

## Risk Register

### For discussion

1. The Commission last considered the risk register at its July meeting. Following this meeting, the following updates have been made: -
  - Risk 4 (lack of understanding) now refers to deliberate spreading of misinformation.
  - Added risk of political interference from outside UK to risk 5 (the political landscape).
  - Added increased likelihood of cyberattacks to risk 7 (failure of governance systems) to reflect current environment.
2. As recorded in the risk register, four risks are decreasing (risk of not meeting deadline, risk of political interference, delay in legislative change and risk of insufficient staff resource). Risk 7 is increasing due to the likelihood of a cyber-attack in the current environment.
3. The Commission is invited to consider the updated register and discuss the identified risks and proposed mitigations.

**Secretariat**  
**September 2025**

No.	Type	Description	Effect	L/I	Mitigating Actions	Mitigated L/I	I/D/Same	Comments
1	Review	Risk of not meeting submission deadline due to legislative framework and reiterative cycle of revise proposals/consult/local inquiries and low trigger point for local inquiries	Challenging to meet 1 May 2025 deadline.  Risk of JR challenge  Damage to reputation of Commission and to the boundary setting process.	M/M	Appearance at SPPA meeting  Formal response to Independent Review provides opportunity to potentially improve legislation	M/M	↓	Final Report submitted to Ministers on 30 April 2025  Formal response to Independent Review consultation provides opportunity to potentially amend legislation
2	ER	Political interference/lack of support from Ministers	Unreasonable scrutiny increases likelihood of proposals failing  Damage to reputation of Commission, Parliament and democratic process	M/M	Final Report submitted to Ministers and subsequent evidence to SPPA explaining reasons for decisions, legislative compliance and constraints	M/M	↓	At 12 June SPPA meeting, offered to provide evidence at future date  6 monthly meetings with Minister
3	ER	Legislative change/ delay in introduction of automaticity	Impact of planned electoral reform work on Commission  Impact of SG review into work of BS  Impact on staff resources, dual reviews	M/M	Continue to state Commission's position and offered to attend SPPA Committee to discuss further.  Chair regularly meeting with Chair of Independent Review and discussion at 5 June meeting  Formal response to consultation reiterating Commission's position	M/M	↓	Independent Review commenced and formal consultation closes on 7 August. Further consultation with stakeholders in Autumn 2025
4	ER  Review	Lack of understanding about role of Commissions and reviews	Misunderstanding of statutory role of Commissions  Low level stakeholder engagement in consultation process  Ineffective consultation.  Spread of misinformation (including deliberate) and disinformation	H/M	Actively maintain stakeholder relationships.  Early engagement with stakeholders including media to improve understanding of the Commission's work.  Continue to monitor press coverage and try to correct any published misinformation. Try to increase media's understanding of review process by early engagement.  Try to understand Councils' roles in sharing information and engage further.  Raise online/hybrid/in person inquiries with SG in context of electoral reform	M/M	-	Last consultation, lower response numbers but misinformation not as prevalent.  Some misunderstanding of impact of review demonstrated at SPPA Committee but corrected by both Convener and Chair
5	ER  Review	Changes to political landscape including elections out of cycle, frequent ministerial changes and increasing risk of interference from outside UK	Impact on relevance of review and trust in political systems	M/M	Effective liaison between Secretariat/sponsor department to build known events into project planning  Communications to stakeholders	M/M	-	
6	R  Review	Insufficient staff resource and/or loss of staff/Commissioner with appropriate skills and knowledge.	Impact of dual review/UK electoral reform and possibly of early UK review  Unable to conduct business to full level of effectiveness and delay to review.  Damage to reputation of Commissions	M/M	Liaise with SG to ensure commissioner appointments support continuity of knowledge/skills.  Liaise with SG over vacancy management including temporary staff  Ensure appropriate induction and ongoing training of staff and Commissioners	L/M	↓	
7	R	Failure to maintain and apply robust governance systems	Act outside legislation or perception acting outside  Increased likelihood of Judicial review  Increased likelihood of cyber attack	L/H	Maintain and update internal policy and processes  Ensure appropriate documentation of procedures, reasons for decisions and engagement with different bodies  External legal advice	M/M	↑	Review Business Continuity Plan at next meeting

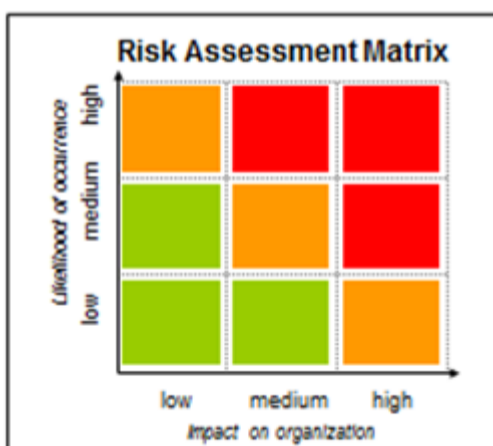
			Damage to reputation of Commission and democratic process Business Continuity Plan Data breach/GDPR/IT Fraud Physical security Climate Change/EDI/Biodiversity		Business Continuity Planning Use of SCOTS- technical support from Scottish Government. Ongoing training of staff and Commissioners Shift website to more secure provider			
8	T Review	Outside bodies not supplying necessary data or data of poor quality	Impact on quality and accuracy of decision making	L/H	Liaise regularly with data suppliers Data quality checks on receipt and establish if there are other forms of data.	L/M	-	Electoral reform process to clarify access to electoral registers
9	R	Insufficient budget	Insufficient budget undermining effectiveness of consultation Potential of dual review	L/M	Project planning to match review process to budget availability Corporate planning and liaise with sponsor team to ensure aware of budget needs	L/L	-	

The risk register shows the weightings of each risk for likelihood and impact, each classified as high, medium or low.

	Likelihood
<b>High (H)</b>	High probability of occurrence
<b>Medium (M)</b>	Conceivable might occur
<b>Low (L)</b>	Unlikely to occur

	Potential Impact
<b>High (H)</b>	Risks that can have a major effect on Commission operations. May result in significant financial loss, major disruption to outputs or serious damage to the Commission's reputation.
<b>Medium (M)</b>	Risks that have a noticeable effect on Commission operations. Each will cause a degree of disruption to outputs and may affect budgets.
<b>Low (L)</b>	Risks where the consequences and impact will not be severe and any associated losses relatively small. As individual occurrences they will have a negligible effect on Commission operations.

These are combined to determine the risk category: Red = HH, MH or HM, Amber = MM, HL, LH, Green = LL, ML, LM.



- ER External Relations
- R Resources (including staff)
- T Technical