

Bank risk management workshop

Operational risk

John Thirlwell, FCIB, FIOR

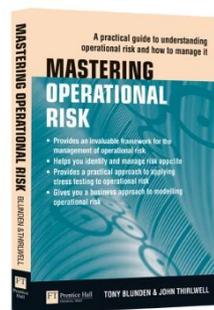
ifs, 13 March 2012

Agenda

- Operational risk – what it is and why it matters
- The operational risk management framework
- Operational risk governance
- Measurement and assessment: uses and abuses of data
- Getting senior management buy-in: the benefits of good operational risk management
- People risk and operational risk culture

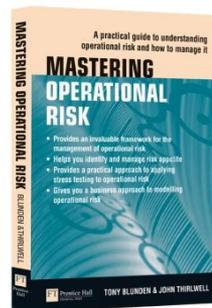
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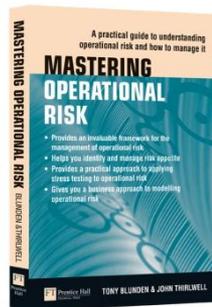
'The world has never been so full of risk'

(Thomas Aquinas, 1245)



National security strategy (Oct 2010)

TIER 1	TIER 2
International terrorism	Chemical, biological, nuclear, radioactive (CBNR) weapons
Cyber attacks and large scale cyber crime	Overseas insurgency creating environment for terrorism
Major accident or natural hazard, e.g. extensive coastal flooding, pandemic	Organised crime
International military crisis	Satellite communications disrupted



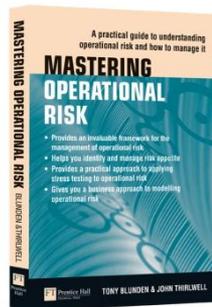
Year	Event
1988	Piper Alpha oil rig (North Sea)
1993	Metallgesellschaft
1995	Barings Bank (+ Daiwa (1995), Sumitomo (1995), Allfirst/Allied Irish (2002), National Australia Bank (2004), Société Générale (2008))
1998	Long Term Capital Management
2000	Millennium Bug
2001	World Trade Center (9/11)
2001	Enron/Arthur Andersen
2003	SARS near-pandemic
2005	Hurricane Katrina (+ Dennis, Emily, Rita, Wilma)
2010	BP/Deepwater Horizon oil spill (+ Texas City (2005), Alaska pipeline (2006))
2010	Eyjafjallajökull (Iceland) volcano
2011	Japanese tsunami and Fukushima reactor

Defining operational risk

‘Operational risk is the risk of direct or indirect losses resulting from inadequate or failed processes, people or systems, or from external events.’ [*Operational risk: the next frontier*. RMA/PriceWaterhouseCoopers, 1999]

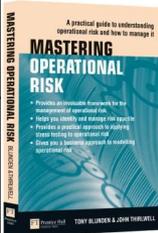
‘The risk of **loss** resulting from inadequate or failed **internal** processes, people or systems or from external events’ [Basel II]

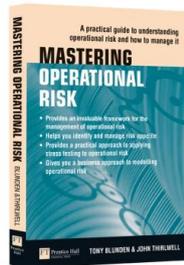
- includes legal risk; excludes strategic and reputational risk
- regulatory risk?



Is operational risk different from other risks?

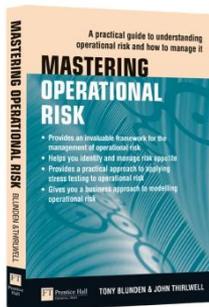
	Credit, market, commodity, liquidity	Operational
Is the risk transaction-based?		
Is the risk assumed proactively ?		
Can it be identified from accounting information e.g. the P&L?		
Can audit confirm that every occurrence of the risk has been captured?		
Can its financial impact be capped or limited?		
Can you trade the risk?		
Is everybody in the firm responsible for the risk?		
Does the risk affect every activity?		





An attempt to frame the unframeable, to assuage fears about the uncontrollable 'rogue others' and to tame the man-made monsters [of the financial system].

Prof Michael Power, *Organized uncertainty : designing a world of risk management* (OUP, 2007)

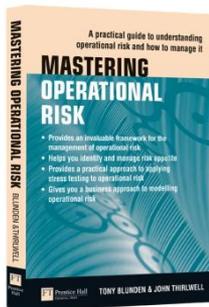


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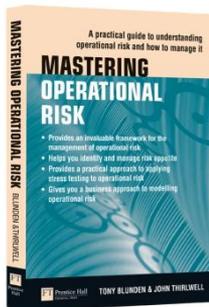
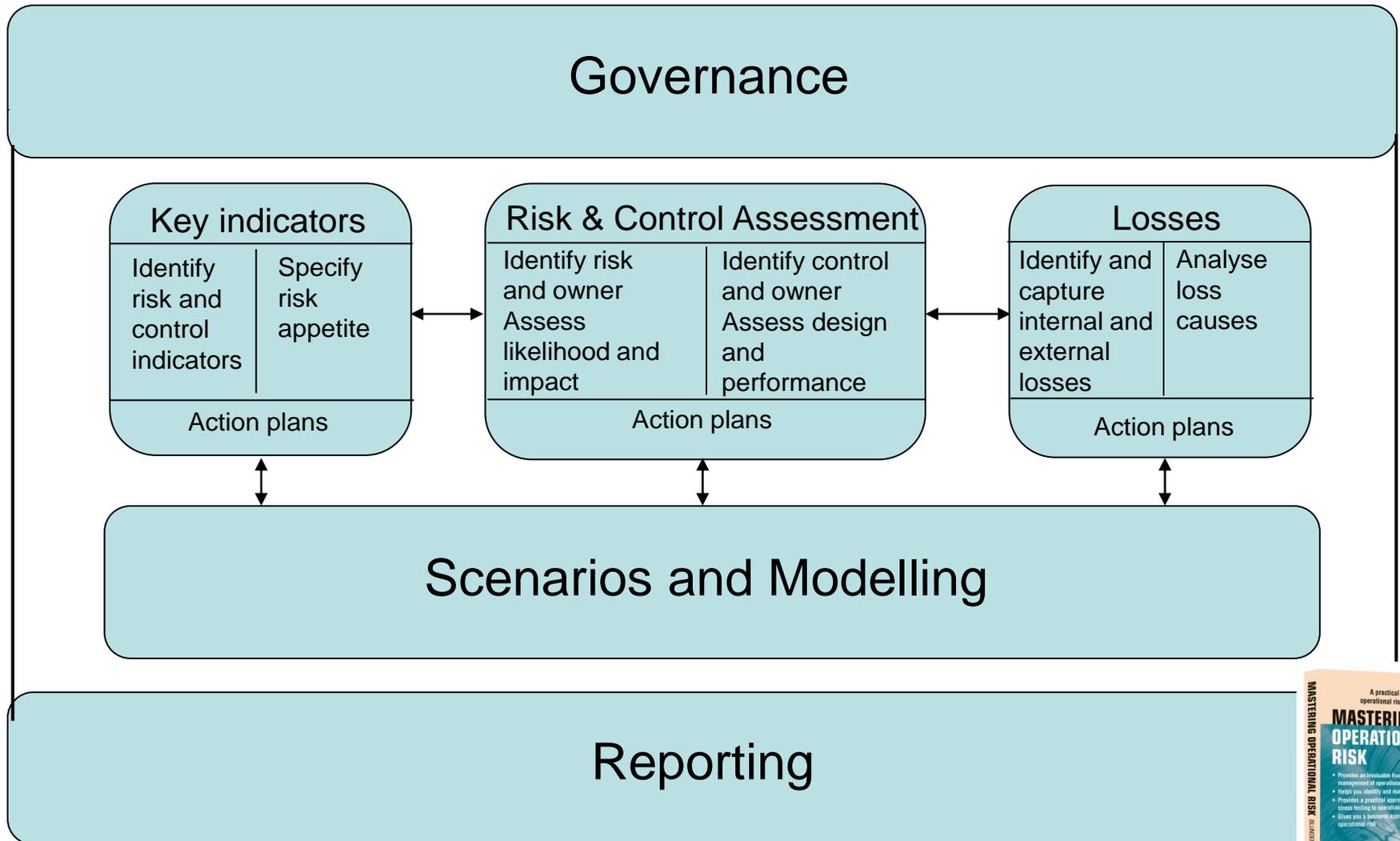
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Traditional risk 'cycle'

- Identify
- Measure / Assess
 - Losses
 - Risk and control assessments (probability/likelihood and severity/impact)
 - Scenarios
 - Modelling
- Manage / Mitigate
 - Controls
 - BCP and reputation risk management
 - Insurance
 - Outsourcing
- Monitor / Report
 - Risk indicators

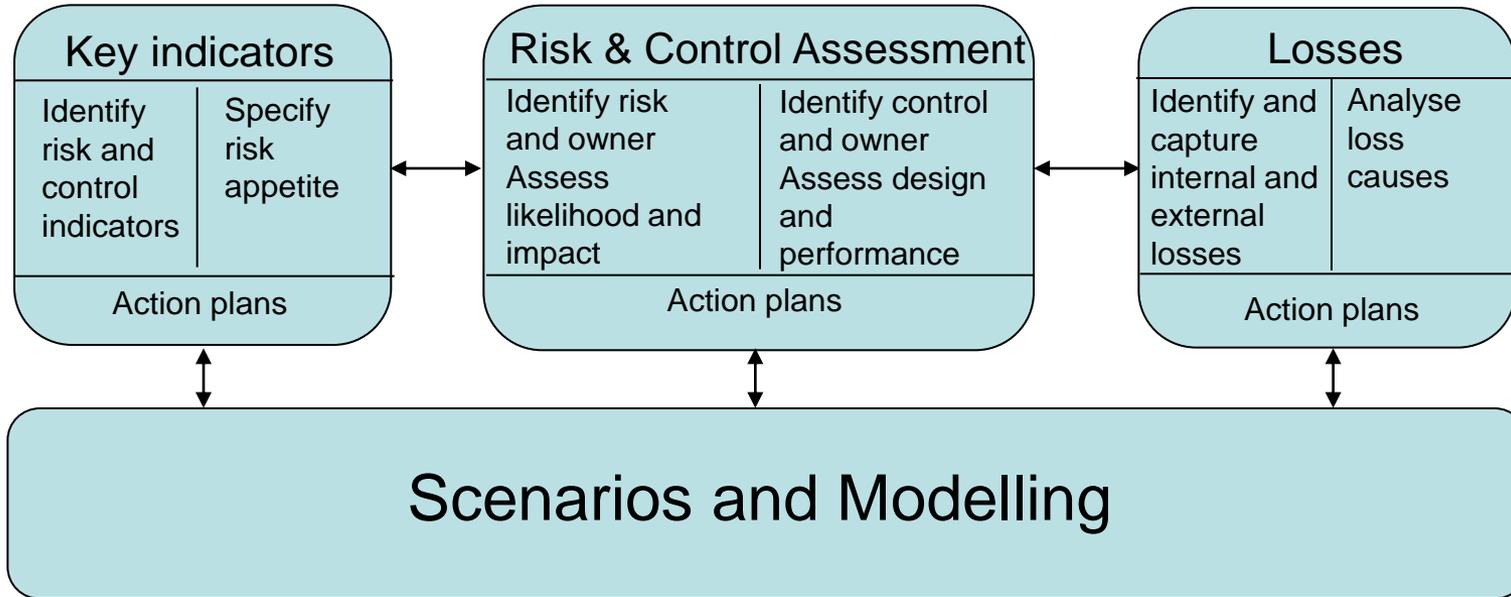


ORM Framework

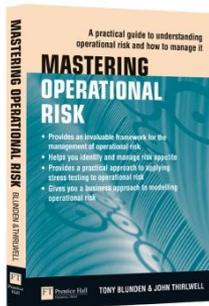


ORM Framework

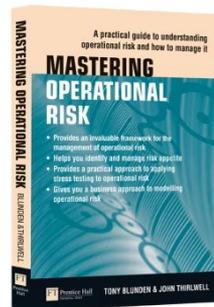
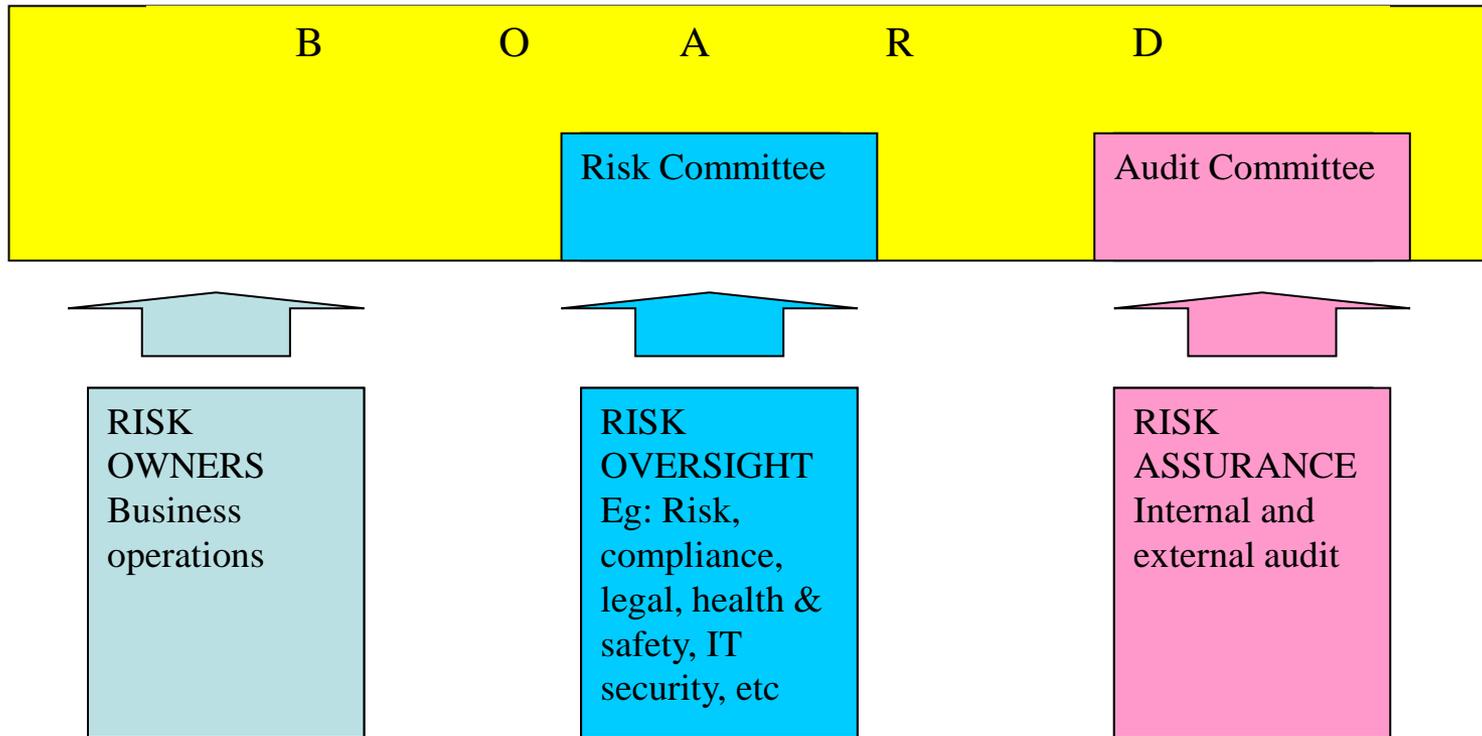
Governance



Reporting

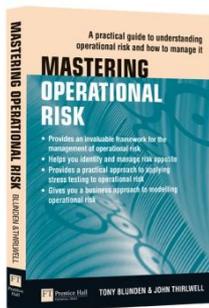


The 3 lines of defence

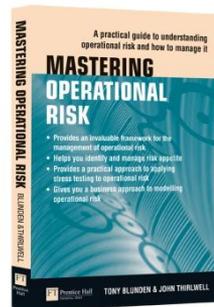
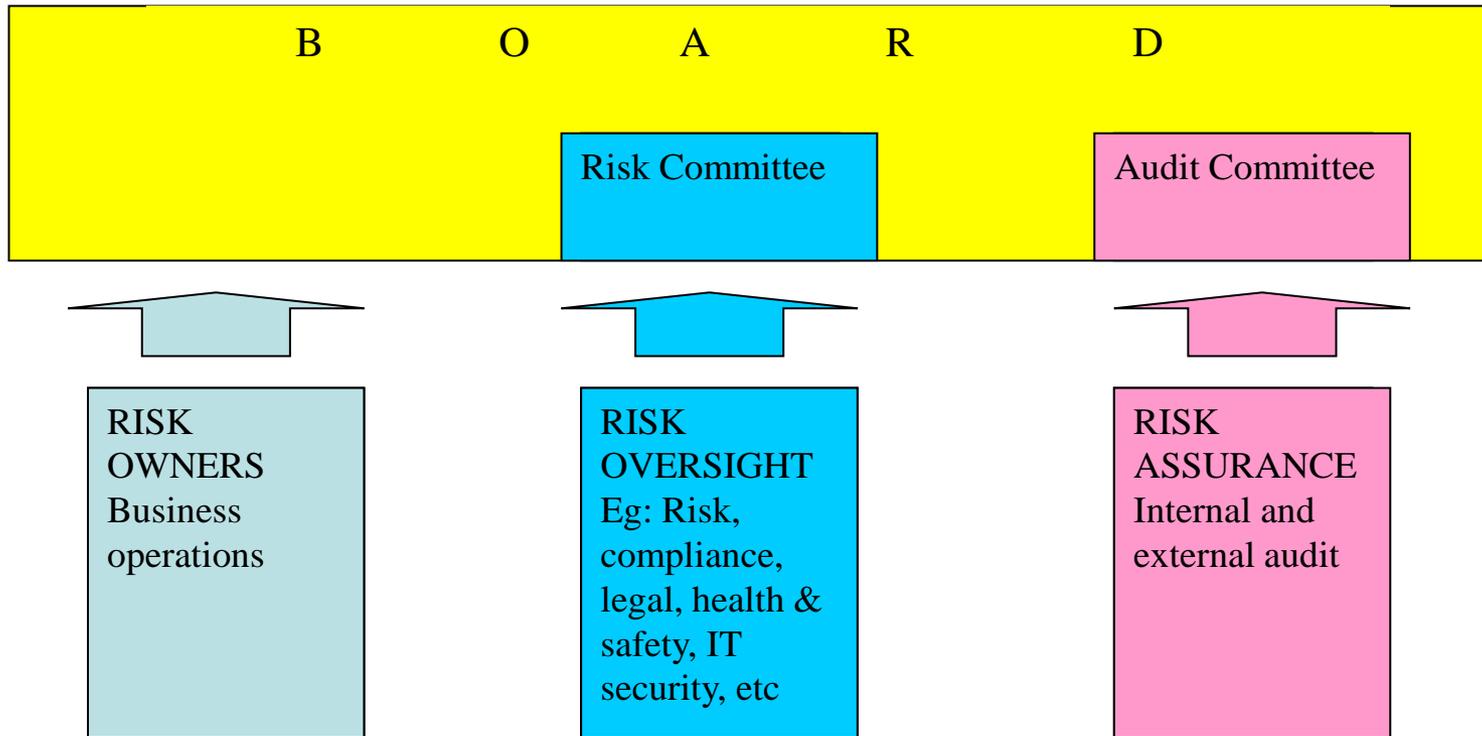


Board

- Leadership
 - Culture
 - Tone from the top / tune in the middle
- Strategy and objectives
- Risk appetite
- Reporting and communication

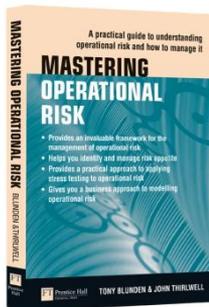


The 3 lines of defence



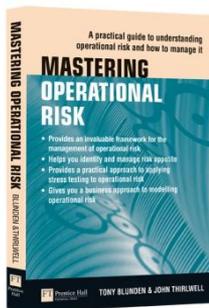
The risk function

- Does risk management manage risk?
- Control? or challenge and oversight?
- The risk function and
 - BCP
 - 3rd party dependencies (outsourcing, supply chain etc)
 - Insurance
 - IT security
 - New products
 - Compliance
 - Legal
 - Employees/HR: health & safety; discrimination
- Is the CEO the CORO or even the CRO?



Risk assurance

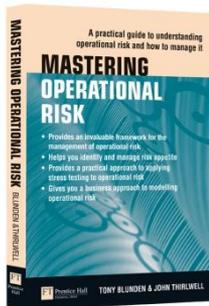
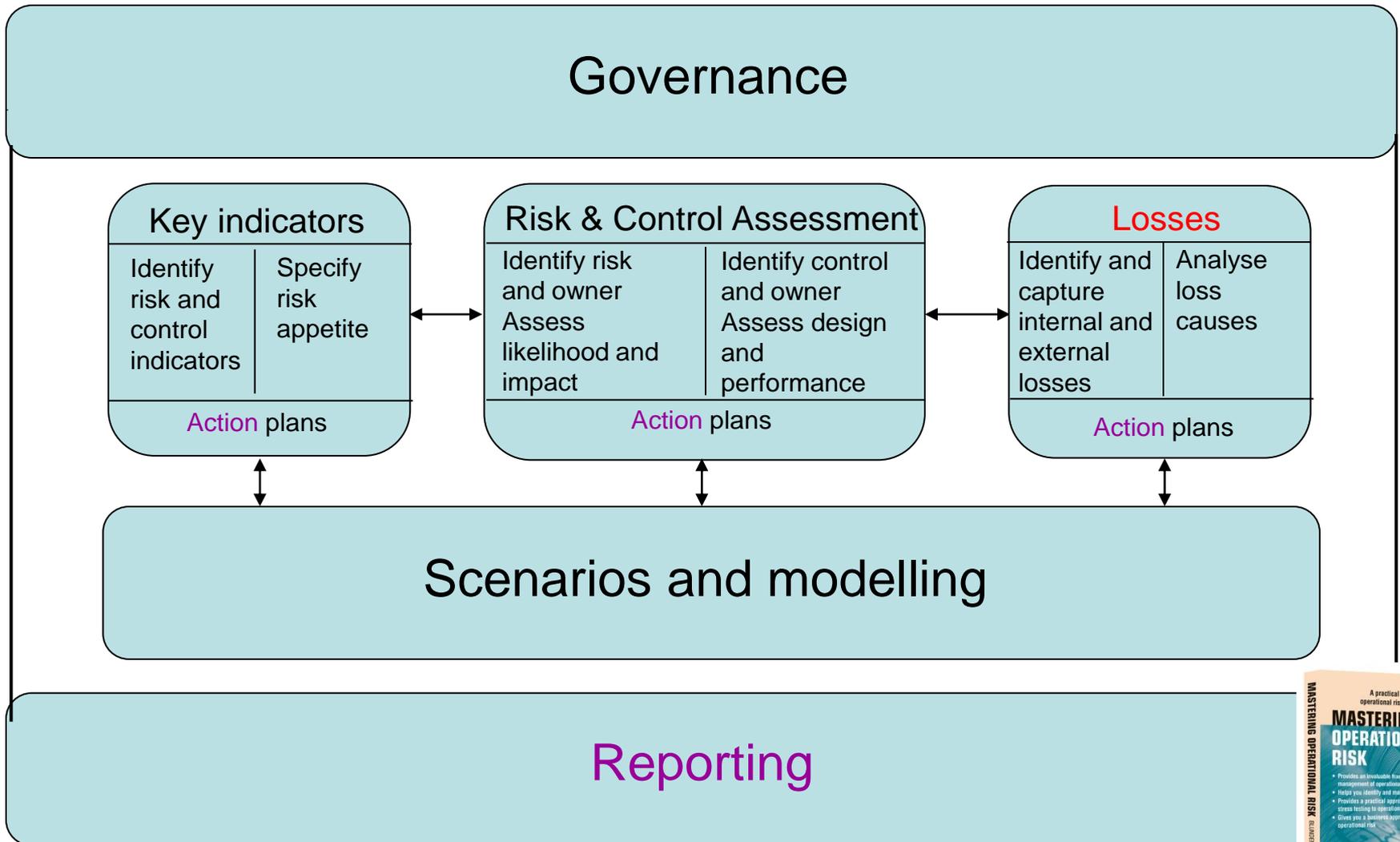
- Independent
- Internal audit
 - Clear role
 - As consultant and investigator?
- External audit – financial reporting



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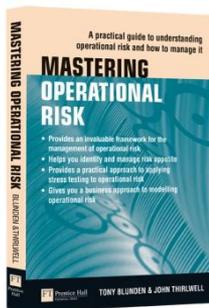


The risk register

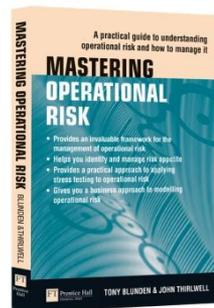
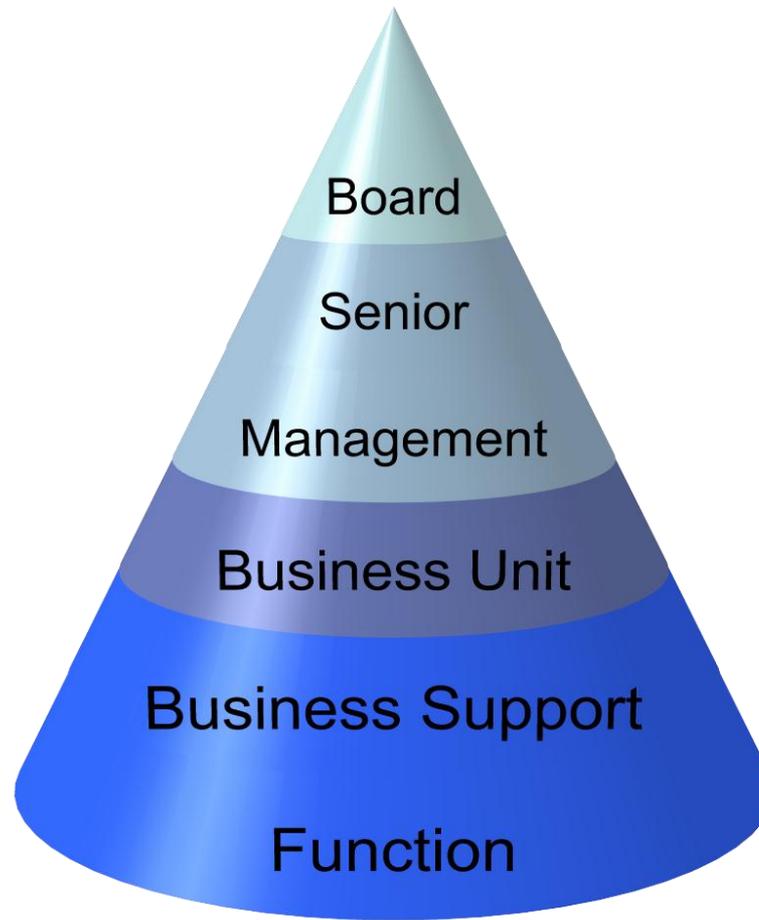
‘The conveyor belt of sins’

or

‘What needs to go right?’

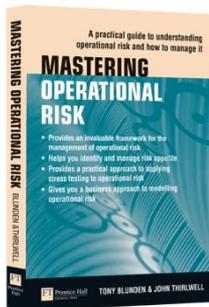


Whose risk (appetite) is it anyway?



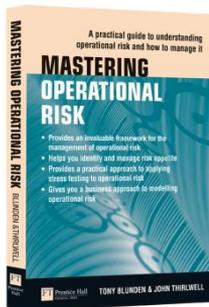
Issues and decisions concerning event data

- Which events?
 - Reporting threshold
 - Near misses
 - “Boundary” losses
 - Gains
- The data
 - Amount (the basis of severity)
 - Date (the basis of frequency)
 - Loss category

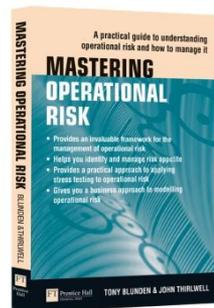
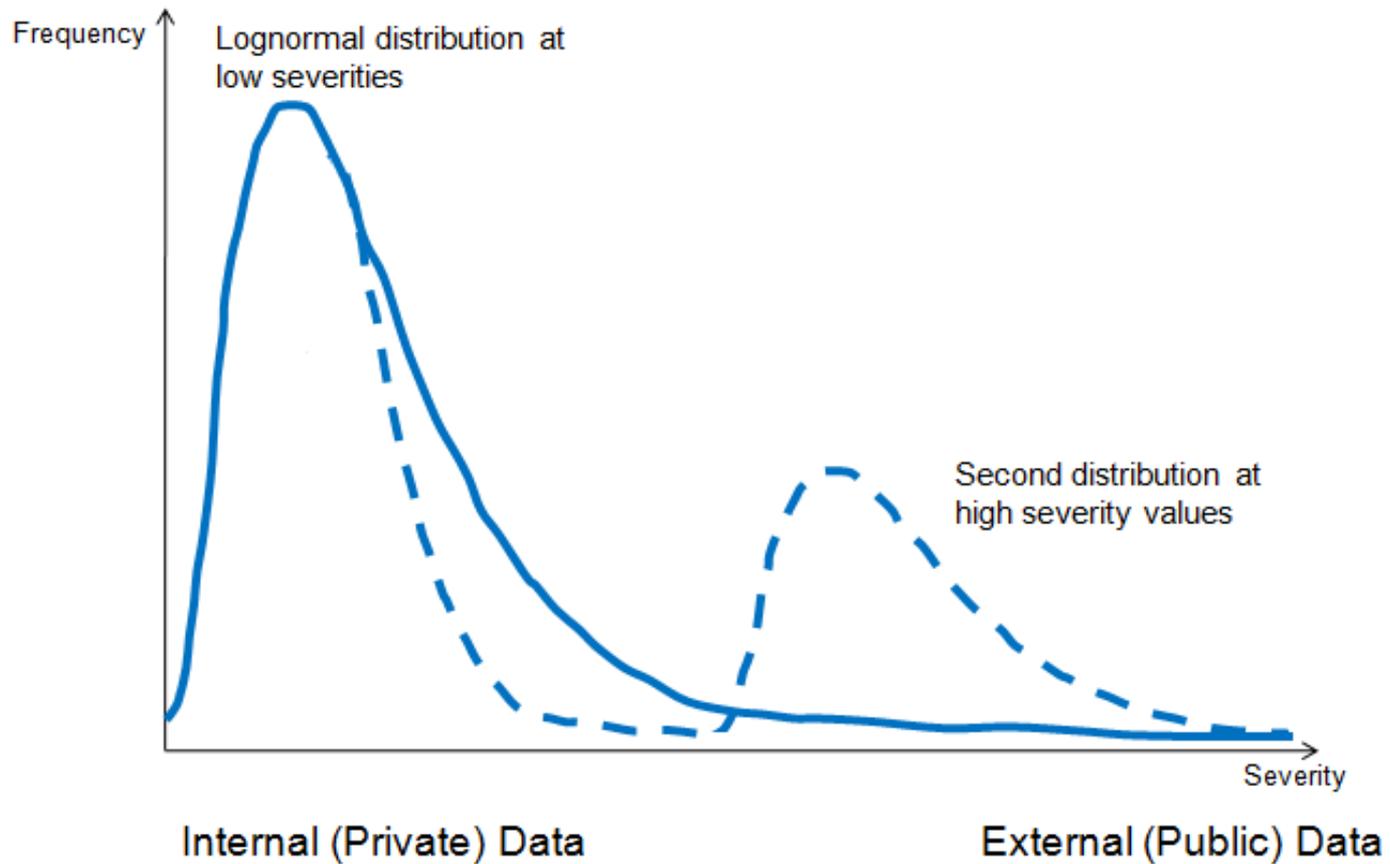


Realities of risk event data

- It will be incomplete, scarce and patchy, even allowing for external data – the ‘tail’ problem.



Lognormal and bimodal distributions



Realities of risk event data

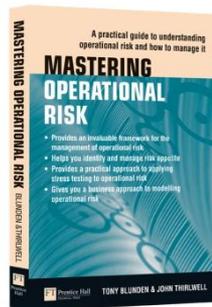
- It will be incomplete, scarce and patchy, even allowing for external data – the ‘tail’ problem.
- It will be inconsistently reported although, once reported, it is auditable.
- It is historic and backward looking. Major events will probably have led to tighter controls, change of policy etc. The external environment will change.

However

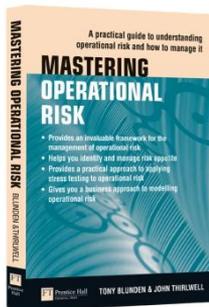
- It can validate indicators, risk and control assessments and scenarios
- It is the beginning of the essential chain of:

Data → information → knowledge → understanding

BUT THAT ONLY COMES WITH . . .



Felix qui potuit rerum cognoscere causas (Vergil, *Georgics*)

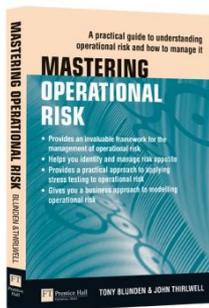


Felix qui potuit rerum cognoscere causas

(Vergil, *Georgics*)

It is the cause, it is the cause, my soul.

(Shakespeare, *Othello*)

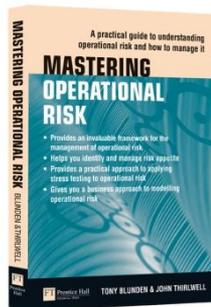
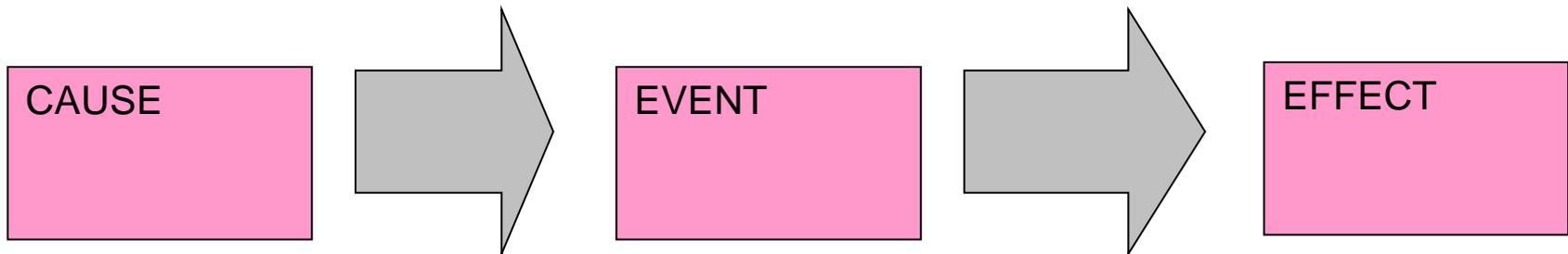


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Some Nobel thoughts on quantification

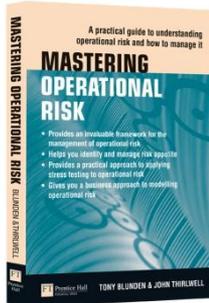
Unlike the position that exists in the physical sciences, in economics and other disciplines that deal with essentially complex phenomena [*operational risk?*], **the aspects of the events to be accounted for about which we can get quantitative data are necessarily limited and may not include the important ones.**

[Friedrich von Hayek, *Pretence of Knowledge*, Nobel acceptance speech 1974]

Our knowledge of the way things work, in society or in nature, comes trailing clouds of vagueness. **Vast ills have followed belief in certainty.**

[Kenneth Arrow, *I know a hawk from a handsaw* CUP 1992]

So be humble!



ORM Framework

Governance

Key indicators

Identify risk and control indicators	Specify risk appetite
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Action plans

Risk & Control Assessment

Identify risk and owner Assess likelihood and impact	Identify control and owner Assess design and performance
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Action plans

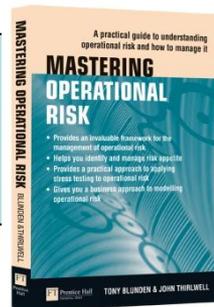
Losses

Identify and capture internal and external losses	Analyse loss causes
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Action plans

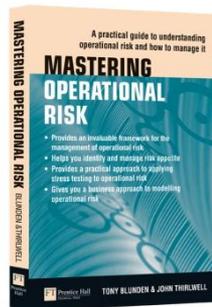
Scenarios and modelling

Reporting



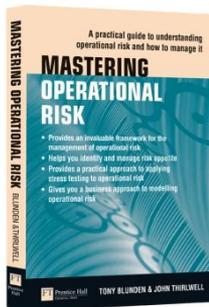
Traditional risk management

Likelihood High (4)	4	8	12	16
Med High(3)	3	6	9	12
Med Low (2)	2	4	6	8
Low (1)	1	2	3	4
Impact	Low (1)	Med Low (2)	Med High (3)	High (4)



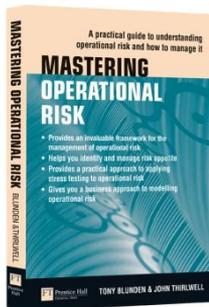
Intelligent ORM

Likelihood High (4)	4	8	n/a	n/a
Med High(3)	3	6	9	n/a
Med Low (2)	2	4	6	8
Low (1)	1	2	3	4
Impact	Low (1)	Med Low (2)	Med High (3)	High (4)



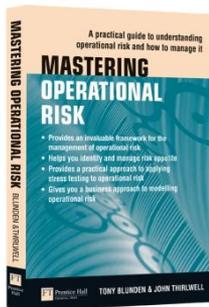
Scenarios

- Stories
 - Use news stories or random words
- Combination of events over a period of time
- Forward-looking



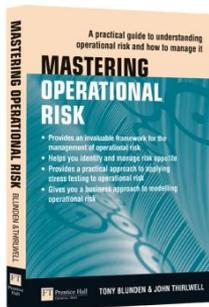
Issues with risk and control assessments and scenarios

- Subjective biases
 - Availability bias - and the elephant
 - Motivational bias
- Lack of challenge / peer review
- Combination of events *over a period of time* (scenarios)
- Paper overload
- Lack of management buy-in
- Lack of feedback
- Lack of follow-up
- Failure to use in-house data as validation (e.g. risk indicators, loss data)



Modelling operational risk - an alternative approach

- Use existing risk and control assessments
- No need to wait for adequate loss history
- How it might work:
 - Set up ranges
 - Assess impact and likelihood of risks
 - Assess failure probabilities of controls
 - Correlate risks (if possible)
 - Challenge input
 - Run Monte Carlo simulations
 - Assimilate results and reports



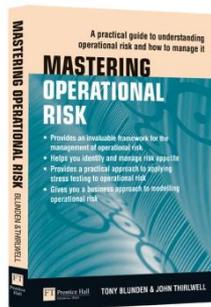
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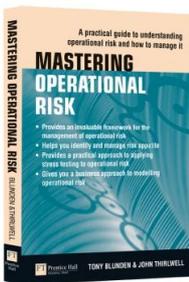
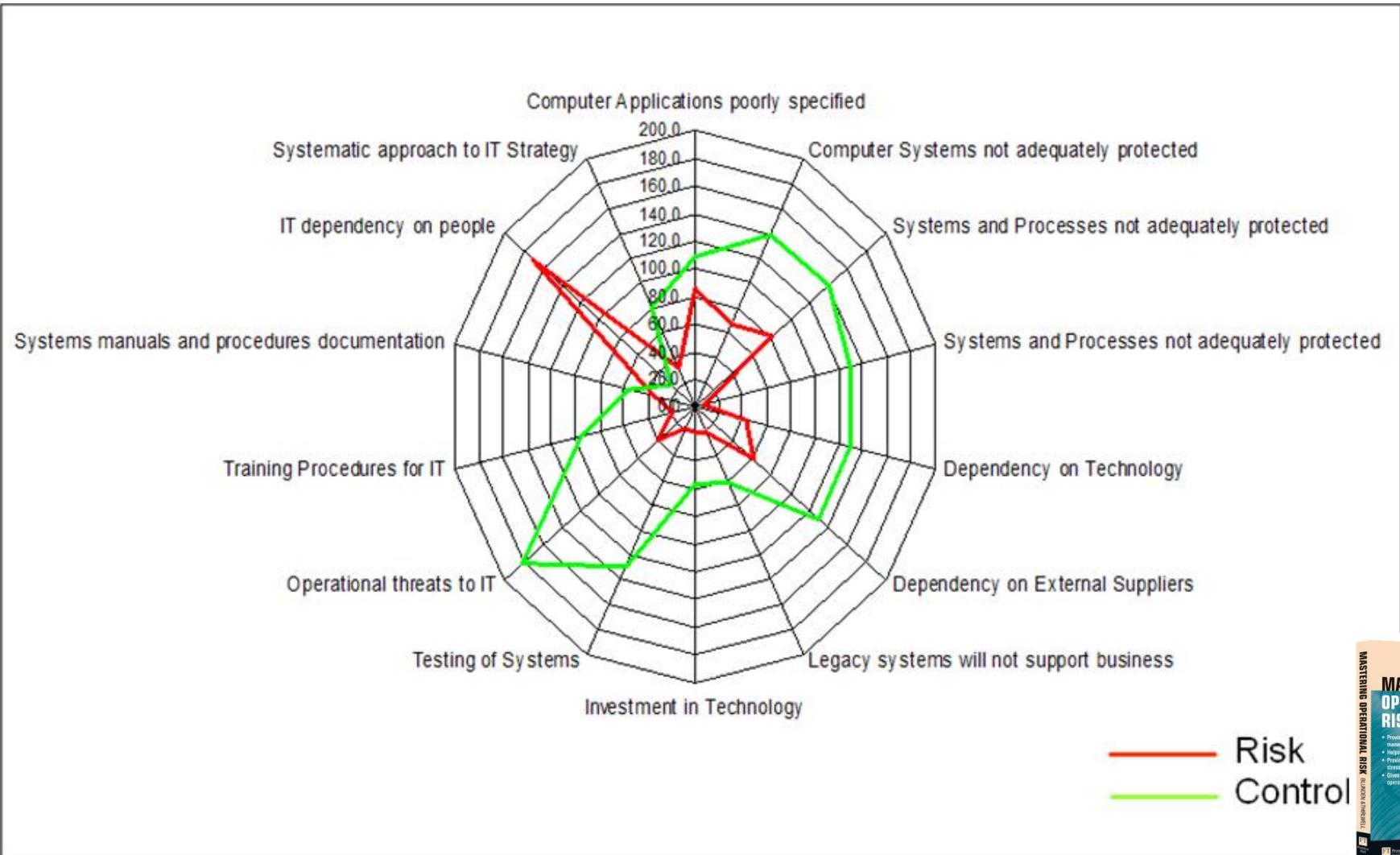
Benefits of an effective operational risk management framework

Informed decision making

- Understanding the OR context of decisions (governance)
- Distinguishing *your* operational risks and optimising control resource (RCA)



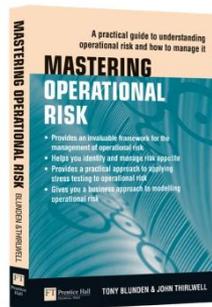
Optimising resource through risk and control assessments



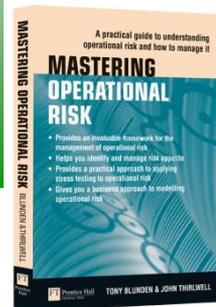
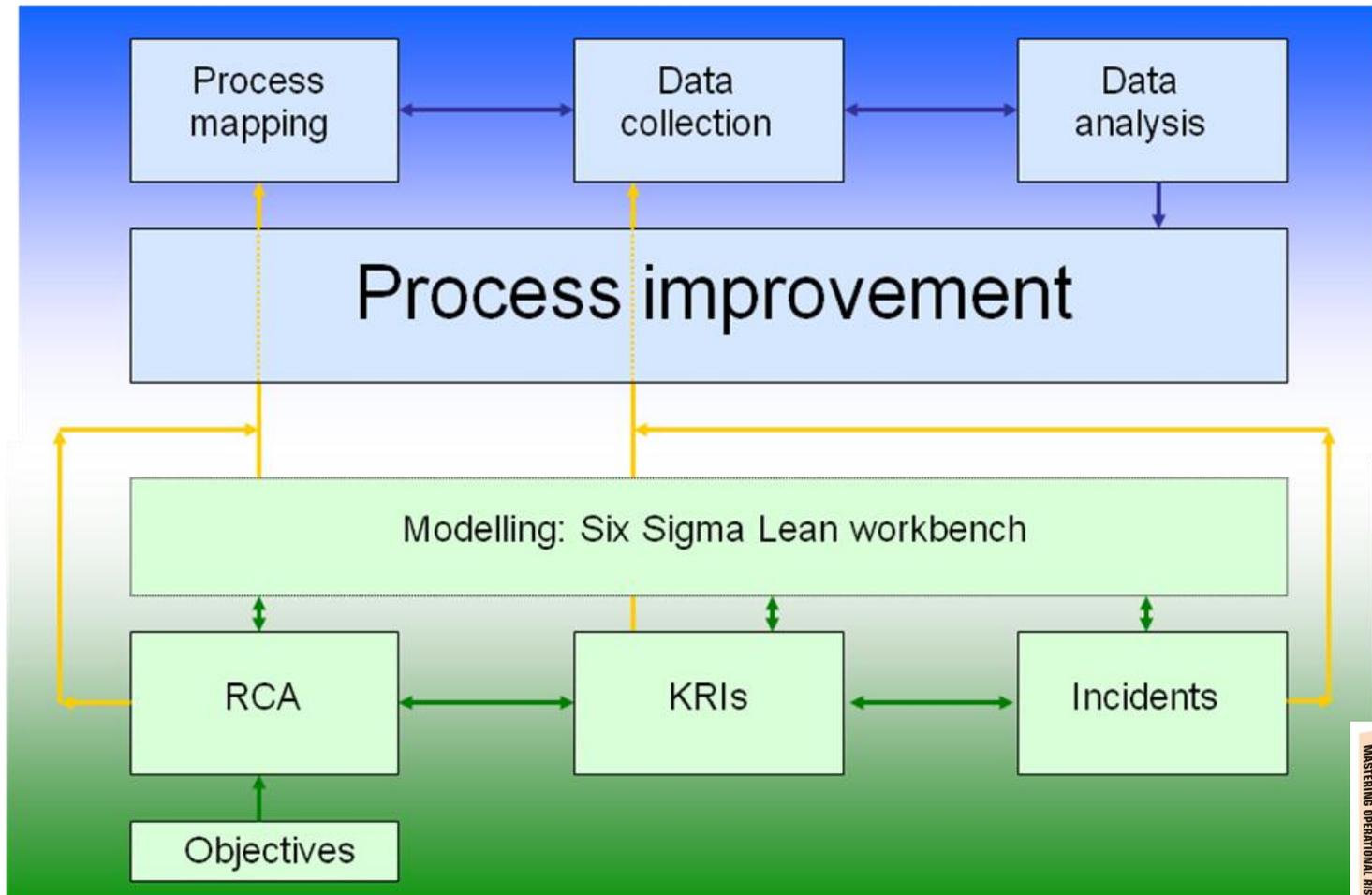
Benefits of an effective operational risk management framework

Informed decision making

- Understanding the OR context of decisions (governance)
- Distinguishing *your* operational risks and optimising control resource (RCA)
- Assessing past problems (losses)
- Knowing where you are now (indicators) . . .
- . . . and where you may be heading (scenarios)
- Allocating capital (modelling)
- Getting the *right* information (reporting)

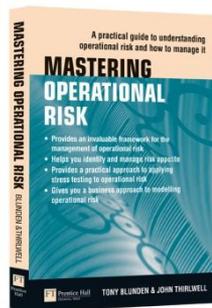


Interaction of operational risk management and Six Sigma and Lean



Other benefits of operational risk management

- Business continuity planning
 - Will you be a survivor?
 - Will you be back in business first?
- Insurance buying
- Outsourcing
 - Managing the core
 - Better customer service
 - Higher activity levels
- Project management
- Reputational damage
 - Preventing it
 - What to do if it happens
- People risk management

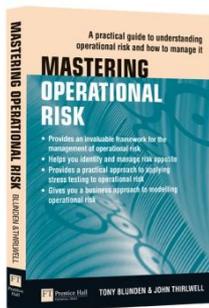


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People risk

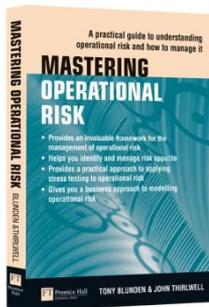
Operational risk is the **risk of loss from inadequate or failed** internal processes, **people** and systems or from external events.



People risk – the financial crisis

Financial crisis

- Asset bubble
- Failure to apply good risk management
- Failure to apply good risk governance
- Human behaviour (greed, herd instinct)
- Politicians, regulators, central banks



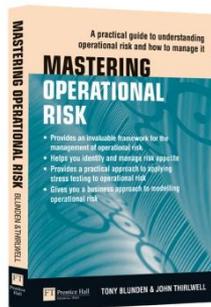
US Congressional Financial Crisis Inquiry Commission (2011)

‘The crisis was **avoidable**.’

The key conclusions were that there were:

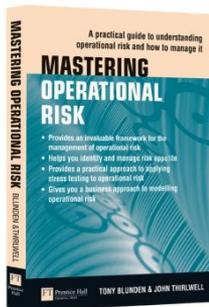
‘**dramatic failures of corporate governance and risk management** at many systemically important financial institutions’

‘a **systemic breakdown of accountability and ethics**’



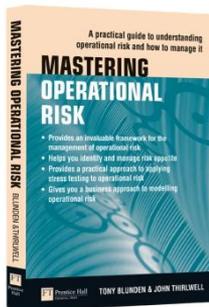
People risk essentials

- Leadership and culture
 - Openness and transparency
 - Communication
- Corporate strategy and objectives
 - Excellent behaviours defined
- Clear roles and responsibilities
- Change and flexibility



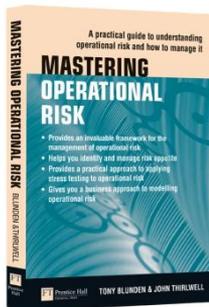
Senior people risk

- The people risk of the CEO
- The people risk role of the CEO and senior management
 - Instilling the risk culture enterprise-wide
 - Behaviour: the tone from the top
 - Do they walk the talk?
 - Do they exemplify the firm's values and behaviours?
 - Speaking up
- The people risk of risk management



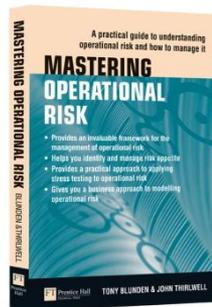
Mitigating people risk

- Objectives and, through them, behaviours are the drivers for key people risk controls:
 - Selection
 - Appraisal and performance management
 - Training
 - Reward
 - Succession planning
- People risk and reputation risk



People risk and HR

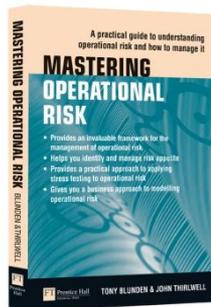
- Is HR a transactional or a risk function?
- Much risk is managed by good HR. How much is managed by a good HR department?
- Understanding and predicting risk is highly dependent on understanding human and organisational behaviour. HR has a role as senior management's guide.
- Would the HR Director be on the short-list for CEO or COO?



- All risks should be viewed through a people lens and all people issues viewed through a risk lens



- Good people management
is good risk management
is good operational risk
management



Contact details

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