# **Operational Risk**

Regulation, Analysis and Management

# *edited by* CAROL ALEXANDER



An imprint q/"Pearson Education London • New York • Toronto • Sydney • Tokyo • Singapore \* Hong Kong • Cape Town New Delhi • Madrid • Paris • Amsterdam • Munich • Milan • Stockholm

## Contents

Foreword	xix
Preface	xxi

#### PART I

### Regulation

1	The three pillars of operational risk Ralph Andrew Nash	3
	1.1 Introduction	3
	1.2 Pillar 1	4
	1.3 Pillar 2	9
	1.4 Pillar 3	11
	1.5 Insurance	12
	1.6 Conclusion	12
2	A qualitative operational risk framework: guidance, structure	
	and reporting Kenneth Swenson	14
	2.1 Introduction	14
	2.2 Guidance	15
	2.3 Management structure	20
	2.4 Reporting	23
	2.5 Conclusion	29
3	Measurement of operational risk: the Basel approach Victor Dowd	31
	3.1 Introduction	31
	3.2 Development of the Basel Accord	32
	3.3 Definition of operational risk	36
	3.4 The Basic Indicator Approach	40
	3.5 The Standardized Approach	42

#### Contents

	3-6	Quantification of management quality	45
	3.7	Conclusion	47
4		onstructive review of the Basel proposals on operational risk	
	Jacq	ues Pezier	49
	4.1	Introduction	49
	4.2	Critical examination of the Basel proposals	50
	4.3	Analysis of reported operational loss data	60
	4.4	Other supervisory proposals and conclusions	69
5	Leg	al risks and fraud: capital charges, control and insurance	
	Chr	istos Hadjiemmanuil	14
	5.1	The Basel definitions of operational risk and legal risk	74
	5.2	The varied meanings of 'legal risk'	76
	5.3	Banks and the risk of fraud	85
	5.4	Implications for the proposed capital charges for operational risk	88
	5.5	Containing and managing legal risks and fraud	92
	5.6	Insurance and the mitigation of losses from legal risks and fraud	95
6	Op	erational risk and insurance Thomas Michael Leddy	101
	6.1	Introduction	101
	6.2	Definition of insurance: a working draft	102
	6.3	Definition of operational risk	104
	6.4	The mechanics and nature of insurance contracts	108
	6.5	The present and future role of insurance in financial institutions	121
	6.6	Conclusion	126

#### PART II

### Analysis

Statistical models of operational loss Carol Alexander		129
7.1	Introduction	129
7.2	Operational risk types	130
7.3	Bayesian estimation	137
7.4	Introducing the Advanced Measurement Approaches	142
7.5	Analytic approximations to unexpected annual loss	148

	7.6 Simulating the annual loss distribution	156
	7.7 Aggregation and the total loss distribution	158
	7.8 Conclusion	167
	Appendix 7.1 Some remarks on the use of copulas in operational risk	168
8	The Loss Distribution Approach Michael Haubenstock and Lloyd Hardin	111
	8.1 What is the Loss Distribution Approach?	171
	8.2 Basel requirements	172
	8.3 Why use historical loss data?	173
	8.4 Steps to modelling with LDA	174
	8.5 Case study	178
	8.6 Key assumptions	189
	8.7 Advantages and limitations of the LDA	190
	8.8 Issues for further research	191
	8.9 Summary	192
9	A general simulation framework for operational loss distributions	
	Diane Reynolds and David Syer	193
	9.1 Introduction	193
	9.2 The regulatory landscape	195
	9.3 Setting the stage	196
	9.4 A simulation approach for operational risk	200
	9.5 Example applications	203
	Appendix 9.1 Loss models	208
	Appendix 9.2 Model distributions	210
	Appendix 9.3 More on actuarial models	211
10	The path to operational risk economic capital Ulrich Anders	215
	10.1 Introduction	215
	10.2 What is economic capital?	215
	10.3 How to compute economic capital	216
	10.4 How to derive a good economic capital model	217
	10.5 Where to obtain good-quality input data	221
	10.6 How to validate input data	224
	10.7 How to validate the economic capital number	225
	10.8 Summary	225

#### PART III

#### Management

11	Scorec	ard approaches Tony Blunden	229
	11.1	Introduction	229
	11.2	Why use a scorecard model?	230
	11.3	Risks and controls	230
	11.4 ′	The scorecard approach	233
	11.5	Model simulations	234
	11.6	Quantification of gross and net risks	236
	11.7	Risk appetite	238
	11.8	Stress testing and scenario analysis	239
	11.9	Conclusion	240
12	The o	perational risk management framework Michael Haubenstock	241
	12.1	Introduction	241
	12.2	Defining operational risk	243
	12.3	Strategy	244
	12.4	The operational risk process	246
	12.5	Infrastructure	257
	12.6	Environment	257
	12.7	The role of internal audit	259
	12.8	Tying risk management into the business process	259
	12.9	Success factors	260
	12.10	Summary	261
13	Using	operational risk models to manage operational risk Anthony Peccia	262
	13.1	Introduction	262
	13.2	Operational risk and reward	263
	13.3	The integrated operational risk framework	265
	13.4	Risk and control self-assessment	267
	13.5	Exposures and losses	270
	13.6	Gamma and the measure of operational risk	273
	13.7	Sufficiency, relevancy and completeness of loss data	274
	13.8	Scenario analysis	275
	13.9	Operational risk classes and key risk drivers	276
	13.10	Management applications of an operational risk model	280

#### Contents

	13.11	Modelling and the new regulatory requirements	281
	13.12	Summary	283
14	Manag	ing operational risks with Bayesian networks Carol Alexander	285
	14.1	Introduction	285
	14.2	Bayesian networks: useful references and web links	286
	14.3	Introducing Bayesian networks	287
	14.4	Application of Bayesian networks in banking and finance	288
	14.5	Bayesian decision networks	293
	14.6	Conclusion	295
15	Oper	ational risk management Jacques Pezier	296
	15.1	Introduction	296
	15.2	Risk management - an integral part of good management	296
	15.3	Nominal, ordinary and exceptional operational risks	299
	15.4	An ordinary operational risk case study	302
	15.5	Understanding exceptional operational risks	307
	15.6	An exceptional operational risk case study	310
	15-7	Conclusions	320
	Appe	ndix 15.1 A primer on utility theory	322
	Refer	ences	325

Index	328