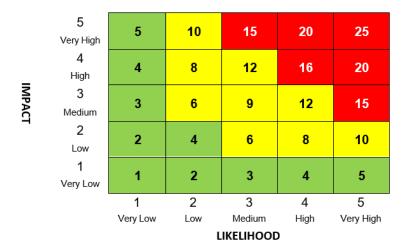
Corporate Risk Register

Generated on: 07 November 2025

South Yorkshire Pensions Authority - Corporate Risk Register

The following report sets out the register of strategic level risks. The risk scores are shown on a matrix of impact and likelihood – this equates to scores as shown on this key:



Next to each current risk score and matrix in the table, an icon is included to show the trend in the score since the previous review.

- Indicates no change in score from the previous review.
- Indicates the risk score has reduced since the previous review.
- Indicates the risk score has increased since the previous review.

The results of the latest review resulted in one risk having its current score increased and four risks having their current score decreased. One new risk has been added to the register, ORG-009 Major ICT Failure.

This table provides a high-level summary of the risks on the register that follows:

Risk Ref	Risk	Previous Score	Score	Risk Rating	Trend
ADM - 001	Poor data quality	12	12		-
ADM - 002	Backlogs in work flows	16	16		-
ADM - 003	McCloud Rectification	16	16		-
GOV - 001	Local Pension Board and Authority Members Knowledge and Understanding	12	12		-
GOV - 003	Delivery of Key Objectives in Corporate Strategy	8	8		
GOV - 004	Failure to apply data protection requirements.	12	12		
IAF - 001	Material changes to the value of investment assets and/or liabilities	12	16		1
IAF - 002	Failure to mitigate the impact of climate change	20	20		
IAF - 003	Border to Coast Strategic Plan	12	9		•
IAF - 004	Imbalance in cashflows	15	15		
IAF - 005	Employer contributions become unaffordable	12	9		-
IAF - 010	The Pensions Review	12	9		•
ORG - 002	Cyber security attack	16	16		
ORG - 004	Failure of the Authority to comply with relevant Regulations	12	12		-
ORG - 009	Major ICT Failure	New Risk	12		
PEO - 002	High level of vacancies within the organisation	9	9		-
PEO - 003	Single person risk in specialist knowledge roles	12	9		-

Risk:	ADM - 001 Poor dat	a quality	Risk Owner:	Assistant Direc	ctor – Pensions
			Last Review:	30-Oct-2025	
Risk effect:	Provision of inaccurate in Inaccurate data impacting	penalties ects such as McCloud rectification on time formation and payment of benefits to members g the valuation of liabilities during the triennial val logs contributing to further increases			
Existing Preventa	ative Measures	Existing Mitigation Measures	Linked Actions		
	ment of data improvement		Further preventative	e measures to be as	sessed to address route cause
plan. Dedicated Program	mmes and Performance	employer data submissions. Use of DART to run daily validations (200 per	In house system in	nprovements and effi	ciencies
Team		day)	Robust contract m	anagement	
Use of DART to run daily validations (200) Projects Team resource to target highlighted issues - bulk data corrections. Use of Hymans data cleansing tool as part of valuation process. Targeted overtime with focus on priority casework		New system testing, releases and updates Dedicated systems team in place Issues and errors reported to System Providers Checking process in existing systems. Targeted staff overtime worked Capacity exercise outcomes have been implemented and a dedicated team resourced	Targeted staff train	iing	
Target matrix and score:	рефи		Current matrix and score:	pedu	Trend:
	Likelihood	Target score: 6		Likelihood	Current Score = 12
Commentary from latest reviews		Data Quality Strategy authorised and in place. Data improvement plan in place for Valuation 2025. Early feedback received from actuary that the data has improved. Internal feedback from ABS exercise again shows that data has improved. Data corrections for annual exercises have been undertaken and are now captured on the Monitoring and Reviewing activity document. Dashboards to be developed to understand and monitor our data quality in real time.			
		The impact of the introduction of the policy and	d monitoring cannot	yet be assessed so t	there is no justification to reduce the score at present.

Risk: ADM - 002 Backlo	Risk: ADM - 002 Backlogs in work flows		Assistant Director -	- Pensions
		Last Review:	30-Oct-2025	
Risk effect: Declines in the overall I Regulatory penalties Reputational Damage	evel of service performance.			
Existing Preventative Measures	Existing Mitigation Measures	Linked Actions		
Capacity planning exercise has been undertaken.	Improved processes and staff training Targeted overtime to focused areas		nplementation of the actior ovide some mitigation in the	n plan (particularly the automation of certain bulk he interim
An action plan considering a range of specific actions to address aspects of problems identified has been developed and is being worked through.	Changes to work tray allocations Outcomes of Capacity Planning implemented - Dashboard in place for teams to enable close monitoring of workloads in against workloads completed.	Review of processes and policies		
	Pre live launch testing processes in place.			
Target matrix and score:		Current matrix and score:	pedu	Trend:
Likelihood	Target score: 6		Likelihood	Current Score = 16
Commentary from latest reviev	ent the rate of clear nthly) to work sole tober 2025. er 2025, the target	ing the backlog cases had	d slowed. The Service Manager Benefits set up a action did not increase clearing of the backlog more 1 March 2026.	
	There is no reason to adjust the risk score at p	resent.		

Risk:	ADM - 003 McCloud	l Rectification	Risk Owner:	Assistant Director -	Pensions
			Last Review:	30-Oct-2025	
Risk effect:	Timescales to rectify mer	nbers benefits not met. TPR fines and reputatio	nal damage.		
Existing Preventa	ntive Measures	Existing Mitigation Measures	Linked Actions		
		SYPA and other Provider Clients working together to collectively drive the Provider to	McCloud - Rectifi	cation Plan to be implement	ted and team training put in place
		deliver the developments required to adhere to national guidance			
Target matrix and score:	hyact		Current matrix and score:	hyact	Trend:
	Likelihood	Target score: 6		Likelihood	Current Score = 16
Commentary from latest review:		Determination made by the Authority at their June meeting to delay rectification to August 2026. But as determination is needed for everyone affected by McCloud, a report was also made to the Regulator in August 2025. Latest system development issued November 2025 is there has been a further delay to the software update, which is proposed to be available June 2026. Officers are working with Civica to understand the requirements expected from this update in order to plan resourcing accordingly.			
		Even though we now have longer to deliver thi	s project there is n	o justification to lower the ris	sk score.

Risk:		nsion Board and Authority	Risk Owner:	Head of Governa	ance and Corporate Services
	Members Knowledg	ge and Understanding	Last Review:	05-Nov-2025	
Risk effect:	Risk effect: Poorly informed decision making Regulatory / legislative non-compliance Insufficient questioning and challenge of officers.				
Existing Preventa	ative Measures	Existing Mitigation Measures	Linked Actions		
			Continuous revie	w of the pensions lands	scape for legislative and regulatory change
Identify changes to legislation and key regulatory requirements that require enhanced knowledge and skills development Continuation of collaborative engagement of Independent Advisors, Internal Auditors and Officers		and associated mandatory training requirements in place.			
Target matrix and score:	pedu		Current matrix and score:	hpad	Trend:
	Likelihood	Target score: 6		Likelihood	Current Score = 12
Commentary from latest review: Further turnover in membership during Q2 means there is no justification to reduce the score at this stage. All new members continue to support with their training and induction.				score at this stage. All new members continue to receive	

Risk:	GOV - 003 Delivery	of Key Objectives in Corporate	Risk Owner:	r: Head of Finance and Performance
	Strategy		Last Review:	v: 22-Oct-2025
Risk effect:	We will not deliver the se	rvice to our scheme members set out in our mis	sion statement.	
Existing Prevent	ative Measures	Existing Mitigation Measures	Linked Actions	s
			Performance Fra	ramework - Further implement and embed the Framework
			Programme Mana	anagement Framework - Further implement and embed the Framework
Target matrix and score:	рефи		Current matrix and score:	
	Likelihood	Target score:6		Likelihood Current Score = 8
		risk score in due course. The Project Management Methodology used to communications on new guidance and minor of the supplementary performance management.	o support our Corp changes to process framework piece coduced to the tear	ce of work is ongoing. Further dashboards are being developed across the Authority eam. A performance framework tracker is being designed to give clear visibility

Risk:		o apply data protection	Risk Owner:	Head of Gov	ernance and Corporate Services
	requirements		Last Review:	05-Nov-2025	
Risk effect:	Financial or Regulatory p Reputational damage to Inability to deliver the ser	the organisation.			
Existing Prevent	tative Measures	Existing Mitigation Measures	Linked Actions		
Data breach process followed to identify areas for improvement. Close liaison with DPO. Reporting to ICO and implementing any recommendations. Implementation of data recovery plan. Access to expertise Assurance Team an ICT control measure Data protection policy training in place. Phase 1 of informati plan fully completed implemented and er staff training completed sessions to raise away.		Access to expertise through BMBC Corporate Assurance Team and DPO. ICT control measures. Data protection policies, procedures and training in place. Phase 1 of information governance action plan fully completed. Data Protection Policies implemented and embedded. All mandatory staff training completed including team sessions to raise awareness of new processes.		ernance Action Pla	n Phase 2
Target matrix and score:	Likelihood	Target score:6	Current matrix and score:	Likelihood	Trend: Current Score = 12
Work on Phase 2 of the Information Governan		November 2025 de	tinues to progress eadline. This will ir	All internal teams have now completed their input to the form further parts of Phase 2 including data retention policy and re will not be reduced until complete.	

Risk:			Risk Owner:	Assistant Directo	or – Investment Strategy
	assets and/or liabilities		Last Review:	07-Nov-2025	
Risk effect:	Sharp and sudden mover	ments in the overall funding level			
Existing Preventa	tive Measures	Existing Mitigation Measures	Linked Actions		
Having a diversified Investment Strategy focussed on relatively lower risk and less volatile investments. Element of inflation protection built into the asset allocation both through specific assets (such as index linked gilts) and proxies such as property and infrastructure		Ability to implement protection strategies if market circumstances indicate they are appropriate.			
Target matrix and score:	hyact		Current matrix and score:	hpact	Trend: 👚
	Likelihood	Target score: 9		Likelihood	Current Score = 16
Commentary from latest review: Gatheral but			to material volatili		e part of global equity markets, have driven the creation of osses in value. As a result of this, the risk score has been

Risk:	change		Risk Owner: Last Review:		
Risk effect:	Significant deterioration in	n the funding level	Last Neview.	21-001-2023	
Existing Preventa	ative Measures	Existing Mitigation Measures	Linked Actions		
	Policies and Net Zero	Climate Change Policies and Net Zero Goals	Additional engage	ment with Border to Coa	ast to identify potentially climate positive investments.
Goals adopted by both the Authority and Border to Coast.		adopted by both the Authority and Border to Coast	Analysis of end o trajectory.	year climate data to gai	in a detailed understanding of the current emissions
Asset allocation tilted to favour more climate positive investments. Review of Investment Strategy following the 2022 Valuation to integrate the achievement of Net Zero within the Strategic Asset Allocation. Reporting in line with the requirements of TCFD and regular monitoring of the level of emissions from portfolios, with outline targets for reductions.			Clear targets for e	emission reduction to be	set for remaining portfolios.
Target matrix and score:	ирас		Current matrix and score:	hpad	Trend:
	Likelihood	Target score: 12		Likelihood	Current Score = 20
Work being carried out as part of the investment strategy review will give a clearer view on the actual trajectory of emissions. However, it is that it is unlikely that the current Net Zero goal will be achievable. Therefore, some degree of reassessment of both the goal and the way in this risk is formulated will be necessary, to ensure the Authority's actions are able to have an impact.				e of reassessment of both the goal and the way in which	

Risk:	IAF - 003 Border to	Coast Strategic Plan	Risk Owner:	Director	
			Last Review:	21-Oct-2025	
Risk effect:		formance. Ilt of the need to move to more expensive productions and volatility levels within the portfolio	ucts.		
Existing Prevent	ative Measures	Existing Mitigation Measures	Linked Actions		
	ecific risk mitigations the 2022 - 2025 Strategic	Process of engagement between the Company and stakeholders to agree the Company's Strategic Plan and Budget containing appropriate mitigations. Succession and contingency planning arrangements in place within the Company Ongoing monitoring of Programme of specific risk mitigations set out in 2022 - 2025 strategic plan			
Target matrix and score:	Likelihood	Target score: 6	Current matrix and score:	Likelihood	Trend:
Commentary from latest review: facing achievement of the 2030 Strategy. While			e there is still muc	h work to do, and in p	ship represents a key step in mitigating the largest risk particular new services such as advisory to develop, these nem, than the process of bringing in new partners.

Risk:	IAF - 004 Imbalance in cashflows		Risk Owner:	Assistant Director -	Investment Strategy
			Last Review:	07-Nov-2025	
Risk effect:		without resorting to borrowing or "fire sale" liquides on individual pensioners.	dation of investme	nts.	
Existing Preventa	tive Measures	Existing Mitigation Measures	Linked Actions		
	oring and forecasting	Maintenance of "cash buffer" of liquidity	Further improvem	ents in cashflow forecasting	3
cashflows		sufficient to cover more than one monthly payroll.	Implementation of strategies to more regularly harvest income from investments		y harvest income from investments
Target matrix and score:	Disperting the state of the sta		Current matrix and score:	pact	Trend:
	Likelihood	Target score: 5		Likelihood	Current Score = 15
Commentary from latest review:		key elements we investigate as we progress. I	he elevated rating	will remain until we have fu	uding any income from assets too) will be one of the inther clarity. on results for some months now, this resulted in an
		updated risk rating back in July 2025.			

Risk:	IAF - 005 Employer	contributions become unaffordable	Risk Owner:	Assistant Director – Pension	าร
			Last Review:	30-Oct-2025	
Risk effect:		es to the extent that they become unaffordable. contributions by employers			
Existing Preventa	tive Measures	Existing Mitigation Measures	Linked Actions		
	es and stabilisation	Investment strategy that is focused on long	More systematic rev	iew of employer covenants	
	pending on the type of	term returns and reduced volatility Reviews of employer covenant and ongoing	More systematic use	e of the funding monitoring tools that the	ne actuary gives us access to
employer 2. Ability reviews	to undertake contribution	monitoring of funding levels			
Target matrix and score:	pedu		Current matrix and score:	рысы	Trend: 🗣
	Likelihood	Target score: 6		Likelihood Current	t Score = 9
Comme		This risk concerns the fact that the overall finar affordability an issue. Covenants are monitored. Work is progressing for the period from 01/04/2026 to 31/03/2029, the surplus being returned through the reduction. The funding position and reduction in contribut therefore the risk rating has reduced to a 9.	g towards the end on with all rates seeing a ons to contribution rat	the 2025 Valuation with all employers a reduction of varying amounts. The Fues.	having received their contributions rates and is 142% funded with a proportion of

Risk:	IAF - 010 The Pensions Review		Risk Owner:	Director		
			Last Review:	21-Oct-2025		
Risk effect: Destabilisation of the B2C pensions partnership. Inability to deliver the investment strategy. Regulatory action against the Authority if we fail to meet the Governance			standard			
Existing Preventative Measures		Existing Mitigation Measures	Linked Actions			
	g partnership through		Ensure that steps are taken to address requirements as far as possible in advance of regulation			
B2C. Strong governance	a arrangements as		Influence Final Guidance and Regulation			
	ndependent Governance					
Review .	•					
Target matrix and score:	мээд		Current matrix and score:	мы	Trend:	
	Likelihood	Target score: 9		Likelihood	Current Score = 9	
Comme	ntary from latest review:	The planning work done to date indicates a me continue broadly as planned, allowing some re			er assets, which allows other developments to	

Risk:	ORG - 002 Cyber se	curity attack	Risk Owner:	Head of ICT	
			Last Review:	30-Oct-2025	
Risk effect:	Significant disruption to the Loss / unauthorised release Reputational damage and	se of key data.			
Existing Preventa	tive Measures	Existing Mitigation Measures	Linked Actions		
place. Incident response retainer with specialist security provider Cyber Security Incident Management Policy in place. Further enhancement of Cyber Security defences		Internal facing Cyber Security Strategy now in place. Regularly updated policies, software and hardware e.g. firewalls etc. to ensure multi layer cyber security defences. Regular penetration testing. Cyber Security Essentials Plus Certification Regular refresher training on cyber security for all staff with a requirement to achieve a minimum level of pass. Policies and Codes of Practice in place Targeted threat protections Regular internal and external audits	Implementation o	f Internal Facing Cy	ber Security Strategy
Target matrix and score:	Likelihood	Target score: 12	Current matrix and score:	Likelihood	Trend: Current Score = 16
Commer	ntary from latest review:	Several significant improvements to our cyber s Security Strategy. At this stage there is no justification to reduce t	·	continue to be expl	ored/implemented, as detailed in the new SYPA Cyber

Risk:	ORG - 004 Failure of the Authority to comply with relevant Regulations		Risk Owner: Last Review:		ance and Corporate Services	
Risk effect: Enforcement action by relevant regulatory authorities						
Existing Preventa	ative Measures	Existing Mitigation Measures	Linked Actions			
Regular reviews of key policies and processes		Service areas are aware of key points of reference for relevant regulations	Delivery of additional Data Protection training in roles and responsibilities for all staff, middle managers, and SMT			
training for staff in relation to operational matters		Reporting of compliance within relevant standards.	implement and embed the Information Governance action plan in collaboration with Internal Audit at each stage of review			
		Assessment of compliance with TPR General			ce with emerging regulatory requirements. TPR General enhanced regular reporting	
milestone approvals		code is in place.				
Target matrix and score:	hpad		Current matrix and score:	hpad	Trend:	
	Likelihood	Target score: 8		Likelihood	Current Score = 12	
Comme	ntary from latest review:	Whilst progress is being made, in line with the justification for change at this stage.	last update there a	re still some outstand	ding items that are targeted for completion by Dec 2025. No	

Risk:	ORG - 009 Major IC	T Failure – NEW RISK	Risk Owner:	Head of ICT		
			Last Review:	07-Nov-2025		
Risk effect:	Risk effect: Disruption to operations resulting in loss of data/data corruption, support arrangements with an increased chance of breaches. Potential reputational damage and financial implications.					
Existing Preventative Measures		Existing Mitigation Measures	Linked Actions			
Managed Detection & Response (MDR) Service E-Backup & Recovery Service Business Continuity Plan Maintenance and support contracts Uninterruptible Power Supply (UPS) High availability and hardware redundancy			Develop a Cyber	Security Strategy (third	party assurance reports)	
Target matrix and score:	Likelihood	Target score: 9	Current matrix and score:	Likelihood	Trend: New Risk Current Score = 12	
As part of the scheduled review process, the risk of Major ICT Failure has been escalated from the ICT Operational Risk Register due to the potentially high impacts across the whole of the Authority's operations. Strengthening exist preventative measures will continue, in addition to specific actions that have been identified in the new Cyber Secur				ed from the ICT Operational Risk Register to the Corporate rations. Strengthening existing mitigations and		

Risk:	PEO - 002 High level of vacancies within the organisation			Director Design 05-Nov-2025	ate	
Risk effect:	Inability to deliver the ser Negative impact on staff Poor staff retention result					
Existing Preventa	tive Measures	Existing Mitigation Measures	Linked Actions			
Capacity planning to identify additional resources. Regular one to ones, review of workload and work life balance. Promotion of wellbeing initiatives. Provision of Counselling, Occupational Health and Employee Assistance Programme. Investment in training and development. Market supplements to secure specialist roles. Develop action plan following 2023 employee survey		Career grade scheme in place to develop in house specialists. Targeted advertising including using social media Introduction of hybrid working and existing flexi scheme. Increase in staffing following capacity planning outcomes.	Develop talent attraction via Employee Value Proposition			
Target matrix and score:	Likelihood	Target score: 6	Current matrix and score:	Likelihood	Trend: Current Score = 9	
Comme				k on the linked actions	s - including the delivery of the People Strategy is continuing framework review to be presented to the Authority in	

Risk:	PEO - 003 Single person risk in specialist knowledge roles		Risk Owner:	Director Desig	gnate
			Last Review:	05-Nov-2025	
Risk effect:	Failure to deliver service and reduced service quality. Reputational damage. Impact on staff morale and wellbeing.				
Existing Preventative Measures		Existing Mitigation Measures	Linked Actions		
Organisational Re		Revised pay and benefits package Range of policies for supporting wellbeing Documented procedures and work	Knowledge Trans	sfer	
Lessons learned to failure.	o identify single points of		Succession Plan	ning	
		instructions Learning and development plans and knowledge transfer			
Target matrix and score:	Likelihood	Target score: 9	Current matrix and score:	Likelihood	Trend: Current Score = 9
Commentary from latest review: Impact score has been reduced from high (4) to medium (3) be identified mitigations for single person risk in the event of a burplanned project on creating a workforce plan during 2026. Whim			ne event of a busir	ed on the work now ness continuity incid	ent. Work will continue regarding wider mitigations through the