

Example Payments Ltd: sample assessment report

Richard Anderson · November 2026 · A sample for a fictional firm, with invented answers

Summary

What this report is, and is not. It measures risk management as the people taking part see it. Where their views differ, the difference is a finding in its own right. It is not independent assurance that controls work: that needs interviews and evidence, which a fuller assessment provides.

40 people took part. Taken as a whole, the board sees risk management as Developed, the executive team as Developed and management and staff as Engaged.

Three things for the board to discuss

1. Below a regulatory floor. On 2 statements (Measured risk appetite, Concentration and substitutability), the typical answer is below what our reading of the regulations that apply would suggest. These are worth checking first.

2. Governance without a usable appetite? Governance over risk is seen as Developed, but risk appetite only as Engaged. Is the board overseeing risk without a clear, usable statement of how much risk it is willing to take?

3. Something the board sees that others can't? On board involvement, the board's typical answer is Sophisticated, but 41% of management and staff don't know. Is this working well but out of sight, or seen differently from the top?

Where views differ most

- **Risk Attitudes:** the board's view is 1.2 levels higher than management and staff's.
- **Risk Appetite and Tolerance:** the executive team's view is 1.0 levels higher than management and staff's.
- **Risk in Decisions:** the board's view is 1.0 levels higher than management and staff's.

Where a group is divided

- **Risk Expertise:** the executive team disagree among themselves; the middle half of their scores spans 0.8 levels.

Where people don't know

- **Regulator involvement:** 41% of management and staff said they don't know.
- **Board involvement:** 41% of management and staff said they don't know.
- **Policy framework:** 37% of management and staff said they don't know.

Strongest and weakest areas

- **Strongest:** Governance over Risk (Developed), Risk Systems and Processes (Engaged).
- **Weakest:** Risk Appetite and Tolerance (Engaged), Risk Expertise (Engaged).

Regulatory floors

For a payment or e-money firm holding customer funds, our reading of the regulations suggests a minimum level on 15 statements. On 2, the typical answer is below it:

- **Measured risk appetite:** below Engaged, the floor suggested by recovery, resolution and wind-down.
- **Concentration and substitutability:** below Developed, the floor suggested by outsourcing and third parties.

Other questions worth exploring

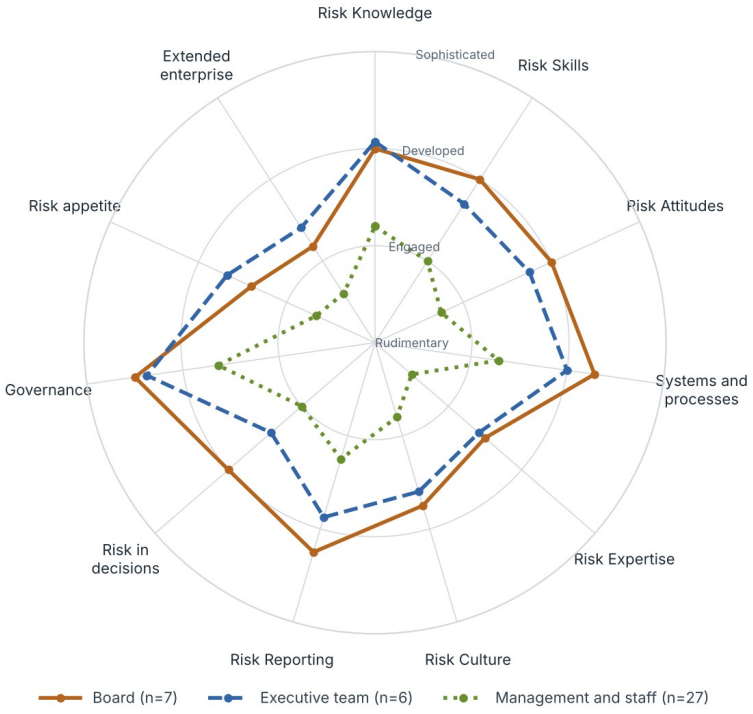
- **A framework people follow because they have to?** The policy framework is seen as Developed, but willingness to take part in risk management only as Engaged. Is the framework helping people do their jobs, or something they comply with?

Who took part

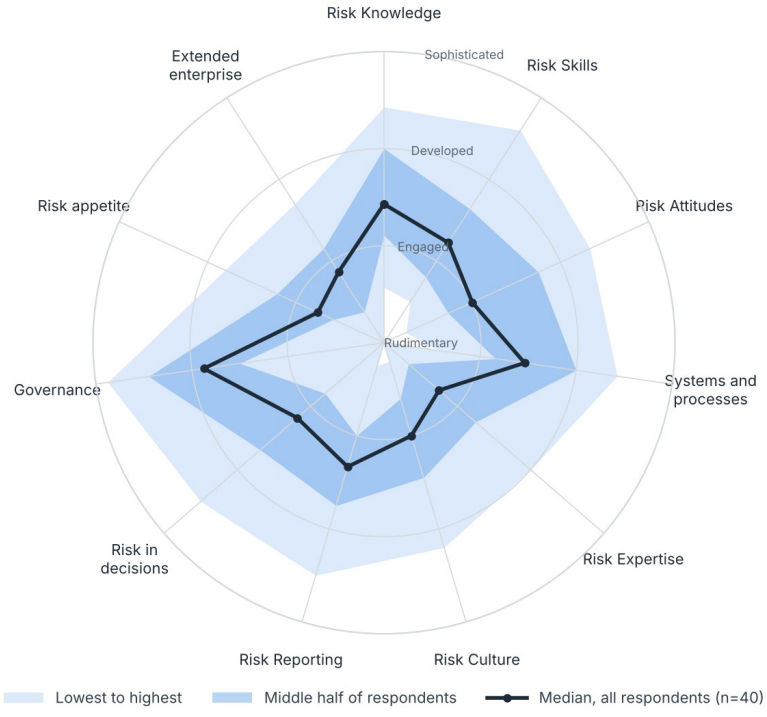
Group	Invited	Responded	Response rate
Board	7	7	100%
Executive team	6	6	100%
Management and staff	39	27	69%
Total	52	40	77%

The overall picture

Each spoke is one of the eleven areas of the model, scored from Rudimentary at the centre to Sophisticated at the edge. A score is the average of each person's answers in that area, leaving out “don't know” and “not relevant”; the chart shows each group's median.



The second chart shows how widely views spread across everyone who took part: the darker band holds the middle half of respondents, the lighter band runs from the lowest to the highest.



1. Risk Knowledge

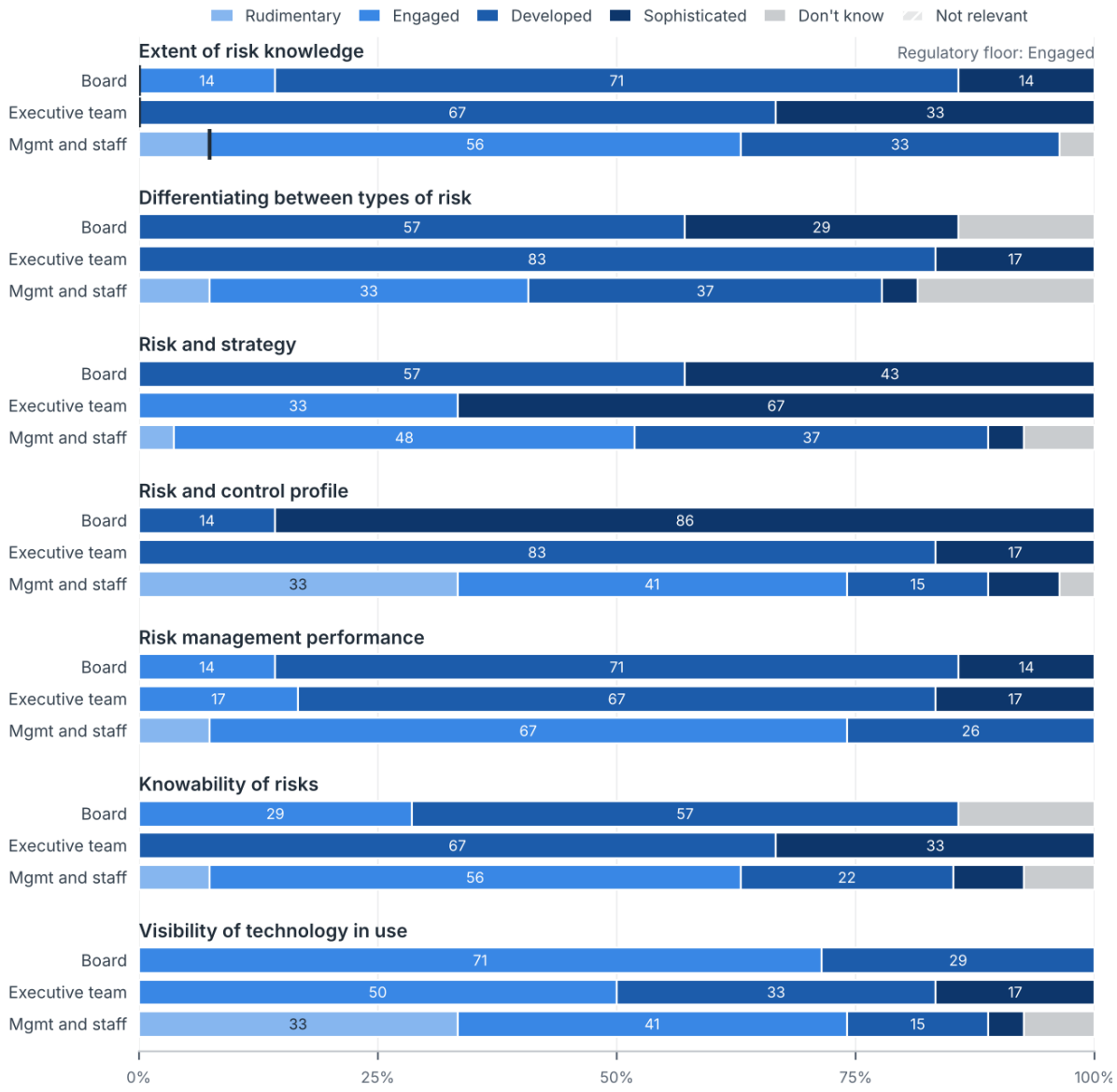
How much people know about the risks the organisation faces.

What good looks like

People at every level know the organisation's main risks, how they connect to what it is trying to achieve, and how well they are being managed. They distinguish risks that can be measured from those that cannot, and know what technology, including AI, is in use.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Knowledge at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Risk and control profile:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.
- **Extent of risk knowledge:** the board's typical answer is Developed, while management and staff most often say Engaged.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Risk and control profile (now Engaged):** move towards Developed, where the risk and control profile of the organisation and its main components is tracked regularly.
- **Risk management performance (now Engaged):** move towards Developed, where management and staff identify the major strengths and weaknesses of its risk management system.

2. Risk Skills

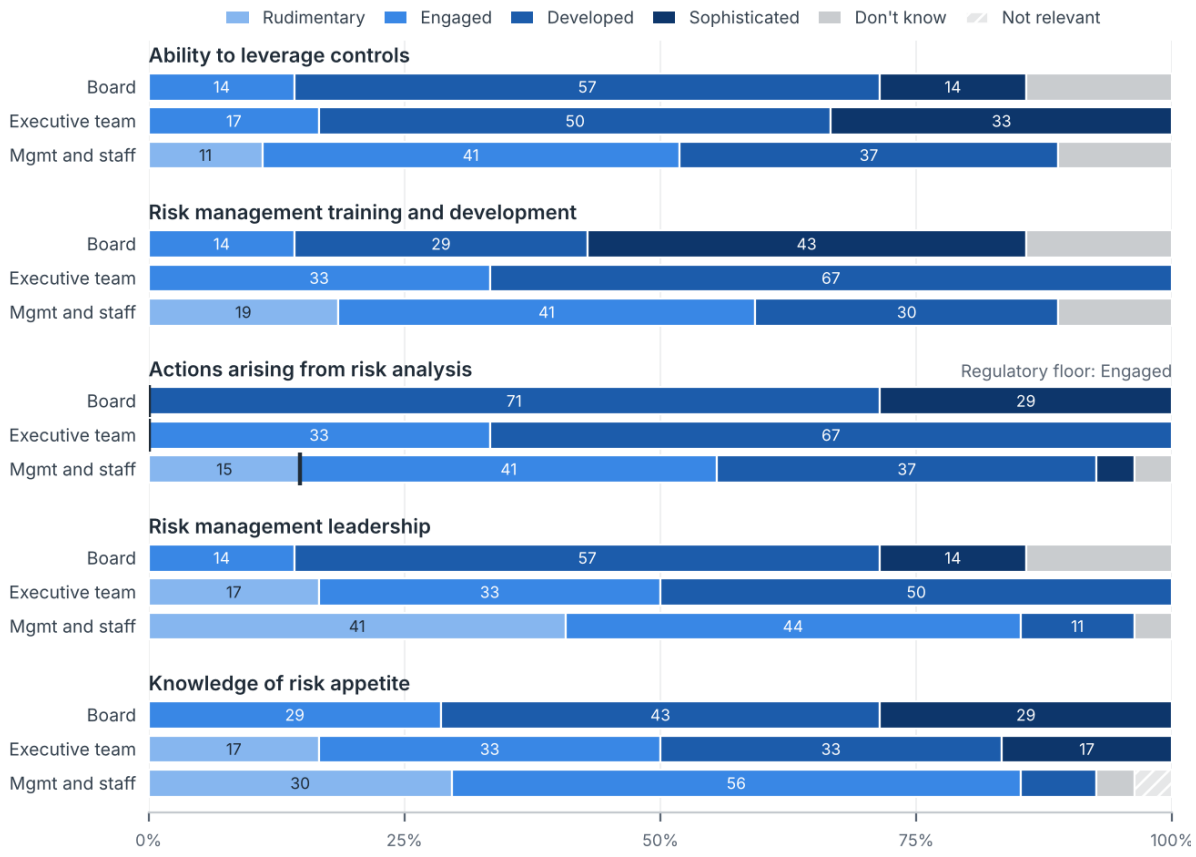
Whether people have the skills to use risk to the organisation's advantage.

What good looks like

Risk management is led visibly from the top, by a risk function led at or near executive level. People are trained for the risks they manage, the register drives action rather than recording it, and people know how much risk is acceptable in their own area.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Skills at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Risk management training and development:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.
- **Ability to leverage controls:** the board's typical answer is Developed, while management and staff most often say Engaged.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Risk management training and development (now Engaged):** move towards Developed, where the organisation organises one or two courses for all staff per year.
- **Risk management leadership (now Engaged):** move towards Developed, where there is visible chief executive and executive team involvement in risk management, and it is led by someone at or just below executive level.

3. Risk Attitudes

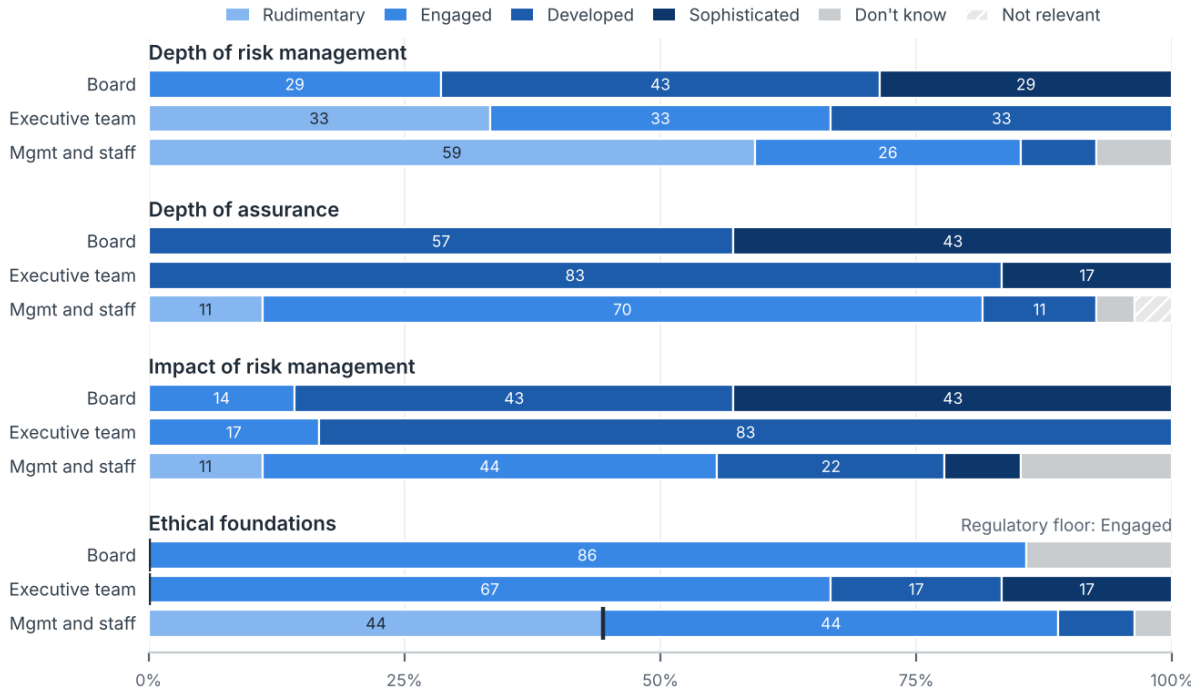
How people regard the process and usefulness of risk management.

What good looks like

Risk management is seen as useful, not as a compliance burden. Risks are spotted early, assurance is welcomed, and the organisation's ethics are clear and lived.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Attitudes at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Depth of risk management:** Executive team are divided: 33% chose Rudimentary and 33% Developed or higher.
- **Depth of assurance:** the board's typical answer is Developed, while management and staff most often say Engaged.
- **Impact of risk management:** the board's typical answer is Developed, while management and staff most often say Engaged.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Depth of risk management (now Engaged):** move towards Developed, where there is a systematic approach to ensuring that risks are identified across the enterprise.
- **Depth of assurance (now Engaged):** move towards Developed, where there is a risk-based approach to internal audit but Internal Audit use their own register of risks.

4. Risk Systems and Processes

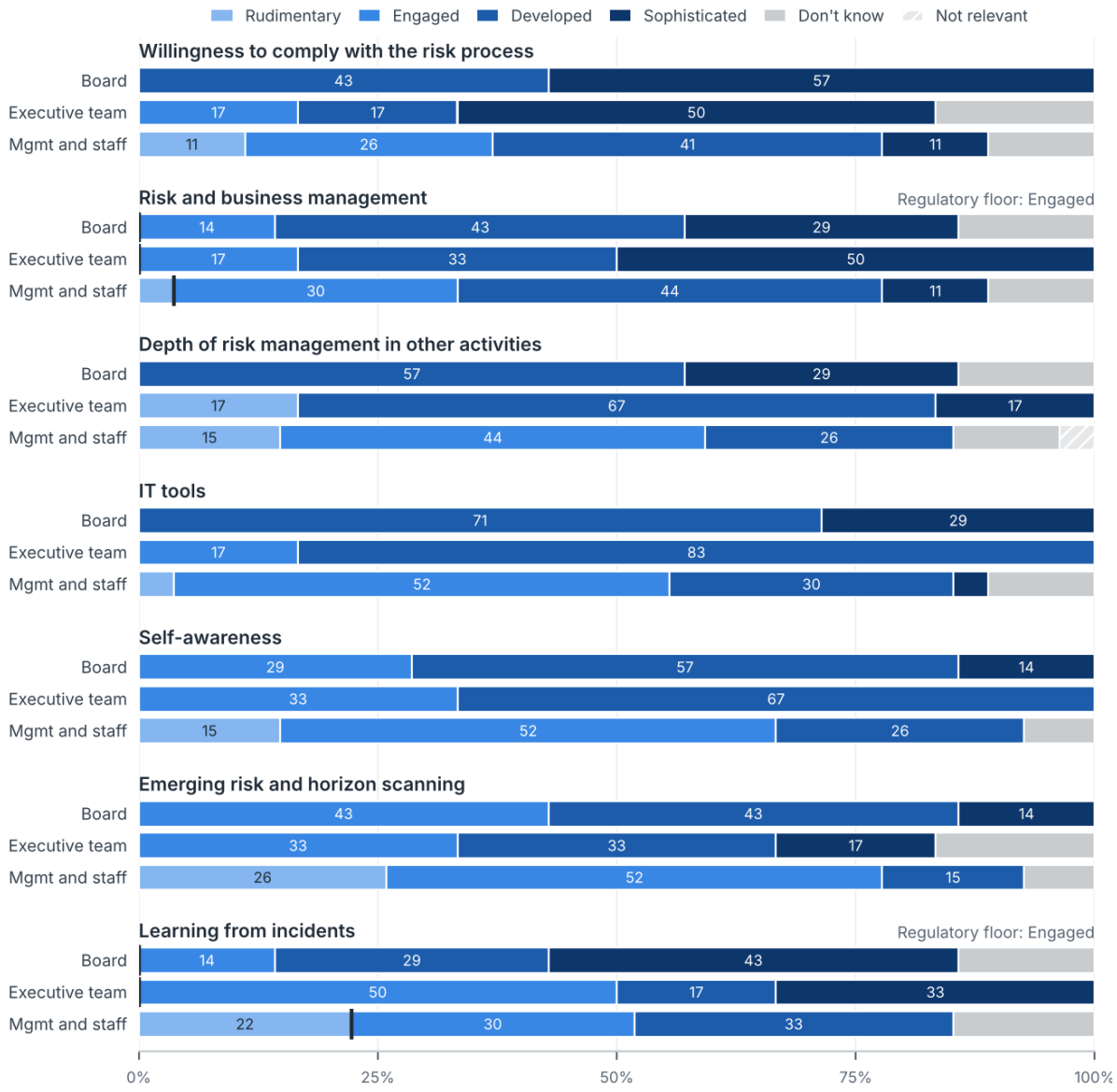
How sophisticated the systems and processes for risk management are.

What good looks like

Risk processes are part of how the business is run: built into planning, projects and assurance, supported by proportionate tools, and kept current by scanning for new risks and learning from incidents.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Systems and Processes at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Learning from incidents:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.
- **Willingness to comply with the risk process:** the board's typical answer is Sophisticated, while management and staff most often say Developed.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Self-awareness (now Engaged):** move towards Developed, where there are occasional reviews of the risk management system by internal audit.
- **Emerging risk and horizon scanning (now Engaged):** move towards Developed, where there is a regular horizon-scanning process feeding the register and the board.

5. Risk Expertise

The technical knowledge and experience people have of risk management.

What good looks like

Staff understand risk and how it is managed in the organisation. They have helped identify the risks in their own area, and know the main risks the organisation faces, not just their own.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”.



What we found

Overall, respondents place Risk Expertise at Engaged: the board at Engaged, the executive team at Engaged and management and staff at Rudimentary.

- **Knowledge of risks facing the organisation:** Executive team are divided: 33% chose Rudimentary and 50% Developed or higher.
- **Personal involvement in risk process:** the board's typical answer is Developed, while management and staff most often say Rudimentary.
- **Personal expertise:** the board's typical answer is Engaged, while management and staff most often say Rudimentary.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Personal expertise (now Engaged):** move towards Developed, where staff have a good understanding of risk and risk management.
- **Understanding of how risk works in the organisation (now Engaged):** move towards Developed, where staff have a good understanding of how risk is managed in the organisation.

6. Risk Culture

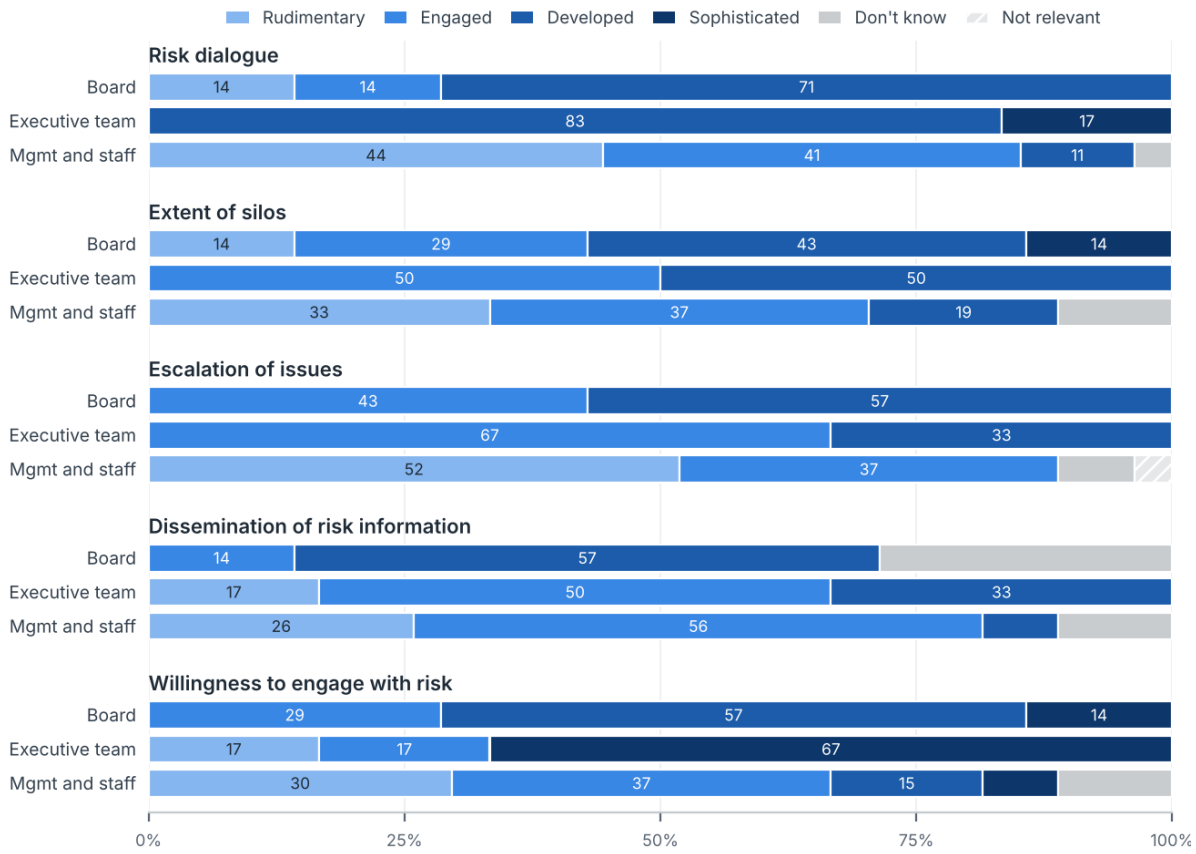
How far risk management is embedded in the culture.

What good looks like

People talk about risk openly, across departments and up the line. Raising a concern is welcomed, information flows both ways, and people engage with risk because it helps them do their jobs.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”.



What we found

Overall, respondents place Risk Culture at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Escalation of issues:** the board's typical answer is Developed, while management and staff most often say Rudimentary.
- **Risk dialogue:** the board's typical answer is Developed, while management and staff most often say Engaged.
- **Dissemination of risk information:** 29% of the board don't know.

In their own words

“People are willing to raise issues with their own manager, but it rarely goes further.”

“Risk feels like something the risk team does to us.”

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Risk dialogue (now Engaged):** move towards Developed, where staff talk about risk with others in the organisation they trust.
- **Extent of silos (now Engaged):** move towards Developed, where staff talk freely about risk with anyone in other departments.

7. Risk Reporting

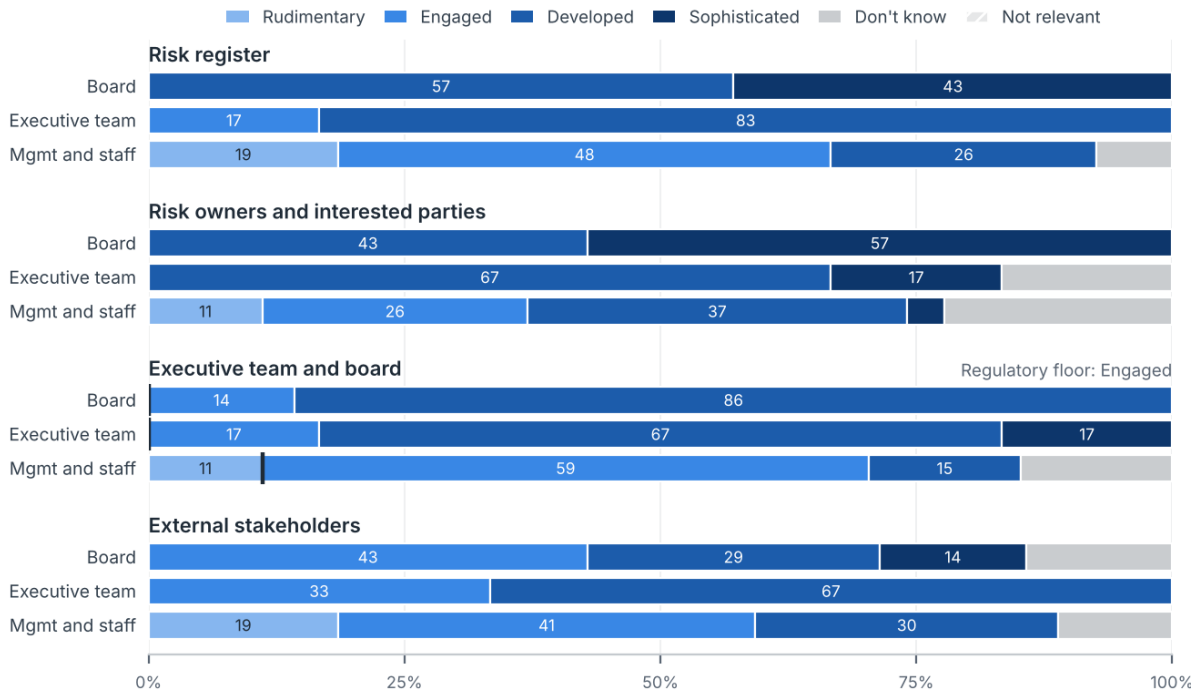
How good internal and external risk reporting is.

What good looks like

The right people see the right risk information. Risk owners know what is in the register, the board and executive discuss risk as a regular item, and external stakeholders get a fair picture.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Reporting at Engaged: the board at Developed, the executive team at Developed and management and staff at Engaged.

- **Risk register:** the board's typical answer is Developed, while management and staff most often say Engaged.
- **Risk owners and interested parties:** the board's typical answer is Sophisticated, while management and staff most often say Developed.

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Executive team and board (now Engaged):** move towards Developed, where both the board and the executive team have risk management as a regular agenda item in their meetings.
- **External stakeholders (now Engaged):** move towards Developed, where risk management output is made available to relevant external stakeholders.

8. Risk in Decisions

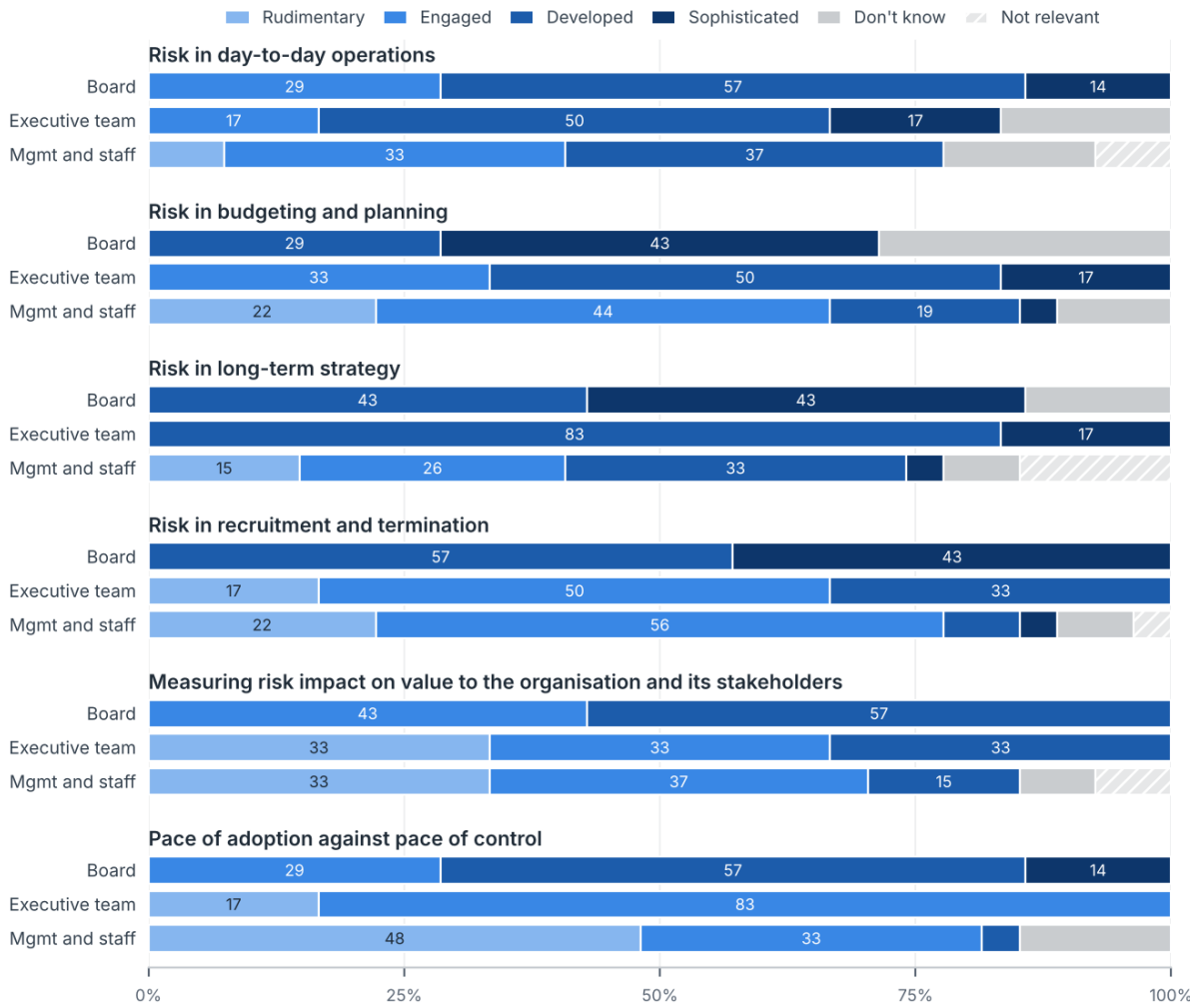
How far risk is used in making decisions.

What good looks like

Risk informs day-to-day operations, budgets and plans, long-term strategy and appointments. Risks are measured, and new technology is adopted at a pace the organisation can control.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”.



What we found

Overall, respondents place Risk in Decisions at Engaged: the board at Developed, the executive team at Engaged and management and staff at Engaged.

- **Measuring risk impact on value to the organisation and its stakeholders:** Executive team are divided: 33% chose Rudimentary and 33% Developed or higher.
- **Risk in budgeting and planning:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.
- **Pace of adoption against pace of control:** the board's typical answer is Developed, while management and staff most often say Rudimentary.

In their own words

“Big decisions are made quickly and risk catches up afterwards.”

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Risk in budgeting and planning (now Engaged):** move towards Developed, where A few members of the management team take risk into account when thinking about budgets and plans.
- **Risk in recruitment and termination (now Engaged):** move towards Developed, where risk management is on the list of core competencies considered in all recruitment or termination decisions.

9. Governance over Risk

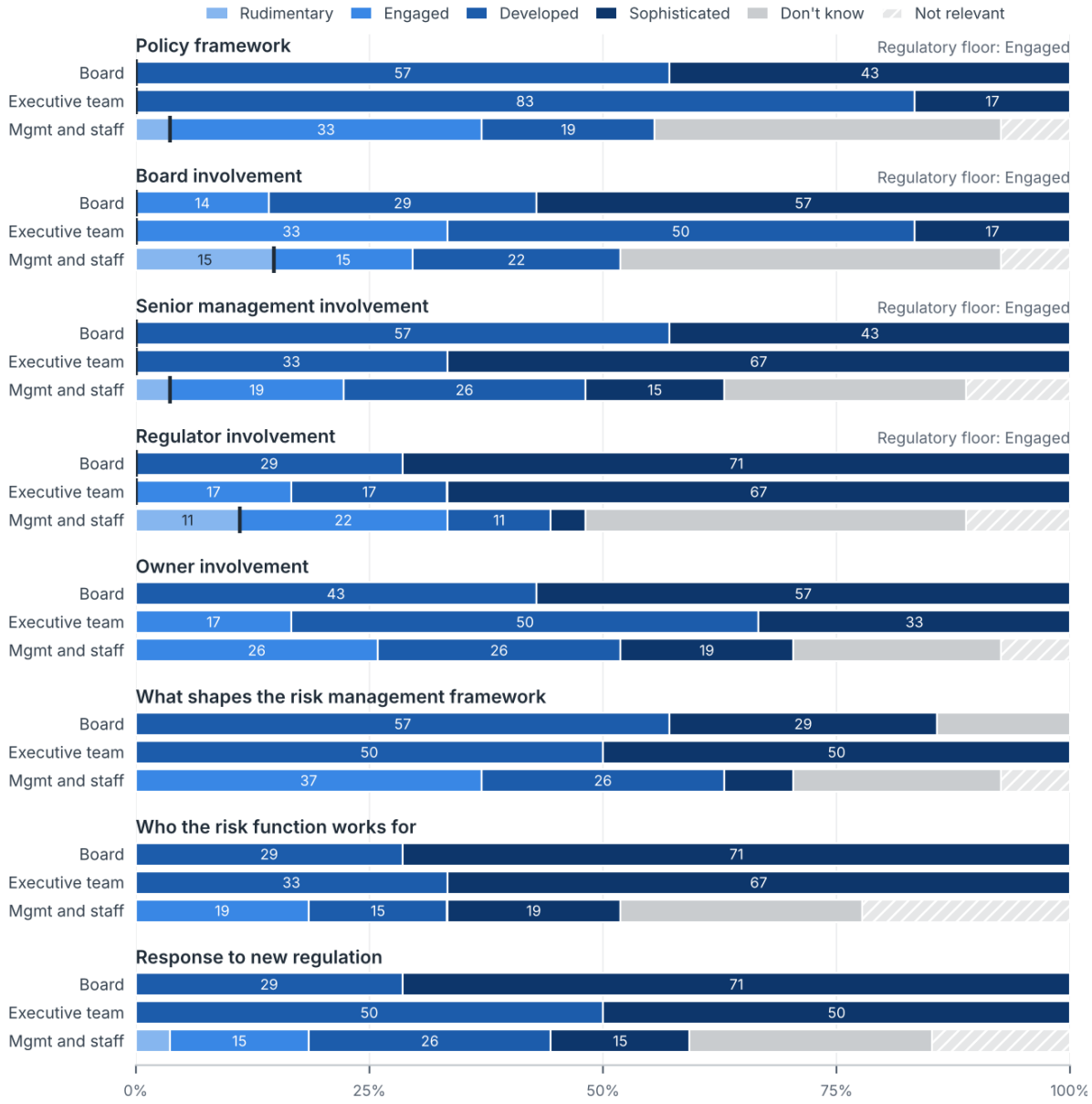
Policies, procedures and oversight of risk management.

What good looks like

The framework is built around the business, documented in proportion, and owned by the board and executive. Regulators and owners are engaged openly, and new regulation is anticipated rather than reacted to.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Governance over Risk at Developed: the board at Sophisticated, the executive team at Sophisticated and management and staff at Developed.

- **Board involvement:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.

- **Regulator involvement:** the board's typical answer is Sophisticated, while management and staff most often say Engaged.
- **Policy framework:** 37% of management and staff don't know.
- **Senior management involvement:** 26% of management and staff don't know.
- **Who the risk function works for:** 22% of management and staff say this is not relevant to their role.

In their own words

"The board takes risk seriously, but most of what reaches it is about compliance."

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Policy framework (now Developed):** move towards Sophisticated, where risk management documentation is reviewed and approved annually by the executive team and the board, to ensure it remains relevant.
- **Board involvement (now Developed):** move towards Sophisticated, where risk management is front of mind for the board all the time.

10. Risk Appetite and Tolerance

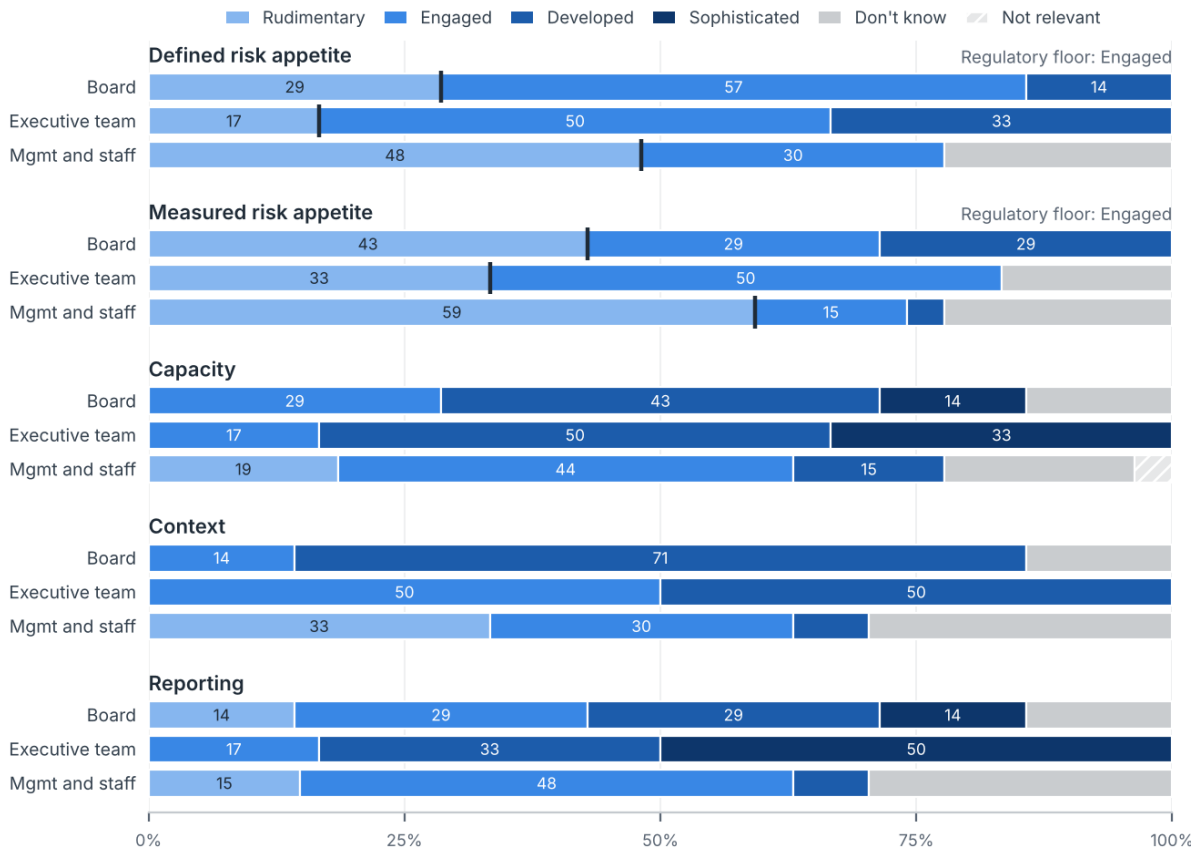
How sophisticated the approach to risk appetite and tolerance is.

What good looks like

The board has defined how much risk it is willing to take, in terms people can use. Appetite is measured with indicators, set with the outside world in mind, understood by managers, and reported by exception.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Risk Appetite and Tolerance at Engaged: the board at Engaged, the executive team at Developed and management and staff at Rudimentary.

- **Measured risk appetite:** the typical answer, Rudimentary, is below Engaged, the floor suggested by our reading of recovery, resolution and wind-down. Recovery and wind-down triggers must be measurable.
- **Defined risk appetite:** the board's typical answer is Engaged, while management and staff most often say Rudimentary.
- **Capacity:** the board's typical answer is Developed, while management and staff most often say Engaged.
- **Context:** 30% of management and staff don't know.
- **Reporting:** 30% of management and staff don't know.

In their own words

“I have never seen our risk appetite statement.”

“Appetite is discussed at board level but doesn't reach the teams making decisions.”

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Measured risk appetite (now Rudimentary):** move to Engaged, the regulatory floor, where the concepts of risk appetite and risk tolerance are backed up by a 3 × 3 or 5 x 5 matrix (or equivalent).
- **Defined risk appetite (now Engaged):** move towards Developed, where the concepts of risk appetite and risk tolerance are well-defined for the organisation, and are applied for some, if not all, risks.

11. Extended Enterprise

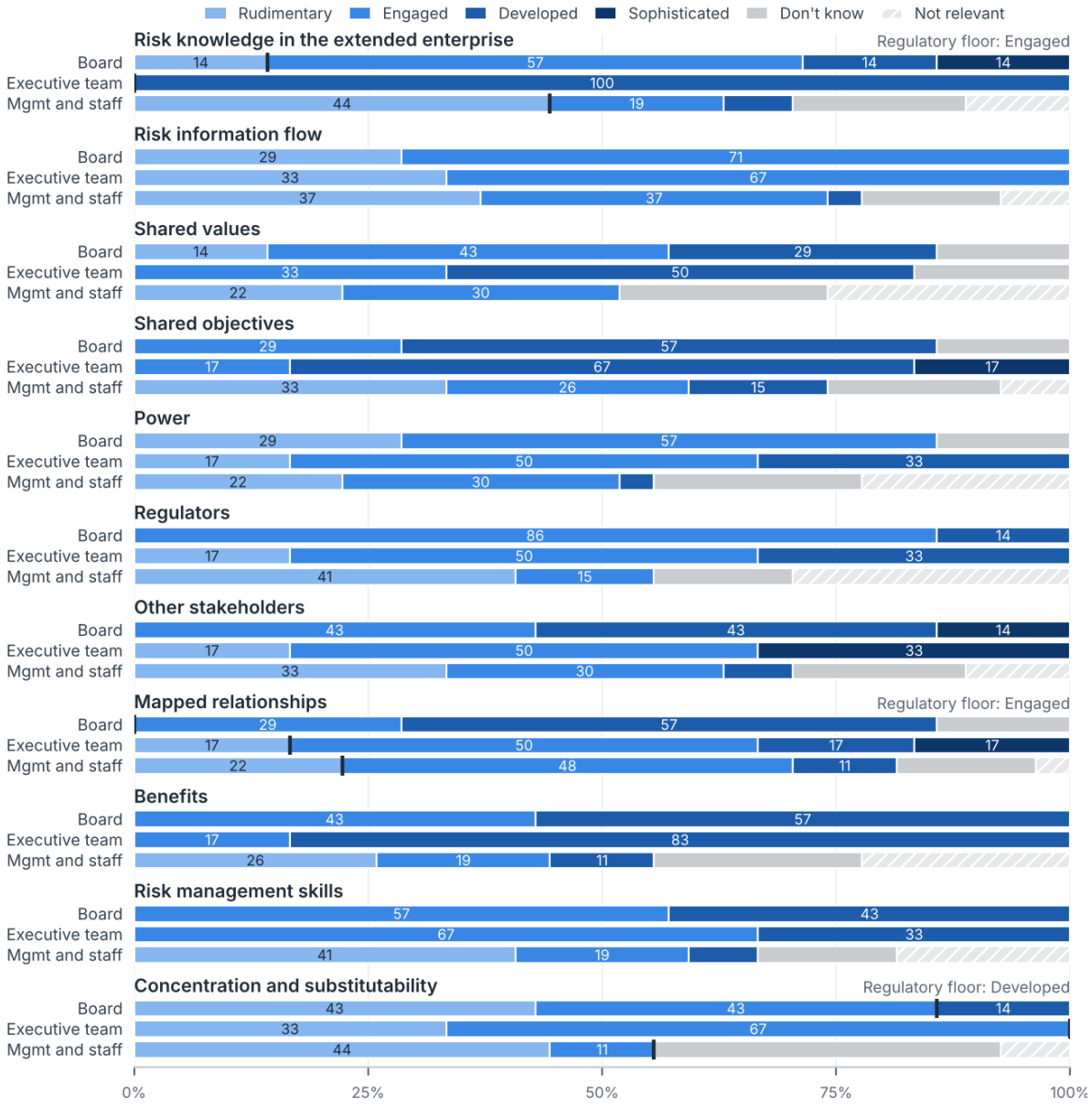
How risk is managed across suppliers, partners and the wider ecosystem.

What good looks like

The organisation understands the risks it shares with the suppliers and partners it depends on: their values, objectives, regulators and power. Relationships are mapped and managed, and critical dependencies have tested fallback plans.

What people told us

Each bar shows how one group answered a statement: the share choosing each level, then “don't know” and “not relevant”. A black line marks the regulatory floor: the share to its left is below it.



What we found

Overall, respondents place Extended Enterprise at Engaged: the board at Engaged, the executive team at Engaged and management and staff at Rudimentary.

- **Concentration and substitutability:** the typical answer, Rudimentary, is below Developed, the floor suggested by our reading of outsourcing and third parties. Exit plans are required for material outsourcing and critical suppliers.

- **Risk knowledge in the extended enterprise:** the board's typical answer is Engaged, while management and staff most often say Rudimentary.
- **Shared objectives:** the board's typical answer is Developed, while management and staff most often say Engaged.
- **Shared values:** 22% of management and staff don't know.
- **Power:** 22% of management and staff don't know.
- **Regulators:** 30% of management and staff say this is not relevant to their role.

In their own words

"We depend heavily on our safeguarding bank and two technology suppliers, and I'm not sure anyone has a plan if one of them fails."

What needs to be done

In a real report, this section sets out my recommendations. Here it shows only the next step on the model's own scale.

- **Concentration and substitutability (now Rudimentary):** move to Developed, the regulatory floor, where concentration is assessed and exit or fallback plans exist for the most critical suppliers.
- **Risk knowledge in the extended enterprise (now Engaged):** move towards Developed, where limited risk data is shared between some members of the extended enterprise.

About this assessment

The four levels

Level	What it means
Rudimentary	More of a problem than a help: bureaucratic, adding little, largely ignored.
Engaged	The basic routines are in place, but they can quickly become a ritual.
Developed	People take part willingly, and management relies on the results.
Sophisticated	Woven into how the organisation works, every day.

How the results are worked out

- Everyone answered the same 66 statements, choosing the one closest to the organisation today. “Don't know” and “not relevant to my role” are reported but not scored.
- Results are reported for three groups: the board, the executive team, and management and staff. No group of fewer than 5 people is reported, and individual answers are never shown.
- Area scores are averages of each person's answers in that area; group figures are medians, so one unusual answer cannot move them far.
- Comments are quoted without names and edited where needed to remove anything that would identify the person.
- The three things for the board to discuss are chosen by fixed rules: anything below a regulatory floor first, then patterns across the answers that don't fit together, then the largest difference between groups.

Regulatory floors

As a payment or e-money firm holding customer funds, the organisation is subject to: authorised firm: governance and risk systems, safeguarding customer funds, operational resilience, outsourcing and third parties, consumer duty, recovery, resolution and wind-down. Where our reading of these suggests a minimum level, the report marks it as a floor. Floors are AndersonRisk's interpretation, mapped to the levels of the model; they are not legal advice, and a score below a floor is not a finding of breach, which is a matter for the organisation, its advisers and its regulators.