
Mitigating the Growth of Fraud Risk in Banking

GARP Toronto Chapter

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Fraud Risk in Retail Banking

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Agenda

What is Fraud

Canada is Unique

Where we are

- History
- Chip and PIN
- Move from Detection to Prevention
- Social Network Analysis

Current Threats

Questions

What is Fraud?

Fraud is a **deception** deliberately practiced in order to secure unfair or unlawful gain . As a legal construct, fraud is both a civil wrong (i.e., a fraud victim may sue the fraud perpetrator to avoid the fraud and/or recover monetary compensation) and a criminal wrong (i.e., a fraud perpetrator may be prosecuted and imprisoned by governmental authorities). Defrauding people or organizations of money or valuables is the usual purpose of fraud, but it sometimes instead involves obtaining benefits without actually depriving anyone of money or valuables, such as obtaining a drivers license by way of false statements made in an application for the same

Canada is Unique

“Canada is a unique environment for fraud, we are fraud friendly

Rich social services

Privacy laws are strict

minimal deterrents”

– Craig Hannaford, Executive consultant Fraud Squad TV, Ex RCMP

History

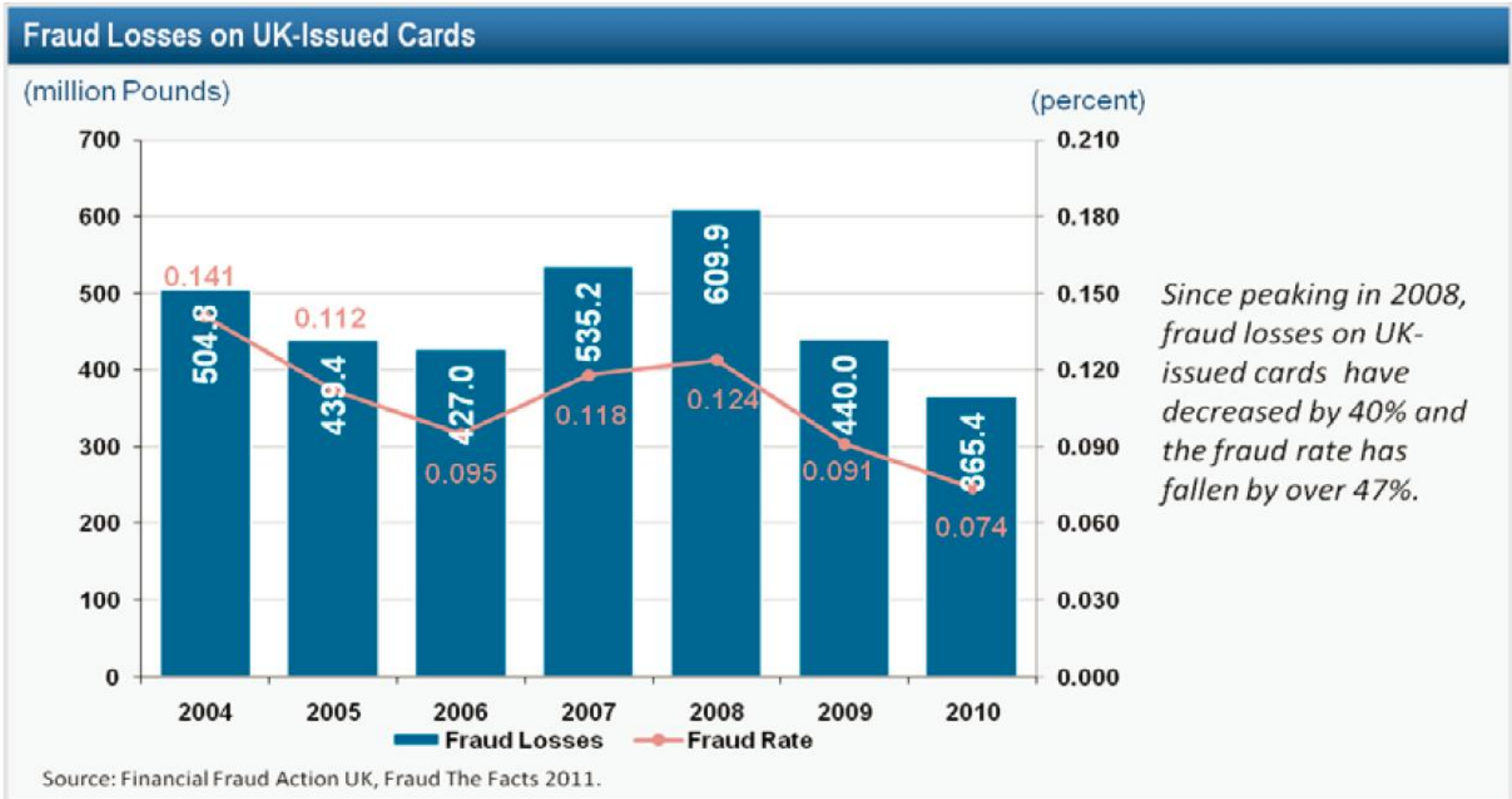
Automated detection born in the Credit Card space

- Real-time detection
- Analytics
- Large call centers to handle alerts
- Mature systems and process

Cheques still a problem

- Altered cheques
- Stolen

Chart 1: Fraud Losses on UK-Issued Cards



Chip and PIN continued...

- Lost and stolen down
- Counterfeit down
- Card not Present Up
- Cross boarder up
- 1st Party up (hidden in PCL)

Move from Detection to Prevention

1st Party Fraud

- Hidden in PCL
- Manipulated credit files
- Standard detection systems fall down (except bustout)
- Same fraudsters over and over again

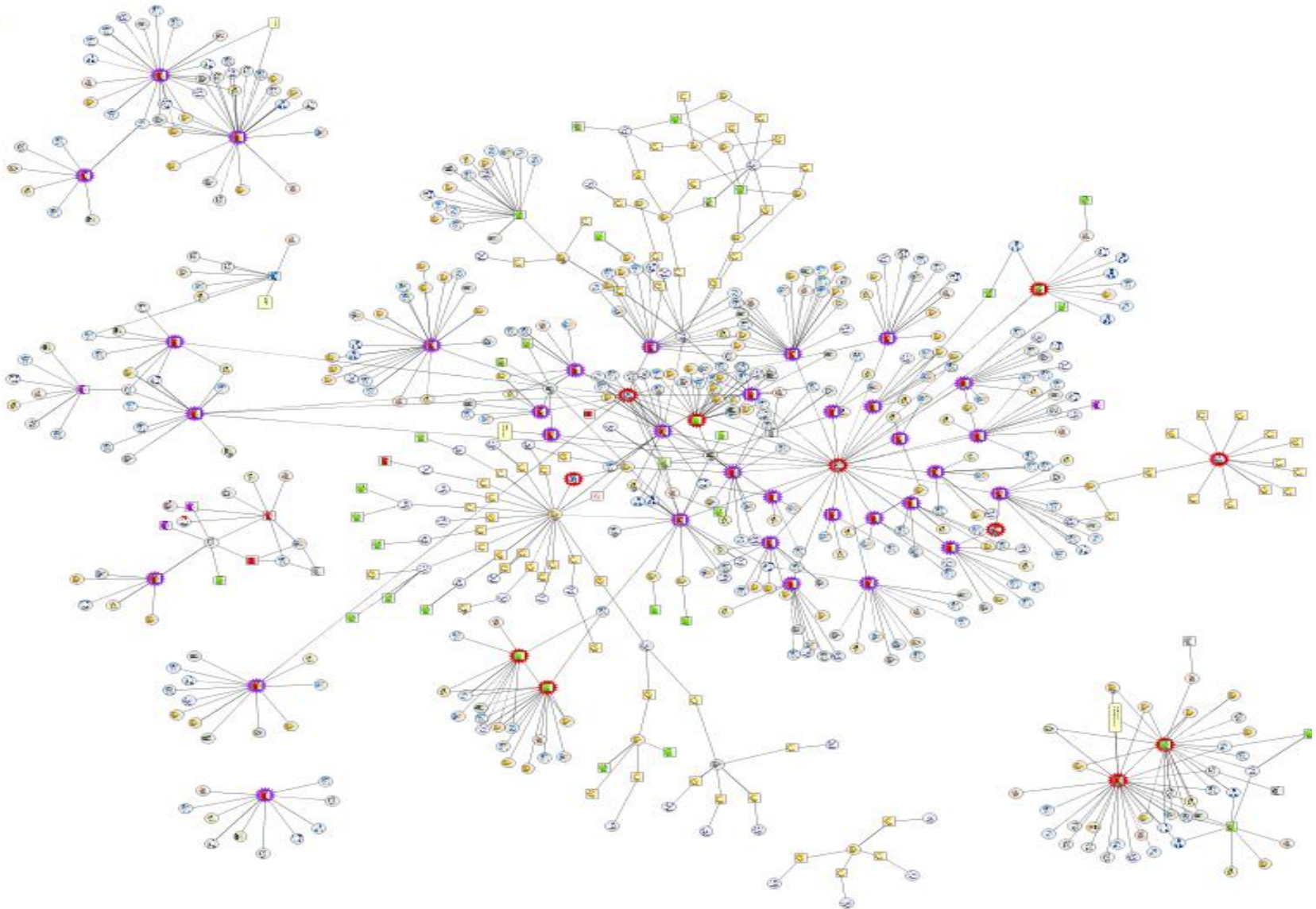
Requires consortium solution

- Citadel
- LinkView

Prevention

Social Network Analysis

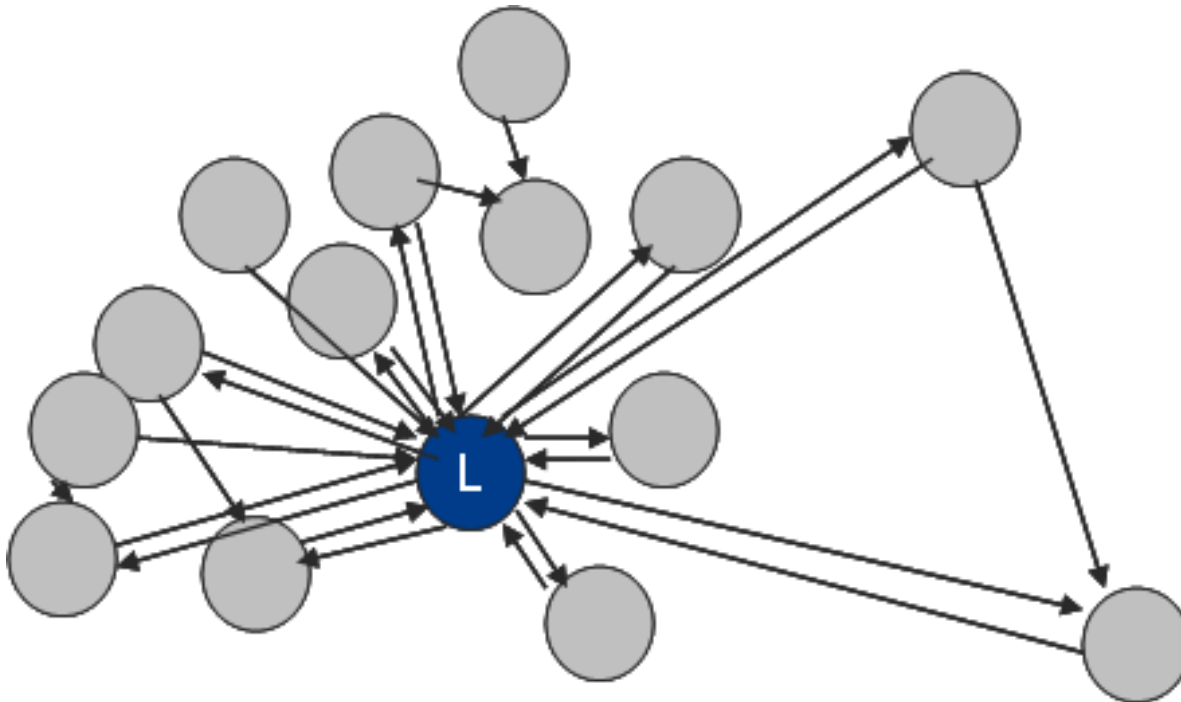
Social Network Analysis



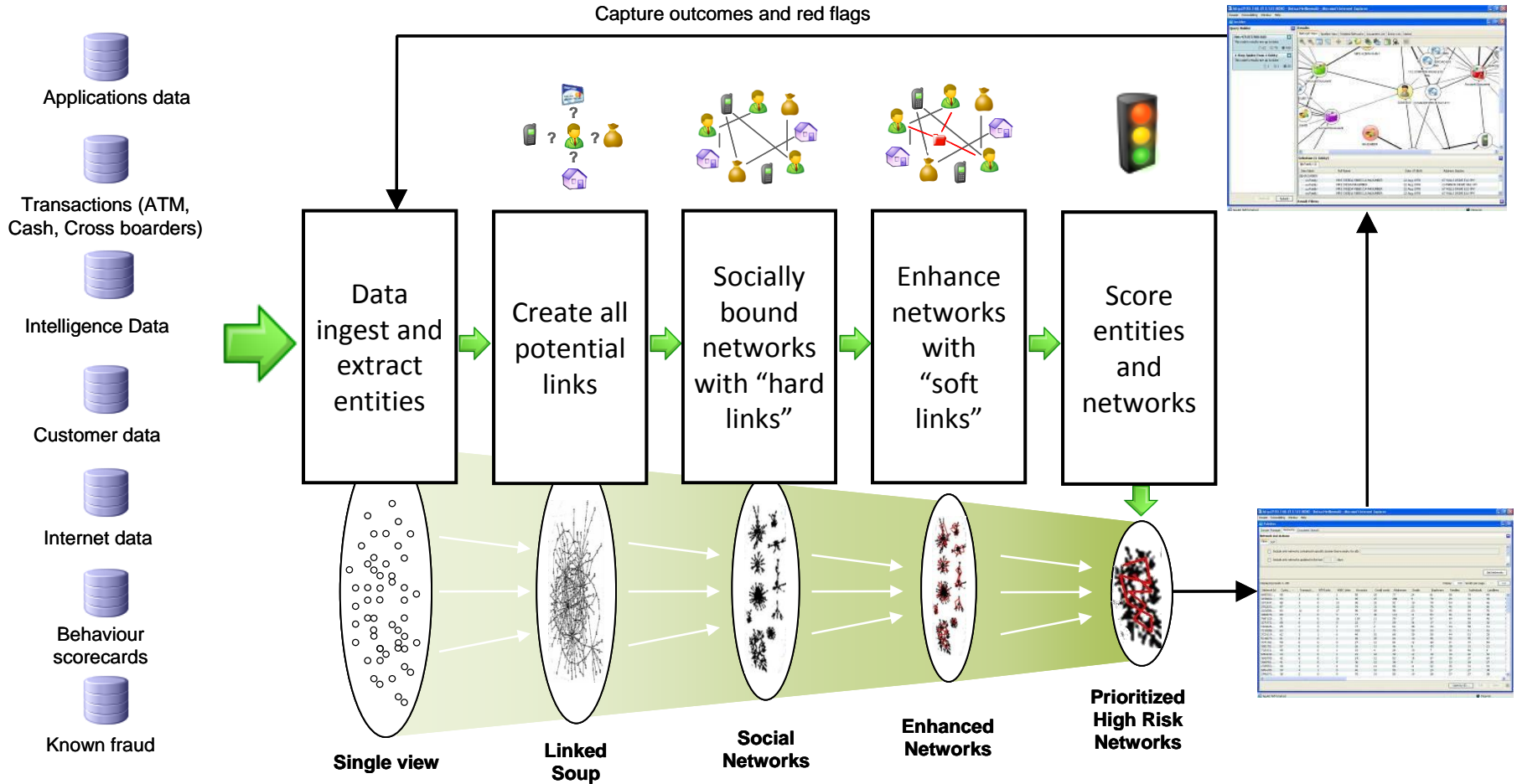
What is “Social Network Analysis” ?

Definition:

The practice of linking individuals and measuring the strength of their relationships



Network Build Approach



Current Threats

As new products and channels are developed to make it easier and faster for customers – faster and easier for criminals

Identity theft

- More elaborate
- Make and sell kits
- Must monitor new customers and changes to customer's profiles

Mobile Fraud

- Simulators
- They find the holes

Phishing, Phishing, Phishing

- Wealth Management
- Wires
- ACH

What keeps me awake at night

Fraud where bank is used as vehicle but no losses

Ponzi

- Court settlements
- Difficult to detect

Book Keeper Fraud

- Hits small business

Elderly Abuse

Fraud by Employees against clients

Wires



Fraud Risk in Capital Market

Maurits Bakker

Director FS Risk Consulting

PwC

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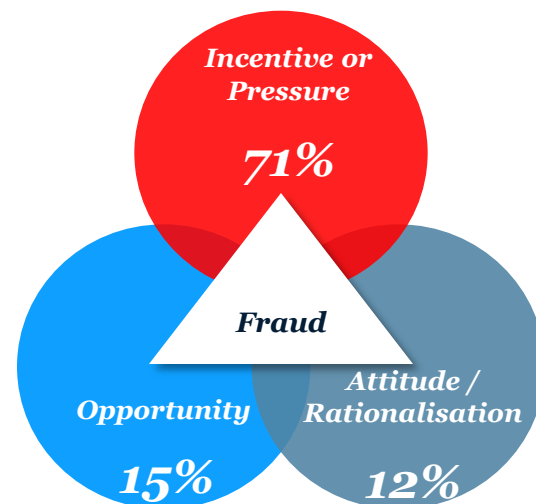
4 Industry trends

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6 Connecting the Dots

What is Fraud Risk in Capital Markets?

- Fraud Risk is the risk of someone defrauding the institution through an **intentional act committed to secure an unfair or unlawful gain**.
- Understanding fraud risk is about understanding who and why people commit fraud (the Fraud Triangle on the right illustrates 3 elements needed for someone to commit fraud).



Source: PwC Global economic survey

Who could be the perpetrator?

- Employee
- Customer
- 3rd Party Vendor
- Other External Party (e.g. market participant, cyber criminal)

What type of fraud could be perpetrated?

- | |
|------------------------------------|
| Asset misappropriation |
| Misrepresentation of information |
| Intentional mispricing |
| Unauthorized activities |
| Market manipulation |
| Misuse of confidential information |
| Bribery and corruption |
| Anti-trust |

Who are the victims of the perpetrated fraud?

- The Bank
- Customer
- External Parties

Fraud Example (1/3) Unauthorized Trading

UBS lost \$2.3 billion (2011) and Societe General lost \$7.2 billion (2008) due to “rogue traders”.



The traders found ways to conceal their positions or offset their P&L through fictitious trades, amending or cancelling trades, suppressing breaks in reconciliations and other means.



Fraud Example (2/3) Market Manipulation

The accusations on manipulation of LIBOR and other rate setting mechanisms (e.g.) have resulted in significant internal and regulatory investigations into market manipulation for the banking industry. In relation to LIBOR, a number of banks have received fines which total in excess of \$3.5 billion and there are still several banks under investigation.



Fraud Example (3/3)

Intentional Misselling

JPMorgan was fined a record fine of \$13 billion in 2013 for being accused of misleading investors during the housing crisis due to alleged misrepresentations.



Lessons Learned

What went wrong and what can we learn from it?



Industry Trends: Enhancement of Fraud Risk Capabilities

Banks have responded by developing tailored fraud strategies for their platforms and by strengthening their analytics capacity.

Examples of Fraud Risk Capabilities Developed

Most banks are in the process of developing a **fraud scheme inventory** to support assessing and mitigating fraud risks

Some banks are **partnering with control functions** to introduce a fraud lens to existing control frameworks

The majority of banks are developing **surveillance technology capabilities** by looking into “big data” vendor solutions

Certain banks are in the process of defining an **operating model** on how to **escalate alerts** with an appropriately defined workflow

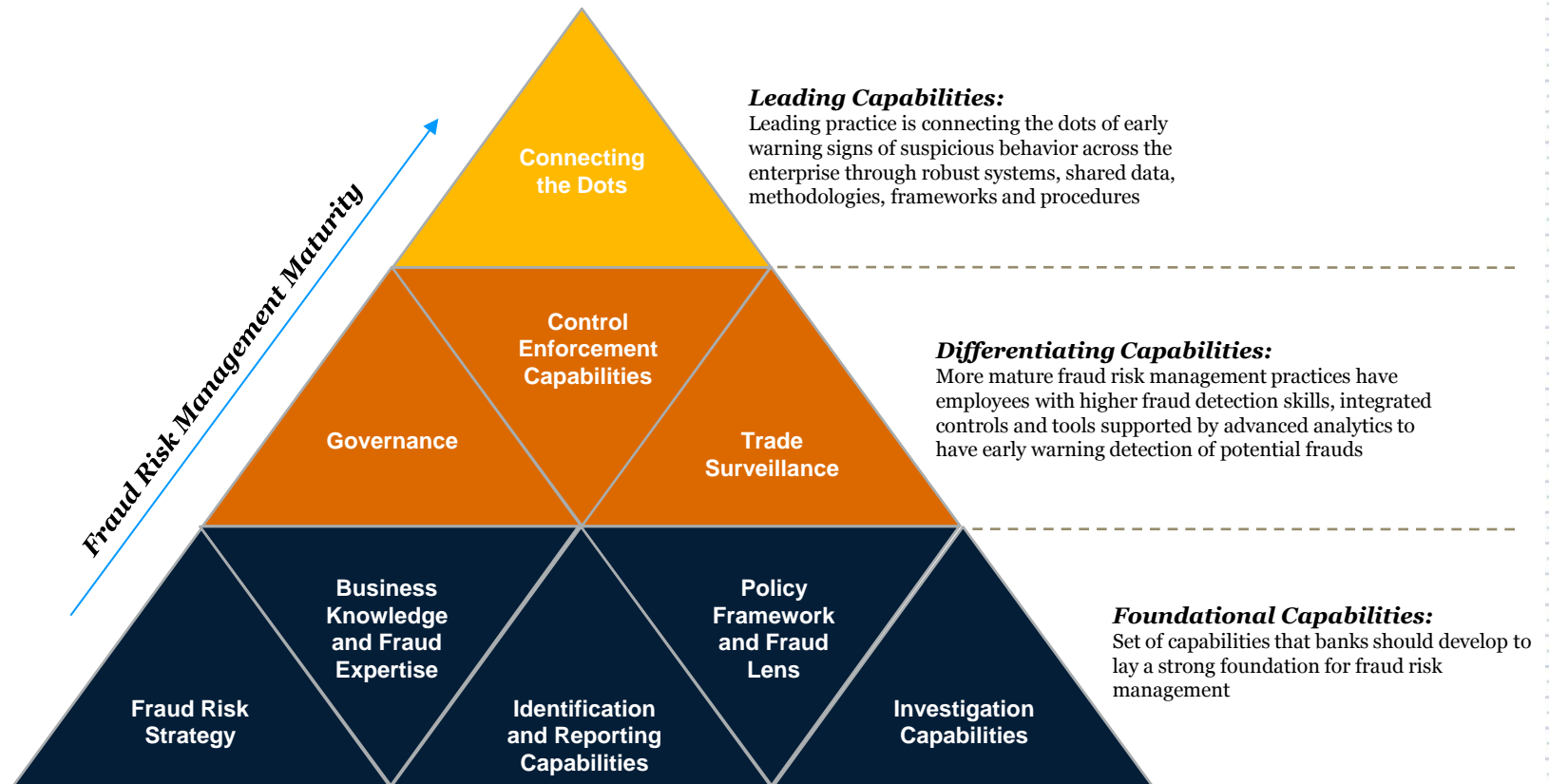
Some institutions have their investigations delivered by an **enterprise-wide shared service** while others have created dedicated **investigation teams**

Most banks are in the process of strengthening **front office supervisory controls** to develop a more robust unauthorized trading framework

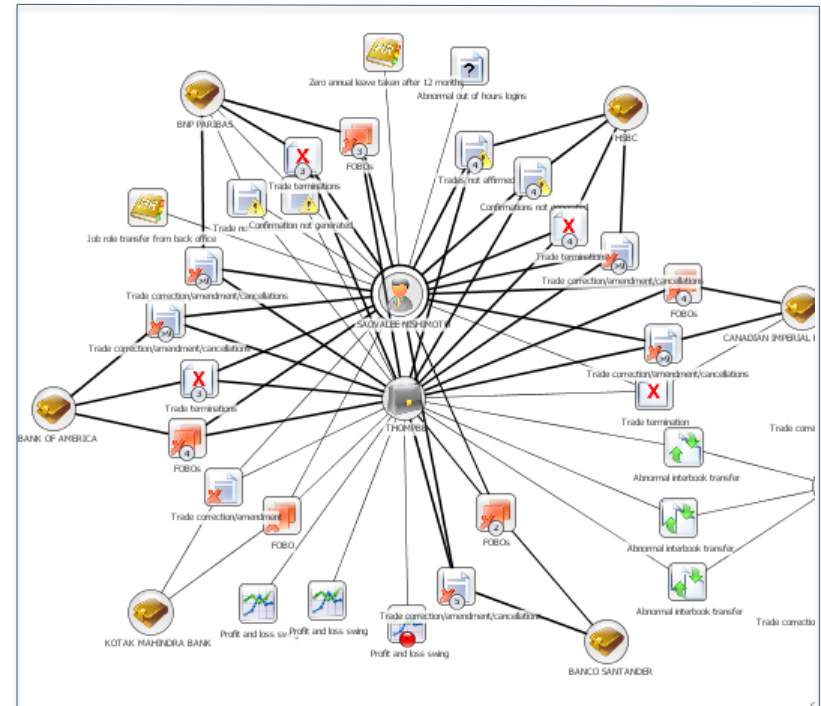
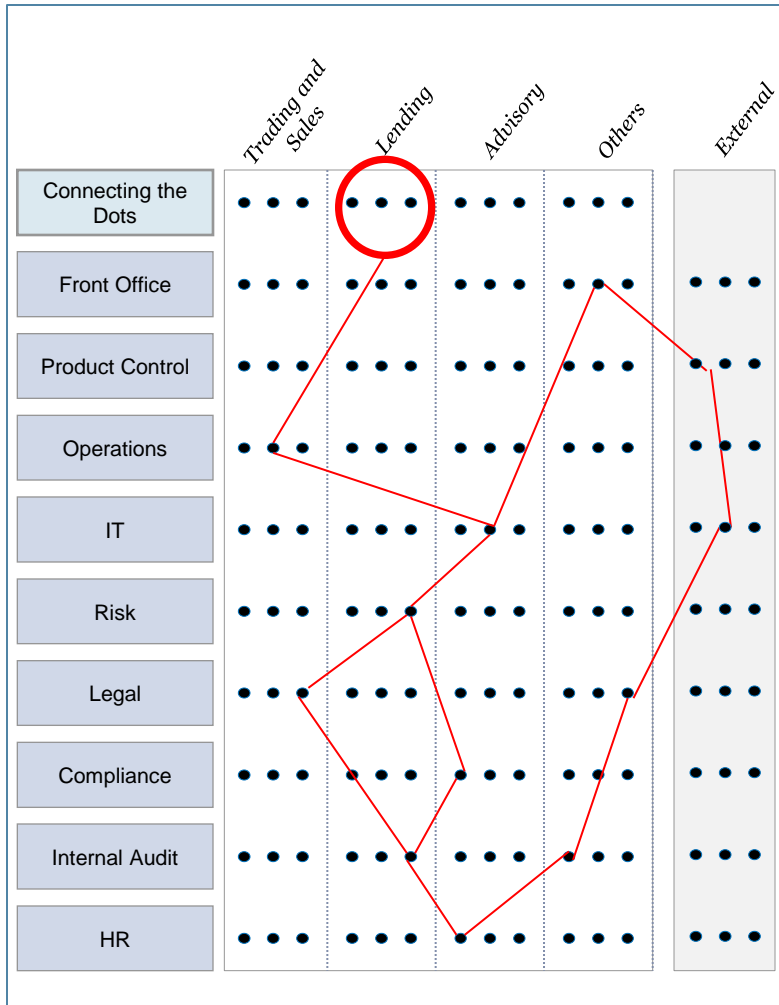
A Framework for Response

We have developed a structured framework to support the enhancement of an institutions' Fraud Risk Management Capabilities

Fraud Risk Management Capabilities and Maturity Framework



Connecting the Dots through Social Network Analysis Leading Capabilities





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Fraud Risk – Data Breach



John Russo
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Agenda

1. Today's Breach Facts and Figures...somebody get the Popcorn...Please!!!
2. Impacts and Costs of a Data Breach
3. True Fraud Victims in Canada (Equifax Canada Statistics) and Victim Assistance
4. What the Hack...we've been Breached!?!?!
5. Fraud Management Checklist and Criminal Creativity
6. Tri-partite Relationship between Consumers,
Data Custodians and Credit Bureaus
7. Contacts



Impact and Costs of a Data Breach

- **42%** of incidents involved a malicious/criminal attack
- Average cost of a breach **5.9M** or **\$201** per record

.4M Detection & Escalation

.6M Notification

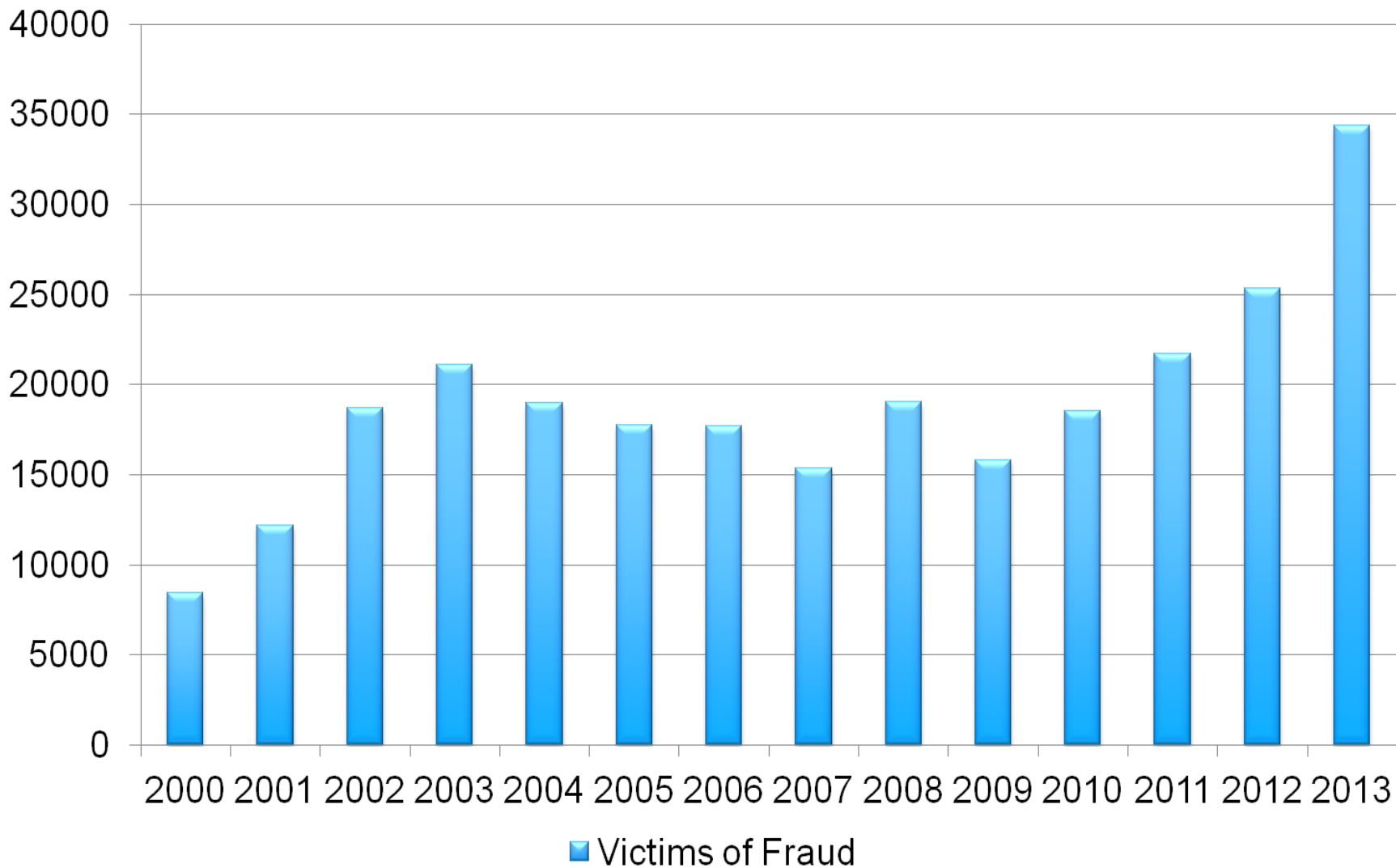
1.6M Post-breach services

3.2M Lost business

- More customers terminated their relationship with the company that had a Data Breach; the average abnormal churn rate increased by 15% between 2013 and 2014.
- A recent North American study by *Javelin Research* reports ONE in every THREE consumers affected by a Data Breach becomes a True Victim of Identity Theft - up from nearly ONE in FOUR in 2012.

The Ponemon Institute's "2014 Cost of Data Breach Study: Global Analysis"

Protected Consumers (True Fraud Victims as of Dec. 31, 2013)



Fraud Victim Assistance

Equifax Canada Handling Process:

- ✓ Confirm identification;
- ✓ Review content of file and alert credit grantor(s);
- ✓ Provide consumer with credit grantor information;
- ✓ Obtain consent to notify Canadian Anti-Fraud Centre (formerly *Phone Busters*);
- ✓ Place Fraud or Identity Alerts on consumer's credit file; or
- ✓ Assist in Credit Monitoring

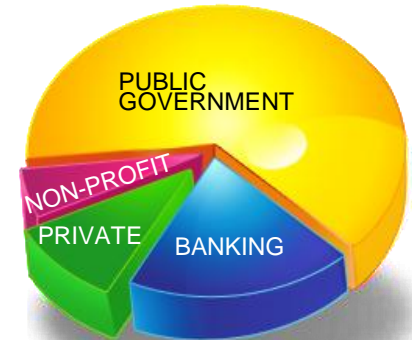


“What the Hack?!?!?!...we’ve been breached!!!”

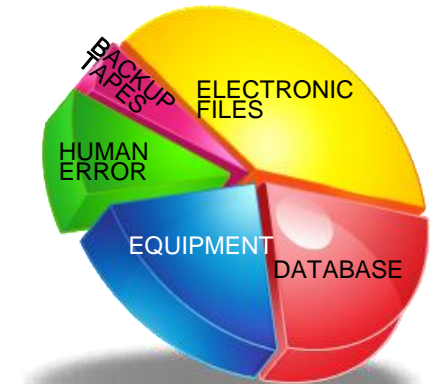
447 Reported Breaches & over 17M records exposed*



INSTITUTION BREACHED



SOURCE OF DATA BREACH



CANADA

Fraud Management Checklist for your Team in a Breach - Friendly World

Things to think about

- What are your fraud **prevention** capabilities & procedures?
- What are your fraud **detection** capabilities?
- Do you have strong fraud **management** policies?
- Do you have **tools** to investigate/analyze suspected fraud?
- How do you **track** your fraud losses? Are they **hiding** somewhere else?
- Do you have strong internal fraud **controls** & **monitoring**?
- Do you have a fraud prevention **education** program for your staff?



Criminal Creativity - Fraud Crimes - *What to look for on the Credit File*



Applications typically start with a 'no hit' scenario

Fraudsters use a variety of **online** credit applications to build the fictitious ID

Online credit file creation dates tend to be from **2002** to the **present** time

Their goal is to make it look like a **real ID** – spreading out inquiries over time

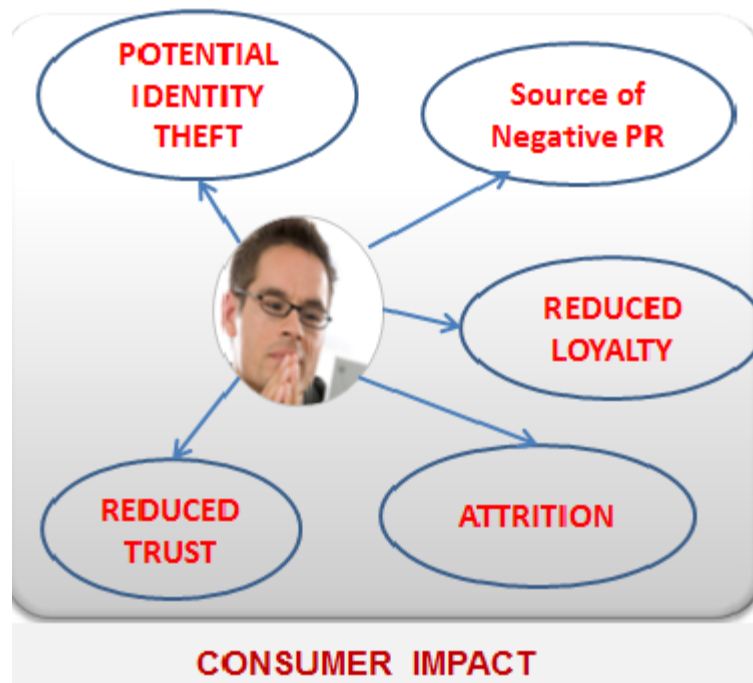
Fraudster maintains **good credit standing** on existing products

Files tend to have "**too much available credit**" (i.e., under-utilization)



The Consumer's Perspective: What are their pain points?

- When a cybercrime or data breach happens, the consumer is often, overwhelmed, concerned, confused and feeling powerless
- Consumer expects transparent communication, protection and resolution
- Educating and empowering the consumer will lessen the risk to the consumer and to your business
- In every data breach there is risk, but also **Opportunity**



The Data Custodian's Perspective

- Having a robust data breach plan in place that is quick to implement and reliable is essential to mitigating organizational impacts of cybercrimes or data breaches
- Implementing proactive self-regulation will help protect the consumer, mitigate business risks, and lessen the need for government regulation



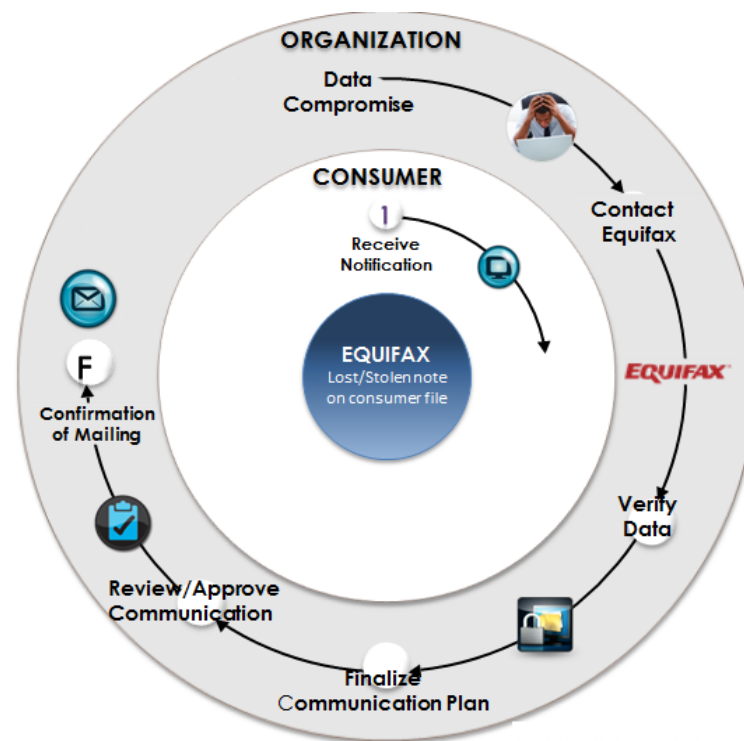
The Credit Bureau's Perspective:

Protect Consumer's valuable credit information

Promote fair consumer handling as a best practice; it's a "win-win" for all

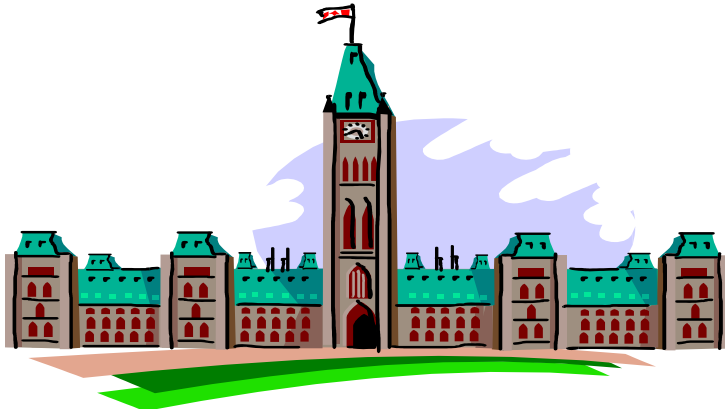
Consumer Support: empower, educate, assist and comfort

- Credit Alert Flags
- File Notations
- 24/7 Monitoring
- Identifying consumers at risk
- Consumer notification
- Reporting
- Incidence response checklists



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