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**Lunchtime Seminar:**  
**6 December 2022**



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# Empirical Risk Management



Rohan Light



# Rohan's Risk Empirical



- 1. My take on decision risk**
- 2. Some outputs from current fieldwork**
- 3. The Flaw of Averages**
- 4. Hacking Monte Carlo**
- 5. Some causal risk diagrams**
- 6. Some AI risk stuff**



## empirical (adj.)

1560s, originally in medicine, "pertaining to or derived from experience or **experiments**," from Latin empiricus (n.) "a physician guided by experience," from Greek empeirikos "experienced," from empeiria "experience; **practice without knowledge**," especially in medicine, from empeiros "experienced (in a thing), **proven by use**," from assimilated form of en "in" (see en- (2)) + peira "trial, experiment,"





**Governance Risk & Compliance Professional**  
(primary risk credential)

**Certified Auditor - UK GDPR** (AI risk, specialism)

**Re-identification Risk Lead** (data risk)

**Manager Insight and Analytics** (client  
service-delivery decision risk)

**Portfolio Risk Specialist**, Inland Revenue  
(enterprise investment risk)

**Senior Risk Advisor**, Inland Revenue  
(enterprise compliance risk)

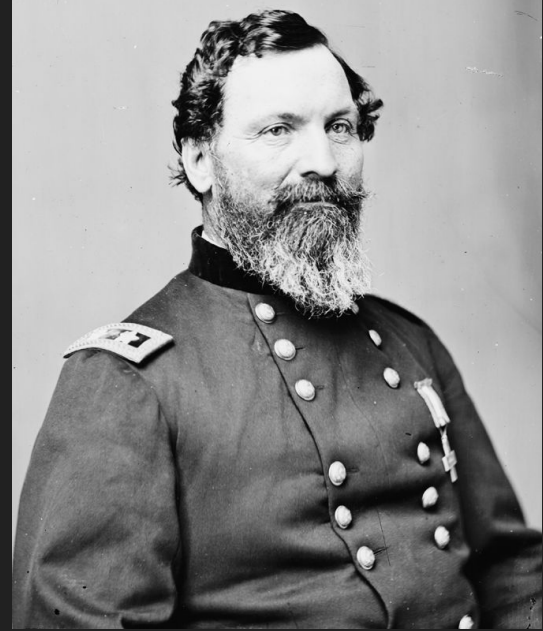
**Commercial Analyst**, Te Papa Tongarewa

"Why, my man, I am ashamed of you, dodging that way, they couldn't hit an elephant at this distance"

"General, I dodged a shell once, and if I hadn't, it would have taken my head off. I believe in dodging"

"[Laughing] All right, my man; go to your place"

For a third time the same shrill whistle, closing with a dull, heavy stroke



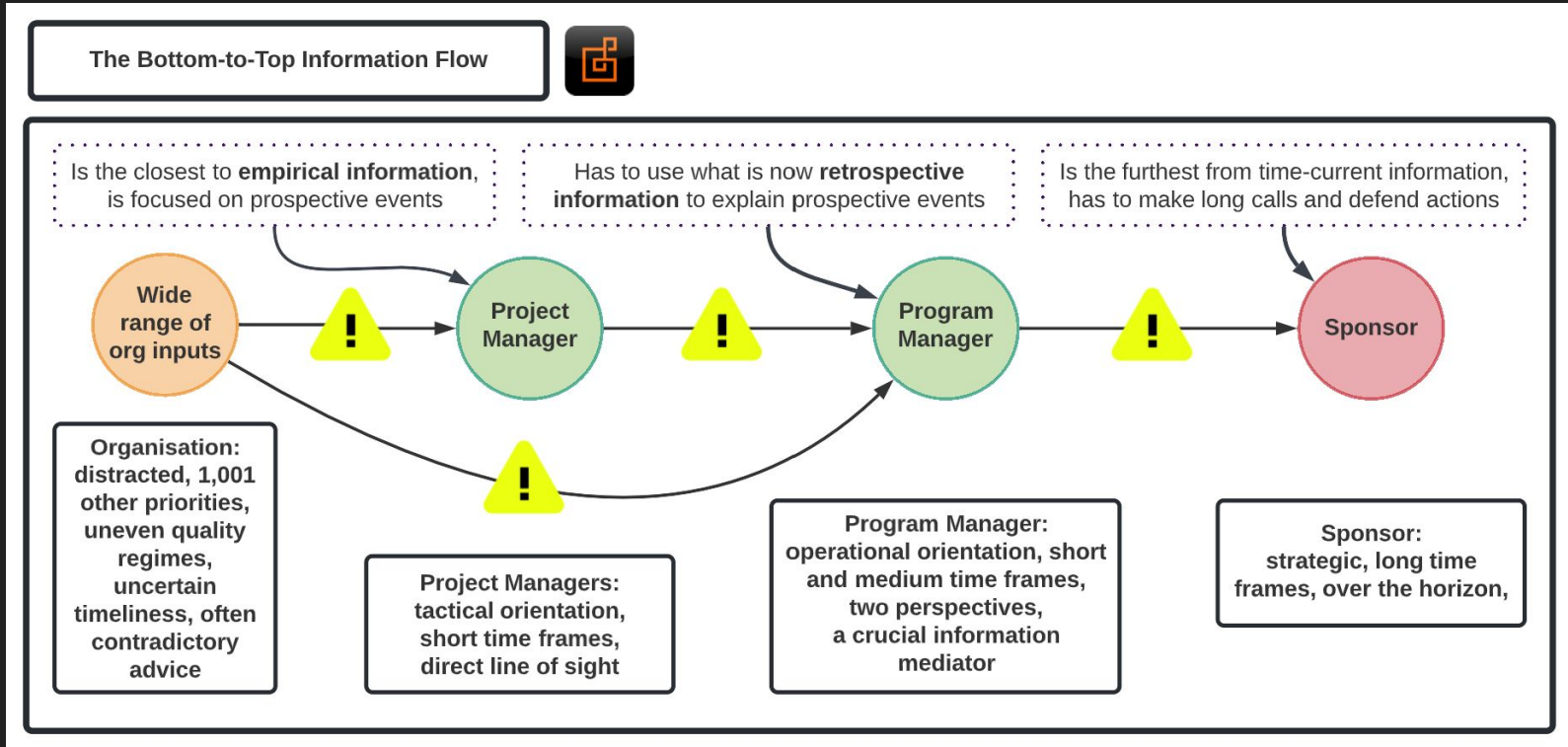


**Decision risk** is the chance and cost of being wrong... where wrong is a better course of action we would have taken... **if we could have**

Sometimes there are **no real options** and we have no real agency. Sometimes we don't know what that better course of action was

Sometimes we have few chances and a huge cost regardless. And yet... **we still have to make that decision**

# Fieldwork 1: there is a hidden trap in this handoff...



**The Flaw of Averages:** a plan made using averaged inputs is wrong, on average. Wah?

As a program manager, you look at a set averaged metrics of the component projects. Contextual to the current project state, which can be sampled many times along a timeline, **most of those metrics will be wrong**

We quickly become interested in how wrong and **whether any states of wrong are survivable** (or even advantageous)

This is a statistical quirk and I study them in decision making. How to illustrate?



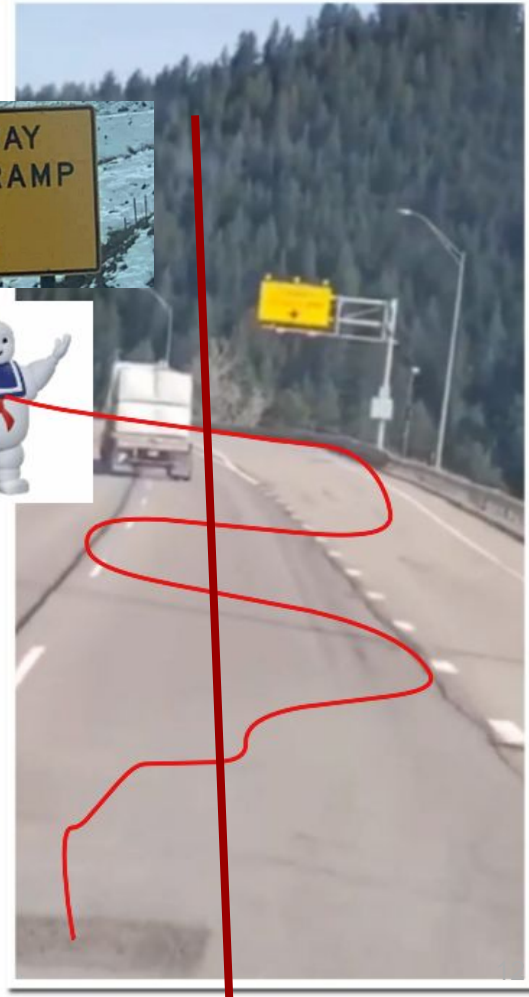
<b>The Mad Hatters Amazing Construction Programme</b>	Funds Approved (\$m)
Replica Eiffel Tower on the Waterfront	276.00
12th Floor Giant Spa Pool for Rich Execs	39.00
Underwater Eastbourne Hyperloop	72.00
Personal Sleep Pods on Building Exterior	118.00
Beehive Great Glass Elevator	29.00
	<b>534.00</b>

Note the route the Marshmallow Man took prior to the second truck (the one with the dashcam) crossing his line of travel

The average **position** for his journey is good news: we get **NOT SPLAT** (he sidestepped the first truck)

Yet, sadly, the average **state** of Marshmallow Man in the narrative is **SPLAT**: he's huge, turns slowly and there are just too many trucks to dodge

The inevitability of **SPLAT** makes all the discussion about **NOT SPLAT** kind of cruel





# Fieldwork 2: I add probability up front for mini Monte Carlo



Risk Volatility Test		Volatility Test 1: blowing the budget. This test looks at how much more we might have to pay over the lifetime of the project							Volatility Test 2: running late. This test looks at when a project actually delivers and closes <i>(Note: post-covid median delay is 200 days)</i>				
The Mad Hatters Amazing Construction Programme	Funds Approved (\$m)	Range of Outcome Likelihoods*				Financial Risk Implications			Range of Delayed Delivery Date Likelihoods***				
		On Budget	Best Case Variance	Middle Range	Worst Case Variance	Best Case Variance \$m	Middle Range \$m	Worst Case Variance \$m	On time	Best Case: up to 60 days late	Steep Spike: up to 250 days late	Worst Case: more than 1 year late	The Deep Down Side: more than 2 years late
Weights and Ranges		1-15 %	16-31 %	32-85 %	86-100 %	0.23	0.53	0.93	1-15%	16-60%	61-83%	84-97%	98-100%
Waterfront Eiffel Tower Replica	276.00	<b>1**</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>339.48</b>	<b>422.28</b>	532.68	1	<b>6</b>	<b>1</b>	2	0
12th Floor Giant Spa Pool for Rich Execs	39.00	<b>2</b>	<b>0</b>	<b>7</b>	<b>1</b>	47.97	<b>59.67</b>	<b>75.27</b>	2	<b>6</b>	1	<b>1</b>	0
Underwater Eastbourne Hyperloop	72.00	<b>2</b>	<b>1</b>	<b>4</b>	<b>3</b>	88.56	<b>110.16</b>	<b>138.96</b>	0	<b>7</b>	1	<b>1</b>	1
Personal Sleep Pods on Building Exterior	118.00	<b>3</b>	<b>0</b>	<b>6</b>	<b>1</b>	145.14	<b>180.54</b>	<b>227.74</b>	<b>4</b>	3	<b>2</b>	1	0
Beehive Great Glass Elevator	29.00	<b>2</b>	<b>1</b>	<b>3</b>	<b>3</b>	35.67	<b>44.37</b>	55.97	1	<b>4</b>	3	<b>2</b>	0
	<b>534.00</b>	<b>9</b>	<b>4</b>	<b>24</b>	<b>11</b>	<b>656.82</b>	<b>817.02</b>	<b>1,030.62</b>	<b>8</b>	<b>26</b>	<b>8</b>	<b>7</b>	<b>1</b>

**Blue bolded numbers** show a for arguments sake possible forward risk portfolio

**Red bolded numbers** shows the results of 10 simulations, for this portfolio, in current conditions

\* Range calculated from a 2017 meta-study, with additional elements via McKinsey, both based on real world construction industry actuals

\*\*\* Range calculated from a 2022 machine learning meta-study



You take a test to see if you have **icthyscrathly** disease: it comes back positive. How likely is it that you have icthyscrathly?

The **forward probability** is the probability of a positive test, given that you have icthyscrathly:  $P1 (\text{test} | \text{disease})$

This is the same for most humans because it depends only on the technical capability of the device to perform tests

The **inverse probability** is the one you're **actually interested in** - what is the probability that **you** have icthyscrathly, given the positive test:  $P2 (\text{disease} | \text{test})$

$P1 (\text{test} | \text{disease})$  doesn't behave the same way as  $P2 (\text{disease} | \text{test})$  does. Many/most organisations answer inverse probability questions with forward probability answers

## Different courses of action?



When someone says they want to know **'what to do'**, they are appealing to **instrumental rationality**

When they ask about **'what is true'**, they are appealing to **epistemic rationality**

It is common to see groups who are instrumentally rational... as well as epistemically irrational

Epistemic rationality is tied to empirical and experiential learning. Consider two advisors, one epistemically irrational

Their boss asks a 'what to do' question of the two advisors. Both sources present the same, but one is batsh\*t crazy: the advice differs. What to do indeed

**Epistemic  
dilemma?**

# You can't be 'in control' w/o controls



## Mad Hatters Amazing Construction Programme

These controls consist of activities, systems, policies, devices, practices, processes, techniques or tools that meaningfully reduce the risk to the PoW delivering on its mission

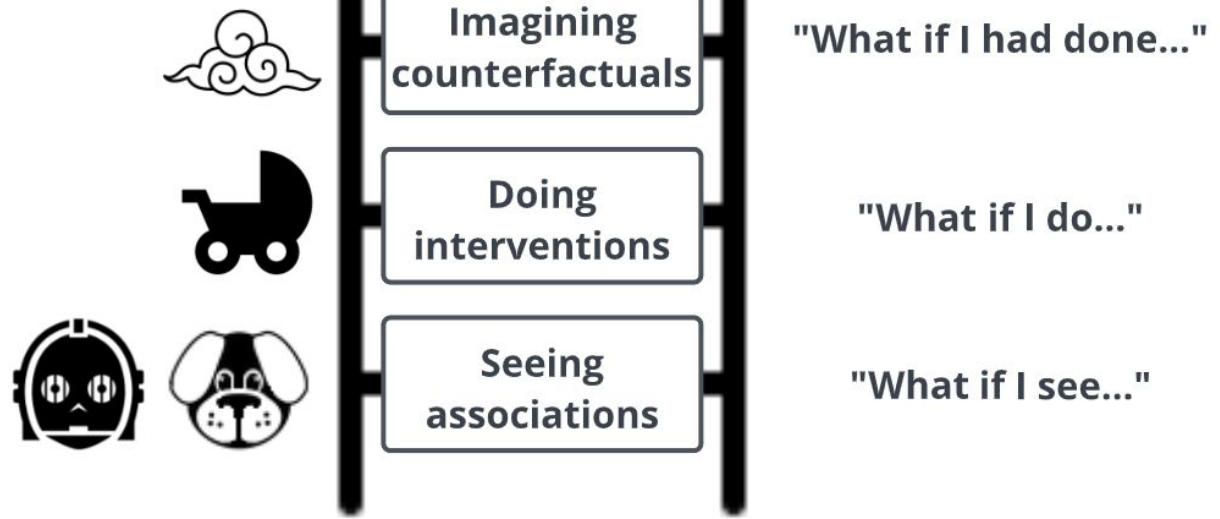
#	CONTROL SOURCE	CONTROL OWNER								
			Preventative	Detective	Corrective	Effective	Good	Partial	Ineffective	
C1 HRC	Clear decision making processes		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C2 HRC	An integrated work plan, status report and risk/issue/decision register		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C3 HRC	Relevant, timely communications to staff, and providers		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C4 HRC	Daily SitRep Report		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C5 HRC	An approved 2DHB Response Framework		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C6 HRC	Approved 2DHB minimum service levels		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C7 HRC	Service level endemic plans		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C8 HRC	Integrated staff shortages management plan		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



Levels of Learning

Activities and Information

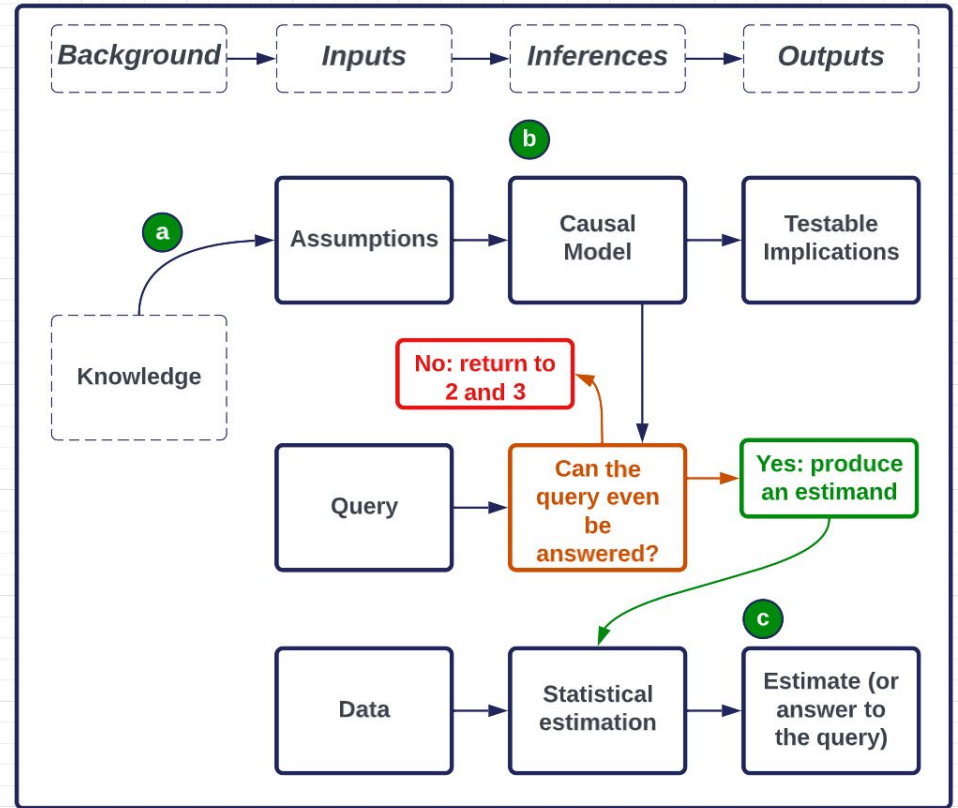
Types of Question





## Note:

In causal work, the **estimand** and the **query** do not coincide  
Here, the estimand is a recipe;  
**data** are the ingredients  
applied to the recipe; and the  
**estimate** is what comes out of  
the oven



This is how we use causal processes to control for a) assumptions, b) causal errors introduced by statistical estimation and c) low information/high uncertainty estimates

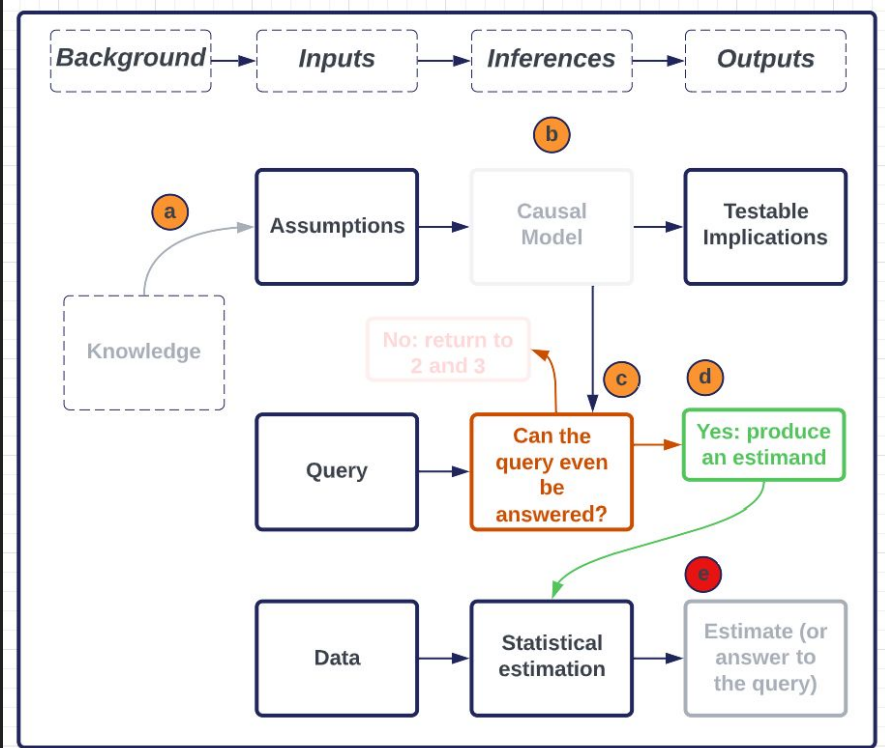


### To falsify:

To submit a claim to a known prove-it-wrong test: if that test fails, then the claim is true, to the extent of the failed test

### An estimand:

A test mechanism that produces stable estimates of known evidential value



As a generalisation, this says

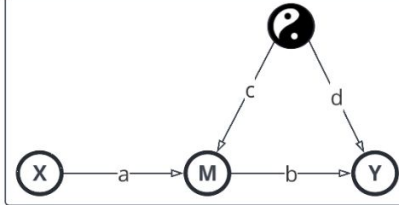
- a) we have an **uncertain link** between knowledge and assumptions,
- b) we don't deploy a **causal model** which means assumptions directly affect both testable implications and the truth nature of the query,
- c) we don't know how to **falsify**, so we can't remove large amounts of uncertainty,
- d) thus producing weaker **estimands**;
- e) taken together we make weak **estimates** and thus are to a large extent risk-blind

## Any Programme-of-Work Four Basic Risk Scenarios

CCHV EPMO 1/8/22

### We labour under uncertainty

- These are causal risk models: they use the language of **causal science** to model prospective risk, without losing sight of innovation opportunities.
- They encourage **matakite**, foresight and situational awareness for the purposes of risk avoidance and benefit realisation

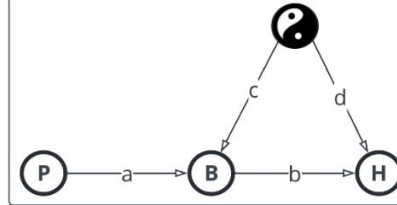


### There are two sides to uncertainty (and two sides to each of those two sides)

- Some of these effects are helpful (**opportunities**), while others are not (**threats**)
- We manage opportunities as **innovation** and the threats as **risk**, all the time not fully understanding how the two relate

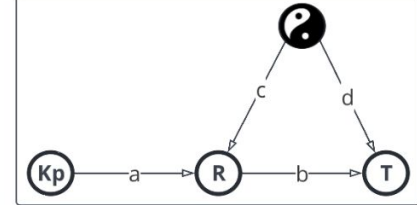
### How to read it

- We are applying **intervention X** for effect (a) on M, which is a 'mediator', some other thing that is intended to produce a secondary effect (b) upon **target state Y**
- However, there are **unknown, unseen, unestimated and/or unconsidered** effects (c and d) on both our mediator and target state



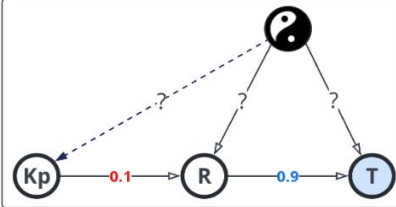
### How to read it

- Our context is **change investment**: building and sustaining value for Te Whatu Ora and local communities
- The model says **project P** is an **intervention** on some **health capability** group B to improve **health outcomes H**
- Note: the project is only a temporary entity



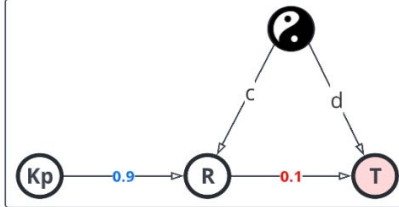
### How to read it

- We can speak te reo **Māori!**
- The operation of the causal model remains unchanged: it speaks all human languages because humans think causally about things
- The project is the **kaupapa Kp**, the business group is the **rōpū R**, the health outcomes are those of the people, the **tangata T**



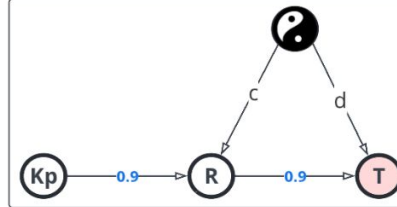
### How to read it

- This is the **first** basic change investment risk case: the effect (a) of the kaupapa on the rōpū did not have an impact on a successful outcome
- A common situation is where the kaupapa has insufficient independence from other rōpū, who might have a conflict of interest over the kaupapa



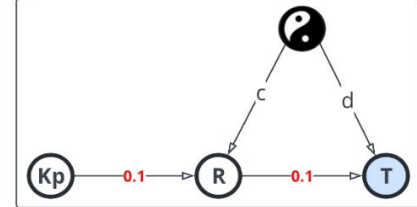
### How to read it

- This is the **second** basic change investment risk case: the effect (a) of the kaupapa on the rōpū was excellent, but the rōpū had no impact on an unsuccessful outcome
- A common situation is where the rōpū has insufficient mana with other rōpū, who might have a conflict of interest over tangata



### How to read it

- This is the **third** basic change investment risk case: both kaupapa and rōpū were successful, but the tangata felt no improvement
- This indicates deep seated, strategic or cultural obstacles, which may or may not have been identified by Te Whatu Ora, the kaupapa or the rōpū



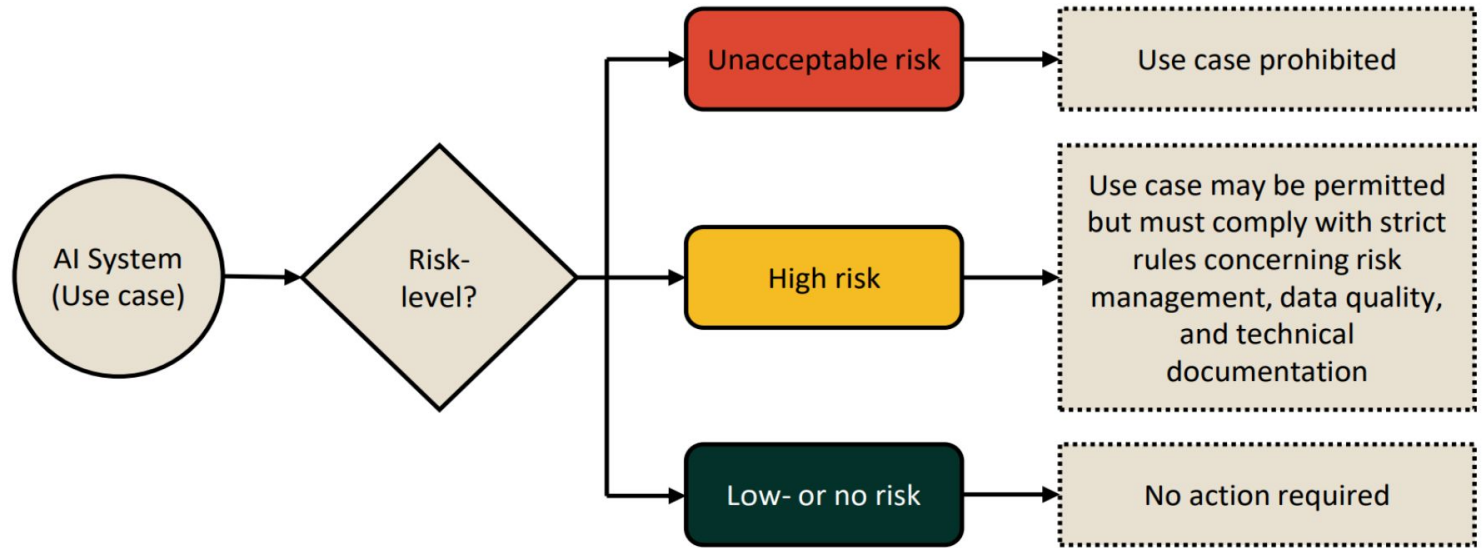
### How to read it

- This is the **fourth** basic change investment risk case: both kaupapa and rōpū were unsuccessful, but the tangata felt improvement
- This may indicate significant untapped or unknown innovation opportunities; or something greater within tangata is empowering and enabling change



**Epistemic  
irrationality  
bad causal  
model  
herd effect**

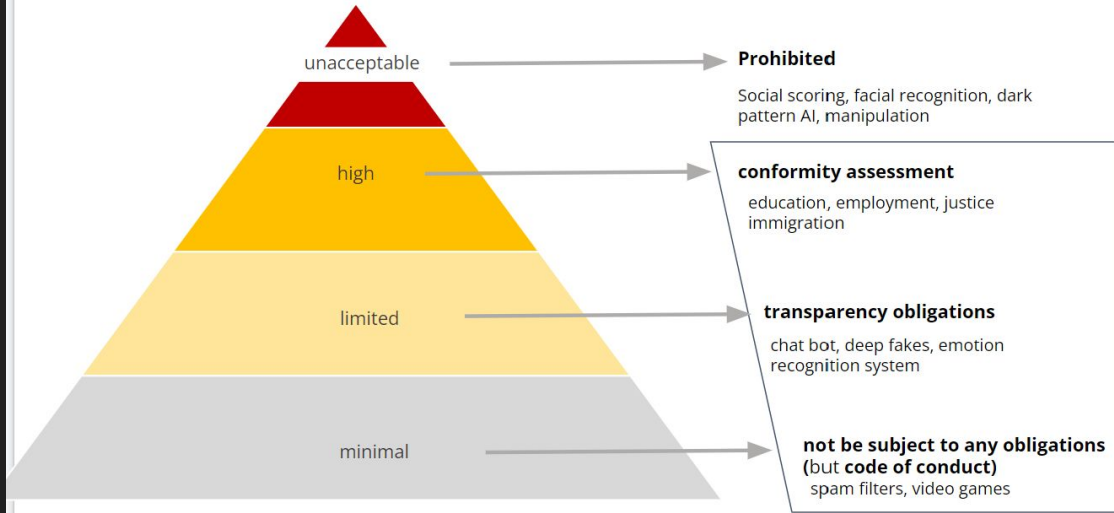




*Figure 1: Risk categories for AI use cases under the AIA [14]*



# Risk-based approach



Type of risk

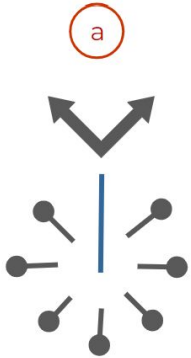




# Documentation

General Oversight and Accountability	The organisation shall conduct an <b>Ethical Risk Assessment</b> for all instances of <b>Ethical Choice</b> found in the algorithmic lifecycle including documenting:	Public Disclosure Document
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Identification of the nature of the decision (e.g. binary or multi-faceted)



An unbiased display of Pros and cons for each side of the choice



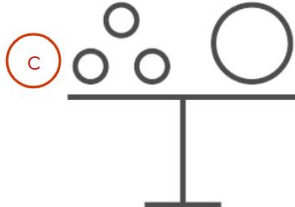
**Decision reached**



Traceability of the deployment of the choice



Residual risk associated with the choice



An unbiased display of tensions and Trade-offs for each side of the choice



Receipt of Traceability when the deployment is satisfied

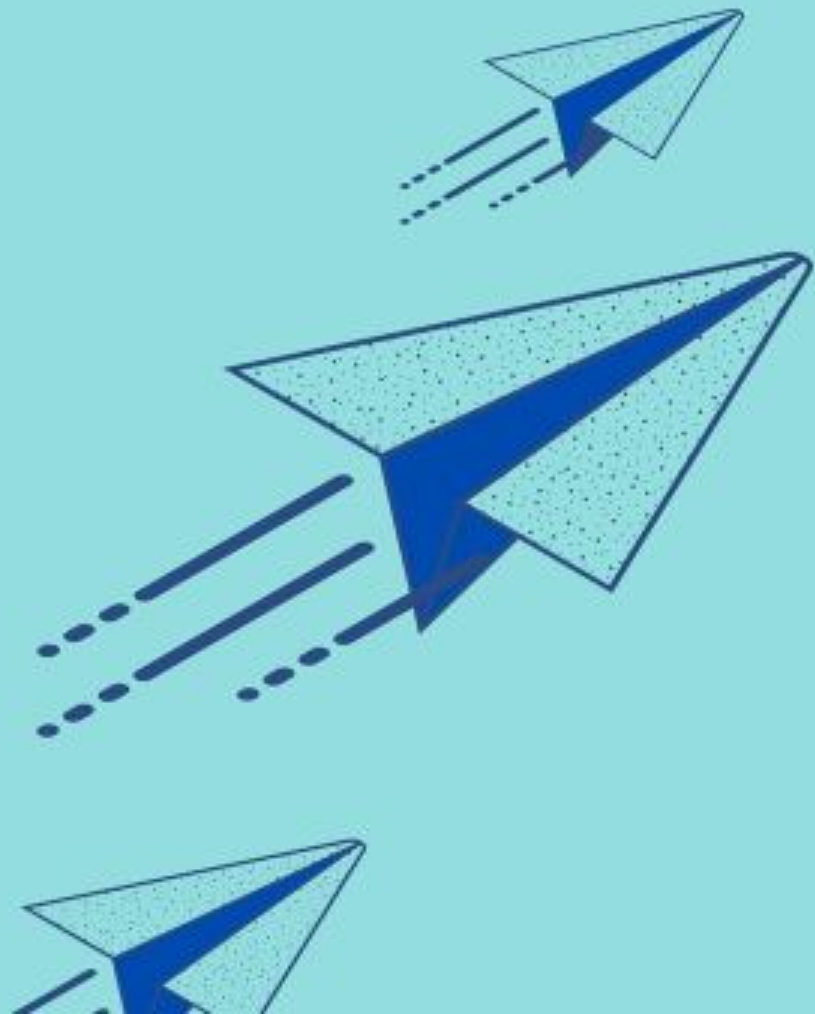


**Effective  
observation  
doesn't  
need lots of  
data**



# Do you have any questions?

Type them into the Q&A platform





**Thank you for joining us today**

