4 /4 (the top) rating.

We have asked our employers how their organisation would like to proceed in relation to ill health liability insurance, with the responses being:

- 31 asking for their ill health allowance (in their contributions) assumption.
- 18 interested in a presentation from Hymans.
- 21 not interested in ill health liability insurance.

KRA: Governance & Staffing

- 11. To ensure the **effective management and governance** in a way that strives for continuous improvement through improved value for money, the promotion of excellent customer service and compliance with all regulatory / best practice requirements.
- 12. To recruit, train, nurture and retain highly motivated staff with the necessary professional, managerial and customer focus skills to deliver on the ever-increasing complexities of the LGPS.
- 13. To *continually review the effectiveness of our committees and advisers* and our decision-making.

Governance & Staffing KRA Commentary:

Pensions administration has transferred from HR & OD to Finance.

We delivered elected member support / training on 18 September and our next training session on 10 November will cover current issues in the LGPS and paying pensions.

We have reviewed the Appendices tabled at the 17 March 2020 Pensions Committee and updated versions are attached as Appendix 2 (Good Governance Position Statement) and Appendix 3 (Objectives for the Fund's Investment Advisor) to this Business Plan.

It has been agreed that the Pension Board will do deep dives into specific issues covered in the Business Plan and Risk Register in the future. The following issues are likely to be on the Board's list: GMPs, McCloud, Pooling, Public Sector Exit Payments and The Pensions Regulator.

KRA: Investments, Funding & Actuarial

14. To achieve a relatively stable "real" investment return above the rate of inflation over the long term, in such a way as to minimise and stabilise the level of contributions required to be paid by employers in respect of both past and future service liabilities and to achieve a 100% funding level over a suitable timescale. This includes setting of appropriate investment strategies, the appointment of capable investment managers, and the monitoring and reporting of investment managers' performance, with appropriate action being taken in the event of underperformance.

Investments, Funding & Actuarial KRA Commentary:

The Fund's asset valuation as at 30 June 2020 of £2,938m was greatly impacted by COVID-19 and there remains a lot of volatility in the financial markets that is envisaged to remain for

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many months to come.

As detailed in the next section, the Fund has generated an average annual return of 5.1% compared to its benchmark of 4.0% over the 3 years to 30 09 2020.

Over the year to 30 09 2020 the Fund generated a return of 2.8% compared to its benchmark of -1.3%.

A <u>proposal to extend full GMP indexation</u> that would have a relatively small adverse impact on liabilities for us has been issued by the government.

4 INVESTMENT TARGETS

- 4.1 The 2019 actuarial valuation set the following real annual discount rates:
 - a) Past service: Consumer Prices Index + 1.65%.
 - b) Future service: Consumer Prices Index + 2.25%.
- 4.2 The assumed annual Consumer Prices Inflation is +2.4%.
- 4.3 Therefore our annual return on investment targets are 4.05% (for deficit recovery payments) / 4.65% (for future service contributions).
- 4.4 To achieve this, we are a partner in LGPSC, have set benchmarks for our sectors and have achieved the 3-year returns shown in the right column of the table below:

Sector	Benchmark	Average annual Performance over the 3 years to 30 June 2020 (to 30 September is not yet available) v benchmark
Far East Developed	FTSE All World Asia Pacific Index + 1.5%	5.0% (1.2% above benchmark)
Emerging Markets	FTSE All World Emerging Market index +2.0%	Not available as new fund invested from July 2019
United Kingdom	FTSE All Share Index	-1.4% (0.2% above benchmark)
North America	FTSE All World North America - Developed Series Index	12.6% (0.1% above benchmark)
Europe ex - UK	FTSE All World Europe ex UK Index - Developed Series Index	3.7% (0.1% below benchmark)
Global (alternatives)	40% GPAE - FTSE-Research Affiliates Fundamental Index (RAFI) Dev 1000 Equity Fund, 30% GPBK - MSCI World Mini Volatility Index, 30% STAJ - CSUF - STAJ	8.1% (= benchmark)
Fixed Interest	Barclays Global Aggregate Corporate Bond Index – Hedged into GBP	Not available as only invested March 2020
	EQT Corporate Private Debt - Absolute Return 6.5%	Not available as only invested May 2018
Property / Infrastructure	Various absolute benchmarks for different fund managers	Property 4.8% (2.4% below benchmark) Infrastructure 7.2% (1.4% below bmark)

5 ADMINISTRATION KPIs

5.1 We measure our performance against CIPFA industry standard targets for our key pension administration processes. We have regular meetings that review how we are performing on a case by case basis (% processed within target) and our average performance for all the cases

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of a process (average turnaround). This informs our resource allocation between processes and highlights which processes to seek to improve.

5.2 A commentary on the tables below is provided earlier in the shaded KRA: Administration section (that follows section 3.7).

Activity / Process	Number processed in Sep 2020	% Processed within KPI in Sep 2020	Av turnaround (working days) in Sep 2020	Target turnaround (working days)	2020/2021 Year to date average number processed per month
Joiners notification of date of joining	0	0	n/a	40	111
Process and pay refund	18	100	2	10	16
Calculate and notify deferred benefits	10	90	17	30	39
Letter notifying actual retirement benefits	91	100	3	15	42
Letter notifying amount of dependant's benefits	9	100	1	10	6
Letter acknowledging death of member	16	100	2	05	15
Letter detailing CETV for divorce	10	100	2	45	7
Letter notifying estimate of retirement benefits	99	92	5	15	76
Letter detailing transfer in quote	11	100	2	10	13
Process and pay lump sum retirement grant	100	100	16	23	64
Letter detailing transfer out quote	24	92	4	10	20
Letter detailing PSO implementation	0	n/a	n/a	15	0

	for year to date i.e. 1 April – 30 Sep 2020	within KPI for year to date i.e. 1 April – 30 Sep 2020	within KPI in the last quarter i.e. 1 Jul – 30 Sep 2020	(working days) for year to date i.e. 1 April – 30 Sep 2020	Sep 2020	(working days)
Joiners notification of date of joining	669	76	18	18	49	40
Process and pay refund	98	100	100	3	3	10
Calculate and notify deferred benefits	236	97	96	11	10	30
Letter notifying actual retirement benefits	256	100	100	3	2	15
Letter notifying amount of dependant's benefits	38	100	100	3	2	10
Letter acknowledging death of member	90	98	95	3	2	05
Letter detailing CETV for divorce	42	100	100	3	3	45
Letter notifying estimate of retirement benefits	456	96	96	4	4	15
Letter detailing transfer in quote	79	96	93	4	3	10
Process and pay lump sum retirement grant	389	100	100	16	15	23
Letter detailing transfer out quote	124	98	96	3	3	10
Letter detailing PSO implementation	0	n/a	n/a	n/a	n/a	15

6 BUDGET

In addition to the commentary provided earlier in the shaded KRA: Accounting section (that follows section 3.7), detailed reporting of our budget position is provided twice a year to Pensions Committee and included in <u>our annual reports</u>.

Fund Investment	20/21	21/22	22/23
INVESTMENT MANAGEMENT FEES	11,382,600	12,190,400	13,122,600
love store at Administration Deals and	442.200	445.400	442.200
Investment Administration Recharge Investment Custodial and related services	142,300 367,200	145,100 374,500	
Investment Professional fees	81,000	71,500	,
Performance Measurement	15,500	15,800	,
INVESTMENT ADMINISTRATION COSTS	606,000	606,900	618,100
Scheme Administration Pension scheme Administration recharge	995,700	973,600	996,000
Actuarial services	240,000	300,000	240,000
Audit	27,500	27,500	•
Legal Fees	33,500	33,500	33,500
Committee and Governance recharge	11,000	11,000	11,000
SCHEME ADMINISTRATION COSTS	1,307,700	1,345,600	1,308,000
GRAND TOTAL (Excluding Investment Mgt Fees)	1,913,700	1,952,500	1,926,100
GRAND TOTAL (Including Investment Mgt Fees)	13,296,300	14,142,900	15,048,700

<u>Appendix 1 – Operational Plan: Projects</u>

This appendix summarises the work that we are doing to achieve particular aims. For us a project is a piece of work that is something that we would not do on a daily basis like processing a retirement. Some of our projects recur annually.

It uses the following acronyms / abbreviations:

AA Asset allocation
A/C Accounting
Ac Academies
Admiss Admission
Admit Admitted

AH Aquila Heywood

BCP Business Continuity Plan

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Bods Bodies Calcs Calculations

CARE Career average revalued earnings

CB Corporate bonds

CEM <u>CEM Benchmarking Inc</u>

Cert Certificate

CIPFA Chartered Institute of Public Finance & Accountancy

Coll Colleges
Config Configuration
Conts Covenants

Cttee Pensions Committee
EM Emerging markets
Engage Engagement
Er Employer
Expend Expenditure
FI Fixed interest

FRS Financial Reporting Standards
FSS Funding Strategy Statement
GMP Guaranteed Minimum Pension

Gov Governance Inc Income

Inv Investments, Funding & Actuarial

KRA Key result area

LGPS Local Government Pension Scheme

LGPSC LGPS Central Limited

Manag Management

MHCLG The Ministry of Housing, Communities and Local Government

ONS Office for National Statistics

Q Query Recti Rectification Rtn Return

SAB Scheme Advisory Board
Sch Scheduled bodies
SF Superannuation Fund

SI Statutory Instrument

Sub Pension Investment Sub-committee

Term Termination
TBD To be determined
TPR The Pensions Regulator

Y/End Year end

Appendix 2 (Good Governance Position Statement)

Appendix 3 (Objectives for the Fund's Investment Advisor)

~ ENDS ~

Operational Plan: Projects 5 November 2020 NOTES:	KRA	Aspirat ion	Lead	Start	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Comments
11 LGPS Central budget (various)	A/C	1	RW	Oct-17		Cttee			Cttee			Cttee				Cttee		Cttee	to date and scheduled
12 Annual Report & Accounts / associated docs (30 11 20)	A/C	2	RW	Jan-20	Publish						to Audit	Cttee		signed off	Publish	Cttee			2020 on schedule
15 ONS Inc / Expend return (quarterly)	A/C	1	RW	Jan-20			¼ rtn			¼ rtn			¼ rtn			⅓ rtn			to date and scheduled
16/17 MHCLG SF3 LGPS Funds account (310821)	A/C	1	RW	Jul-21										Annual					2020 and 2021 scheduled
18 TPR Occupational Pension Schemes Survey (310321)	A/C	1	LP	Mar-21					Annual										2020 and 2021 scheduled
19 CEM investment benchmarking (310721)	A/C	1	RW	Jun-20									Annual						scheduled for scheme year 18/19
14 CIPFA benchmarking (311020)	Ad- min	6	LP	Jun-20		Cttee										Annual		Cttee	2020 scheduled
1 GMP reconciliation and rectification (TBD)	Ad- min	7	вс	Apr-18			letters out		recti										now expect to write to members Jan 2021 due to HMRC delaying
2 GMP equalisation (TBD)	Ad- min	7	вс	TBD															running later than expected as awaiting guidance
4 Valuation / FSS / pots / admiss + term policies (310321)	Ad- min	7	RW	Apr-19															reviewing FSS re SI 2020 No 893
8 Enveloping procurement (290220)	Ad- min	5	вс	Aug-18															running later than expected but interim solution with Adare live
32 Reprocure pension admin system	Ad- min	4		May-20		Cttee			AH notice							AH contrac		Cttee	existing contract reviewed and spec of requires being finalised
10 Pension Administration Strategy review (010421)	Ad- min	10	CF	Jan-21				consult	Cttee	publish									2020 and 2021 scheduled
13 Review data quality (TPR) (TBD)	Ad- min	4	LP	Jan-21									Annual						2020 Mercer and Heywood
25 Revalue CARE accounts (06 04 2021)	Ad- min	4	SH	Mar-21						System config.									2020 and 2021 scheduled
26 Provide FRS info (various)	Ad- min	7	AL	Jan-20		admit bods			Sch				Coll	Ac			1	admit bods	to date and scheduled
3 Branding and digital strategy (TBD)	Eng- age	5	CF	Oct-18															awaiting pension admin system re-procure
20 Monitor employer covenants / pots / conts	Eng- age	10	RW	Jan-20		Cttee	ask ers		Cttee	reset erconts		Cttee				Cttee		Cttee	Pfaroe in place
21 Deferred annual benefit statements (310821)	Eng- age	9	CF	Jan-21								Annual	Q manag						$\sqrt{2020}$ and 2021 scheduled
22 Employee annual benefit statements (310821)	Eng- age	9	CF	Jan-21					Y/End					Annual	Q manag				$\sqrt{2020}$ and 2021 scheduled
23 Pensioner P60s (290521)	Eng- age	3	SH	Jan-21							Annual	Q manag							$\sqrt{2020}$ and 2021 scheduled
24 Payslips reflecting pension increase (300421)	Eng- age	3	SH	Jan-21						Annual									$\sqrt{2020}$ and 2021 scheduled
27 Pension Savings Statements (061021)	Eng- age	3	LP	Jan-21												Annual			$\sqrt{2020}$ and 2021 scheduled
29 Pensioner newsletter / life cert (30 11 20)	Eng- age	9	CF	Jan-20	Annual												Annual		$\sqrt{2020}$ and 2021 scheduled
28 /30 Good Governance (TBD)	Gov Staff	11	RW	TBC															Inv adviser objectives and position statement reviewed
33 McCloud: data collection; er rates; and calcs	Ad- min	3	LP	Aug-20					Cttee							Cttee			plan being developed
5/6 Review of Asset Allocation / ISS (31 03 21)	Inv	14	RW	Apr-20	Sub	Cttee			Cttee			Cttee Sub			Sub	Cttee	Sub	Cttee	√ 2020 and 2021 scheduled
9 Increase assets managed by LGPS Central Limited	Inv	14	RW	Feb-19		Cttee			Cttee			Cttee Sub				Cttee		Cttee	√ for EM / CB and looking into infrastructure / private debt

Proposed Worcestershire Pension Fund Position Statement: Good Governance

Business Plan November 2020 Appendix 2

This position statement has been prepared to summarise how we are taking forward the LGPS Scheme Advisory Board's (SAB) Good Governance workstream in preparation for draft statutory guidance being issued. The numbering relates to the recommendations in the November 2019 Hymans Robertson Phase II <u>report</u> 'Good governance in the LGPS'. We are also closely monitoring SAB's Responsible investment guidance workstream.

Good Governance proposal	Current position	Identified actions
A. General		
A.1 MCHLG will produce statutory guidance to establish	Still awaiting draft guidance to	Prepare for guidance
new government requirements for funds to effectively	review and benchmark	
implement the proposals below. ("the Guidance")		
A.2 Each administering authority must have a single	Our Chief Financial Officer is	No further action needed
named officer who is responsible for the delivery of all	so named	
LGPS related activity for the fund ('the LGPS senior		
officer')		
A.3 Each administering authority must publish an	We publish a governance	Benchmark our governance compliance
annual governance compliance statement that sets out	compliance statement as part	statement against the guidance and peers
how they comply with the governance requirements for	of <u>our annual reports.</u>	annually
LGPS fund as set out in the Guidance. This statement		
must be signed by the LGPS senior officer and, where	This has been updated in the	
different, co-signed by the S151 officer	2019/20 Annual Report	
B. Conflicts of interest		
B.1 Each fund must produce and publish a conflicts of	Elected members' (not	Review best practices employed at other
interest policy which includes details of how actual,	officers') conflicts of interest	funds (including private sector) to help
potential and perceived conflicts are addressed within	are declared at the start of	identify possible conflicts and approaches
the governance of the fund, including reference to key	each Pensions Committee	in preparation for producing a policy
conflicts identified in the Guidance	meeting	
B.2 The Guidance should refer all those involved in the	Awaiting draft guidance	To ensure that all those involved in the
management of the LGPS, and in particular those on		management of the LGPS are aware of this
decision making committees, to the guide on statutory		position statement and consider training
and fiduciary duty which will be produced by the SAB		and guidance to Fund members.

Good Governance proposal	Current position	Identified actions
C. Representation	•	
C.1 Each fund must produce and publish a policy on the representation of scheme members and non-administering authority employers on its committees, explaining its approach to representation and voting rights for each party	Information about the Pensions Committee is available via our website. The Pension Board's terms of reference are available via our website. Our annual reports, our Investment Strategy Statement and para K of appendix 1 of the Worcestershire County Council constitution contain information about representation.	Review whether the current position remains adequate annually using comparator Funds to benchmark practices.
D. Knowledge and understanding		
D.1 Introduce a requirement in the Guidance for the key individuals within the LGPS, including LGPS officers and pensions committee members, to have the appropriate level of knowledge and understanding to carry out their duties effectively	We use a knowledge and skills questionnaire for new elected members and key officers, using them to form action plans as to how gaps can be resolved. Our elected members' training programme is tabled at most Pensions Committee meetings. Our officers participate in training provided by the LGA, attend the annual LGPS conference, are on the distribution list for LGPC bulletins and develop the	This was updated in 2020 and will be reviewed in 2021 to update the knowledge and skills questionnaire for all members. We will review that the current position remains adequate at the year- end (annually) through a gap analysis and draw up appropriate training plans to address.

Good Governance proposal	Current position	Identified actions
	LGPS knowledge of our employers through monthly employer newsletters.	
D.2 Introduce a requirement for s151 officers to carry out LGPS relevant training as part of their CPD requirements to ensure good levels of knowledge and understanding	Our s151 officer's previous role was the most senior officer at another LGPS fund and skills framework completed 18 months ago.	s151 to also complete skills framework assessment and address within his CPD programme.
D.3 Administering authorities must publish a policy setting out their approach to the delivery, assessment and recording of training plans to meet these requirements	Our current training policy was tabled at the 17th March 2020 Pensions committee meeting	Review annually with Pension Board the current policy. The review should take account of the level and scope of training for officers, the latest external training available and the attendance records of elected members.
D.4 CIPFA and other relevant professional bodies should be asked to produce appropriate guidance and training modules for S151 officers to consider including LGPS training within their training qualification syllabus	Awaiting guidance.	To respond to CIPFA and CIPP, expected guidance and consider peer / CIPFA / LGA review.
E. Service delivery for the LGPS function		
E.1 Each administering authority must document key roles and responsibilities relating to its LGPS fund and publish a roles and responsibilities matrix setting out how key decisions are reached. The matrix should reflect the host authority's scheme of delegation and constitution and be consistent with the descriptions and business processes	The Worcestershire County Council constitution and our annual reports contain information about roles and responsibilities, and we have job descriptions for every officer's role.	To publish a matrix that meets the requirements of the guidance and clarifies the role and responsibility of everyone involved in every stage of the processes we carry out during a member's administration lifecycle.
E.2 Each authority must publish an administration strategy	We comply with this requirement.	To conclude our 2020 annual review of our Pension Administration Strategy by taking account of all employer feedback to our proposed changes resulting from our consultation.

Good Governance proposal	Current position	Identified actions
		To benchmark our strategy for
		completeness and innovation with
E.3 Each administering authority must report the fund's performance against an agreed set of indicators designed to measure standards of the service	These are included in our annual reports and the quarterly Business Plans tabled at Pensions Committee meetings	comparator funds to continual develop. To use this information to allocate resources between processes and to reengineer processes. To continually work with the Pension Board to check and develop our KPIs and seek out benchmarking.
E.4 Each administering authority must ensure their committee included in the business planning process. Both the committee and LGPS senior officer must be satisfied with the resource and budget allocated to deliver the LGPS service over the next financial year	Quarterly Business Plans are tabled at Pensions Committee meetings	To review the effectiveness of our Business Plans.
E.5 Each administering authority must give proper consideration to the utilisation of pay and recruitment policies, including appropriate market supplements, relevant to the needs of their pensions function. Administering authorities should not simply apply general council staffing policies such as recruitment freezes to the pensions function	Our recruitment and staffing levels are not constrained by Worcestershire County Council and we are able to use market forces adjustments.	To seek out what information, for example from CIPFA benchmarking, is available about pay in the LGPS.
F. Compliance and improvement		
F.1 Each administering authority must undergo a biennial independent Governance Review and, if applicable, produce the required improvement plan to address any issues identified. IGR reports to be assessed by a SAB panel of experts	We do not currently do this.	Prepare for guidance but are keen to explore peer review as noted in F2 below and will seek to explore options if guidance is not forthcoming quickly.
F.2 LGA to consider establishing a peer review process for LGPS Funds	We do not currently do this.	Prepare for guidance and investigate external benchmarking, like PASA

Proposed objectives for WPF Investment advisor

Task	Current Position as at end of	KPI / Outcome			
	September 2020				
A. Provide qualitative general advice to the Fund on markets, RI, risk and strategies that have no direct monetary decisions but shape the Fund's thinking at relevant Pensions Committee, Pension Investment Sub Committee, local Pension Board (as required) and meetings with Officers.	 Detailed investment updates are provided for each Pension Investment Sub Committee with a shorter more summarised version to the Pensions Committee. The investment advisor has attended all the Pension Investment Sub Committee and Pensions Committee meetings. 	 Attend all Pensions Committee and Pension Investment Sub-Committee meetings unless for unforeseen unavoidable circumstances and meeting attendance being agreed in advance of Committee timetable publication. Provide quarterly written reports to Committees in line with Committee timescales and 			
B. Monitoring the Fund's portfolios and considering and providing general advice on the desirability of retaining particular classes of assets or of changing them.	 Regular performance review meetings have been taken with all our investment managers at least half yearly and quarterly for our active investment managers. The investment advisor has been integral to these meetings and has provided appropriate challenge where needed as well as highlighting poor performance to the Committee and put managers on 'watch' where required. The investment advisor helped to develop and shape the 2020 	reporting requirements, which include questions for Officers and Councillors to use at meetings with investment managers and a yearly review for publication in the Fund's annual report. Highlighting areas upon which members' attention should be focused. • Attend all quarterly review meetings with 'active' investment managers unless for unforeseen unavoidable circumstances and meeting attendance being agreed in			

Task	Current Position as at end of September 2020	KPI / Outcome
	strategic asset allocation review which sets the Fund's asset allocation direction for the next 3 to 5 years and was agreed by Pensions Committee in December 2019.	 advance of Committee timetable publication. Any areas of poor performance highlighted, challenged and solutions identified. The Pensions and Pension Investment Sub Committees were satisfied with the value for money represented by the services.
C. Support the Fund with achieving timely and cost-effective implementation of the Fund's investment decisions, where appropriate considering the evolution of the LGPS Central pool.	 The investment advisor has attended meetings and provided guidance where the Fund is seeking to transition investments to the pool. He has also signposted to additional technical advice required for the actual transition process. Also, regular performance meetings have been held with LGPSC and appropriate challenge made where underperformance is happening. 	 Ensure a focus on key risk / return priorities. Any areas of misalignment with the Fund's objectives and / or poor performance highlighted, challenged and solutions identified.
D. Provide other ad-hoc support and advice as required by either the Pensions and Pension Investment Sub Committee or the Fund's other service providers.	Advice and support have been provided for an ESG audit and a climate risk scenario report besides the regular support described above.	Any ad hoc support and advice provided in line with agreed service specifications and on a timely basis.

Task	Current Position as at end of September 2020	KPI / Outcome
		 Advisor's fee shared and updated at year end with open report of any additional fees earnt through advice. Conflicts register updated at least half yearly, and upon any changes to the investment advisor as soon as they are known to that person.
E. Oversight of the relationship between the Fund and the pool, ensuring what the pool offers complies with strong transition, sound governance and the requirements of the Fund.	 Regular performance meetings have been held with LGPSC and appropriate challenge made where underperformance is happening. Ad hoc discussions are also held with the chief executive of LGPSC and his lead officers where necessary. 	 Attend all quarterly performance review meetings with LGPS Central where the Fund has invested unless for unforeseen unavoidable circumstances and meeting attendance being agreed in advance of Committee timetable publication. Any areas of poor performance highlighted, challenged and solutions identified.
F. Support the fund in training, through transparent general advice.	The investment advisor has provided training and helped source a number of training events.	Pensions, Pension Investment Sub Committee and Pension Board satisfied with the quality and content of any training requested.

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Task	Current Position as at end of September 2020	KPI / Outcome		
G. Ensure the Fund complies with relevant investment pensions regulations, legislation and supporting guidance, and reflects the policies approved by the Pensions Committee.	There have been no instances of non-compliance with relevant regulations or policies.	No instances of non- compliance with relevant regulations or policies.		



PENSION BOARD 13 NOVEMBER 2020

RISK REGISTER

Recommendation

1. The Chief Financial Officer recommends that the Pension Board reviews the 05 November 2020 WPF Risk Register.

Background and update

- 2. The Risk Register is kept under regular review and, following the November 2020 review by officers, an updated Register is attached as an Appendix.
- 3. The review resulted in the residual risk score of WPF07 (Future change to LGPS regulations or other legislation) being increased from 20 (green) to 40 (amber).
- 4. No new risks were added to the Register.
- 5. Mitigating actions have been updated for new measures and previous measures that have been completed / developed further / have changed timelines.
- 6. Our staff continue to predominantly work from home to deliver a 'business as usual' service with no loss in productivity.

Supporting information

Appendix - WPF Risk Register 05 November 2020

Contact Points

Specific Contact Points for this report

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Background Papers

In the opinion of the proper officer (in this case the Chief Financial Officer) there are no background papers relating to the subject matter of this report.





Risk Register

As at 05 11 2020

About this Risk Register

The following colour coding is used for the 31 residual risk scores:

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    Red >= 45 (02 risks)
    Amber >= 25 but < 45 (11 risks)</li>
    Green < 25 (18 risks)</li>
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Risk scores can range from 0 to 100 and are derived by multiplying an impact score by a probability score as follows:

Impact = 0 (none); 5 (minor); 15 (moderate); 20 (major); or 25 (severe).

Probability = 0 (no chance); 1 (25% likely to happen); 2 (50:50); 3 (75% likely); or 4 (certain to happen).

The far-right column, Residual Risk Score, includes upwards or downwards arrows if the score has changed since the previous Risk Register (as at 16 06 2020 in this case).

In the far-right column, Residual Risk Score, the scores in brackets below the current score indicate what the previous score was if the score has changed since the previous Risk Register.

The 31 risks logged in this register are in highest Residual Risk Score:

- 1. WPF 12 Mismatch in asset returns and liability movements.
- 2. WPF 10 Being reliant on LGPS Central Limited delivering its forecasted cost savings.
- 3. WPF 23 Employers cannot pay their contributions or take on an inappropriate level of risk or their contributions take them too close to limits of their available expenditure.
- 4. WPF 07 Future change to LGPS regulations or other legislation, for example from SAB's governance working groups or from the written statement on remedying survivor benefits for opposite-sex widowers and surviving male civil partners where male survivors remain entitled to a lower survivor benefit than a comparable same-sex survivor or from the government's response to its 'Restricting exit payments in the public sector' consultation.
- 5. WPF 11 Failure to pool assets using LGPS Central Limited.
- 6. WPF 31 Pandemic affecting our staff / our employers' Payroll or HR staff / staff at payroll providers who provide services to us or our employers.
- 7. WPF 06 Fair Deal consultation proposals being implemented.
- 8. WPF 19 Failure to procure a pensions admin system for the future.
- 9. WPF 24 Employers having insufficient skilled resources to supply our data requirements.
- 10. WPF 08 Failure to appoint suitable investment managers and review their performance / markets / contracts.
- 11. WPF 03 Failure of officers to maintain a sufficient level of knowledge / competence or to act in accordance with our roles and responsibilities matrix.
- 12. WPF 28 Cyber-attack leading to loss of personal data like bank account details.
- 13. WPF 30 Failure to maintain the quality of our member data.
- 14. WPF 32 GMP rectification not completed in line with the Pensions Regulator's / our members' expectations.
- 15. WPF 09 Being reliant on LGPS Central Limited's investment approach.
- 16. WPF 22 The following key actuarial assumptions set at each actuarial valuation do not match our actual experience between actuarial valuations: the number of ill health retirements; that employer strain costs associated with early / redundancy / flexible retirements are covered by the payments collected from employers; pay / price inflation; and life expectancy.
- 17. WPF 18 Failure of existing pension admin system to deliver the services contracted.
- 18. WPF 20 Staff leaving or going on long term absence.
- 19. WPF 21 Failure of business continuity planning.
- 20. WPF 02 Insufficient knowledge amongst members of Pensions Committee / Pension Board / Pension Investment Sub Committee members.
- 21. WPF 13 Liquidity / cash flow is not managed correctly.
- 22. WPF 14 Failure to exercise proper stewardship of our assets.
- 23. WPF 26 Fraud by staff.
- 24. WPF 15 Failure of the actuary to deliver the services contracted.
- 25. WPF 01 Failure of governance arrangements to match up to recommended best practice.
- 26. WPF 17 Failure of custodian to deliver the services contracted.
- 27. WPF 04 Not having an established and meaningful Business Plan / Pension Administration Strategy.
- 28. WPF 16 Failure of investment adviser to deliver the services contracted.
- 29. WPF 25 Fraud by scheme members.
- 30. WPF 29 Failure to deliver member communications in line with regulatory requirements, for example the 31 August annual benefit statement deadline.
- 31. WPF 27 Incorrect calculation of benefits through human error or delayed notification of a death.

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Description of Risk	Leading to	Gross Impact		Gross Risk Score		Resi- dual Impact	Resi- dual Prob- ability	Resi- dual Risk Score
Financial Officer) Page 29	Mismatch in asset returns and liability movements.	Exposure to risk or missing investment opportunities or increases in employer contributions.	25	3	75	We regularly review our Investment Strategy Statement, have a diversified portfolio and implement a policy of extended recovery periods to smooth employer contributions. Qualified advisers including an independent investment adviser are contracted and set objectives that are reviewed regularly. Funding position, actuarial valuation assumptions and mortality / morbidity experience are reviewed regularly by the Pensions Committee. Strategic asset allocation is reviewed quarterly by the Pension Investment Sub Committee. We have equity protection arrangements in place up to July 2021 for all of our passive market cap equity funds. We continue to liaise with all our investment managers in response to the initial market falls and ongoing market volatility caused by COVID-19, although equity markets have recovered a lot of the initial losses. New ideas are always encouraged by officers who also carry out peer group discussions. Monthly Investment Working Group meetings are held between the partner funds and LGPSC to explore new investment opportunities.	25	2	50
WPF 10 (Chief Financial Officer)	Being reliant on LGPS Central Limited delivering its forecasted cost savings.	Paying too much in fees / investment under- performance.	25	2	50	Whilst the Pension Investment Sub Committee and LGPS Central's Practitioners' Advisory Forum (PAF) monitor the costs of being a partner fund of LGPS Central Limited, there is little they can do about LGPSC admitting that any expected cost savings will not emerge as soon as anticipated. Whilst we have not transferred many assets so far, there are fixed costs of being a partner fund. The Monthly Investment Working Group meetings at which all 8 partner funds are represented review staffing changes at LGPSC and the performance of assets under LGPSC's management.	25	2	50

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Leading to	Gross Impact	Gross Prob- ability	Risk		Resi- dual Impact		Resi- dual Risk Score
WPF 23 (Chief Financial Officer)	Increase in liabilities.	20	3	60	Risk profile analysis is performed to understand the strength of an employer's covenant when setting the terms of admission agreements (that may require bonds) and in setting the term of deficit recovery periods during the actuarial valuation process. The aim is to keep employer contributions as stable and affordable as possible. During the 2019 actuarial valuation we actively engaged with employers by issuing interim results, by offering 1:1s with the actuary and by asking employers to complete an employer contribution election form. At a Fund level employers have confirmed that the LGPS remains affordable, a situation that we are monitoring in the light of COVID-19. We have been able to offer some flexibility in exceptional circumstances: a top 10 employer with financial pressure has been allowed to phase in increased payments, reflecting our policy of positive engagement with a view to strengthening employer covenants wherever possible. Contribution increases are phased over a three year period for most employers and allowances are provided for short term pay restraint where evidence is provided. We monitor membership profiles and changes, ensure that employers are reminded of their responsibilities where this is appropriate and work with at risk employers. We are currently undertaking the latest (2020) annual covenant review by analysing employers' financial metrics. We are setting up employer risk monitoring using Mercer's Pfaroe tool to enable us to monitor employer financial and other risks more closely. We have employer grouped investment strategies.	20	2	40

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Prob-	Gross Risk Score	Mitigating Action	Resi- dual Impact	Residual Probability	Residual Risk Score
WPF 07 (Chief Financial Officer) Page 31	Future change to LGPS regulations or other legislation, for example from SAB's governance working groups or from the written statement on remedying survivor benefits for opposite-sex widowers and surviving male civil partners where male survivors remain entitled to a lower survivor benefit than a comparable same-sex survivor or from the government's new legislation on exit payments.	comply with The Pensions Regulator.	25	3	75	As it is already clear that there will be significant resource implications in removing the unlawful age discrimination for employers and for LGPS funds, we have added McCloud to our list of projects and estimated the resource implications. We are consulting with our actuary re advising our employers how to proceed / our timescales / the contribution implications for employers who are not making advance financial provision. Two key issues to address in determining our resource requirements include the volume of calculations / aggregations that will be required and data accuracy / checking / availability (collecting data from employers who have changed payroll). We are monitoring the new and proposed legislation to limit exit payments in the public sector. We expect the legal uncertainty to add to our workload and have added wording to our calculations. We have also done a number of sample manual calculations to ensure that we are able to cope without our pension admin system being able to produce calcs in line with the new legislation. We have checked with Equiniti that Brexit will not present us with problems in paying pensions overseas. Officers participate in various scheme and industry groups and fora. The Committee and Board monitor LGPS developments. We are setting up employer risk monitoring using Mercer's Pfaroe tool to enable us to monitor employer financial and other risks more closely. We undertake annual covenant reviews, have introduced employer grouped investment strategies on 1 April 2020 and work with at risk employers.	20	2	40

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Gross Prob- ability	Gross Risk Score		Resi- dual Impact	Resi- dual Prob- ability	Resi- dual Risk Score
WPF 11 (Chief Financial Officer)	Failure to pool assets using LGPS Central Limited.	Lack of compliance with Ministry of Housing Communities & Local Government (MHCLG) requirements.	25	3	75	We are a working member and shareholder of LGPSC. The pool went live from the 1st April 2018 and met the government's pooling timetable and to the required standard. It also complied with FCA regulations. Each pool member has an equal share in the pool and the first Shareholders meeting and central committee have taken place. There is a Practitioners Advisory Form (PAF) with the pool's investment managers that meets monthly. The pool has a number of work streams: investments; client reporting; finance; responsible investment; and governance. Formal transition procedures are in place. We will take legal advice before not pooling our assets and monitor the willingness of the pool to invest in the sort of assets that could have a positive impact on future funding levels. The first transfers of our assets (in emerging markets and corporate bonds) were undertaken in July 2019 / Feb 2020. Infrastructure investments and private debt are currently being looked into.	15	2	30
WPF 31 (Head of NR Service Commissioning)	Pandemic affecting our staff / our employers' Payroll or HR staff / staff at payroll providers who provide services to us or our employers.		20	2	40	Whilst we have successfully moved to home-working supported by a small postal / scanning service at County Hall and expect to be able to adapt to the new ways of working, our workload and resources have as yet not been tested by a significant increase in member deaths or in staff absence. We are not experiencing problems with suppliers / employers. We continue to be vigilant and to keep our priorities under review by monitoring our KPIs and the guidance from Public Health England / the LGA. In preparation for a possible wave two, we have developed amendments to our normal procedures that would cope with staff, data or systems being unavailable and specifically cope with increased volumes of deaths. We will continue to review capacity v resources and to liaise with other LGPS funds over their proposed ways forward.	15	2	30

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Description of Risk	Leading to	Gross Impact		Gross Risk Score		Resi- dual Impact	Resi- dual Prob- ability	Resi- dual Risk Score
WPF 06 (Chief Financial Officer)	Fair Deal consultation proposals being implemented.	Increasing administrative complexity.	15	3	45	Government consultations are being delayed as the government focusses its efforts on COVID-19. When the regulations come out we will develop measures to mitigate this risk. Risk profile analysis is performed to understand the strength of an employer's covenant when setting the terms of admission agreements (that may require bonds), and we ensure that employers are made aware of consequences of their decisions and that they are financially responsible.		2	30
of HR Service	Failure to procure a pensions admin system for the future.	Inability to pay pensions / reputational or financial loss / staff downtime / loss of service delivery / data loss.	25	3	75	The hosting of Altair has been moved from WCC servers to a cloud solution supplied by Aquila Heywood, the supplier of Altair, to deliver greater resilience. We have signed up to the national LGPS framework for pension admin systems to reduce the costs and timeframe of this procurement and investigated the terms of our existing contract with Heywood. We are finalising our Spec of Requirements.	15	2	30

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact		Gross Risk Score	Mitigating Action	Resi- dual Impact	Residual Probability	Resi- dual Risk Score
WPF 24 (Head of HR Service Commissioning) Page 34	Employers having insufficient skilled resources to supply our data requirements.	Missing, incomplete and incorrect records on pensions administration system that undermines service delivery and causes difficulties in establishing correct benefits at individual level / liabilities at employer and whole of Fund level. Potential issues with The Pensions Regulator.	15	3	45	MHCLG is consulting on amendments to the statutory underpin to remove the unlawful age discrimination identified in the McCloud judgment. As it is already clear that there will be significant resource implications for employers and LGPS funds, we have added McCloud to our list of projects and are consulting with our actuary re advising our employers how to proceed / our timescales / the contribution implications for employers who are not making advance financial provision. Two key issues to address in determining our resource requirements include the volume of calculations / aggregations that will be required and data accuracy / checking / availability (collecting data from employers who have changed payroll). In the face of COVID-19 our employers are continuing to deliver on their responsibilities. We updated the Pension Administration Strategy on 1 April 2020. We support employers with monthly newsletters / its website / employer fora. Officers have developed a 'New to the LGPS?' employer workshop and an employer workshop on 'Form Completion' to follow up on the 'Pensions Development Pathway', employers 'How to' and the 'What the Fund expects from its employers' calendar. We have produced a new 'Transfers of staff between our employers / academy conversions' guidance note and accompanying Excel spreadsheet. Officers are working on expanding this material by developing information for employers on IDRP and ill health retirements. Checking individual records at points of significant transaction is undertaken.	15	2	30

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Gross Prob- ability	Gross Risk Score		Resi- dual Impact		Resi- dual Risk Score
WPF 08 (Chief Financial Officer) Page		Investment underperforma nce / regulatory non- compliance / paying too much in fees.	25	3	75	The Pension Investment Sub Committee has been introduced to deliver more effective decision making: its predecessor, the Pension Investment Advisory Panel, had to have its recommendations approved by the Pensions Committee. It monitors performance of our diverse range of investment managers (including LGPSC), meeting with / placing managers on watch as appropriate. We carry out a subjective review and objective analysis of asset performance and take advice from the investment adviser, LGPS Central Limited / its partner funds. Contract service is reviewed quarterly by the Pension Investment Sub Committee. The Finance Manager - Pensions reviews investment managers' internal control reports and reports any significant exceptions to the Chief Financial Officer. CMA objectives for our Investment Adviser were agreed at the 17 March 2020 Pensions Committee.	25	1	25
WEF 03 (Chief Financial Officer)	Failure of officers to maintain sufficient level of knowledge / competence or to act in accordance with our roles and responsibilities matrix.		25	3	75	Officers are appropriately qualified and participate in various scheme / industry groups / fora to keep up-to-date on pensions issues. They also review specialist publications. Officers have drafted a staff knowledge assessment to assist in developing its own workforce.	25	1	25

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Description of Risk	Leading to	Gross Impact	Prob-	Risk	Mitigating Action	Resi- dual Impact		Resi- dual Risk Score
WPF 28 (Head of HR Service Commissioning)	Cyber attack leading to loss of personal data like bank account details.	Data Protection breach / fraud.	25	2	50	Whilst we are constantly under attack, the Worcestershire County Council (WCC) infrastructure has proved robust, and we have obtained reassurance from Heywood following COVID-19. We use WCC's breach notification process and WCC's data policy, for example through the use of data encryption and password protection. Regular meetings are being set up with WCC IT Infrastructure. Systems are set up in line with data protection regulations. A complete address update is done regularly by employers. Mitigating processes include the Business Continuity Plan (BCP), data breach, addresses being checked by a dedicated checker and communication taking place with member / employer before a payment is made. All post office returns are investigated and followed up and nothing is sent out if new address is not found.	25	1	25
WFF 30 (Head of the R Service Commissioning) 30	Failure to maintain the quality of our member data	Paying incorrect or no benefits / problems with the Pensions Regulator / reputational or financial loss.	25	2	50	Our annual Mercer, Heywood and GAD data quality reviews shows our data is up with other LGPS funds. We will be using the standard approach re data collection for McCloud. We target correcting those areas where our data is not of the highest quality.	25	1	25
WPF 32 (Head of HR Service Commissioning)	GMP rectification not completed in line with the Pensions Regulator's / our members' expectations.	Claims from members, reputational damage or fines from the regulator.	25	1	25	We have drafted letters for communicating with members. Our supplier (ITM) will be highlighting extreme cases for us to review. The working assumption is that we will write to affected members in January 2021 and implement the rectification in March 2021, dates that have been put back due to HMRC delaying the provision of data extracts.	25	1	25
WPF 09 (Chief Financial Officer)	Being reliant on LGPS Central Limited's investment approach.	Investment underperforma nce / regulatory non- compliance.	25	2	50	We are challenging LGPSC's infrastructure ideas. The Pension Investment Sub Committee monitors performance of this investment manager. The Pensions Committee and officers carry out a subjective review and objective analysis of asset performance resulting from decisions taken by the Pensions Committee following advice from our investment adviser.	20	1	20

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Description of Risk	Leading to	Gross Impact		Gross Risk Score	Mitigating Action	Resi- dual Impact		Resi- dual Risk Score
	The following key actuarial assumptions set at each actuarial valuation do not match our actual experience between actuarial valuations: the number of ill health retirements; that employer strain costs associated with early / redundancy / flexible retirements are covered by the payments collected from employers; pay / price inflation; and life expectancy.	contributions.	20	2	40	Actuarial assumptions are reviewed regularly as part of each actuarial valuation to reflect analysis based on our actual membership experience and across the wider LGPS, as well updated national trends. We will introduce monitoring for all ill health retirements, advising employers of the increase in their liabilities associated with each case. We have made ill health liability insurance available to our employers which will mitigate our exposure for those employers who take up the insurance. We check that employers have paid their strain costs for non-ill health cases and ensure that employers are made aware of the financial consequences of the retirements they offer their employees. During the 2019 actuarial valuation we highlighted to employers the need to make realistic pay assumptions and required evidence from employers to support any reduced pay inflation allowance within their assumptions. The impact of price inflation is mitigated to some degree as we invest in assets which are sensitive to changes in price inflation e.g. index-linked Government bonds. We intend to develop the investment pots further to provide greater inflation protection. Mortality assumptions are set with some allowance for future increases in life expectancy, and the cost cap should limit the impact of improvements in life expectancy, something that would not be expected in the short term following COVID-19.	15	1	15

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)	Description of Risk	Leading to	Gross Impact		Gross Risk Score	3 3	Resi- dual Impact		Resi- dual Risk Score
WPF 18 (Chief Financial Officer)	existing pension	Inability to pay pensions / reputational or financial loss / staff downtime / loss of service delivery / data loss.	25	2	50	We have obtained business continuity assurance from Heywood as part of its COVID-19 response. Contract service is reviewed annually and there are regular meetings with Aquila Heywood. Robust system maintenance routines. Internal and external systems support. Back-up procedures. Business Continuity Plan. The Pension Administration Strategy reminds employers of their responsibility to provide accurate and timely information on pay. The current pensions administration system's hosting Altair has been moved from WCC servers to a cloud solution supplied by Aquila Heywood. We have signed up to the national LGPS framework for pension admin systems and as Heywood are an approved supplier we have independent validation of its current arrangements.	15	1	15
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WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Gross Prob- ability	Gross Risk Score		Resi- dual Impact	Resi- dual Prob- ability	Resi- dual Risk Score
Financial Officer and Head of HR Service Commissioning)		Insufficient staff resource or remaining staff not having the skills to do their areas of work.	25	2	50	We are preparing for the maternity absence of one of our Senior Pensions Assistants. Cross skilling is achieved by mentoring to develop officers with a high level of knowledge and experience. Officers have developed a staff knowledge assessment that will help to ensure functions are reviewed to ensure they are sufficiently staffed / have succession planning. Lockdown and home working have reduced the risks posed by COVID-19 re illness. Specialist agency cover is available. Absences will be managed in line with Worcestershire County Council's new attendance policy. Exit interviews / questionnaires are used to explore the reason for anyone leaving.		1	15
WPF 21 (Chief Financial Officer)	Failure of business continuity planning.	Inability to deliver critical functions like paying pensioners.	25	2	50	Our and Worcestershire County Council's (WCC) Business Continuity Plans have passed the tests posed by COVID-19 to date. The current pensions administration system's hosting Altair has been moved from WCC servers to a cloud solution supplied by Aquila Heywood that means it is more securely backed up. We will review lessons learned from its successful response to COVID-19 as we move out of lockdown. We will ensure that WCC includes delivery of support services to us in its Risk Register. Home working is in place.	15	1	15

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Gross Prob- ability	Gross Risk Score		Resi- dual Impact		Resi- dual Risk Score
WPF 02 (Chief Financial Officer)	Insufficient knowledge amongst members of Pensions Committee / Pension Board / Pension Investment Sub Committee members.	Poor decision- making / scrutiny.	15	2	30	Training policy, sessions and plans have been implemented in line with the Chartered Institute of Public Finance and Accountancy (CIPFA) knowledge and skills framework / best practice guidance. We have undertaken a knowledge assessment of Committee and Board members. Induction training session for new members were held on 30 June, 4 Sep and 18 Sep. Five training sessions were delivered between Sep 2018 and Feb 2020, and a session on current LGPS issues and paying pensions will be held on 10 Nov.	15	1	15
WPF 13 (Chief Financial Officer) Page 40	Liquidity / cash flow is not managed correctly.	Assets may need to be sold at unplanned times or investment opportunities may be missed.	15	2	30	The Finance Manager - Pensions monitors cash flow on a monthly basis. We currently have under 15% of total net assets exposure to illiquid assets. All contributing employers are provided with deadlines for payments and clear guidelines for providing associated information. We monitor contributions payable and paid on a monthly basis and also reconcile to E5 (our accounting system) on a monthly basis.	15	1	15
WPF 14 (Chief Financial Officer)	Failure to exercise proper stewardship of our assets.	Potential erosion of investment returns or reputational damage.	15	2	30	We have a Statement of Compliance with the Stewardship Code. We have tasked LGPSC with developing the identified reporting requirements. We participate in the Local Authority Pension Fund Forum (LAPFF) and other groups. The Pension Investment Sub Committee monitors Environmental, Social and Governance (ESG) policy regularly. We are conducting an ESG audit which will aid our stewardship and help inform our future investment strategy.	15	1	15
WPF 26 (Head of HR Service Commissioning)		Financial loss.	15	1	15	Audits of our processes take place on an ongoing basis, checking samples. Changes to Altair leave a footprint that identifies who made the change. Manager checking remains in place, supporting 'business as usual' whilst staff are working from home. Citrix has log-in security. Altair has multiple login protections. National Fraud Initiative information is processed every six months. We are working to join Tell Us Once. Month end reconciliations are also carried out.		1	15

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact		Gross Risk Score		Resi- dual Impact	Resi- dual Prob- ability	Resi- dual Risk Score
WPF 15 (Chief Financial Officer)	Failure of the actuary to deliver the services contracted.	Financial loss or loss of reputation / employer confidence or need to make major changes at short notice.	20	1	20	Following a review of their performance we have renewed Mercer's contract to 31 Oct 2023.	15	1	15
WPF 01 (Chief Financial Officer) Page 41	Failure of governance arrangements to match up to recommended best practice.	Financial loss or loss of reputation / employer confidence or need to make major changes at short notice. Audit criticism or reputational damage.	25	2	50	The annual review and audit / sign off arrangements for the annual report that includes our Governance Compliance Statement are in place for 2020. The accounts are checked against the Chartered Institute of Public Finance and Accountancy (CIPFA) example accounts and an external audit accounts checklist. We have reviewed our Governance Policy Statement. We have a good governance position statement.		1	5
WPF 17 (Chief Financial Officer)	Failure of custodian to deliver the services contracted.	Loss / inaccessibility of assets / inability to invest.	25	1	25	COVID-19 has not proved a problem for the Finance Manager - Pensions review of managers' SAS70 audit reports. We have diversification of custody via pooled funds. Contract service is reviewed annually and there are regular meetings with the supplier, BNY Mellon. Audits were completed in 2019 and are planned during 2020.	5	1	5
WPF 04 (Chief Financial Officer)	Not having an established and meaningful Business Plan / Pension Administration Strategy.	Poor decision making and delays in responding to stakeholders e.g. elected members.	5	4	20	Pension admin KPIs / investment performance / project summaries are included in the Business Plan reviewed by the Pension Board and Pensions Committee on a regular basis. Investment performance is independently confirmed by Statesmen. E5 (our accounting system) management reports are available and automatic reporting is in place on the pensions admin system. The revised Pension Administration Strategy has been in place since 1 April 2020.	5	1	5

WPF Risk Register 05 November 2020 Risk Ref (risk owned by)		Leading to	Gross Impact	Gross Prob- ability	Gross Risk Score	Mitigating Action	Resi- dual Impact		Resi- dual Risk Score
WPF 16 (Chief Financial Officer)	Failure of investment adviser to deliver the services contracted.	Financial loss or loss of reputation / employer confidence or need to make major changes at short notice.	20	1	20	Contract service is reviewed annually, objectives are in place and there are regular meetings with the supplier, M J Hudson.	5	1	5
,	Fraud by scheme members.	Financial loss.	5	1	5	We are keeping to the same standards following COVID-19 by requiring a member signature as authorisation and not taking instructions over the phone. A signed form or instruction can be scanned and emailed to us. Telephone callers are asked questions to check that they are who they claim to be. We carry out National Fraud Initiative (NFI) checks, sends payroll slips / communications at intervals through the year to home addresses and requires evidence of certificates (e.g. birth certificate).	5	1	5
WPF 29 (Head of HR Service Commissioning)		Financial loss or loss of reputation / employer confidence or need for corrective action at short notice.	5	1	3	We completed our annual review of its Policy Statement on Communications and relaunched it with the revised Pension Administration Strategy on 1 April 2020. Employee annual benefit statements that are returned to us are passed on to the member's employer. The 2020 deferred and employee annual benefit statements were despatched before 31 Aug along with an accompanying newsletter. We have produced our second annual pensioner newsletter.	5	1	5
	Incorrect calculation of benefits through human error or delayed notification of a death.	Too much being paid out in benefits.	5	1	5	In addition to system testing we have a test system and a test site for Altair (the pension payroll system). Every calculation has independent checking and set procedures. Staff receive training and performance is benchmarked. We have developed a revised overpayments write off process and intend to use it to report overpayments to the Pensions Committee. Life Certificates are also used.	5	1	5



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PENSIONS BOARD 13 NOVEMBER 2020

FORWARD PLAN

Recommendation

- 1. The Chief Financial Officer recommends that the Board comment and approve the Forward Plan.
- 2. The forward plan highlights the key areas that are anticipated to be reported in the future. This is attached as an Appendix and the Pension Board are asked to comment and approve the plan.

Supporting Information

Appendix - Forward Plan

Contact Points

Specific Contact Points for this report

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Background Papers

In the opinion of the proper officer (in this case the Chief Financial Officer) there are no background papers relating to the subject matter of this report:



Pensions Board Proposed Forward Plan

Appendix 1

Pension Board Items	26/02/2021	16/06/2021	22/09/2021	17/11/2021
SAB Good Governance Principles (Including TPR Findings)	Υ		Υ	
CMA Investment Advisor Objectives	Y		Υ	
SAB Responsible Investment Consultation Feedback	Y			
New Stewardship Code	Y			
Business Plan Progress update (to include Administration and	Y	Υ	Υ	Υ
Investment areas)				
Annual Business Plan	Υ			
Annual Admin Strategy	Υ			
Annual investment Strategy Statement	Υ			
Pension fund admin Budget Approval	Y			
Training Requirements	Y	Υ	Υ	Υ
Update on Pooling (including any feedback on MCHLG Investment	Y	Υ	Υ	Υ
Pooling consultation				
Risk Register	Υ	Υ	Υ	Υ
Regulatory Updates including Scheme Advisory Updates	Y	Υ	Υ	Υ
Outcome / update from Task and Finish Groups Topics for Further	Y	Υ	Υ	Υ
Exploration				

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