

Risk Register

For discussion

1. The Commission last considered the risk register at its September 2025 meeting. Following this meeting, the main change has been to remove risk 1 from the register as the approval process for the Second Review is now complete.
2. As recorded in the risk register, three risks are also decreasing (risk of political interference, delay in legislative change and risk of insufficient staff resource). Risk 6 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
December 2025**

| 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 | ↓ | At 12 June SPPA meeting, offered to provide evidence at future date 6 monthly meetings with Minister |
| 2 | 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 Formal response to consultation reiterating Commission's position | M/M | ↓ | Independent Review commenced and formal consultation closes on 7 August. Informal consultation with small group of stakeholders now complete. Expecting recommendations to be published in early Dec 2025. |
| 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 | M/M | Effective liaison between Secretariat/sponsor department to build known events into project planning Communications to stakeholders | M/M | - | |
| 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 | L/M | ↓ | |
| 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 | ↑ | Check cyber security arrangements under SG |

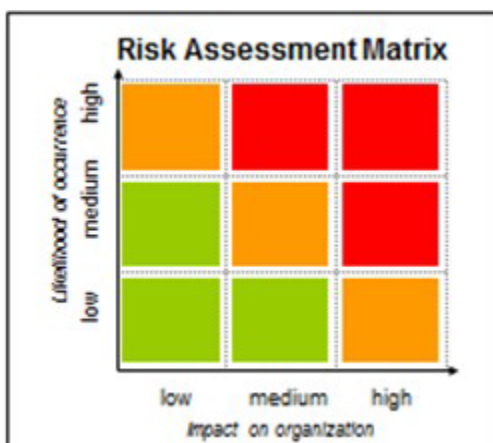
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|---|---|---|--|-----|---|-----|---|---|
| | | | Damage to reputation of Commission and democratic process Business Continuity Plan Data breach/GDPR/IT Fraud Physical security Climate Change/EDI/Biodiversity | | Business Continuity Planning Use of SCOTS- technical support from Scottish Government. Ongoing training of staff and Commissioners Shift website to more secure provider | | | |
| 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 |
| 8 | 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 | |
|-------------------|--------------------------------|
| 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