**HSBC Approach: RSAM + SNOW Hybrid Approval Flow for Country Data Access**

**🧩 Context:**

* **RSAM** is the primary **governance, risk, and compliance (GRC)** platform managing entitlements, user roles, access certification, etc.
* **ServiceNow (SNOW)** is used for broader **ITSM functions** like request management, approvals, fulfillment, and notifications.
* Country-level stakeholders (like Malaysia or India data owners) require oversight **before anyone can access their data**, even if it’s a global entitlement.

**🛠️ How the System Was Set Up:**

**1. Entitlement Requests Raised in RSAM**

* A user requests access to a *global role* (e.g., GlobalData\_ReadAccess).
* RSAM stores metadata on the entitlement like:
  + Countries/data domains it covers (e.g., India, MY)
  + Criticality level (e.g., PII, financial)
  + Default approvers (like global IAM team)

**2. Trigger a SNOW Approval Workflow If Entitlement Has Country Flag**

* RSAM evaluates metadata.
* If access includes a **“restricted country tag”** (like country=India), a **ServiceNow request ticket** is **auto-generated** using an API integration or webhook.

**Ticket metadata includes:**

* + Requester details
  + Entitlement name
  + Country affected
  + Purpose of access
  + Risk score

**3. Country-Specific Approval Group in ServiceNow**

* The ticket is routed to an **approval group configured in SNOW** (e.g., India\_Data\_Owners).
* These groups are **configurable via SNOW UI**, easier to maintain than hardcoding in RSAM.
* Approvers have SLAs (e.g., approve in 2 business days).
* Auto-reminders and escalation paths configured.

**4. Upon Approval, RSAM Is Updated**

* Once SNOW approval is completed:
  + SNOW sends a callback via API or webhook to RSAM.
  + RSAM logs the approval status, ticket ID, approver name.
  + Final approval completes and access is provisioned (or fulfilled through IGA tool like SailPoint).

**✅ Benefits of This Approach**

| **Benefit** | **Description** |
| --- | --- |
| 🪶 **Minimal RSAM Workflow Changes** | RSAM simply needs a “flag and forward” integration point. No deep workflow rewrites. |
| 📋 **Audit-Ready via SNOW** | ServiceNow ticket contains approver details, timestamps, comments — easily auditable. |
| 🔄 **Easy Approval Group Management** | Country-specific approver groups managed in SNOW UI — no redeployments required. |
| 🔐 **Access Scoped by Country Logic** | Only if access affects restricted regions does the external approval get triggered. |
| ⏱️ **Better SLA Monitoring** | SNOW workflows come with SLA tracking, escalation, and notifications. |

**⚠️ Challenges/Complexities**

| **Challenge** | **Notes** |
| --- | --- |
| 🔄 **Sync Delay Between Systems** | Approvals happening in SNOW need to sync back cleanly into RSAM to avoid mismatches. |
| 🧪 **Test Scenarios Across Systems** | Requires cross-system testing: RSAM → SNOW → RSAM handback. |
| 🔗 **Integration Maintenance** | Webhook or API setup must be versioned and securely authenticated. |
| 🔐 **Data Sensitivity Flow** | SNOW must not display sensitive data in clear text while routing approvals. |

**💡 How You Can Apply This in Your Firm**

| **Requirement** | **HSBC-style Solution** |
| --- | --- |
| Global entitlement touches India/MY data | RSAM flags these as “restricted\_country=TRUE” |
| Separate approval needed | RSAM triggers SNOW approval workflow |
| Don’t want RSAM workflow explosion | Offload dynamic approval logic to SNOW |
| Need to audit approvals | Leverage SNOW ticketing + RSAM integration |
| Country list may grow | Add approver groups in SNOW, not RSAM workflows |
| Timeline sensitive | Begin with “flag + SNOW ticket” MVP, expand later |

**🔧 Implementation Flow in Your Case**

pgsql

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[User Requests Global Access in RSAM]

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[Check: Does it impact India/MY?]

|

Yes / No Branch

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(If Yes)

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[Create SNOW Ticket with Metadata + Risk]

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[Country Data Owner Approves in SNOW]

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[SNOW Callback → RSAM Marks as Approved]

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[Final Approval + Provisioning]