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Operational Risk Management in Local Chinese Securities Companies

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With a history of less than 20 years, the operation and management of local Chinese securities companies is not yet mature. The fact remains that most of the risk lies within the companies' embezzlement of customers' funds or failure of supervising the behavior of their branches. Thus we have developed an operational risk management framework for local Chinese securities companies and a set of tools to manage their branches. This framework sets up procedures and instructions for establishing a controlled environment for the companies. The tools develop systems for collecting and monitoring information and evaluating and appraising branches accordingly. This framework and these tools have been implemented in the first IPO securities company of China and have achieved good results.

Introduction

China's securities markets embarked on a rapid track for developments when the Shanghai Stock Exchange and Shenzhen Stock Exchange were both established in late 1990. At present, China's securities market offers several types of financial instruments, including: A shares, B shares, T-bonds, corporate bonds, convertible bonds, investment funds, warrants and so on. By the end of 2006, some market data were presented as following¹:

1. There were 1,507 listed companies in China, out of which 1,398 companies issued A shares, the other 109 companies issued B shares.
2. There was an aggregate market capitalization of RMB 8, 940.4 billion², among

- which the capitalization for tradable stocks amounted to RMB 2, 500.3 billion,
3. In the year 2006, the turnover of stocks and funds reached RMB 9, 247.2 billion,
4. About 77 million securities investment accounts were opened; most of them are retail investors. The institutional players include securities companies, insurance companies, investment fund management companies, Qualified Foreign Institutional Investors (QFII), corporate annuities and China National Social Security Fund, etc.

As the important intermediaries in China's capital market, there are over 100 securities companies in China, most of which are local.¹ Based on the mechanism of category regulation of the China Securities Regulatory Commission (CSRC), 19 securities companies are classified as the innovation category companies; 30 securities companies are classified as the normative companies according to their net capital, business management and so on. In the meantime, about 40 securities companies were closed by the CSRC. One or more of the followings reasons explain their closures:

1. Embezzlement of customers' funds;
2. Embezzlement of customers' bonds by repurchasing;
3. Illegal operation, for example overdraft and issuing bonds without authorization.

The overall level of quality of the securities companies is important and determinant to the health and stable operation of the securities market and country's financial system. Therefore, operational risk management becomes important and necessary to every securi-



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¹ Source: <http://www.wind.com.cn>

² The ratio to GDP reached about 50 percent.

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ties company. It is important for us to develop a suitable framework to manage the risk of loss resulting from inadequate or failed systems, people and internal processes; and especially to prevent the companies and their branches from embezzling the customers' funds. We have developed a framework for local Chinese securities companies to manage their operational risk, which covers the organization, operation, monitoring and reporting in the securities companies. Some parts of the framework seem to be platitude; however, they are extremely important for the local Chinese securities companies.

The Chinese securities companies do not have a long history and the risk management in these companies has also just started. Some principles, which are supposed to be the general knowledge or guidelines in risk management have not been properly implemented or enforced in China's securities companies. Taking that into account, some of these contents are considered in our framework. It is possible for the securities companies to design and arrange and also evaluate their own operational risk management accordingly. This framework surely provides a reference for the regulators and any others who are interested in evaluating the risk management of China's securities companies.

Operational Risk Management Framework—Organization**1. Separation of Decision Making, Implementation and Supervision**

There should be an appropriate division of work and organization in the securities companies to guarantee that the decision making, implementation and supervision are separated.

2. Chinese Wall System

The decision making, information, staff and offices of the departments of broker-

age, asset management, proprietary trading and underwriting and sponsorship in each securities company should be separated to prevent insider trading and market manipulation.

3. Segregation of Duties between the Front Offices and Back Offices

The front offices should not take the duties of the back offices such as settlement and accounting. On the other hand, the back offices such as the department of settlement should not do trading with customers.

4. The Vertical Management of Branches

In China, securities companies generally own the 10 or more branches distributed in a broad range of the country. Every branch has its own staff and departments for business, finance and information & technology to support its operations. To prevent the failure of internal control, these three kinds of staff must be directly under the control of headquarters. The employment, assessment, salary and routine management of the staff must be determined independently by the three corresponding departments in the headquarters. Regular rotation, mandatory vocation and audit should be enforced. This organization arrangement is the base of the following reporting tool.

Operational Risk Management Framework—Operation**1. Accounts**

- (a) To ensure the reality and integrity of the information of customers' accounts.
- (b) To establish the one to one relationship between security account, capital

account and bank account to prevent the embezzlement of the customers' funds,

- (c) To set up the backup documents of the important customers at the headquarters instead of only leaving them in the branches.

2. Clearing, Settlement and Custody

- (a) To ensure the clearing and settlement departments are independent to trade units; to check up the clearing & settlement results with trading recordings.
- (b) To deposit more than 70 percent customers' funds in the headquarters instead of branches to prevent the embezzlement by the branches,
- (c) To set up a detailed record of bonds' ownership to prevent the repurchasing without customers' authorization.

3. Accounting

- (a) To make sure that the accounting is standardized and timely.
- (b) To check the customers' asset records with different sources every day.
- (c) To check the accounts with banks to against unilateralism record.

4. Trading

- (a) To make sure a completed procedure of the key business such as the opening of securities investment accounts and depositing,
- (b) To separate the conflicting authorization in the trading system; to make sure there is an approval process for special authorities.
- (c) To make sure that the change or upgrade of the trading system or system parameters are set up by headquarters.

Operational Risk Management Framework—Monitoring

The internal supervision organizations of a securities company should include the board of supervisors, the risk management committee under the board, the risk management department, the audit regulation department, the legal department and so on. We have also set up a Real-time Monitoring and Early-warning System (RMES) to monitor the large amounts or suspicious monetary or securities transactions and give proper warning. It is an important means to check the operation and misappropriation of customers' assets.

1. Data Sources Needed in the RMES

- (a) Trading System
- (b) Accounting System
- (c) Banking System
- (d) Clearing & Settlement System

The purpose of acquiring the data from different sources is to maintain a system of checks and balances. In addition, a series of monitoring indicators from these sources can detect the abnormal behaviors to determine suspicious operations.

2. Tools in RMES:

- (a) Real-time Monitoring and Early Warning
To monitor each securities transaction and the deposit of funds; to compare them with a pre-determined threshold value; to give early warning information;
- (b) Account Management
To check the legitimacy and completeness of customers' accounts; to check one-to-one relationship between the customer security account, capital account, and bank account; to check whether the trading fee is abnormal;

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(c) Special Operations Watching

To check whether there are special business operations and abnormal behaviors, such as overdraft, record correcting, manual deposit of securities and abnormal bank stock transferring.

(d) Bond Repurchase Check

To check whether there is any bond repurchase without customers' authorization.

(e) Fund Balance Check

To check in the trading system, the financial system, the settlement system and the banking system whether the funds' records meets the balance equation.

(f) Inquiries Function

To meet the demand of inquiries of customer information, transaction history and other information on bank accounts.

Operational Risk Management framework—Reporting

Each business line in a securities company has its own reporting systems. To further guard against risk in particular in cases where branches are out of rule, we have designed a reporting tool to strengthen internal control in the branches. We try to prevent the misappropriation of customer assets with this tool. This reporting tool includes what to report, who should report and reporting process.

1. What to Report

The contents of the report are set by the department of risk management in the headquarters of the securities company. The contents of the report are mainly the abnormal operations, such as the withdrawal of too large an amount of funds or other adjustments;

2. Who Should Report

The manager and staff from the departments of business, finance, information and technology in the branches should all sign the report to confirm the accuracy and integrity of the contents of the report.

3. Reporting Process

Daily, branches should report business status of the previous day. Staff in the department of risk management should check the accuracy and completeness using the RMES. For abnormal conditions, they should follow a tracking and follow-up process.

Due to the vertical management of these organizations mentioned above, staff can be mutually supervised. The reporting tool will help to reinforce the internal control, and to improve the operation of the staff (any operational or procedural error must be reflected in the report and seen by the manager related). In this way, the operational risk of the branches can be reduced.

Conclusion

In this article, we present a framework for China's local securities companies to improve their operational risk management, which includes organization, operation, monitoring and reporting. We have also developed a series of tools in monitoring and reporting that support this. It may be a source of reference to formulate system and process standards and can be adjusted according to actual situations for all securities companies to establish their own operational risk management systems. Some parts of our framework and tools are adopted by the supervision institution used to judge whether a securities company can be classified as an innovation category or other one. It has also been implemented and has proven to be effective in CITIC Securities Co. Ltd., the only securities company listed in China up to now. ♦