

Operational Resilience Measure and Report

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Evolution of Resilience Regulation

Regulatory Challenge

- Board accountability for critical infrastructure. Requirement for IT expertise on the board.
- End-to-end (E2E) resilience collaboration *vs* silo approach.
- Resilience requirements not as advanced as they should be [e.g. E2E mapping and testing of critical economic functions (CEFs)].
- Insufficient prioritisation in operationalising resilience requirements that have been identified.
- Greater appreciation for / demonstration of conduct considerations within IT Risk appetite.
- Maturity and delineation of 3LoD - risk and control management not keeping pace with newly emerging risks.
- Breadth of IT risk assessment activities *vs* individual service.
- Need for a better understanding of 3rd party dependencies and ensuring their compliance with the given organisation's conduct framework.
- Granularity of RTOs, including interdependencies.

Outcomes

- Increase in infrastructure reviews to address IT resilience. However, firms are not fully taking into account the need for resilience across the business.
- Confused granularity of metrics, compounded by a lack of clarity / consistency in key metric reporting.
- PwC development of the Operational Resilience Maturity Assessment tool (ORMA), utilising knowledge of Dear Chairman exercises.
- PwC development of Operational Resilience programme methodology and supporting tools.



The supervisory journey

Gamechanger H1 2012

- Multiple incidents at several banks.

Q3 2012

- FSA undertakes Dear Chairman Exercise making IT resilience a Board issue.

Q2 2013

- FSA becomes PRA and FCA. Focus on IT resilience is sustained.

Q4 2014

- CHAPS RTGS outage highlights concentration risks in payment infrastructure.
- FCA / PRA fine RBS £56m.
- Banks respond to DCEII.
- SEC 'Flash Crash' proposals.

Today

- Supervisory focus on resilience at FCA / PRA and international regulators. Technology Resilience Questionnaire issued by FCA.

Q2 2012

- Payments outage at RBS affects 6.5m customers for up to a month.

Validation/Learning Q4 2012

- Board Chairpersons explain to FSA how they manage and control IT risk, and deliver DCE1 response.

Regime response Q3 2014

- European Supervisory Authority joint committee report identifies insufficient understanding of IT risks by regulators.

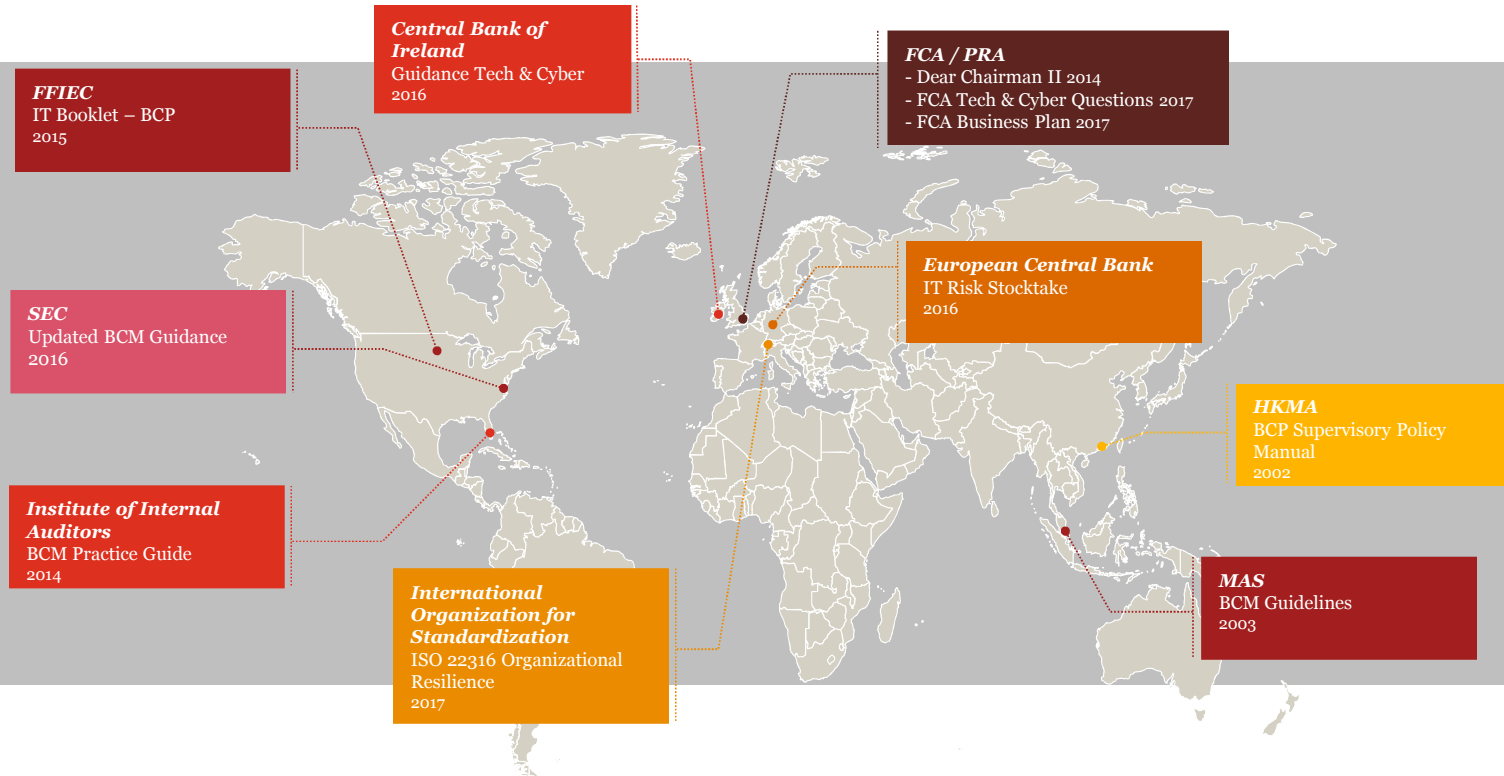
Supervision H2 2015

- Private DCEII feedback to 7 participants. No market report was forthcoming from FCA / PRA.

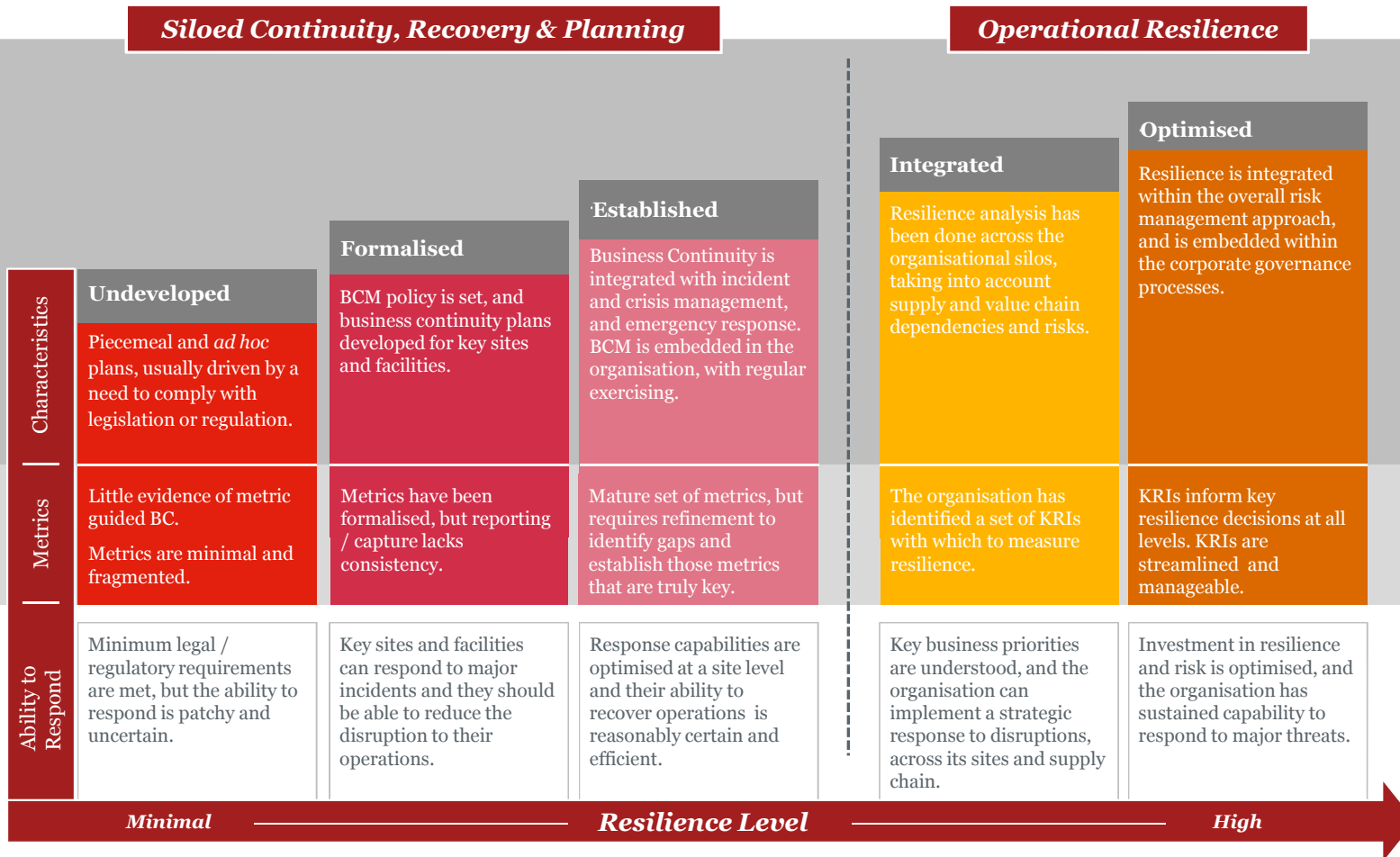
Regulatory Changes Worldwide

Global regulatory expectations and standards

- European regulators and international standards are now setting a **clear expectation** that organisations should make the **strategic shift** from BCM, recovery focused programmes to an integrated multi-disciplined end-to-end resilience approach, **with client and market impacts** as the **significant influencers**.



The Path to Resilience



End-to-End Operational Resilience – The Journey

Resilience Trajectory

Stages

Phases

Benefits

Identify Critical Services (CS) & set Governance

CS selection should take into account services identified as systemic by the regulator, as well as the following four areas:

- (1) License to Operate
- (2) Customer Promise
- (3) Business Strategy
- (4) Business Impact Assessment

1

Define Risk Appetite & top-down KPIs & KRIs

Define risk appetite for the CS (including the channels that make up the CS) by utilising prioritised service tiers; assign thresholds for KRIs based on this tiering.

2

Mapping

The CS and principle channels are mapped out, identifying the critical path through activities. The four pillars of service capability (People, Premises, 3rd Parties, and Technology) are mapped against each activity on the critical path.

3

Assessment

Risk assessment leverages reproducible, consistent methodology, delineated through execution of the initial programme. This approach provides an overall risk profile and gap analysis; risks, summaries, and overall ratings are mapped for each service.

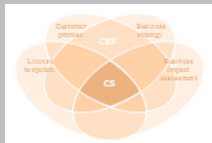
Assessing KRIs – KRIs are applied across the critical path to help identify risk hot-spots (both vulnerabilities and dependencies).

4

Reporting & Remediation

Reporting will enable the bank to make informed decisions regarding remediation actions spanning the organisation.

5



Identify & Select



Critical Services

- Knowing what matters most to the bank
- Well-understood priorities
- Ownership established
- Quicker decision making in crises

Risk Appetite and KRIs

- Driven by risk appetite and performance
- Linked into Risk Management
- Resilience across siloed activities
- Meeting regulatory expectations

End-to-End Mapping

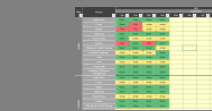
- Understanding of value chain
- Critical path identified
- Key dependencies and their owners identified
- Single points of failure and concentration of risk identified

Measure & Assess

Service	CS	Channel	Activity	Control	Assessment	Rating	Owner
CS1	Channel A	Activity 1	Control 1	Assessment 1	Rating 1	Owner 1	
CS2	Channel B	Activity 2	Control 2	Assessment 2	Rating 2	Owner 2	

Metrics that count

- Direct link between KRIs and risk appetite
- Ability to drill down and diagnose issues relating to service delivery
- Cross-cutting analyses provide pillars with business impact data
- Ability to assess forward looking indicators to anticipate problems
- Combination and extension of existing metrics for efficiency



Reporting & Controls

Insight and Action

- Overall Resilience dashboard
- Controls applied at best point
- Integration with risk management
- Joined up top-to-bottom view
- Follows regulatory direction
- Timeliness of action
- Efficiency of investment

You are here...

Stage 1:
Identify Critical
Services (CS) & set
Governance

**Stage 2:
Define Risk
Appetite & top-
down KPIs & KRIs**

Stage 3:
Mapping

Stage 4:
Assessment

Stage 5:
Reporting &
Controls

Stage 2 – Define Risk Appetite & Top-Down KPIs & KRIs



Board agreed Risk Appetite

Risk Appetite statement and metrics, agreed by the Board, help define the high-level boundaries of the Risk Management Framework (RMF).



Operational Resilience Risk Appetite

Risk Appetite articulated to reflect the operational impact that management is willing to accept, with respect to Operational Resilience. This is aligned to the RMF / Impact criteria.



Service alignment to Service Tiers and Risk Thresholds

Impact	Tier			
	Tier 1 Critical	Tier 2 High	Tier 3 Medium	Tier 4 Low
Annual Acceptable Outage (Average annual hours)	No planned downtime	< Xh	> Xh < Xh	> Xh < Xh
Availability per month	-	-	-	-
Recovery Time Objective (RTO)	-	-	-	-
Recovery Point Objective (RPO)	-	-	-	-
Incidents - Business Process	-	-	-	-

Risk Appetite established for each service. Services are subsequently categorised into defined service tiers: Severe, High, Medium, Low. Systems, data facilities, and vendors are categorised by the corresponding tier level of the service they support.

Risk Appetite defined for Services
e.g. 'access to cash for ATMs'

Operational Resilience metrics and thresholds [e.g. Maximum Acceptable Outage (MAO), Recovery Time Objective (RTO), etc.] are defined for each of the four service tiers. Service categorisation is determined by way of the Risk Appetite.



**Operational Resilience Capabilities supporting
Metrics and Thresholds**

Pillar	Tier			
	Tier 1 Critical	Tier 2 High	Tier 3 Medium	Tier 4 Low
Technology	• Low - Live across multiple data halls	• High availability in multiple data halls	• High availability in single data hall	• Single data hall
Process & People	-	-	-	-
Premises & Assets	-	-	-	-
Incidents	-	-	-	-
Third Parties (including sub-contractors)	-	-	-	-

Operational Resilience capabilities, required to support the achievement of the Operational Resilience thresholds in the resilience service tiers, are defined in terms of the four pillars:

- i. People & Process
- ii. Technology
- iii. Suppliers
- iv. Premises & Assets



Operational Resilience Policies, Standards & Procedures

Policies, internal controls and procedures supporting Operational Resilience are fully documented.

Top-down, Business aligned, RMF



KPIs and KRIs are set in parallel with tiers and thresholds so that generated MI is succinct, specific, and relevant.

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Stage 4 – Assessment

Risk profile

- The **Critical Process owner** is responsible for the completion of the **Gap Analysis** using data validated through the workshop, risks that sit within the risk portal, and KRIs.
- Once approved this should be shared with the organisation's Resilience team for their oversight and collation into a central repository.

In scope E2E Name:	SWIFT & CHAPS Payments		E2E Type	High-Value Payments	Resilience Category	Tier 1	Profile version	1 - Resilience
			E2E Owner	A.N.Other	Aligned CEF	Payment Services	Creation date	01/01/0000
E2E Overview	Payments process for both SWIFT & CHAPS outwards and inwards payments. Inwards uses same teams, systems and process steps as outwards. Outwards is deemed more critical.						Date approved	01/01/0000
Daily Transactions	Daily Financial Volumes	Time critical	Work arounds	Systems on critical path		Business Functions	Critical Suppliers	
xxx	xxx	xx	xx	xxxx		xxxx	xxxxx	

Known Risks to the Process

- Risk 1
- Risk 2
- Risk 3

*Example Output:
Board Risk Profile*

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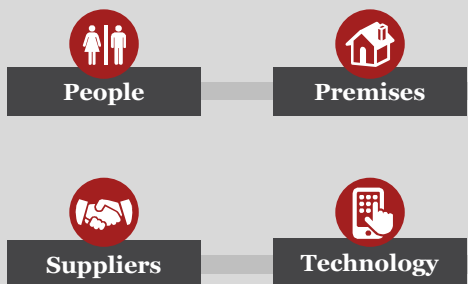
Stage 3:
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Stage 5 – Reporting & Remediation

The KRIs utilise data from across the 4 pillars of resilience, this data can be fed in to the reporting dashboard to provide 3 views. From the process level the data can be aggregated to provide monthly and quarterly reporting and YTD trend analysis.



DATA

Operational Resilience			
Process Name:	High-Value Payments	Process Resilience Tier:	
Date	Overall Process RAG Status	Overall Process Score	Overall Resilience Team Opinion
Feb-17	Amber	0.50	e
Pillar	RAG Status	Score	Comments
People & Process	Amber	0.50	a
Premises	Amber	0.50	b
Technology	Amber	0.50	c
Third Parties	Amber	0.50	d

Process Level

Pillar	KRI	KRI Description	Payments		
			High Value	Standard	Other
Process	11	Reduce & Reassess Risks	Green	Green	Red
	12	Proximity & Resilience	Red	Amber	Red
	13	Business Resilience	Green	Green	Red
	14	Business Continuity	Green	Green	Red
	15	Business Resilience	Green	Green	Red
	16	Business Resilience	Green	Green	Green
	17	Business Resilience	Green	Green	Green
	18	Business Resilience	Green	Green	Green
	19	Business Resilience	Green	Green	Green
	20	Business Resilience	Green	Green	Green
Premises	21	Business Resilience	Green	Green	Green
	22	Business Resilience	Green	Green	Green
	23	Business Resilience	Green	Green	Green
	24	Business Resilience	Green	Green	Green
	25	Business Resilience	Green	Green	Green
	26	Business Resilience	Green	Green	Green
	27	Business Resilience	Green	Green	Green
	28	Business Resilience	Green	Green	Green
	29	Business Resilience	Green	Green	Green
	30	Business Resilience	Green	Green	Green
Technology	31	Business Resilience	Green	Green	Green
	32	Business Resilience	Green	Green	Green
	33	Business Resilience	Green	Green	Green
	34	Business Resilience	Green	Green	Green
	35	Business Resilience	Green	Green	Green
	36	Business Resilience	Green	Green	Green
	37	Business Resilience	Green	Green	Green
	38	Business Resilience	Green	Green	Green
	39	Business Resilience	Green	Green	Green
	40	Business Resilience	Green	Green	Green

Monthly Aggregation

Pillar	Process	2017 RAG Status					
		Jan	Feb	Mar	Apr	May	Jun
Process	High Value	Green	Green	Green	Green		
	Facitor	Green	Red	Amber	Amber		
	Digital	Red	Red	Amber	Amber		
	Telephony	Green	Green	Green	Green		
	Point of Sale	Green	Amber	Amber	Amber		
	Counter	Red	Green	Red	Green		
	Cheques & Credit Clearing	Green	Green	Green	Green		
	Lending Drawdowns	Amber	Amber	Amber	Amber		
	ATM	Green	Green	Green	Green		
	Cash	Amber	Amber	Amber	Amber		
Premises	Fraud & AML	Green	Green	Green	Green		
	Liquidity & Capital Management	Green	Green	Green	Green		
	High Value	Green	Green	Green	Green		
	Facitor	Amber	Amber	Amber	Amber		
	Digital	Green	Green	Green	Green		
	Telephony	Green	Green	Green	Green		
	Point of Sale	Amber	Amber	Amber	Amber		
	Counter	Green	Green	Green	Green		
	Cheques & Credit Clearing	Green	Green	Green	Green		
	Lending Drawdowns	Amber	Amber	Amber	Amber		

YTD Trends

KRIs across 4 pillars inform MI summary

While the 4 pillars provide a mutually exclusive and comprehensive segmentation of the business, we understand that many organisations may align their focus differently. PwC methodology and tools are customisable to your needs.

Gradual aggregation of data provides a **reliable view** of organisational resilience, and presents a dependable methodology that **ensures accuracy of data** reported



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Process Level

Operational Resilience			
Process Name:	High-Value Payments	Process Resilience Tier:	
Date	Feb-17	Overall Process RAG Status	Amber
		Overall Process Score	0.50
		Overall Resilience Team Opinion	e
Pillar	RAG Status	Score	Comments
People & Process	Amber	0.50	a
Premises	Amber	0.50	b
Technology	Amber	0.50	c
Third Parties	Amber	0.50	d

Overall RAG status of Process

Overall RAG status of each Pillar

Pillar assessments that are segmented appropriately:

- People = Teams
- Premises = Location
- Technology = Systems
- 3rd Party = Suppliers

KRIs defined by a set of Attributes. Individual RAG scores per attribute allow you to quickly identify problem areas / gaps

People				Premises				Technology				3rd Parties												
KRI #	Description	RAG Status	RAG Score	Comments	KRI #	Description	RAG Status	RAG Score	Comments	KRI #	Description	RAG Status	RAG Score	Comments	KRI #	Description	RAG Status	RAG Score	Comments					
1	Primary Power	Green	1.00		1	IT Reliability	Green	1.00		1	Disaster Resilience	Red	0.17		2	Resilience	Amber	0.50						
2	Disaster Resilience	Red	0.17		2	IT Reliability	Green	1.00		2	Disaster Resilience	Red	0.17		3	Resilience	Amber	0.50		3	Disaster Resilience	Red	0.17	
3	Disaster Resilience	Green	1.00		3	IT Reliability	Green	1.00		3	Disaster Resilience	Red	0.17		4	Resilience	Amber	0.50		4	Disaster Resilience	Red	0.17	
4	Disaster Resilience	Green	1.00		4	IT Reliability	Green	1.00		4	Disaster Resilience	Red	0.17		5	Resilience	Amber	0.50		5	Disaster Resilience	Red	0.17	
5	Disaster Resilience	Green	1.00		5	IT Reliability	Green	1.00		5	Disaster Resilience	Red	0.17		6	Resilience	Amber	0.50		6	Disaster Resilience	Red	0.17	

KRI RAGs broken down by Pillar simple, digestible format

KRI #	Level 1 KRI	Attribute #	Attribute	Control Type	Owner of Metric	Data Source	Frequency of Update	Targets			RAG Guidelines			Appetite			Results		
								Tier 1	Tier 1	Tier 1	Severe	Severe	CHAPS 3270	GPP	Livetrnk	Attribute RAG Score	Attribute RAG Status	Comments	
1.1	Availability	3.2.4	Availability - Application Capacity CPU	Primary			Monthly	95% of predicted utilization in 10 months	Severe	Severe	Amber	Amber	Amber	0.54	Amber				
		3.2.5	Availability - Application Capacity Memory	Primary			Monthly	95% of predicted utilization in 10 months	Severe	Severe	Amber	Amber	Amber	0.54	Amber				
		3.2.6	Availability - Application Capacity Disk	Primary			Monthly	95% of predicted utilization in 10 months	Severe	Severe	Green	Green	Green	1.00	Green				
		3.2.7	Availability - Infrastructure Serviceable #	Primary			Monthly	Asset in within predictable #	Severe	Severe	Red	Red	Red	0.00	Red	Does to be obtained for all			
		3.2.8	Availability - Application Serviceable #	Primary			Monthly	Asset in within predictable #	Severe	Severe	Red	Red	Red	0.00	Red	Does to be obtained for all			
		3.2.9	Availability - Production Operating system	Primary			Monthly	In support of greater than 50%	Severe	Severe	Red	Red	Red	0.00	Red	Does to be obtained for all			
		3.2.10	Availability - Current version of Asset	Primary			Monthly	Priority - 1	Severe	Severe	Red	Red	Red	0.00	Red	Does to be obtained for all			
3.2.11	Availability - Application only	Primary			Monthly	Always on, 99.99% ps	Severe	Severe	Amber	Amber	Amber	0.54	Amber						
3.3.1	ITSL Resilience	Process				Monthly	Yes	Severe	Severe	Amber	Amber	Amber	1.00	Green					



Stage 5 – Reporting & Remediation

Monthly Aggregation

Monthly view across critical processes, aligning each process to specific functions

Pillar	KFI	KFI Description	Jan-17												
			Payments			Channels			Services			Internal			
			High-Value	Faster	Digital	Telephony	Point of Sale	Counter	Cheques & Credit Clearing	Lending Drawdowns	ATM	Cash	Fraud & AML	Liquidity & Collateral Management	
People	1.1	Risks & Resilience Risks are identified and understood for both RAG as well as for the resilience perspective.	Green	Green	Red										
	1.2	Operability & Resiliency Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Red	Amber	Red										
	1.3	Business Stability Risk measures the likelihood of a business being able to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis.	Green	Green	Red										
	1.4	Risks & Control Environment Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Green	Green	Red										
	1.5	Business Resiliency Risk measures the likelihood of a business being able to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis.	Green	Green	Red										
	1.6	Process Risk Factor Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Green	Green	Green										
	RAG	Overall RAG status for pillar	Green	Green	Red										
Premises	2.1	Process Risk Factor Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Green	Green	Green										
	2.2	Operability & Resiliency Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Green	Green	Green										
	2.3	Business Stability Risk measures the likelihood of a business being able to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis. It is measured by the ability to continue to operate in the event of a crisis.	Green	Amber	Green										
	2.4	Risks & Control Environment Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Amber	Amber	Green										
		RAG	Overall RAG status for pillar	Green	Amber	Green									
	2.5	IT Resilience Facility response to external disruption, level of capability and capacity to ensure essential operations including banking and clearing services for another entity to have access to services.	Green	Green	Green										

YTD Trends

Quickly identify emerging trends in your resilience portfolio using aggregated data from your monthly assessments

Pillar	Process	2017 RAG Status						
		Jan	Feb	Mar	Apr	May	Jun	Jul
People	High-Value	Green	Green	Green	Green			
	Faster	Green	Red	Amber	Amber			
	Digital	Red	Red	Amber	Amber			
	Telephony	Green	Green	Green	Green			
	Point of Sale	Green	Amber	Amber	Amber			
	Counter	Red	Green	Red	Green			
	Cheques & Credit Clearing	Green	Green	Green	Amber			
	Lending Drawdowns	Amber	Amber	Amber	Green			
	ATM	Green	Green	Green	Green			
	Cash	Amber	Amber	Amber	Amber			
	Fraud & AML	Green	Green	Green	Green			
	Liquidity & Collateral Management	Green	Green	Green	Green			
Premises	High-Value	Green	Green	Green	Green			
	Faster	Amber	Amber	Amber	Amber			
	Digital	Green	Green	Green	Green			
	Telephony	Green	Green	Green	Green			
	Point of Sale	Amber	Amber	Amber	Amber			
	Counter	Green	Green	Green	Green			
	Cheques & Credit Clearing	Green	Green	Green	Green			

Remediation

- Prioritisation – MI dashboards provide a means to identify those areas that require immediate attention
- Repeat Issues – automated 90 day RAG statuses allow the resilience team to make a fairer assessment on the state of a given resilience area
- Investment – MI reporting in this way allows the organisation to distribute its investment into the most relevant areas

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Stage 5 – Reporting & Remediation – Dashboards

Easy-Interpret Metrics

Pivot data at the touch of a button without fear of scrambling data

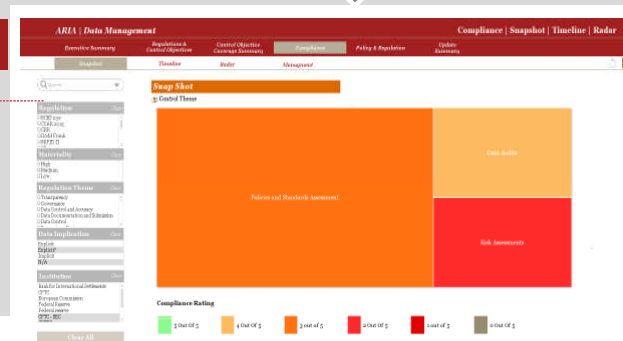


Benefits

- Disseminate data without the need for static reporting
- Identify trends using dynamic data arrays
- Instant visualisation in a plethora of chart types, matrices, etc.
- Minimises exposure to editable data

Audience Specific

Quickly identify emerging trends in your resilience in a format that can be tailored easily to different audiences



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