

This paper will be published

SRA Strategic Risk Update

Purpose

- 1 This paper provides the SRA Board with a progress report on the SRA Strategic Register (SRR) and our approach to risk management development.

Recommendation

- 2 The Board is asked to agree:
 - a) the Strategic Risk and Residual Risk Level Report (annex 1)
 - b) the revised Strategic Risk Register (annex 2).

If you have any questions about this paper, please contact Liz Rosser, Executive Director Operations and Resources, liz.rosser@sra.org.uk

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Background

- 3 Risk in the organisation is managed in accordance with the SRA Risk Management Framework (RMF). This sets out responsibility for managing risk in the SRA together with the reporting arrangements for the Executive Team, Audit and Risk Committee (ARC) and the SRA Board. The Strategic Risk Register (SRR) is reviewed regularly and reported to the Board three times a year as part of our performance reporting.
- 4 The Executive Team considered our key organisation risks and agreed general updates to the SRR and these were subsequently reviewed by ARC.

Strategic Risk Register (SRR)

- 5 The Strategic Risk Register comprises the following risks:
 - Regulatory Focus (SRR1)
 - Equality, Diversity, and Inclusion (SRR2)
 - Technology (SRR3)
 - Risk Based Regulation (SRR4)
 - Investigation and Enforcement (SRR5).
- 6 ARC received the latest updates to the Strategic Risk Register at its meeting on 4 December 2025 which covered changes to the strategic risks, including updates on progress of activities and risks which are outside of risk appetite. It was agreed that the whole SRR will be revisited afresh as part of the Board session on developing the next corporate strategy.
- 7 The Committee considered what would be required to bring SRR4 and SRR5 into appetite. On SRR4 the Committee noted the importance of the work of the Risk and Data Programme to help us identify and act on key risks that could lead to consumer harms and help ensure we are managing and making the best use of our information. It recognised the context for SRR5 and the increased numbers of reports and actions in place to mitigate these challenges, whilst also considering our strategic approach.
- 8 The risks are summarised in annex 1, and the full details of all the risks held on the SRR are contained in annex 2.

Risks escalated or downgraded between the Strategic and Mid-tier risk registers (MRR).

- 9 There were no risks that were escalated or downgraded between the above registers since the last report to the Board.

Other discussions on risk

- 10 The Committee considered the Mid-Tier Risk Register, comprising both operational and market risks. The Committee recognised the challenges in setting appropriate risk appetites for market risks and noted that the Executive would come back to it at the next Committee meeting. The Committee was provided with an overview of the second

update on the Risk and Intelligence Framework (RIF) and was pleased to note this was maturing well. The first annual report on RIF would come to ARC in March and the Board in April.

Recommendations: the Board is asked to agree:

- a) the Strategic Risk and Residual Risk Level Report (annex 1)**
- b) the revised Strategic Risk Register (annex 2).**

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Supporting information

Links to the Corporate Strategy and/or Business Plan and impact on strategic or mid-tier risks

- 11 The recommendations affect the organisation's Corporate Strategy/Business Plan as, if the strategic and mid-tier risks are not managed effectively, this could adversely impact on our ability to successfully deliver our key objectives. It may also have a reputational impact.
- 12 This work will underpin our commitment to improving our operational performance and making justifiable decisions promptly, effectively, and efficiently.

How the issues support the regulatory objectives and best regulatory practice

- 13 Effective risk management procedures, combined with robust internal controls, will enable the SRA to deliver its regulatory objectives.

Public/Consumer impact

- 14 Effective risk management procedures, combined with robust internal controls, helps to protect the public.

What engagement approach has been used to inform the work and what further communication and engagement is needed?

- 15 The SRR is discussed by the Executive Team, Director Team, reviewed by ARC and is reported to the SRA Board regularly.

What equality and diversity considerations relate to this issue?

- 16 Risk management is embedded across the organisation and any risks associated with EDI will be captured within risk registers as appropriate. There is also a specific risk in the SRR around EDI.

How the work will be evaluated

- 17 As part of the ongoing risk assurance programme of strategic and mid-tier risks, the documented control measures will be reviewed and assessed to determine the effectiveness in managing the SRA risks.

Annexes

Annex 1 Strategic Risk and Residual Risk Level Report
Annex 2 Strategic Risk Register

NB: the annexes to this paper will not be published as they include discussion of risk that might be exacerbated by publication.