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S pozdravom,
doc. Ing. Peter Szovics, PhD.
riaditeľ IBV NBS, n.o.

Tvorba opravných položiek v komerčných bankách v zmysle IFRS 9

V novembri 2009 vydala Rada pre Medzinárodné účtovné štandardy (International Accounting Standards Board – IASB) nový Medzinárodný štandard finančného vykazovania (International Financial Reporting Standard - IFRS) pre rozpoznávanie a meranie rizík finančných nástrojov IFRS 9 - Finančné nástroje. Zámerom vydania tohto štandardu bolo nahradenie IAS 39 - Finančné nástroje - účtovanie a oceňovanie.

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Novo vypracovaná regulácia v tejto oblasti navrhuje nové požiadavky pre meranie a vyhodnocovanie finančných aktív v oblasti tvorby opravných položiek na znehodnotených finančných nástrojoch. Pôvodne mal byť aplikovaný od 1. januára 2013, pričom aplikácia pred týmto dátumom bola povolená. V súčasnosti IASB posunula jeho platnosť od 1.1.2015.

Základnou požiadavkou štandardu IFRS 9 je dosiahnutie dlhodobej stability finančného sektora a bankových konsolidovaných celkov v Európskej únii aj v čase ekonomických cyklov. Základom fungovania stability finančného sektora bude transparentnosť, zodpovednosť v nadväznosti na zabezpečenie harmonizácie národných politík, ktoré budú organizované a regulované na medzinárodnej úrovni. Príkladom je aj v súčasnosti požiadavka Európskej centrálnej banky (ECB) na presun národných úsekov bankových dohľadov do ECB, aby požiadavky súvisiace s vykazovaním a meraním stanovených veličín boli nielen regulované z jedného centra, ale taktiež ich konsolidované výsledky boli vyhodnocované na jednom mieste a to najmä z toho dôvodu, že veľké bankové domy majú dcérske komerčné banky v rámci Európskej únie, čo vyžaduje pri ich komplexnom vyhodnocovaní využívanie jednotných zásad a princípov v nezávislosti od požiadaviek vyplývajúcich z národných politík.

Tak ako to vyžaduje štandard IAS 39 tak aj IFRS 9 vyžaduje, aby aktívne finančné nástroje komerčných bánk boli priebežne vyhodnocované v nadväznosti na posudzovanie všetkých typov rizík. S vyhodnocovaním rizík znehodnotených finančných nástrojov je úzko spätá potreba tvorby opravných položiek. Tvorba opravných položiek vyhodnocovaná podľa požiadaviek vyplývajúcich z medzinárodných účtovných štandardov (IAS) je v súčasnosti odlišná od požiadaviek tvorby vyplývajúcej z požiadaviek IFRS 9 a taktiež odlišná napríklad od požiadaviek vyplývajúcich zo smernice Basel III. V zmysle regulácie vyplývajúcej z požiadaviek IFRS 9 a Basel III bude nevyhnutné vytvárať opravné položky na očakávané straty, ktoré môžu spôsobovať cyklické výkyvy alebo pôsobenie finančnej krízy. V zmysle IAS 39 sú však opravné položky tvorené na objektívne skutočne zistené straty vyplývajúce z pôsobenia rizík. Takáto tvorba opravných položiek na znehodnotených finančných nástrojoch je odôvodnená stanoviskom, že tvorba opravných položiek na predpokladané straty, ktoré ešte nenastali nedáva preukazný a objektívny pohľad na finančnú situáciu komerčnej banky. Takto postavené požiadavky posudzovania rizík znehodnotených finančných nástrojov spôsobujú rozdiely pri vykazovaní vytvorených opravných položiek znehodnotených finančných nástrojov v bilancii komerčných bánk zostavených podľa IAS a tvorbou podľa požiadaviek pre vykazovanie kapitálovej primeranosti. Rozdiely sú vo výške ich tvorby. Podľa požiadaviek IFRS 9 sa vytvárajú predpoklady k zosúladieniu tvorby opravných položiek v zmysle požiadaviek medzinárodných štandardov pre finančné vykazovanie a ich tvorbou požadovanou v zmysle dokumentov Basel III pre bankové konsolidované celky.

V zmysle súčasných legislatívnych požiadaviek v SR na tvorbu opravných položiek na znehodnotených finančných nástrojoch, ktoré sú zakotvené najmä v zákone o účtovníctve, v IAS 34 „Vykazovanie v priebehu účtovného obdobia“ a v IAS 39, je nevyhnutné prezentovať investorom a klientom verný a pravdivý obraz o skutočnostiach, ktoré k určitému časovému obdobiu

nastali vo vykazujúcej komerčnej banke a o súčasnej finančnej situácii vykazovaného obdobia. Komerčné banky v SR na základe týchto požiadaviek a v zmysle IAS 34 a IAS 39 štvrťročne vytvárajú opravné položky na identifikované straty znehodnotených finančných nástrojov avšak nie je možné vytvárať opravné položky na očakávané straty, ktoré môžu spôsobovať cyklické výkyvy alebo pôsobenie finančnej krízy. V zmysle požiadaviek obozretného podnikania komerčných bánk, ktoré vyplývajú zo smernice Basel III, ktoré sú zakotvené vo výkaze o kapitálovej primeranosti sú požiadavky na tvorbu opravných položiek odlišné od požiadaviek ich tvorby podľa medzinárodných účtovných štandardov a preto komerčné banky sú povinné tieto opravné položky vykazovať v inej výške ako sú prezentované v bilancii. Kým požiadavky Basel III vychádzajú z pravdepodobnosti vzniku strát finančných nástrojov a potreby tvorby proticyklických opravných položiek, medzinárodné účtovné štandardy vyjadrujú požiadavku tvorby opravných položiek na identifikované straty z finančných nástrojov komerčnej banky, ktoré sú preukázané, objektívne posúdené a vyhodnotenú zohľadnením všetkých objektívnych skutočností, ktoré majú priamy vplyv na konkrétny finančný nástroj.

Vybrané finančné nástroje aktív nesú so sebou všetky typy rizík a už v čase ich vzniku možno z predchádzajúcich skúseností konštatovať, že dôjde k ich znehodnoteniu. Tvorba opravných položiek má priamy vplyv na výšku zisku vypočítaného podľa požiadaviek medzinárodných účtovných štandardov, ktorý je dosiahnutý v priebehu účtovného obdobia. Ak komerčné banky nemôžu v bilancii vykázať aj tvorbu opravných položiek na riziká finančných nástrojov vyplývajúcich z predpokladaných cyklických výkyvov, nie je možné vytvárať vankúše, ktoré by slúžili na zabezpečenie sa proti možnému riziku, čo môže komerčným bankám spôsobiť do budúcnosti problémy. ■



Keynes Animal Spirits In The Financial Markets

Is it time that 'Risk Management' should place greater focus on human emotions and their effect on financial decision-making?

Steven Goldstein

Executive Coach, Risk Reward

This article introduces some new concepts and ideas about human decision-making, and considers some implications for the financial market risk industry. It also looks at whether it needs to put into place changes in the way the financial risk management industry works and functions, in order to take greater account of aspects of human behaviour. Finally it looks at whether businesses can introduce improvements and enhancements to the way they work in order to prevent and mitigate risk, and to improve the quality of decision-making in the financial markets. In John Maynard Keynes's celebrated 1936 book, 'The General Theory of Employment, Interest and Money', he used the term "Animal spirits" to describe emotions which influence human behaviour. Now, almost eight decades later, new research is shedding further light on these 'animal spirits', and in particular, how they affect people's decisions in the financial markets. Some of these findings are leading to questions about some of the basic assumptions of how people think and act, and are also challenging long-held beliefs and tenets central to economic theory. Whilst this has some direct consequences for the field of financial risk management, it also provides new thinking and offers potential solutions, some of which may help to improve risk management practices and techniques moving forward.

The traditional view from classical economics sees people as rational, utility-maximizing actors; individuals who know what they want and are consistent, methodical, and emotionless in pursuing it. Consistent with this is the view of the human mind as a machine; working like a computer and

rationalizing all options through the use of people's cognitive powers, and the supremacy of intellect. These beliefs are cornerstones of modern economics, however, they are increasingly being challenged by the emerging fields of 'Behavioural Economics' and 'Neuroeconomics'. Backed by a growing body of research, they argue that humans have many limitations to behaving rationally, as well as using feelings and emotions extensively when making decisions. One study which highlights this, looked into the decision-making performance of a group of highly qualified and experienced judges. The study involved 1,112 cases of parole board hearings over a 10 month period. One would expect that judge's rulings are based solely on rational decisions and written laws; however the research revealed that the biggest influence in the outcomes was actually the time of day of the hearings. Prisoners who appeared before the judges early in the morning session, straight after the mid-morning break, or immediately after the lunch break, received parole in about 60-70 percent of the cases. But, as each time period progressed, the percentage of successful appeals for parole decreased, with those appearing late in each session receiving parole no more than 10-15 percent of the time. The research found nothing malicious or unusual about the judges' behaviour; rather it was due to something known as 'Decision-fatigue'. 'Decision-fatigue' occurs as more choices are made throughout the day; each subsequent decision becomes harder for people's brains as it draws down on energy in the form of glucose. In this case, no matter how rational and high-minded the judges tried to be, they were fighting their own human biology: The depletion of glucose to the judge's brains



changed the way their thinking processes worked. This led them to non consciously seek shortcuts which expended less energy; in most cases the shortcut involved 'decision-avoidance', which usually meant taking the default choice; to deny parole.

Further support arguing against the 'rational man' theory comes from neuroscience; increasing evidence is arguing for the primacy of emotions as a key part of decision-making. A study by neuroscientist Antonio Damasio, revealed how people who had received brain injuries which had resulted in a loss of ability to feel emotions, were incapable of making even the most basic of decisions; often spending hours deliberating over irrelevant details, such as where to eat lunch. The common belief is that the human mind uses purely cognitive process to reach logical conclusions, however as research into this field continues, these beliefs and existing theories of rational decision-making are being seen as increasingly implausible. Damasio has labelled the popular belief of the mind acting independent of the body, as 'Descartes' Error'.

Coming back to financial markets, I want to look at what some implications from these alternative beliefs may be for financial risk-management, and to see whether these insights may offer steps towards improvements in the way financial risk management works. Much of the focus of risk management in the financial markets is on quantifying and measuring financial risk. A whole architecture of financial models, process and practices has arisen around this. However, what if the basic underlying assumptions that underpin some of these models are incorrect? The concept of 'rational man', largely underscores the long-standing assumption that markets are random, and that deviation from true value in liquid markets will be arbitraged away by 'rational- man'. As a participant in the financial markets for many years I have always disputed this assertion. Markets are human constructs, driven by human perceptions, reactions and decisions, which are largely triggered by people's emotions. Keynes understood the way markets worked from a behavioural perspective. In what was called the 'Keynesian beauty contest', he said, 'you win not by picking the soundest investment, but by picking the investment that others, who are playing the same game, will soon bid up higher'. It may be a stretch to say that because people act emotionally rather than rationally, that therefore markets are not random. However, it is this emotional human behaviour which leads to trends, manias, panics and long-term distortion from value, which are NOT quickly arbitraged away by the mythical 'rational man'.

If markets are not-random, then this calls into question many of the risk-management models which themselves are based off this assumption, this is however further compounded by over-reliance on these models. The financial markets are obsessed with quantifying risk, yet even if these models are correct, they are merely tools which do not have predictive capabilities. Decisions around risk, should also involve subjective feeling and judgment based on expertise. Anurag Vaish of the 'Final Mile' consultancy, which specialises in finding risk solutions through neuroscience and behavioural economics, sums it up well: 'Risk is a feeling not a number; financial Institutions are highly number driven and continue to represent risk more

as numbers'.

A further aspect of research into human behaviour is the realisation that we are not as in charge of the choices we make as we like to think we are. Our emotions affect our non-conscious thinking, which has a far greater pull over our behaviour than we realise. It is this non-conscious thinking, in collaboration with other inherent and learned human biases, which lead seemingly rational and intelligent people to make poor choices. This could help explain the prevalence of major human financial errors within financial businesses, e.g. JP Morgan, UBS, SocGen, Amaranth, etc. - working on improving the monitoring of and quality of decision-making, is not merely a matter of risk-control and risk-mitigation, it is also a pro-active endeavour which can yield businesses a greater return on investment. Financial market businesses, via risk-management, could more closely monitor individual risk practices and behaviours. Steps could also be taken to deliver improved robustness and quality in individual, managerial and group decision-making. Input from risk practices in other industries may also provide potential solutions. For example, simple checklist practices have been put into place in industries as diverse as medicine and aviation, with profound effects on safety and quality. Also application of 'what-if-scenario' exercises in coordination with stress-testing (this is practiced in the disaster-recovery industry). Furthermore, businesses could look to redefine 'fit and proper' to move beyond meaning possessing 'honesty, integrity and reputation', to also include sufficiently qualified and educated in 'risk, products and markets'. A further step could be increased monitoring of individual behaviour using risk management systems together with subjective judgment; this could be done through highlighting specific individuals and particular risks for increased monitoring, possibly using a system of 'raised flags' for special attention.

Moving forward, it may take a break from past thinking to find solutions to some of the problems the industry faces. One interesting business which practices this is the 'Final Mile' consultancy; they call their work 'Behavioural Architecture' and they look for and design alternative solutions to existing risk-orientated problems. A good example of their work, which received widespread global coverage, involved an experiment on a stretch of the Mumbai Rail system, notorious for deaths from people crossing rail tracks. As a result of some innovative recommendations they made which accounted for human decision-making and behaviour, deaths from rail-tracks crossings on a 1-mile stretch of line, dropped from 23 in the previous six months, to just one in the next eight months. In the wake of the 'Global Financial Crisis', and subsequent strong political, regulatory and economic forces re-shaping the financial markets, the financial risk management industry is facing many challenges. Whilst it is unfair to apportion blame to the risk management industry for the financial disasters of recent years, it is right to question some of its assumptions and practices, and to find out whether things could have been done better, and how things can be improved going forward. As part of this process, it may help to step away from some of the beliefs of the past, and to see if new innovative solutions could be found and applied to take the industry forward. ■

Black Swans Mean Business

“This man, on one hand, believes that he knows something, while not knowing (anything). On the other hand, I – equally ignorant – do not believe (that I know anything).” Socrates in Plato’s The Apologies

Atula Abeysekera

Deputy Treasurer of thinktank, Bow Group

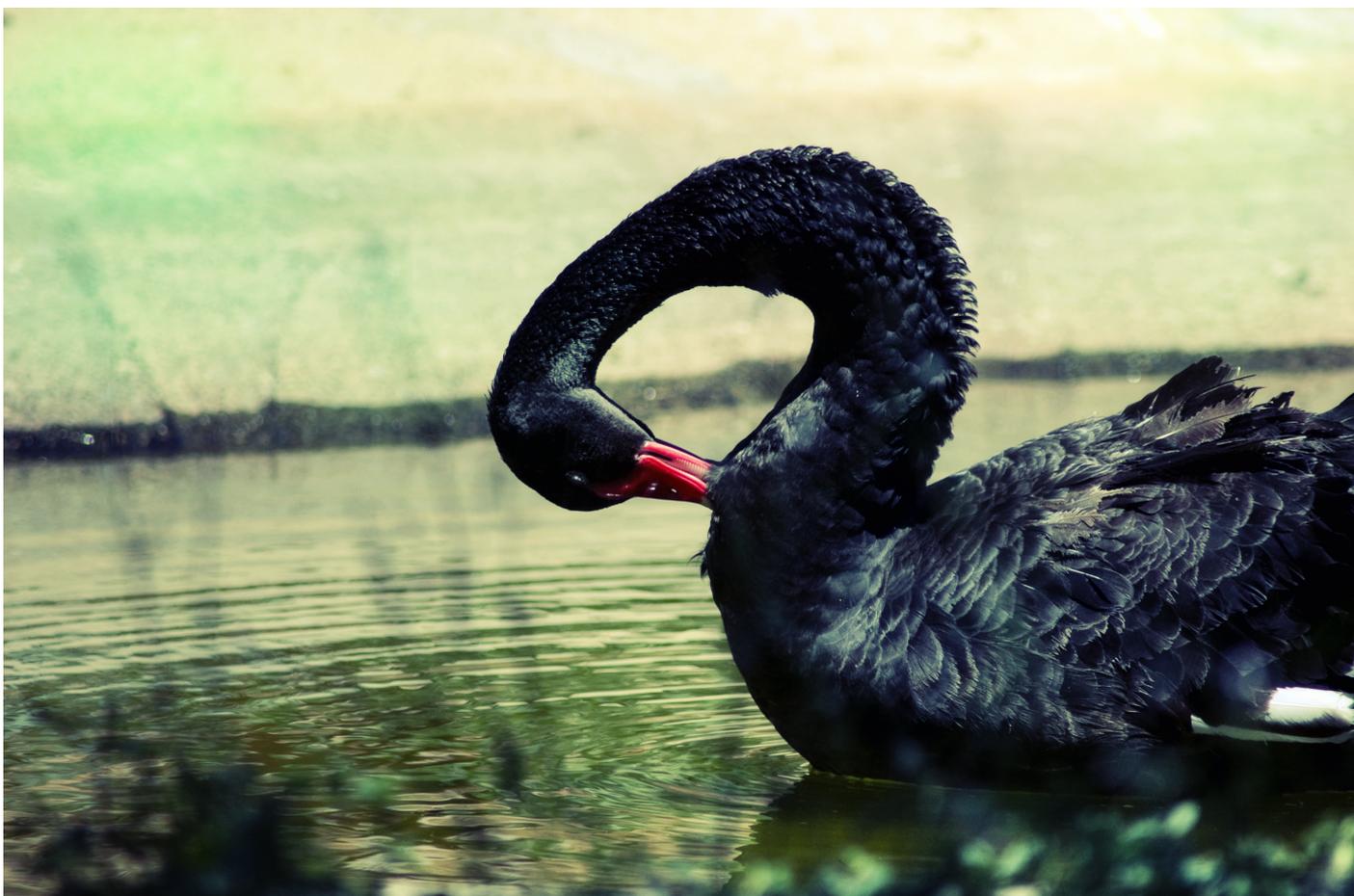
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Atula Abeysekera is a Chartered Accountant with 25 years corporate governance and risk management experience. He has held senior positions in internal audit and risk management at KPMG, Morgan Stanley, Fidelity Investments and Lazard. Atula is currently the Deputy Chairman of the Risk Forum Committee of the Chartered Institute of Securities and Investments and a member their disciplinary panel. He is a member of the think tank Bow Group Council and, in 2011, was awarded the Freedom of City of London. In this article he describes how government can better predict and manage national crises. Drawing on reforms to the way that businesses and, in particular, banks have reformed their risk management processes, the paper challenges the ways that the UK Government copes with so-called ‘Black Swan’ events.

The notion of Socratic ignorance has been a ideological theme for centuries. As the notion goes, the wise man is not he who thinks he knows everything, rather he who knows that he does not know everything.

Since ancient times, this idea has formed a common thread in philosophy. Its application to the fields of economics and politics has, however, been a more recent phenomenon. As recently as 2004, in his book *Foiled by Randomness*, Nassim Nicholas Taleb applied the idea to financial markets. He proposed that the notion that financial institutions can both fully know and fully quantify the risks associated with their businesses is a false wisdom, an arrogant oversight that has a value destructive effect on their business models.

When, in 2007, Taleb published his now famous book, *The Black Swan*, the notion was expanded beyond financial



markets into the seemingly unpredictable and devastating events, which impact not only economics but the security of the nation. These occurrences he called 'Black Swans'. Black Swans have now entered into the common parlance of big business, with risk managers busily deploying strategies to better predict and deal with the fall-out of Black Swans. The Boards of Directors of large enterprises are gradually realising not only that the risks to their business will never be fully quantified but also that, in this knowledge, they gain a competitive advantage by being better prepared than their competitors to deal with crises.

Institutions outside of the financial sphere are only just beginning to take note of Taleb's important theory. So as Business (and especially financial institutions) begins to acknowledge the necessity of understanding Black Swan events and incorporating them (as best they can) into their business models, the UK Government has started to lag in its thinking around Black Swan risk.

Given the obvious importance to the nation of preventing national disasters, or at least mitigating their impact, what lessons can the Government take from the world of Business to address these risks and to add value to the national security strategy?

This Bow Briefing describes the ways in which Business analyses and protects itself from Black Swan events. By looking in detail at recent examples of national and international crises and getting visibility on both their effect on the nation and how better risk strategies could have helped to mitigate their effects, we argue that the Government has much to learn. In doing so, we make several specific and achievable policy proposals, which we have set out on page 6. The Government should embrace modern qualitative and quantitative methods of risk management, as it is only with robust governance structures and cutting edge risk management solutions created by modern enterprise that the Government can begin to effectively cope with that elusive beast, the Black Swan.

II Black Swans

Sometimes, from seemingly harmless causes come harmful effects. When those effects make themselves known, it seems obvious what the cause of the effect was; that the effect was always going to happen. According to Taleb, a Black Swan Event has three key characteristics:

- it occurs outside projected expectations (a fat tail to a distribution curve)
- it carries extreme impact; and
- it seems explainable after the fact.

Consider the following recent examples of Black Swan events with respect to these underlying characteristics.

Urban unrest (2011)

An Outlier

The independent Riots Communities and Victims Panel (UK) estimated that around 15,000 people were actively involved in the riots, which spread through England in the Summer of 2011 at alarming speed. The Government showed no sign of having predicted the riots and, as expected, the panel concluded that the causes of the riots were complex and were

not about, or caused by, any single issue.

Extreme impact

Resources from several police forces were mobilised to deal with the crisis. Five people lost their lives and several businesses and homes were destroyed. The Riots Communities and Victims Panel estimated that the costs to the country was in the region of half a billion pounds. Given the major impact on police resources and the wider economic ramifications, few would argue that the impact of the riots was not extreme.

Explainable after the fact

The Riots Communities and Victims Panel's interim report looked at the August 2011 riots in the context of the English riots of 1981. The Panel noted that "it is thirty years since the publication of the Scarman report. The Panel is clear that the riots in August 2011 were very different disturbances to those in 1981. However, it is a sad fact that in some respects, the underlying challenges are strikingly similar".

Volcanic Ash Cloud (2010)

An Outlier

When a relatively small volcano, Eyjafjallajokull (let's call it 'E'), erupted in Iceland in April 2010, it ejected material as high as 20,000 feet. This event demonstrated the inherent uncertainties of volcano science. Although volcanoes are far more predictable than earthquakes, each volcano is unique, with each one having its own personality, and, as such, predicting the timing and scope of their eruptions is notoriously tricky.

Volcano scientists are empiricists, who rely primarily on past performance to predict future activity. However, when it came to it, their methods, which included measuring the regularity with which E had previously erupted proved futile. Whereas the Iceland volcano produced only a small eruption at first, it seems now that the cause of the second, more serious eruption was that a vent, previously unknown to the scientists had opened beneath a glacier on the volcano and the resulting 'soda pop' effect proved devastating. This phenomenon had previously not been observed.

Extreme impact

The eruption of E had a significant impact on the civil aviation industry, causing thousands of flights to be cancelled and the economic destruction that limited transport entails. The eruption also had an impact on the RAF, which had to temporarily suspend flight training after ash deposits were found in jet engines. Indeed, the gridlock produced by the cancellation of air travel was deemed sufficiently serious by the previous Government to require a meeting of COBR to be convened to discuss remedial measures.

Explainable after the fact

With hindsight, the scientific community felt that the impact of the eruption on airspace could have been predicted and better prepared for. Following the event, the UN, through the International Strategy for Disaster Reduction (UNISDR), urged European Governments to integrate volcano risk as part of their air travel policies and legislation. It is interesting that now UNISDR is now

working on greater coordination and interaction between decision makers and the scientific community to achieve meaningful results in this field.

III The Current UK Government Approach

The UK Government's civil and national security risk is currently managed by the following organs of government:

- in the case of managing domestic emergencies, The Civil Contingencies Secretariat ('CCS'), established in 2004 under the Civil Contingencies Act (its executive committee, the Civil Contingencies Committee ('CCC'));
- in the case of protecting the country's national security and other interests, the National Security Council ('NSC'), established in 2010; and
- to manage emergencies, both domestic and international, 'COBR (A)', or 'Cabinet Office Briefing Room (A)', which provides a forum for the CCC to meet and a focal point for the Government's response.

For a full description of these bodies, please take a look at our recent paper, Intelligence Design: UK National Security in a Changing World. We provide below, however, a brief summary of the roles of these bodies, with particular regard to their risk management capabilities.

Domestic Emergencies

In recent years, the UK Government has made a good start on firming up its risk management architecture. The Government was one of the first governments in the world to create a nation

nal risk register ('NRR') for domestic civil emergencies under the CCS. The NRR documents civil emergency risks over a 5-year time horizon including malicious risks (e.g., terrorism) and non-malicious risks (i.e., naturally occurring events and accidents). The National Risk Assessment ('NRA') for civil contingencies is assessed annually to ensure it reflects the latest evidence and draws upon the best available evidence and advice from subject matter experts. The CCS Preparedness and Response Team systematically and routinely scans the short-range horizon (generally up to six months ahead) for potential or emerging civil domestic risks within this timeframe. CCS has links to departments, their agencies and other public bodies which are responsible for monitoring and managing civil emergency-related information. These channels have ensured that CCS receives timely notification of impending events, such as events to include wide-area flooding, suspected animal disease outbreaks such as Foot and Mouth Disease, and human health threats such as the swine flu pandemic.

International Emergencies

The NSC has adopted the methodology used in the development of the National Risk Register. The methodology used involves thinking around the impact of an event (based on economic consequences, casualties and social or structural factors) and the likelihood of such an event occurring over a determined timeframe.

The National Security Risk Assessment ('NSRA') is reviewed every two years and uses similar concepts to the NRA



process described above. It involves making judgements about the relative impact of each risk, alongside an estimation of the likelihood of each risk. The NSRA process assesses all major disruptive risks to the UK's national interest, which are of sufficient scale or impact so as to require action from the Government.

Using 5 to 20 year horizon scanning, the NSRA identifies and analyses a full range of real and potential risks, giving the greatest weight to those with the ability to cause immediate and direct harm to the UK's territories. In general, a risk assessed as high likelihood and high-impact would also be considered as a high priority for action. Similarly, those risks judged to be low-impact and low-likelihood would be considered lower priorities.

The management of domestic risks is overseen by the Joint Committee of National Security Strategy ('JCNSS'), which is made up of 22 members (12 from the Commons and 10 from the Lords). This provides a forum to challenge conventional wisdom and to hold the organs of Government to account.

COBR(A)

The primary function of COBR is to coordinate the national response to both domestic and international emergencies. In addition, the Cabinet Office engages proactively with central and local Government and other partners in preparing for such events by developing and testing response plans. The COBR mechanism is triggered by emergencies which require sustained central Government coordination and support from a number of Departments and where appropriate, the devolved administrations.

Recent Performance

Complex interdependencies in modern societies make it more likely that emergencies will require a large degree of co-ordination across Government.

The Government has made a reasonable start on this. A good example of developments to civil contingencies planning is the extensive contingency measures drawn up by the Government to prepare for extreme flooding in England: 'Project Excessive Watermark'. This was undertaken following the Pitt review of the 2007 summer floods, a Black Swan event. The tests concluded that England and Wales has the capability to respond to severe, widespread flood emergencies.

On the other hand, the Government has not always been so proactive. Looking at the fuel protests of 2000 and 2012, the Government was completely underprepared for the former, and by the time the latter came along, only reactive measures had been taken by the Government, such as calling in the military, should the drivers of petrol tankers decide to stage a national strike. Ultimately the military was not required, and these preparations were time and resource consuming for COBR(A) and for Government Departments.

The lack of strategic focus resulted from a failure to be proactive and more robust architecture is needed to mitigate the effects of such occurrences. There is much to do, and the world of Business and, in particular, the experiences of the financial sector, offers some useful ideas, which could lead to meaningful progress in this area.

IV Business Approaches

Recent Black Swan events such as the Financial Crisis, the BP oil spill in the Gulf of Mexico and the abovementioned Tsunami in Japan have prompted businesses to plan for extreme events and look again at their risk architecture.

Complex businesses have often developed their own enterprise risk management frameworks to capture these emerging unknown risks. These frameworks employ forward-looking governance structures and quantitative techniques to assist in the decision-making process.

These organisations generally have good risk management practices for specific risks at 'business unit' level, but also have the ability to aggregate these risks across the entire organisation, sometimes applying correlation factors between risks.

There are formal and informal processes for escalating risks through the hierarchy of a business but they generally follow a "three lines of defence" approach, as described below:

- the 1st level of defence is the person who identifies the risk (whoever identifies the risk, is responsible for managing the risk);
- the 2nd level of defence is a separate risk management department, headed by a senior risk officer; and
- the 3rd level of defence is the Board of Directors (or appropriate governing body), supported by an independent audit function.

A risk crystallises if all three levels are breached.

The success of the three level defence system depends upon good management information systems, change management control procedures, strategic planning processes, and financial reporting conventions. In addition to this, most business organisations have an annual risk assessment review and material and emerging risks are subjected to extensive stress testing. Should a risk not be accounted for, a remediation plan will then be implemented to reduce the risk to the organisation.

The day-to-day analysis of risk varies in its nature across industries and jurisdictions. Some industries use probabilistic approaches such as planning for 1 in 200 year single or multiple events, while the others take a more qualitative approach. Some take a combination of both. The objective is to have the appropriate governance structure to identify these events, so that contingency plans can be initiated, if necessary, to mitigate the risk.

Most business organisations are aware of the dangers of 'group think' and they will actively seek expertise from outside the industry to formulate, or at least inform, their risk strategy promote this enterprise-wide risk management, most Boards are also aware of the importance of risk culture and the role it plays in identifying and escalating risks promptly through the chain of command.

These organisations generally have an experienced Chief Risk Officer who reports to a Board-level Risk Committee. The Risk Committee is generally made up of executive and non-executive directors, with an independent director as its Chairman. The external members, who come from various business disciplines, provide both independent external oversight and bring their own experience and expertise to bear. ■

Prehľad termínov realizácie vzdelávacích podujatí IBV NBS,n.o. 1/2013

Január

- 3.-4. 1. 2013 Kapitálová primeranosť
- 18. 1. 2013 Skúška sprostredkovateľov - SS
- 23. 1. 2013 Skúška sprostredkovateľov - VS
- 25. 1. 2013 Právo pre bankovú prax - 3. skupinová konzultácia
- 28. 1. 2013 Implementing & Embedding OIS Discounting Across the Business
- 29. 1. 2013 Back Office/Treasury Back Office

Február

- 4. 2. 2013 Bank Analysis Training Course
- 7. 2. 2013 Právo pre bankovú prax - 4. skupinová konzultácia
- 12. 2. 2013 Audit informačnej bezpečnosti
- 13. 2. 2013 Platobný styk - nové prvky a účastníci
- 13. 2. 2013 Skúška sprostredkovateľov - VS
- 14. 2. 2013 Stresové scenáre
- 20. 2. 2013 Skúška sprostredkovateľov - SS
- 25. -26. 2. 2013 OFV - ZS, SS, VS, - sektor Úvery
- 26. 2. 2013 Platobný styk I
- 27. -28. 2. 2013 OFV - ZS, SS, VS, - sektor PaZ

Marec

- 4. 3. 2013 Riadenie likvidity
- 5. 3. 2013 Funds Transfer Pricing
- 5. 3. 2013 Finančné riziká banky a ich riadenie v podmienkach Basel II -M1
- 7. 3. 2013 Školenie pre používateľov IS SEPA SIPS
- 7. 3. 2013 Skúška sprostredkovateľov -SS
- 8. 3. 2013 Ochrana osobných údajov pre banky a fin. inštitúcie
- 12. 3. 2013 SWIFT I
- 12. 3. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním
- 13. 3. 2013 Právo pre bankovú prax - 5. skupinová konzultácia
- 14. 3. 2013 Školenie ICM TARGET 2
- 14. 3. 2013 Hodnotenie kvality interného auditu
- 19. 3. 2013 Cenné papiere - domáce a zahraničné
- 20. 3. 2013 Bankové záruky a medzinárodné fin. podvody v oblasti bank. záruk
- 20. 3. 2013 Právo Európskej únie
- 21. 3. 2013 Skúška sprostredkovateľov -VS
- 25. -26. 3. 2013 Vybavovanie reklamácií a sťažností
- 26. 3. 2013 Finančné riziká banky a ich riadenie v podmienkach Basel II -M2
- 27. 3. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním

Apríl

- 1. 4. 2013 Model Risk /EN
- 2. 4. 2013 Finančné riziká banky a ich riadenie v podmienkach Basel II -M3
- 4. -5. 4. 2013 Kontroling vo finančných inštitúciách
- 8. 4. 2013 Aktuálne dokumenty Bazilejského výboru - roky 2012, 2013
- 9. 4. 2013 Riadenie business požiadaviek v IT
- 9. 4. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním
- 10. 4. 2013 Skúška sprostredkovateľov -VS

- 11. 4. 2013 Komponenty k finančnej analýze konsolid. účt. závierok IFRS
- 12. 4. 2013 Skúška sprostredkovateľov -SS
- 15. -18. 4. 2013 Analýza dlhopisov -oceňovanie a účtovanie
- 16. 4. 2013 ZP -pracovnoprávne minimum pre manažérov a generalistov
- 16. 4. 2013 OFV -ZS, SS, VS, -sektor Úvery
- 17. 4. 2013 Bazilej III
- 18. 4. 2013 Právo pre bankovú prax -Záverečná skúška
- 18. -19. 4. 2013 OFV -ZS, SS, VS, -sektor PaZ
- 22. -23. 4. 2013 Adaptácia nových pracovníkov v predajnom procese
- 23. 4. 2013 Finančné riziká banky a ich riadenie v podmienkach Basel II -M4
- 23. 4. 2013 SWIFT II
- 24. 4. 2013 Najnovšie trendy v podvodoch, reálne príkl. z praxe + opatrenia
- 30. 4. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním

Máj

- 6. -7. 5. 2013 Základy teórie portfólia
- 13. 5. 2013 Basel III -Advanced /EN
- 14. 5. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním
- 14. 5. 2013 Basel III v podobe smernice CRD IV
- 14. 5. 2013 SEPA -SEPA prevody a SEPA inkasá, SEPA end -date
- 15. 5. 2013 Boj proti podvodom vo finančnej sfére
- 16. 5. 2013 FATCA
- 17. 5. 2013 Skúška sprostredkovateľov -VS
- 22. 5. 2013 Skúška sprostredkovateľov -SS
- 23. -24. 5. 2013 Vymýhanie pohľ. podľa zákona o konkurze a reštrukturalizácii
- 27. -28. 5. 2013 Konsolidovaná účtovná závierka a zmeny v IFRS od 1.1.2013
- 27. -28. 5. 2013 Komunikácia s ťažkým zákazníkom -vedenie reklamácie
- 28. 5. 2013 Zákl. bank. a poisť. pre zamest. s neekonomickým vzdelaním
- 28. 5. 2013 Platobný styk II
- 30. 5. 2013 Školenie pre používateľov IS SEPA SIPS

Jún

- 4. 6. 2013 Medzinárodné štandardy finančného výkazníctva IFRS I
- 5. 6. 2013 Medzinárodné štandardy finančného výkazníctva IFRS II
- 5. 6. 2013 Školenie pre používateľov IS STATUS_DFT
- 5. -6. 6. 2013 Obozretná regulácia bánk v EÚ a Bazilej III
- 6. 6. 2013 Overovanie pravosti podpisu a elektronický podpis
- 10. 6. 2013 Platobné systémy v SR po zavedení eura
- 11. 6. 2013 Zákon o platobných službách -praktické využitie
- 12. 6. 2013 Právny systém Slovenskej Republiky
- 12. 6. 2013 Skúška sprostredkovateľov -VS
- 19. 6. 2013 Skúška sprostredkovateľov -SS
- 24. -25. 6. 2013 Predajná komunikácie vo finančnej oblasti
- 27. 6. 2013 Boj proti legalizácii a financovaniu terorizmu
- 27. 6. 2013 Konsolidovaná účtovná závierka a zmeny v IFRS od 1.1.2013

Júl

- 9. 7. 2013 Skúška sprostredkovateľov -VS
- 10. 7. 2013 Skúška sprostredkovateľov -SS