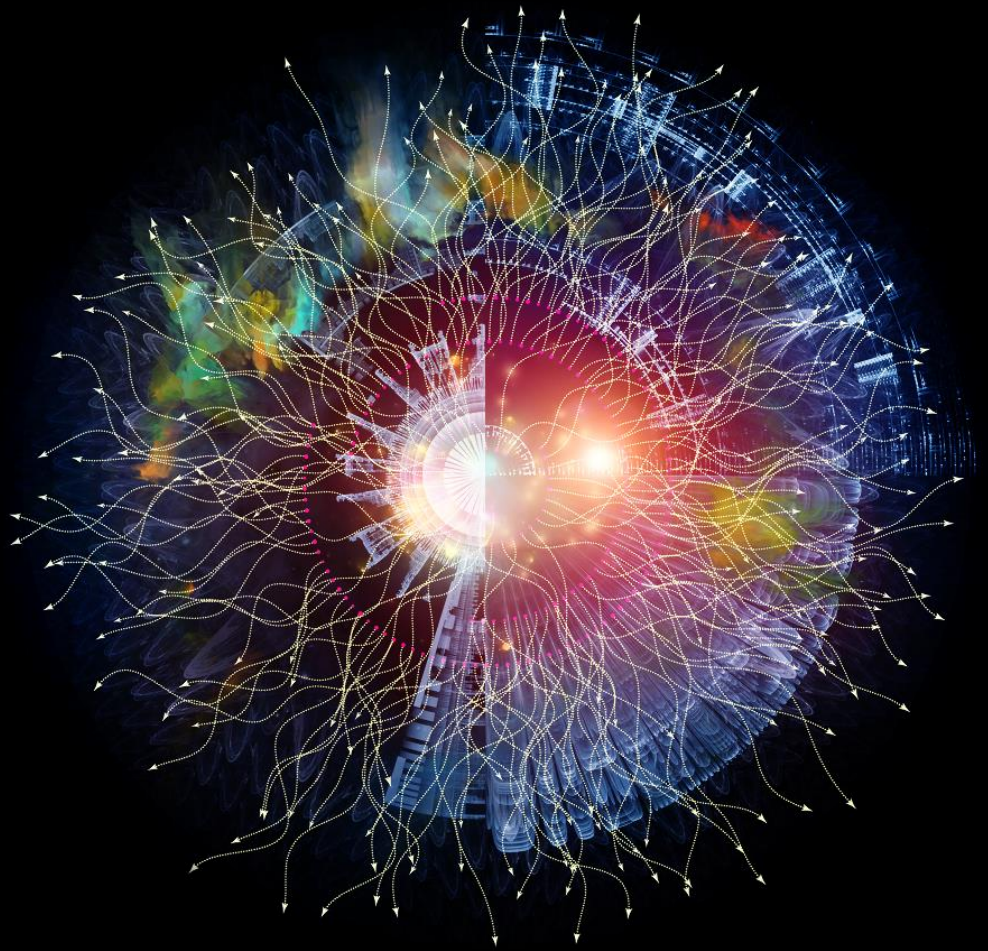
Deloitte.



CPS 230: Operational Risk Management

Strengthening the resiliency of the financial services ecosystem

October 2022

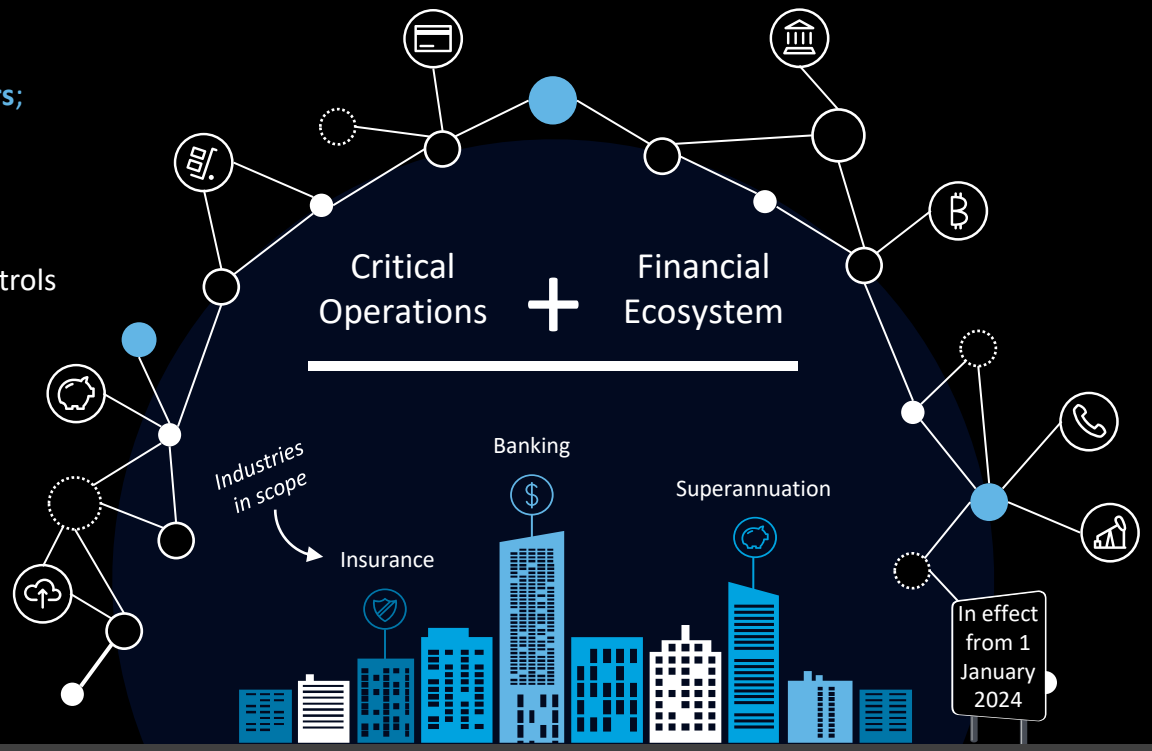
MAKING AN IMPACT THAT MATTERS since 1845

CPS 230 Operational Risk

CPS 230 introduces new and enhanced requirements that will better align the industry with global standards and industry leading practices, and strengthen the overall resiliency of the Financial Services ecosystem.

Key Drivers

- **Low tolerance for disruptions**; increasing expectation (and need) to always be 'on', particularly given significance of the financial services being provided
- **Increasing reliance on service providers**; resulting in a more interconnected and complex financial ecosystem
- **Control failures**; issues and incidents continue to arise due to ineffective controls



Key Objectives

- **Strengthen operational resilience** and reduce the impact of disruptions on customers, market participants and the financial system
- **Ensure critical operations are maintained through severe business disruptions** and risks arising from the use of service providers, including fourth parties, are considered and managed effectively
- **Consolidate and streamline existing prudential standards**

Key Changes and Implications

Today	January 2024
Critical Business Operations Critical business operations are typically identified from the perspective of the entity by assessing the impact on the entity should critical business operations be unavailable.	**Critical Operations** Take an 'outside-in' view and shift the focus from what is critical to the organisation to what is critical to customers, market participants and the financial system more broadly.
Recovery Timeframes As part of conventional business continuity planning, entities have identified Maximum Allowable Outages (MAOs) (or Maximum Tolerable Periods of Disruptions (MTPD)), and Recovery Time Objectives (RTO).	**Tolerance Levels** Define not just how long a critical operation can be disrupted for, but *how much and for how long* before the impact is intolerable. In addition to setting recovery timeframes, identify Maximum Data Losses and Minimum Recovery Objectives or Service Levels.
Management of Material Outsourced Providers Existing policies are typically focused on the management of third-party service providers performing material business activities that would otherwise be performed 'in-house', with monitoring activities usually limited to a review of their performance against agreed service levels. Additionally, entities largely rely on contractual agreements with third parties to mitigate risks associated with fourth-parties..	**Management of Material Service Providers, incl. Fourth Parties** Expand the scope beyond outsourced service providers and identify material service providers (incl. third and fourth parties, partners, suppliers and affiliates) that enable critical operations or expose the organisation to material operational risks. Additionally, ensure risks presented by third and fourth parties are managed proactively and comprehensively on an ongoing basis.
Testing and Review against BCM Objectives Scenarios used for testing are often limited in scope (e.g. only testing a sub-set of critical operations) and/or based on generic unavailability scenarios that are '*contained and plausible*' (e.g., unavailability of technology or an office location).	**Testing and Review Against Tolerance Levels** Establish a more robust testing and review program which includes all critical operations and material risks, and assesses the entity's ability to maintain business operations within tolerance levels through '*severe but plausible'* disruptions.
Board Responsibility Operational risk responsibilities have been steadily shifting towards Line 1 Management, there is still a heavy reliance on risk management functions to maintain end-to-end oversight, and no enforced linkage between Board and Senior Management decision making and the impact of these decisions on the resilience of critical operations.	**Board Accountability** Place *accountability,* not just *responsibility*, on the Board and senior management to oversee and manage operational risk, end-to-end. Risk reporting should be clear on the impacts to the resilience of critical operations.
Broad Focus on Material Risks Entities are only required to maintain a risk management framework which addresses material risks – broadly defined as those with a financial or non-financial 'material' impact on the institution, its depositors and/or policyholders.	**Clear Linkage to Operational Resilience** Review and update the entity's operational risk profile to ensure it comprehensively considers critical operations, approved tolerance levels and interdependencies with third and fourth parties. Risk profiling activities should also consider operational risk incidents and near misses.

Key Contacts

Caroline Brell
Partner, Financial Industry
Risk & Regulatory Services
cbrell@deloitte.com.au

Sean Moore
Partner, Financial Industry
Risk & Regulatory Services
semoore@deloitte.com.au

Erik Kronborg
Partner, Digital & Technology Risk
ekronborg@deloitte.com.au

Ally MacLeod
Partner, Digital & Technology Risk
amacleod@deloitte.com.au

Tommy Viljoen
Partner, Cyber Risk
tfviljoen@deloitte.com.au

Kreeban Govender
Director, Financial Industry
Risk & Regulatory Services
kregovender@deloitte.com.au

Kerri Hie
Director, Financial Industry
Risk & Regulatory Services
khie@deloitte.com.au

Jaramie Nejal
Director, Financial Industry
Risk & Regulatory Services
jnejal@deloitte.com.au

Tarah Unn
Senior Manager, Financial Industry
Risk & Regulatory Services
tunn@deloitte.com.au

Deloitte.

Designed by CoRe Creative Services. RITM1206245