# **SQUARE TABLE**

Operational Resilience. The new normal for keeping services running

**Speaker: Mirna Bognar** 

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#### Talking about resilience...



Wheatfield under Thunderclouds, Courtesy of Van Gogh Museum, Amsterdam (Vincent van Gogh Stichting)

#### **Why Operational Resilience**

- Digitalisation of services and products
- Dependency on digitalisation is high:
  E.g. WEF: critical infrastructure failure listed as sixth global risk in terms of impact
- > Operational resilience is key
  - > For organisations to stay in business
  - For consumers to safeguard their trust in digitalised economy and society



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Slide from Feb 2020

#### Improving IT operations and strengthening Business continuity. Are we done?

- > From an organisation's perspective:
  - > E.g. IT changes that result in triggering a crisis or media attention due to unavailability
  - > E.g. Can we handle data corruption incidents?
  - > What should the target state be?



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## Expectations regarding availability of digitalised services are high...

Dutch National Bank requires availability of time-critical payment orders in peak demand periods



#### Availability of payment chains

Availability	2016 (%)	2017 (%)	2018 (%)	2019 (%)
Chip-and-pin and contactless	99,88 (>99,64)	99,88 (>99,76)	99,89 (>99,88)	99,89 (>99,88)
Mobile banking	99,77	99,83	99,75	99,81
Internet banking	99,79	99,83	99,72	99,78

Source: Dutch Payment Association

- > Internationally:
  - National critical infrastructures
  - > Resilience against "severe but plausible events"

#### ... While threats to digitalised services and processes are increasing

- > Cybercrime
- Complexity of IT systems/unintended impact of innovation and IoT
- Interconnectedness in supply chain
- WEF: "The lack of a global governance framework for technology risks fragmenting cyberspace, which could deter economic growth, aggravate geopolitical rivalries and widen divisions within societies."



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## Some regulatory trends (in FI) regarding operational resilience...

- ➢ In finance (all draft)
  - UK: Bank of England/FCA/PRA Building Operational resilience
  - EC Digital operational resilience act (DORA)
  - BCBS Operational resilience
- > Objectives:
  - Stability of "system" (economic, financial...)
  - Protection of consumers' interest
  - Own strategies
- > Drivers:
  - > Dependency on availability of banking services
  - > Cyber crime
  - > Pandemic lessons learned: WFH, supply chain resilience



## ... Where Operational resilience is defined as...

- European Commission:
  - Ability to **build, assure and review** its operational integrity from a technological perspective ...
- Basel Committee of Banking Supervision:
  - Outcome that benefits from the effective management of operational risk. The ability to deliver critical operations through disruption.
- UK Bank of England:
  - Ability to **prevent, adapt, respond to, recover and learn** from operational disruptions
- ISO 22316 Organisational resilience:
  - Ability of an organization to absorb and adapt in a changing environment



#### ... And requires the following measures:



## Approach at ING: Operational resilience of products/business services... **Objective:** Operational resilience target: E.g. Availability of (e.g. 99,88% for customer-facing services during peak hours) products/ business services Achieved by To meet Measures: **Operational resilience** > Operational resilience

is the adaptability of an organisation to maintain its business functions in the face of (turbulent) internal or external changes/events which do not exceed organisation's operational limit

## ... by building the abilities to monitor, respond, learn and anticipate

Expectations and requirements regarding operational resilience within Customer Experience



Objectives:

- Adopt a consistent end-to-end view on Business- and IT services' operational resilience, taking into account the targets to comply with
- Design resilient Business and IT services, and pro-actively monitor, respond to, and learn from any (turbulent) internal or external changes/events in order to meet the current or future operational resilience targets



(\*) Site Reliability Engineering (ISBN-13: 978-1491929124), https://landing.google.com/sre/book/chapters/part3.html 12 (\*\*) Erik Hollnagel, RAG Resilience Analysis Grid

#### Framework: Google\* meets Resilience Analysis Grid model\*\*



## Implementation: Adopting a consistent end-to-end view, defining targets

#### > In scope:

- Resilience-critical business services (with outside-in monitoring)
  - > E.g. Business services with availability targets like critical payments 99,88%
  - > Scoping is responsibility of Business
- > IT assets\* with high-availability requirements (with internal monitoring)
  - > As derived from resilience-critical business services
  - Scoping is responsibility of IT, based on business requirements
- > Not all IT assets in scope:
  - Outside-in monitoring of business services will detect unavailable service; the IT asset(s) that caused it will be exposed



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### Implementation: Adopting a consistent end-to-end view, defining targets (ctd)



## Implementation: Monitoring – responding – learning – anticipating in small entity



Is it 'good enough': Measuring according to measurement model against defined targets

## Implementation: Monitoring – responding – learning – anticipating in mature entity



Is it 'good enough': Measuring according to measurement model against defined targets

## Implementation: Ability to anticipate – steering on priorities in DevOps by the Business

For example:

- Error budget
  - > Business service must establish availability target
  - > Error budget is 1 availability target, i.e. permitted unavailability of the service
  - > Engineers can spend the budget on anything as long as it is not overspent
- > Error budget becomes common incentive of developers and operations
  - > Room for failure when innovating
  - > A way to decide on the rate of releases and innovation (vs service availability)
  - A way to connect to the business

#### Implementation: Ability to anticipate – managing third parties

- Scope: third parties that materially support critical business services
- > Two categories of risks: the risks of the use of third party and the risks caused by third parties
- $\succ$  Requirements for contracting, contract lifecycle, exit
  - > Risk assessment, due diligence before contracting
  - > Access to information, Right to audit
  - > Exit strategies
  - > Etc

#### But also

 $\succ$  Monitoring and testing security, including operational resilience

EC DORA Article 28-39: OVERSIGHT FRAMEWORK OF CRITICAL ICT THIRD-PARTY SERVICE PROVIDERS





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**Implementation: Guild** 

#### Organisation-wide

- Bi-weekly call to monthly call
- > Members: anybody, started with IT and IT Risk, extended to business
- > Objective: Interpretation of controls, sharing good practices, demos, questions
- Feedback loop on implementation
- > In practice:
  - Open market for tooling, templates, transparency, consistency
  - > Early warning to management regarding impediments
  - > "Owned" by participants



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#### **Implementation: Roles and responsibilities**

- Executive committee responsible for
  - Defining operational resilience targets in line with expectations and requirements from the Customer Experiences and regulators; and
  - > Designing, implementing and executing the controls
- Chief Operations Officer (COO) responsible for
  - > Defining and maintaining the measurement models
  - > Monitoring performance
- > Chief Information Officer responsible for
  - > Supporting COO in defining and maintaining the measurement models for IT;
  - Managing the abilities to anticipate, monitor, respond (including recovery) and learn for the resilience-critical IT services to meet the operational resilience target
- > Business service owners responsible for his/her Business services
- Asset owners responsible for his/her IT Assets





#### **Implementation: What went well**

- > Strong buy-in by the Bank CIO for
  - > Move from IT asset-based approach to service-based approach
  - Collaboration between CIO and COO lines in implementation
- > Outcome-based:
  - Whether a service is resilient or not, can be measured by whether the defined targets are met
- > Measures in line with targets defined
- > Teams helping each other
- Challenges in implementation have direct feedback to management and "policy makers"



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#### **Implementation: What is improving**

Reaching out to the business at operational level: from IT resilience to operational resilience

- > Maturing approach and implementation
  - > No one-size-fits all approach between entities
  - > Maturing in measurement methods
  - > Maturing in steering



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#### Take aways

- > Invest in alignment between business services and IT
- Operational resilience targets and measurement will enable outcome-based steering and will improve (business and IT) operations
- > There are many ways to implement operational resilience
- > Invest in the full cycle to optimise the outcome



#### **Questions?**



#### Thank you for your attention

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All pictures of paintings are courtesy of Van Gogh Museum Amsterdam (Vincent van Gogh Stichting)

#### References

- <u>EC Digital Operational Resilience Framework for financial services (in consultation till 17</u> <u>Dec 2020)</u>
- <u>BCBS Principles for operational resilience</u>
- UK: Bank of England <u>Operational resilience</u>
- <u>Oliver Wyman Striving For Operational Resilience</u>