

Risk Register

	Risk	Score	Mitigation	Residual score		
1.	Project Cost overrun	2*2	Oasis has agreed to bear the costs of the transfer. Hymans Robertson (HR) preparing the project plan and identifying cost drivers. Preparing an estimate of costs for Oasis' approval.	2*1		
		4		2		
2.	Data being migrated from different admin systems. - Risk of data loss and incompatibility with Kent system	4*3	HR to identify the administration systems used by the administering authorities and prepare plan for data migration. 2 workstreams proposed: 1 transfer active and deferred member data a. from CIVICA funds b. from ALTAIR funds 2 transfer pensioner data Plan to use Heywood to manage the data transfer. Issue is cost involved so HR to prepare an alternative plan for the manual migration of data.	3*3		
		12		9		
		FUND		Admin system	Payroll system	Image software
		Bath		altair	altair	altair
		Croydon		altair	TBC	altair
		East Riding		Civica	Civica	Civica
		Enfield		altair	TBC	altair
		GMPF		altair	altair	altair
		Hampshire		Civica	Civica	Civica
		Havering		altair	TBC	Third party
		Kent		altair	altair	altair
		Lambeth		altair	altair	altair
		Newham		altair	TBC	Third party
		S Yorkshire		Civica	Civica	Third party
		West Midlands		Civica	Civica	Civica
		West Yorkshire		Civica	Civica	Civica
		Wiltshire		altair	SAP	altair
Worcester	altair	altair	altair			

3.	Poor quality of data being transferred to Kent. Lots of outstanding queries / discrepancies	4*3	All authorities / Oasis to be asked to resolve all queries relating to members prior to transfer. Kent Fund to do audit of data on receipt and liaise with other authorities / employers / members to resolve queries. Commitment from Oasis to the operation of a single payroll and to provide standard quality of member data going forward.	3*3
		12		9
4.	Pensioners not being paid. At least three of the have pay dates other than last banking day which is the day used by Kent.	3*4	Separate workstream - Only 100 pensioners. Oasis / Kent communication. HR to confirm current payment arrangements, Kent Fund to consider advances for pensioners if required. No change to Kent monthly payment arrangements	2*4
		12		8
5.	AVC providers – different from those used by Kent.	3*3	HR to confirm current providers and Kent to investigate additional arrangements	3*2
		9		6
6.	Financial covenant of Oasis – risk of company going bust	2*5	Dun and Bradstreet credit check – current credit score 85/100. DfE guarantee Last company accounts filed 31 August 2014. Tangible Net Worth £330,425k Kent Fund to monitor risk annually	2*4
		10		8
7.	45 – 50 additional employers - Increased workload for Kent Fund	3*3	Project plan – 2 stage process for data migration. One employer - Oasis Community Learning Trust who will manage membership of the LGPS. Kent Fund to have single relationship with Oasis - one employer contribution rate and one FRS17 report required.	3*1
		9		3
8.	Kent Pension Admin team office move due July 2015	5*3	KCC management to manage move Project plan to take this into account	5*2
		15		10
9.	Kent Pension Admin team resources – impact of possible outsourcing – uncertainty, low morale, staff leaving. Decision due August 2015	4*4	KCC management to manage staff concerns Project plan to take this into account	4*3
		16		12

10.	Lack of communication with academies / members	3*3	HR to oversee communication with members. Oasis to communicate change to staff. HR to manage.	3*2
		9		6
11.	Adverse feedback from other authorities	3*3	Oasis dialogue with all administering authorities concerned – no issues raised. Formal consultation.	2*2
		9		4
12.	Transfer of assets – amounts transferred to reflect current funding levels – may be underfunded relative to Kent employers	3*3	Fund actuaries to agree method of calculating transfer amount, to be included in consultation document. Barnett Waddingham are proposing an initial contribution rate approximate to the average rate which the academies are now paying. At the next valuation BW will calculate a revised rate for Oasis Trust to pay to reflect combined liabilities and asset values	3*2
		9		6
13.	Impact on the Fund of future academy closures	3*2	Hextable Academy is closing and the deficit is being absorbed by the Oasis Trust. There are no future expected closures. If a Trust academy were to close in the future the deficit would be absorbed by the Oasis Community Learning Trust. The DfE have confirmed that the guarantee given in 2013 will apply in the event of the Trust closing and there will be no impact on the Kent Fund.	3*1
		6		3
14.	More academies joining the Oasis Trust - under the direction any new Oasis academies would come into the Kent Fund	4*3	Impact on the Fund negligible as consolidated into the Oasis Trust	4*1
		12		4

Risk category	Number of risks	Number of risks after mitigation	How The Risk Should Be Managed
High Risk (16-25)	1	Nil	Immediate action is required. Project plan agreed to manage the risk. Project Manager / Senior Oasis Trust / Kent Management should be made aware of the current situation and involved in communications and actions where necessary.
Medium Risk (9-15)	11	4	Project plan agreed to manage the risk. Project Manager / Senior Oasis Trust / Kent Management should be made aware of the current situation. Will require specific monitoring and response in order to stop it becoming a high risk event.
Low Risk (1-8)	2	10	Project plan agreed. The risk will be managed by routine procedures and monitoring. Very unlikely to need specific attention or time spent managing it. Can be dealt with as part of the day-to-day work the team undertakes.

Rationale for Oasis consolidating their academies into the Kent Fund provided to DCLG

1.	Oasis Community Learning (OCL) is a large multi-academy trust, serving some of the most disadvantaged communities in the UK as part of our mission to bring educational and community transformation.
2.	As at March 2015 OCL has forty four academies across the UK, with more in development for a September 2015 opening. Currently we participate in fifteen LGPS pension funds, which poses a considerable administrative burden.
3.	Of the fifteen funds, Kent was chosen because it is a progressive fund in its approach to academies, which is large enough to handle this kind of transfer without destabilising the efficiency of its operations to other employers, and it is also well-funded. It is the fifth largest fund in OCL's portfolio of funds, by active members and pensionable pay.
4.	As at the end of February 2015 there were 241 active members across three academies in the Kent Superannuation Fund and the forecast annualised pensionable pay for those members equalled £3.26 million.
5.	OCL did not approach any other funds before Kent. Of the four other funds with larger memberships (measured by numbers of active members and/or forecast annualised pensionable pay), these funds were deemed to be too small to handle such a large consolidation exercise, or to have a detrimental policy towards academies when compared to that towards maintained schools.
6.	OCL based its decision to approach Kent Pension Fund following taking specialist legal advice from DWF LLP and from a careful analysis of the funds it participates in. The approach to Kent coincided with discussions with the Fund about a cessation cost (estimated in 2014 to be in the order of £1.018m) which would otherwise have been payable following the voluntary closure of one of its academies on the grounds of financial viability in August 2016 (Oasis Academy Hextable). Such a cessation cost would be averted by the consolidation without leading to any extra costs for other employers in the Kent Pension Fund, allowing more public funds to be directed to the education of our students.
7.	The benefits to Kent Pension Fund from the consolidation are the participation of more than 2,100 active OCL members into its Fund and inflows of contributions which are currently in the order of £7.3m.