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Merging data streams in operational risk management



Paolo Giudici

Department of Statistics “L. Lenti”
University of Pavia

giudici@unipv.it

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Agenda



- Background
- Current approaches
- Our proposed approach
- Open issues

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Merging data streams in operational risk management

Background



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Statistical models for *risk management*



- **Legislative background:** regulations of Banking Authorities (Basel2 regulations, www.bis.org); but also information security (ISO 17799) and business continuity (BS 25999) require risk measurement
- **Strategic background** is to improve controls, efficiency and performance of (service) companies

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Statistical models for *financial risk management*



Objectives of modelling:

- efficient capital allocation, to cover unexpected losses without allocating too much capital
- effective performance monitoring of business units, branches and processes

Necessary condition is a valid measurement of risks: good data quality, good data mining

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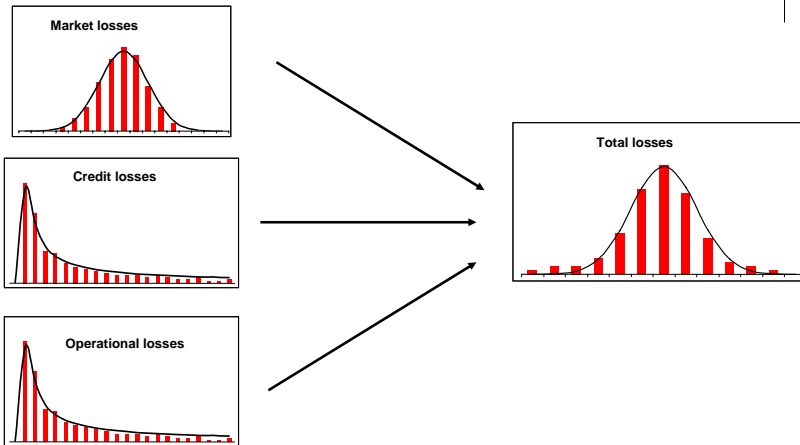
An (*integrated*) statistical view on risk management



- Objective: to estimate a loss distribution, and derive functionals of interest from it (such as the Value at Risk)
- Losses in market risk are realisations of a continuous stochastic process
- Losses in credit risk are realisations of a convolution between a binary process (default or not) and a continuous one
- Losses in operational risk are realisations of a convolution between a counting process (frequency) and a number of continuous ones (severities)

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Final aim: distribution of integrated losses



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Operational risk



- Risk of financial losses caused by: inadequate internal processes, human errors, IT failures or external events. (Basel Committee, *Working Paper on the Regulatory Treatment of Operational Risk*, September 2001).
- Measures risks due to enterprise management (rather than financial or credit management).
- Compulsory for most banks by end of 2007

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Advanced Measurement Approaches



- Suited for large sized and efficient banks, and those operating at the international level
- Based on the analysis of all available and relevant data, by means of a statistical model aimed at estimating the probability distribution of the losses
- Most used statistical models are: scorecard, actuarial. Also causal

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Merging data streams in operational risk management

Current approaches



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Scorecard models



- Based on expert opinions (of process owners) on operational losses expected for a future period (e.g. next year)
- Each process owner evaluates: which are the likely risks; the expected losses; possible causal factors (key risk indicators) of the losses
- In the most diffuse version assessments are in terms of expected frequencies and severities. Typically both on a categorical scale (low, medium, high).

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Actuarial models



- Employs two types of probability distributions:
- the distribution of the *frequency* of the risk events
- the distribution of the losses that arise for each given event (*severity*).
- The convolution between the two determines the loss distributions and, then, the Value at Risk.
- Suited for rare events, with high severity. Do not model relationships between loss events and with their causes. Requires simulation based methods to derive the loss distribution.

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Actuarial methods



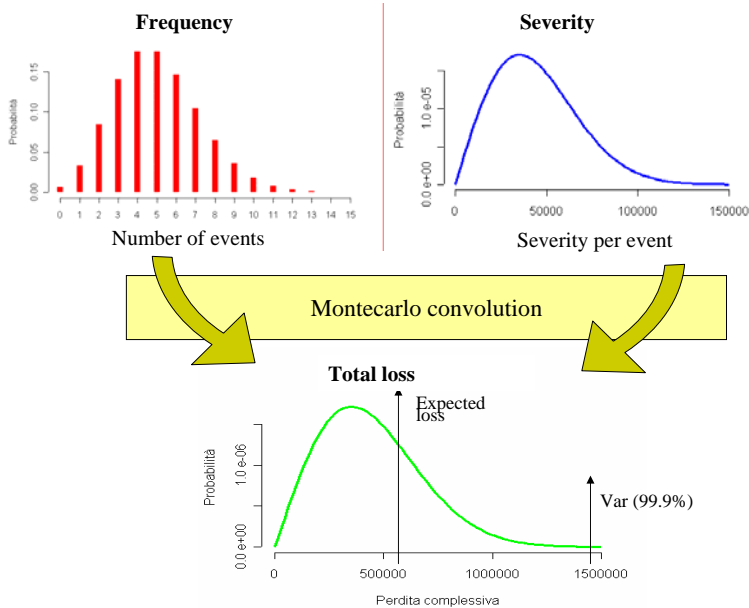
- For each risk type, business unit, and a given period, operational risk losses can be defined as a sum (S) of a random number (n) of single losses (X_i):

$$S = X_1 + X_2 + \dots + X_n$$

- The actuarial model typically assumes that: *a*) single losses are i.i.d. random variables; *b*) the distribution of N (frequency) is independent on that of X_i (severity)

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Actuarial models



Monte Carlo simulation



RUN #	FREQ.	SEVERITY					
		1 First Event		2 Second event		3 Third event	
1	0						
2	3	0.247963	94.10739958	0.984985	300744623.6	0.227363	0.227086103
3	1	0.773522	25007.66528				
4	0						
5	0						
6	0						
7	1	0.982238	4872414.65				
8	1	0.770287	23985.12518				
9	1	0.287759	150.8397754				
10	3	0.027833	0.768589688	0.041871	0.000193265	0.374248	4.911219919
11	0						
12	3	0.938475	548073.9994	0.933653	2484677.895	0.615192	406.9620162
(....)	(....)						
10000	(....)						

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Bayesian actuarial models



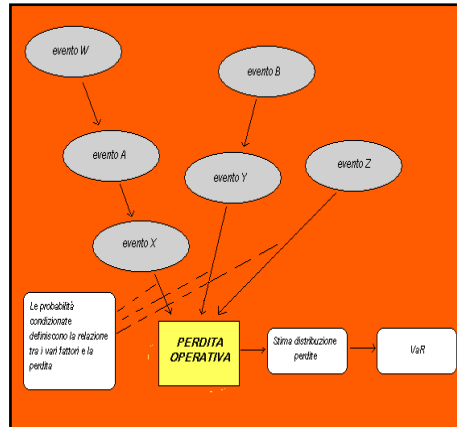
- Can add a prior distribution to both the frequency and severity distribution.
- A conjugate and little informative approach can be chosen.
- E.g. gamma prior for both the frequency and the severity distribution

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Causal models

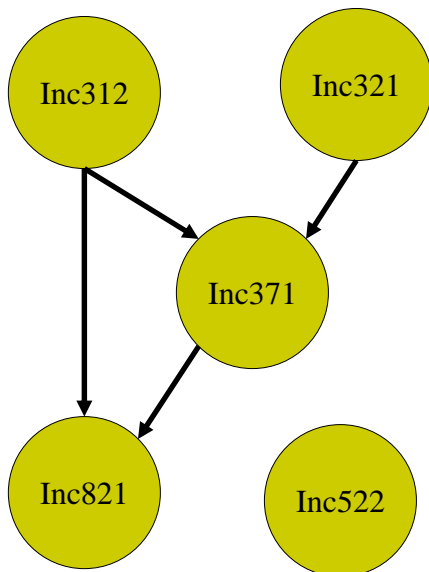


- Each operational loss depends on the outcome of other events (causes), each of which can also be dependent
- Suited for frequent events, with low severity
- Difficult to specify, yet very useful for audit and control purposes



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Bayesian networks



Advantages:

- 1) Can exploit correlations and causations with all risk factors
- 2) Can handle fusion of different sources of information;

Disadvantages:

- 1) Joint treatment of the two components of the expected loss (frequency and severity);

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Merging data streams in operational risk management

Our proposed approach



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Basel 2 requirements



From the official documentation (www.bis.org) it can be desumed that AMA models must be based on the combined usage of four data sources:

“Any risk measurement system must have certain key features to meet the supervisory soundness standard set out in this section. These elements must include the use of **internal data**, relevant **external data**, **scenario analysis** and **factors reflecting the business environment and internal control systems**”

e.g. A sound AMA approach must combine: **historical loss data**, **external (consortium) data**, **expert opinions**, **key risk indicator data**

Our proposal aims to fulfill this requirement.

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How to integrate ?

- The open problem is how to integrate, in a statistically coherent and computationally efficient way, different sources of data.
- We have proposed an approach based on: non parametric models to prioritise risks and calculate the value at risk. This will be described here.
- A different development involves lifting the assumption of perfect dependence among risk types, using Bayesian networks and Copula models. See e.g. Bonafede and Giudici (2007) and Dalla Valle, Giudici and Fantazzini (2007)

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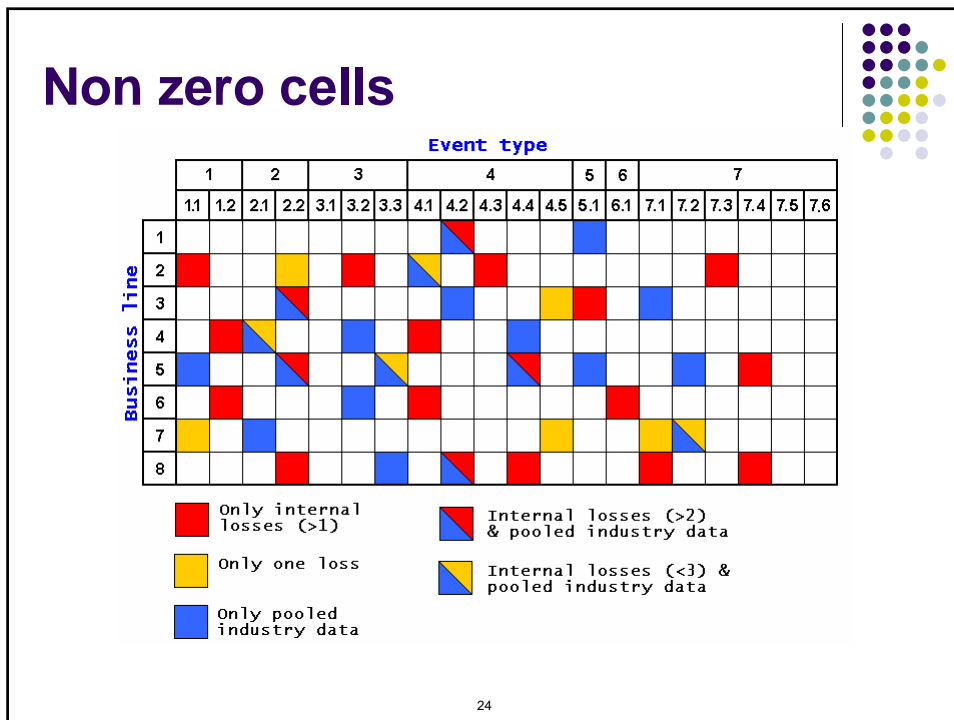
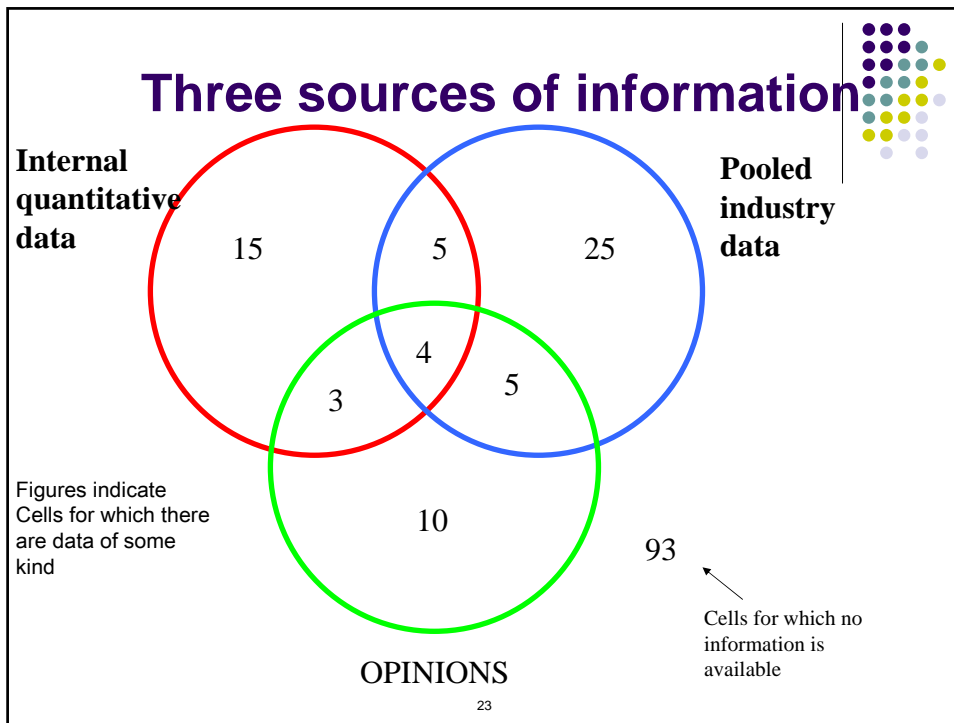
Measurement units

		Event type																				
		1		2		3			4				5		6		7					
		1.1	1.2	2.1	2.2	3.1	3.2	3.3	4.1	4.2	4.3	4.4	4.5	5.1	6.1	7.1	7.2	7.3	7.4	7.5	7.6	
Business Line	1																					
	2																					
	3																					
	4																					
	5																					
	6																					
	7																					
	8																					

Operational risk events are classified in *Business Lines* and *Event types*

For example we may consider 8 business lines and 20 event types, leading to 160 measurement units (named CELLS for brevity)

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Internal Loss data: example



Cells	Total losses					Number of events (frequency)				
	1999	2000	2001	2002	2003	1999	2000	2001	2002	2003
Inc142	253,740	177,777	8,521	109,555	295,914	26	18	1	11	30
Inc211	153,384	202,916	243,028	37,780	258,531	16	21	25	4	26
Inc222	213,453	353,306	51,446	267,176	190,778	22	36	6	27	20
Inc322	346,549	419,123	400,735	320,633	417,310	35	42	41	33	42
Inc243	42,568	119,789	177,147	262,832	124,481	5	12	18	27	13
Inc273	112,718	385,365	468,169	19,638	270,249	12	39	47	2	28
Inc322	137,264	177,939	122,921	272,889	371,847	14	18	13	28	38
Inc345	136,151	267,783	236,546	186,354	15,003	14	27	24	19	2
Inc351	307,910	46,542	95,771	480,578	172,138	31	5	10	49	18
Inc412	214,832	84,897	291,579	128,651	30,656	22	9	30	13	4
Inc441	325,822	449,887	229,711	103,960	184,453	33	45	23	11	19
Inc522	283,863	211,305	233,691	430,623	203,755	29	22	24	44	21
Inc544	56,754	373,848	199,894	232,159	457,074	6	38	20	24	46
Inc574	297,955	411,297	252,613	111,416	444,260	30	42	26	12	45
Inc612	179,020	477,292	15,943	311,724	491,762	18	48	2	32	50
Inc641	214,399	342,697	57,227	101,807	238,547	22	35	6	11	24
Inc661	25,951	250,233	234,439	9,836	346,680	3	26	24	1	35
Inc822	132,085	137,731	198,469	398,928	212,827	14	14	18	1	32
Inc842	199,389	114,443	416,757	137,136	391,886	14	14	18	1	32
Inc842	418,052	7,217	380,512	137,136	391,886	14	14	18	1	32

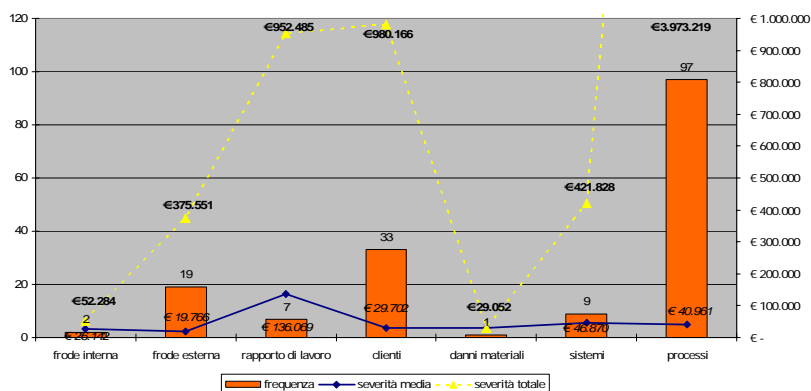
Not real data!

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External loss data: example



Losses 2003-2006 for Italian Consortium DIPO



Source: DIPO

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Self Assessment data: example



Frequency	1.1.1	1.1.2	1.2.1	1.2.2	1.2.3	1.2.4	1.2.5	1.2.6	1.2.7	1.2.8	1.2.9	1.2.10
A Annual	30	30	28	32	27	30	32	32	29	32	27	29
B Monthly	2	2	3		3	2			3		4	3
C Weekly					2							1
D Daily												
Total	32	32	31	32	32	32	32	32	32	32	32	32
A Annual	93.8%	93.8%	90.3%	100.0%	84.4%	93.8%	100.0%	100.0%	90.6%	100.0%	84.4%	90.6%
B Monthly	6.3%	6.3%	9.7%	0.0%	9.4%	6.3%	0.0%	0.0%	9.4%	0.0%	12.5%	9.4%
C Weekly	0.0%	0.0%	0.0%	0.0%	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%
D Daily	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

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Risk indicators: example



$$F_{i,j} = \begin{cases} 1 + 0.3R_i^2 & \text{se } K_{i,j} > 0.66 \\ 1 & \text{se } 0.33 \leq K_{i,j} \leq 0.66 \\ 1 - 0.3R_i^2 & \text{se } K_{i,j} < 0.33 \end{cases}$$

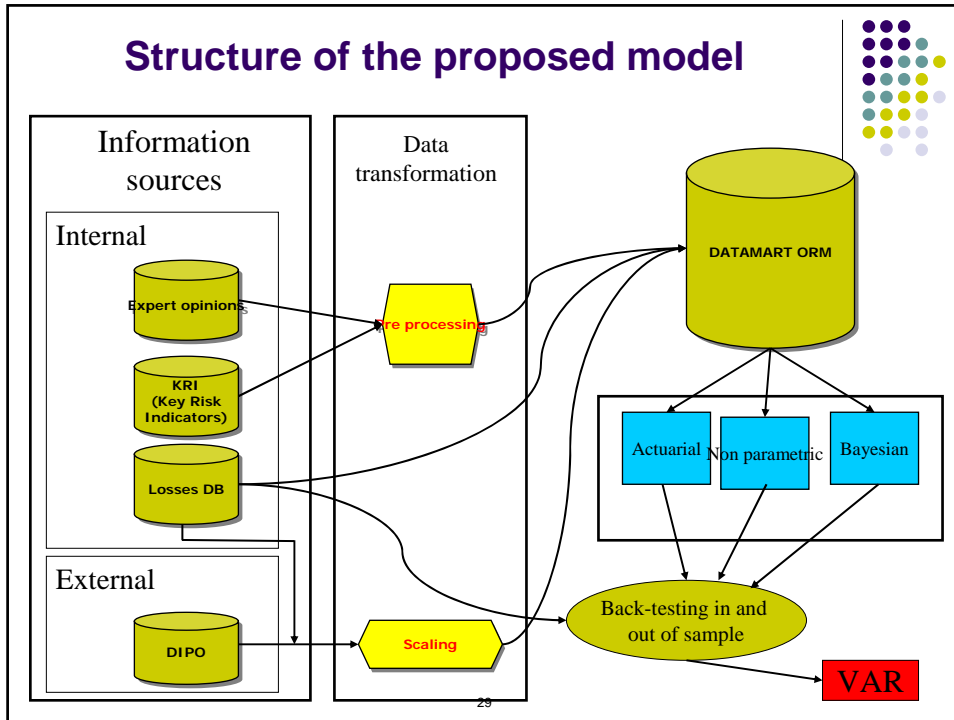
$F_{i,j}$ Correction factor of the i-th area (e.g. province) on the j-th cell (business line * event type)

$K_{i,j}$ Mean of the j-th KRI in the i-th area;

R_i^2 Ratio between deviance of the area means and total deviance for the i-th KRI;

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Structure of the proposed model



Results – rating oprisks

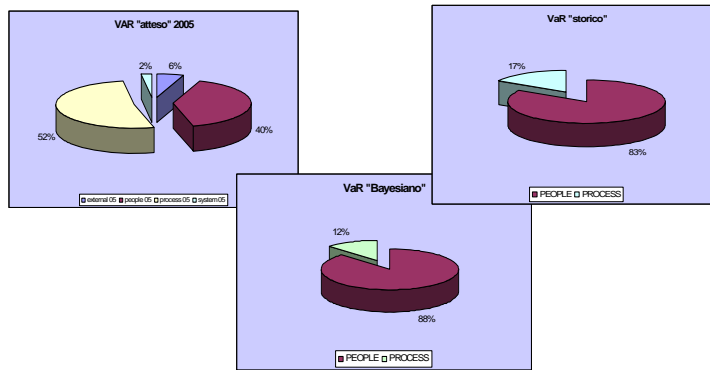
Frequency	1.1.1	1.1.2	1.2.1	1.2.2	1.2.3	1.2.4	1.2.5	1.2.6	1.2.7	1.2.8	1.2.9	1.2.10
A Annual	30	30	28	32	27	30	32	32	29	32	27	29
B Monthly	2	2	3		3		2		3		4	3
C Weekly					2						1	
D Daily												
Total	32	32	31	32	32	32	32	32	32	32	32	32
A Annual	93.8%	93.8%	90.3%	100.0%	84.4%	93.8%	100.0%	100.0%	90.6%	100.0%	84.4%	90.6%
B Monthly	6.3%	6.3%	9.7%	0.0%	9.4%	6.3%	0.0%	0.0%	9.4%	0.0%	12.5%	9.4%
C Weekly	0.0%	0.0%	0.0%	0.0%	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%
D Daily	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Max	93.8%	93.8%	90.3%	100.0%	84.4%	93.8%	100.0%	100.0%	90.6%	100.0%	84.4%	90.6%
Median	A	A	A	A	A	A	A	A	A	A	A	A
Gini index	0.156	0.156	0.233	0.000	0.367	0.156	0.000	0.000	0.227	0.000	0.362	0.227
Min Gini	0.000											
Max Gini	0.849											
Gini Rating	AAA	AAA	AAA	AAA	AA	AAA	AAA	AAA	AAA	AAA	AA	AAA

Results - prioritisation



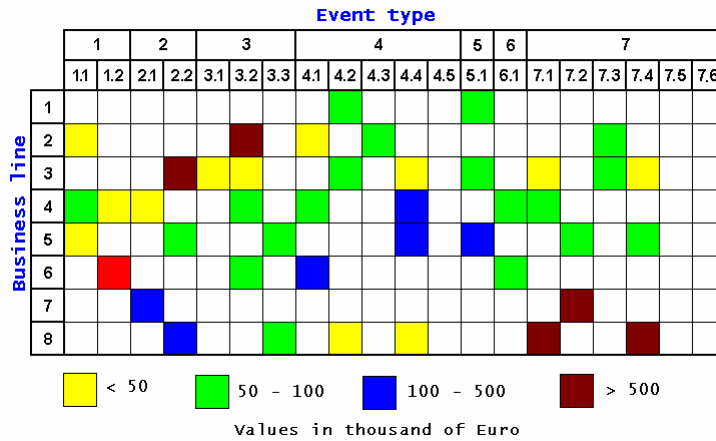
	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	163	discriminazione												
2	449	contabilizzando	AAA	AAA	AAA									
3	476	retribuzioni, maturità, questioni relative alla cessazione del rapporto di impiego	AAA	AAA	AAA									
4	175	retribuzioni dei dipendenti	AAA	AAA	AAA									
5	458	tutti i tipi di discriminazione	AAA	AAA	AA									
6	18	antitrust	AAA	AA	AAA									
7	448	manipolazione del mercato	AA	AAA	AAA									
8	464	inosservanza degli obblighi di trasparenza	AA	AAA	AAA									
9	473	perdite dovute a catastrofi naturali	AAA	AAA	AAA									
10	445	appropriazione indebita di fondi, sostituzione di persona	AA	AAA	A									
11	196	prassi di negoziazione o di mercato improprie	AA	AA	AA									
12	462	attività non autorizzate	AA	AA	AA									
13	454	attività sindacali	AA	AA	A									
14	469	perdite di vite umane dovute a cause esterne (terrorismo, vandalismi)	AA	AA	A									
15	305	corruzione, tangenti	A	AA	A									
16	423	sbassi dei costi da parte informatica	A	AA	A									
17	464	suffragazione di informazioni (perdita pecuniaria)	AA	A	A									
18	444	mancata consegna	B	BB	C									
19	373	uso di produzione impropria autorizzazione, contabile/contabile inadeguata	B	B	C									
20	464	errori di modello (inadeguata procedura di contabilizzazione del prodotto)	B	B	C									
21	432	mancata analisi dei bisogni del cliente	B	B	C									
22	434	distorsioni di modelli o sistemi	B	B	C									
23	475	accesso non autorizzato ai conti	B	B	C									
24	466	archivio clienti inaffidabile (perdita effettiva)	B	B	C									
25	474	mancata, errata o parziale esecuzione delle disposizioni della clientela	BB	BB	D									
26	454	operatività eccedente i limiti e le deleghe ricevuti approvati dal CAI	B	C	C									
27	429	debito, ripiena	B	BB	D									
28	426	mancato rispetto di scadenze o attribuzioni, omissioni di segnalazione previste	B	BB	D									
29	437	assenza di autorizzazioni o di mandati del cliente	B	BB	D									
30	436	finde, frode creditizia, depositi senza copertura	B	B	D									
31	429	appropriazione indebita	B	B	D									
32	444	negligenza nella gestione delle garanzie	B	B	D									
33	465	inesistenza o incompletezza della documentazione legale	B	B	D									

Results – VaR reporting



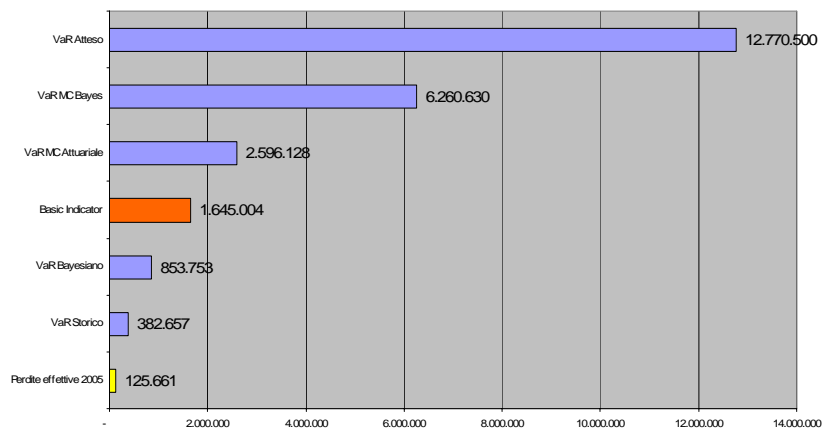
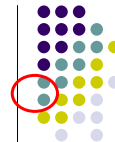
- Comparison between expected, observed and non parametric VaR distributions

Results - VaR reporting



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Results - Backtesting



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Merging data streams in operational risk management

Open issues and references



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Open issues



- a) Necessary to improve expert opinions: more reliable responses needed (cultural factor). For example, as the required VaR is at the 99,9% level, necessary to have different classes widths (especially in the tails).
- b) More work to calibrate different databases with each other (eg loss data collection, self-assessment, pooled data).
- c) Necessary to measure and model explicitly key risk indicators and control factors, and insert them in the model

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