

Risk Register

For discussion

1. The Commission last considered the risk register at its December 2025 meeting where the main change was to remove former risk 1 from the register (as the Second Review had been approved).
2. As recorded in Appendix A, current risks 1 (risk of political interference) and 2 (delay in legislative change) are decreasing. Risks 4 (change to political landscape) and 5 (insufficient staff resource) have been marked as increasing due to likely uncertainty following May 7 elections and upcoming Commissioner vacancy.
3. The Commission is invited to consider the updated register and discuss the identified risks and proposed mitigations.
4. After the May election, the Secretariat proposes that the Commission should carry out a more extensive review of the risk register and discuss the Commission's risk appetite.

Secretariat
March 2026

No.	Type	Description	Effect	L/I	Mitigating Actions	Mitigated L/I	I/D/Same	Comments
1	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. Approval process now complete.	M/M	↓	Next meeting with Minister in March 2026 To arrange meeting with new Minister, once appointed after election
2	ER	Legislative change/ delay in introduction of automaticity	Impact of planned electoral reform work on Commission Impact of outcome of Independent Review on 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 to continue with regular meetings with DD and Minister Formal response to final report setting out Commission's position	M/M	↓	Independent Review final report published on 9 December 2025 SG commitment to introduce legislation in first session
3	ER	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 Stakeholder survey demonstrates that there is still confusion about the boundary setting process
4	ER	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 Impact of co-ordinated AI responses to consultations	M/M	Effective liaison between Secretariat/sponsor department to build known events into project planning Chair to continue to meet regularly with Sponsor Team and Minister, once appointed Communications to stakeholders	M/M	↑	To arrange meeting with new Minister, once appointed after election
5	R	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 Monitor potential impact of Representation of the People Bill on workload	M/M	↑	Representation of the People Bill introduced – to monitor impact on work (if any). Sponsor Team notified of upcoming recruitment for new Commissioner
6	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	-	

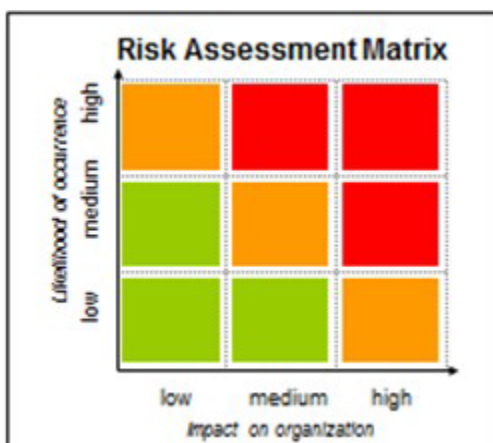
			Damage to reputation of Commission and democratic process Business Continuity Plan Data breach/GDPR/IT Fraud Physical security Climate Change/EDI/Biodiversity		Business Continuity Planning Use of SCOTS- technical support from Scottish Government. Ongoing training of staff and Commissioners Website shifted over to more secure provider			
7	T	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 – secondary legislation.
8	R	Insufficient budget	Insufficient budget undermining ability to develop new approaches 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	
High (H)	High probability of occurrence
Medium (M)	Conceivable might occur
Low (L)	Unlikely to occur

Potential Impact	
High (H)	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.
Medium (M)	Risks that have a noticeable effect on Commission operations. Each will cause a degree of disruption to outputs and may affect budgets.
Low (L)	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