

Risk & Control is Dead
Long live Risk & Control!



Quotes

Walled gardens are now obsolete

Don't have a hacker mindset

Too many regulations & often in conflict

Lack of transparency. Closed door discussions

New concepts require time to learn

It's a witch hunt

Risk communities keep arguing, slow resolution

Deferred decisions

Blame culture

Lots of stress

No process improvement

Product teams do not care about safety

Safety teams do not care about cost & quality

Lots of inefficiencies

Incentive to say NO to innovation

Us vs Them

Silo behaviour

No collective objective

Unable to innovate

Duplicative

BBC Home More ⌂

NEWS

Business

British Airways faces record £183m fine for data breach

⌚ 8 July 2019 [f](#) [w](#) [m](#) [t](#) [s](#)

BBC Home More ⌂

NEWS

Technology

UK watchdog plans to fine Marriott £99m

⌚ 9 July 2019 [f](#) [w](#) [m](#) [t](#) [s](#)

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NEWS

Technology

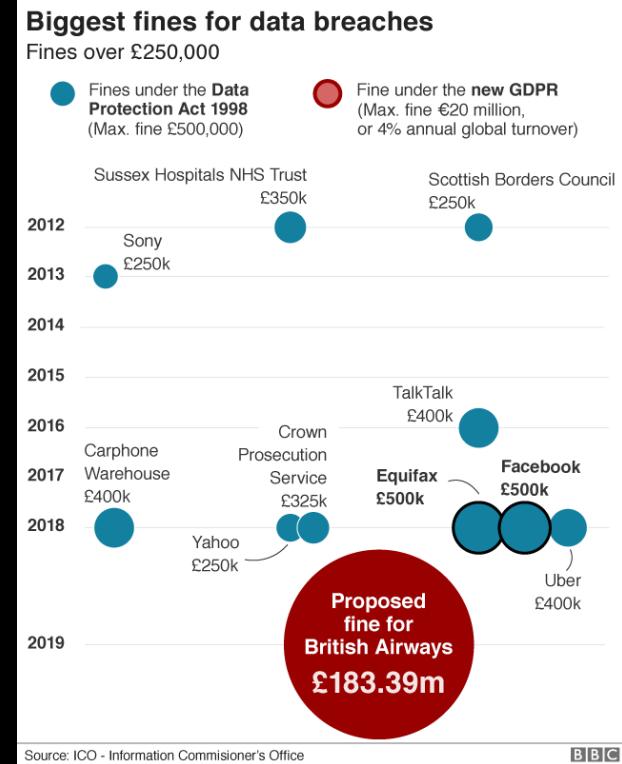
Equifax to pay up to \$700m to settle data breach

⌚ 22 July 2019 [f](#) [w](#) [m](#) [t](#) [s](#)

BBC NEWS ⌂

Capital One data breach: Arrest after details of 106m people stolen

⌚ 30 July 2019 US & Canada [m](#) [f](#) [t](#) [w](#)



NotPetya

\$10,000,000,000*

\$870m Merck

\$400m FedEx

\$300m Maersk

4 hospitals

6 power companies

2 airports

22 banks

300 companies

*source: White House

What are you optimising for?

Antipattern 1

Lack of safety within safety



Head of Regulatory Compliance
Global Enterprise, 2019

“It’s a witch hunt, there’s always someone to blame. ISO9000 says treat exceptions as learning experiences, it doesn’t happen”



Professor Sidney Dekker
DevOps Enterprise Summit 2017

“Inverse correlation between number of incidents reported, honesty, and things actually going wrong”

Is your Risk & Control culture keeping your organisation safe?

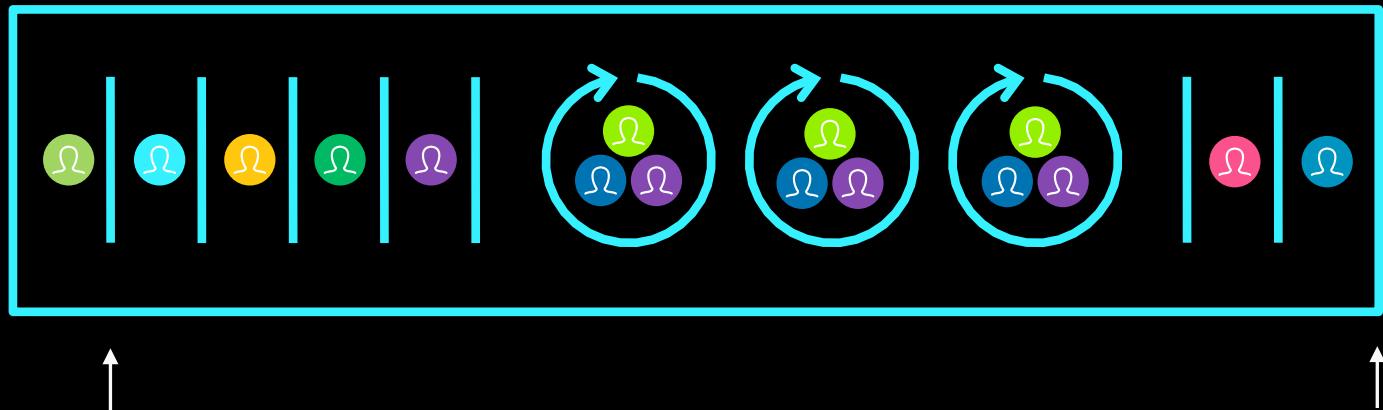
Safe to learn?

Bad news buried?

Safety within safety?

Antipattern 2

Role Silos



↑
Solution pre-determined (BUFD)
Risks pre-determined (BUFR)
At point least is known
Handoffs
Time slicing & context switching

↑
First learning
Risk back-loaded
Unplanned work
Big Bang

What are you optimising for?

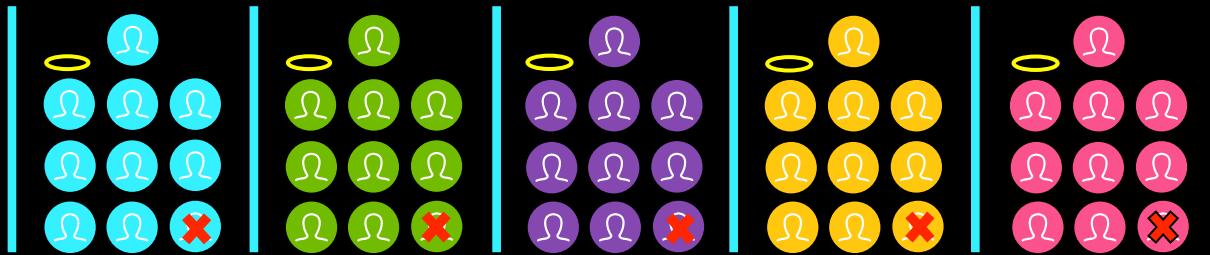
InfoSec

Data Privacy

Fraud

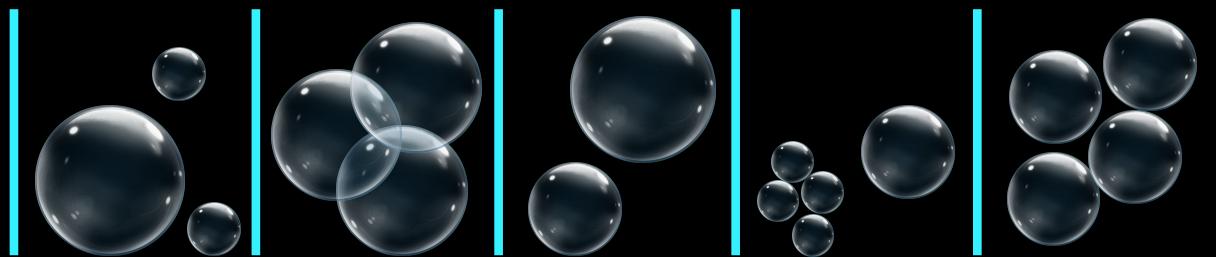
AML

...



What are you optimising for?

The Bubble Effect



What are you optimising for?

Antipattern 3

Fixed Mindset to Risk



#MaximumPossibleCompliance (#MPC)

“You need a perimeter to keep criminals out,
and you need to think wider.

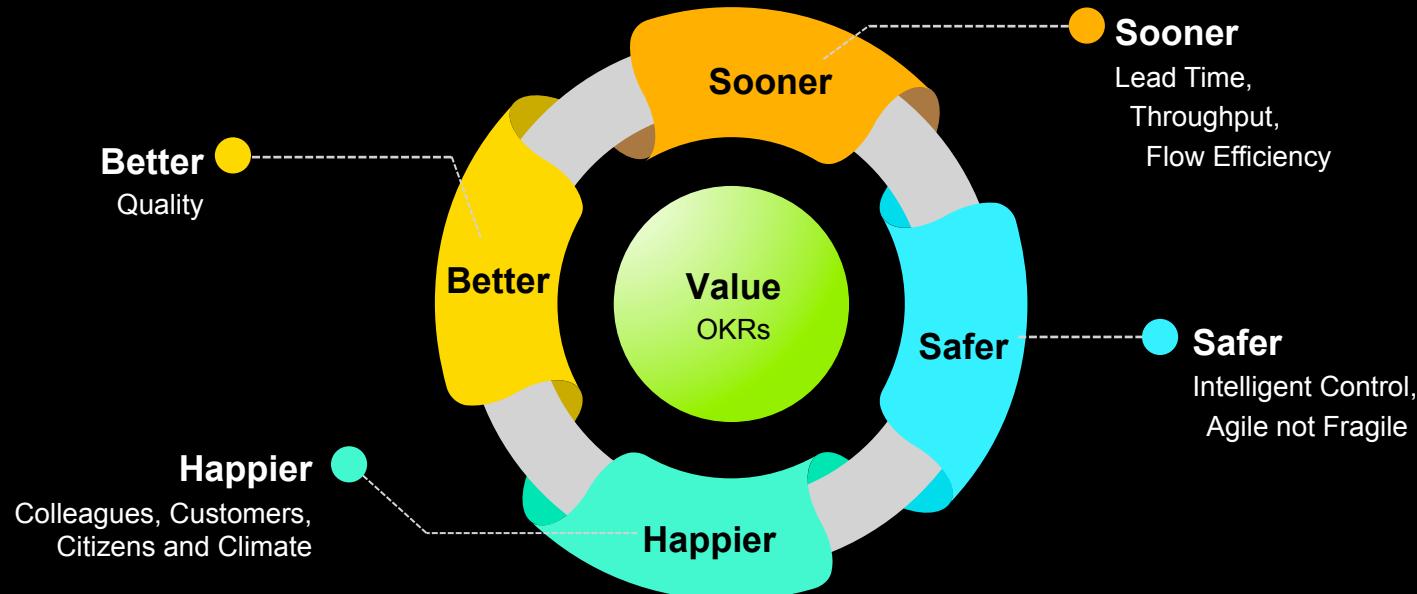
You have to assume that the increasing
number of state-level attacks are all going to be
100% successful.”

Adam Banks, CIO,
Maersk

Patterns

What do you *want* to optimise for?

Better Value Sooner Safer Happier



People ➔ Process ➔ Tooling

Pattern 1

People: Psychological Safety



Professor Sidney Dekker, DOES 2017

Factors in things that go wrong

Human errors

Guidelines not followed

Communication failures

Miscalculations

Procedural violations



Professor Sidney Dekker, DOES 2017

Factors in things that go right

- Human errors
- Guidelines not followed
- Communication failures
- Miscalculations
- Procedural violations



Professor Sidney Dekker, DOES 2017

“The difference between things going wrong and things not going wrong, is not in the absence of negatives, it is in the presence of positives”

Ability to say stop

Past success not taken as a guarantee

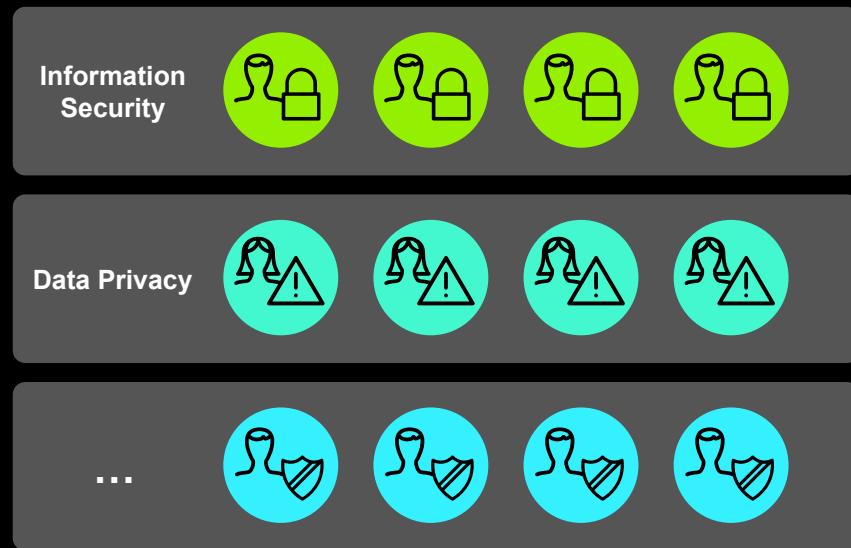
Diversity of opinion, dissent

Keep discussion on risk alive

Pattern 2

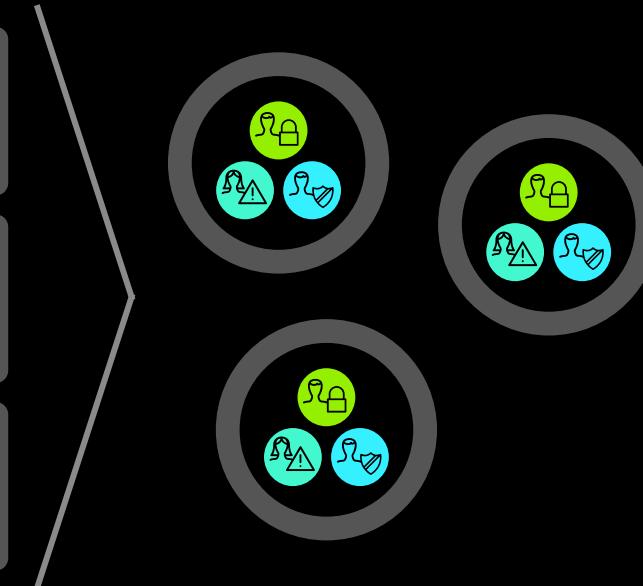
People: Safety Teams

From Role Silos



Siloed, temporal,
timesliced, context switching

To Safety Teams



Multidisciplinary, small, long-lived,
value stream aligned, safety teams

Pattern 3

People: Shared Purpose

Safety Team



Value Stream



Shared Purpose

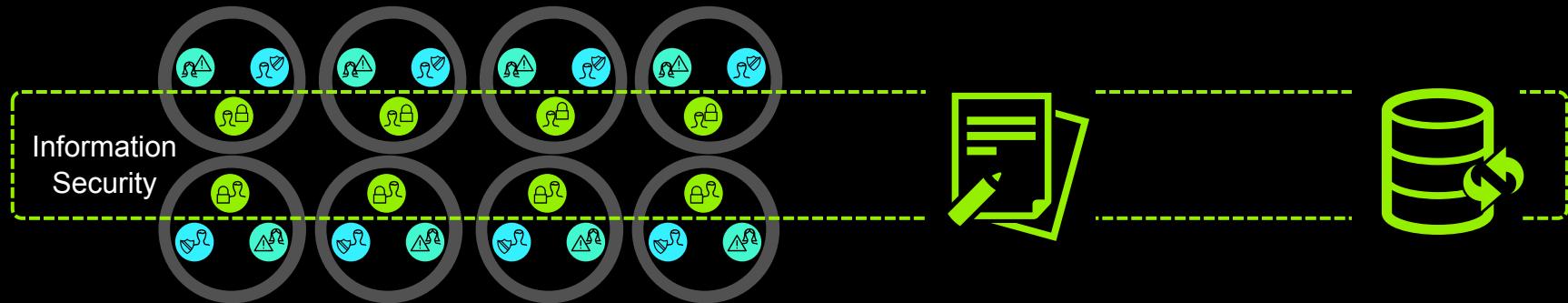
Shared Accountability

Customer aligned

Context sensitive

Optimised for learning

Safety Authorities



Mobilise Safety Teams
Servant Leadership
Community, Innovation
Foster a learning organisation

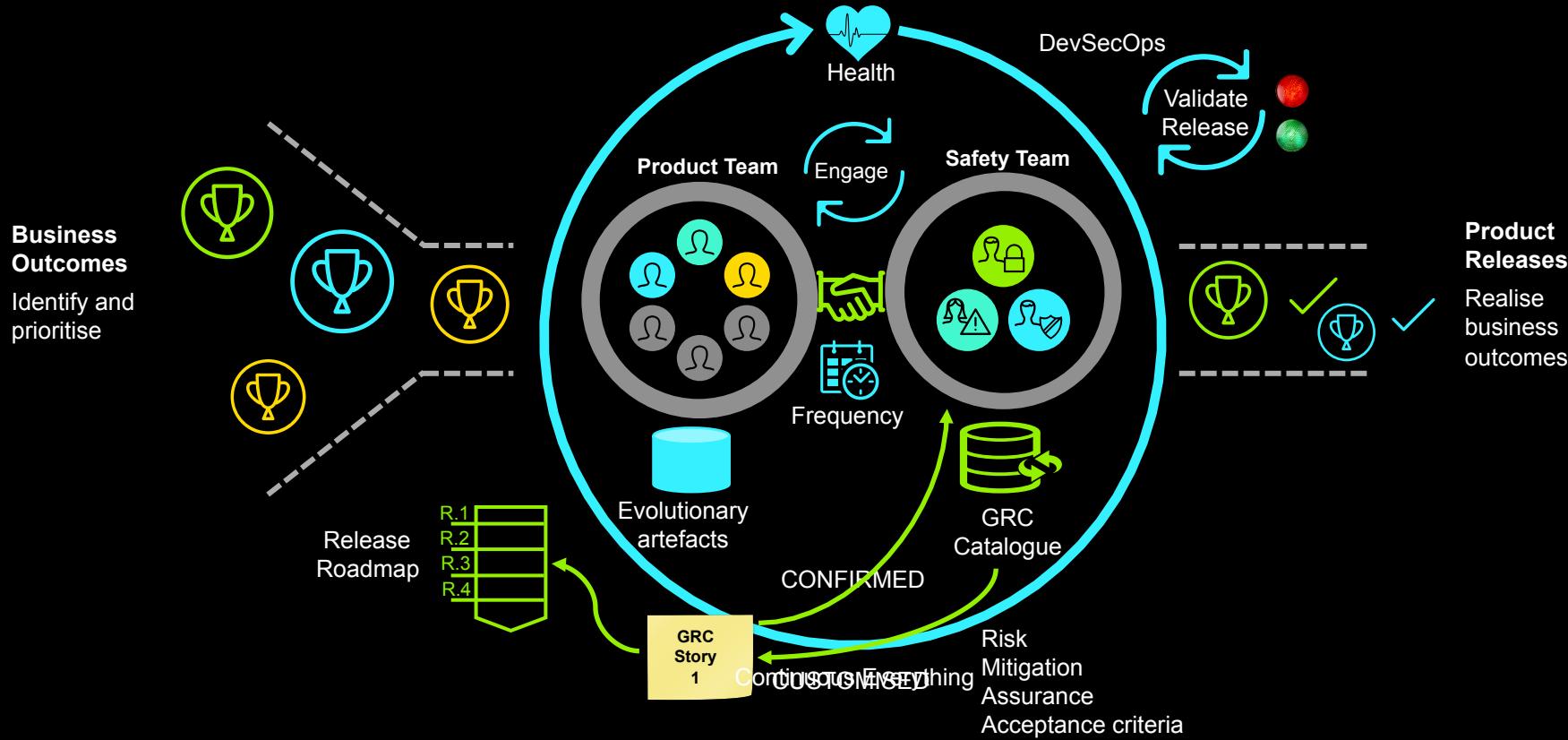
Policy & Standard
Risk Appetite
Specify solutions

GRG Catalogue

Pattern 4

Process: Intelligent Control

Intelligent Control



<Risk Story template here>

True Story



Research Team

We have a great opportunity for machine learning and want to import a 90TB dataset from a 3rd party vendor



Product Team



Our data and ours is in the cloud

Can we import from vendor's cloud account to our own?

Err... that's nuts. How about we press the button "Big Data Xfer" on our cloud control panel?

OK... how about we just do the scans ourselves in the cloud?

We will be disrupted! We can't compete!

Safety Team



The standard says use an approved method:

- encrypted physical disk (x90 disks)
- secure download to on-prem (3 months)

That button has not yet been security verified. Everyone is too busy. It will be at least 6 months

Our approved method for malware scanning is not available on the cloud

Hmm. This is ASCII data. How about we get to the whiteboard and work out an alternative set of mitigations?

Options 1..2..3..4..?

Great. We can code this in 2 weeks

....

We're done, please can you validate?

Risk Story

Confirm

Stop. No innovation. Fixed mindset.

OK. Our risk appetite requires us to ensure there is no network impact so perhaps we can find a new way to do this

Option 3 is best. Using massively parallel lambda scanning in an 'airlock' account we can verify 90TB in minutes not months

We have raised a risk story

Agreed this meets the pattern

We are the dream team !

Safety Differently

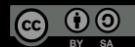
Intelligent Control enablers

Curiosity	over	Control	Psychological safety within safety
Participation	over	Prescription	Standards set risk appetite
Involvement	over	Instructions	Shared purpose & technical excellence
Diversity	over	Deference	Emergent mitigation & continual improvement

Source: Sidney Dekker, 2018

www.safetydifferently.com

<https://www.safetydifferently.com/i-am-not-a-policy-wonk/>



Pattern 5

Tooling: Install Traceability

From DevSecOps To

Sec Dev Sec Ops Sec

Portfolio
Outcomes



GRC
catalogue



Work
(e.g. JIRA)

Continuous
Integration

Security
scanning

Continuous
Deployment

SRE

Red Team



Intelligent Control layer



6 Things To Get Started

- ✓ Start small, learn fast
- ✓ Engage leaders
- ✓ Invite first value stream and first safety team (Rule of One)
- ✓ People: Focus on effective conversations
- ✓ Process: small safe-to-learn experiments
- ✓ Tooling: minimal viable tooling to start



Learn Fast
Stay Safe
Together

Thank you

deloitte.co.uk/BVSSH
medium.com/sooner-safer-happier



