

Effectively Scaling CPS 230 Testing

Your guide for efficiency, engagement
and audit reliability.

Aligned in principle. Challenging in practice.

Scenario-based exercising is mandated across global financial services, yet delivering effective operational resilience testing remains challenging for most institutions.

From CPS 230 to DORA and CISA, the frameworks may differ in detail, but all require organisations to prove resilience through severe but plausible exercise scenarios, not just plan for it.

Meeting these obligations doesn't mean overwhelming the business with more tabletops. Overlapping requirements demand smarter, more efficient ways to test.

 APRA CPS 230



Common challenges in delivering scenario-based testing across financial services regulations:

Stakeholder burnout

Risk, Operations, Technology, Communications and Customer Service are all in scope. Without smart coordination, testing adds pressure to already stretched teams.

Disengaged participation

3-hour workshops led by Powerpoint are no longer keeping up. Low attendance rates compounded by low engagement is leading to incomplete validation of resiliency.

Missed insight moments

Scenario exercises often expose control weaknesses, but insights are lost without real-time capture and ownership tracking.

Inconsistent reporting

Boards and regulators want a clear picture: What's been tested? What were the gaps? Who owns the remediation actions? Manual reporting makes this time consuming and prone to error.

What this **guide** will help you do

Deliver audit-ready capability at scale, while building engagement and resilience insight.

Use this guide to run lean, effective exercises that:

- 1 Systematically test your critical operations under severe but plausible conditions
- 2 Efficiently engage the right teams without duplicating effort
- 3 Surface and automatically record risks, gaps, and actions at every level
- 4 Replace months-long tabletop planning cycles, with Microsimulations that take a fraction of the time deploy
- 5 Deliver audit-ready outputs to boards, regulators and internal stakeholders



Simulations need to go beyond the impact model analysis. Human factors need to play out to identify the gaps between planning and actual response.

Welcome to your Microsimulation



Let's Go!

Gartner

COOL
VENDOR
2023



AI-Powered Deepfake



Data Breach



Loss of Critical Systems



Power Outage

Four principles for effective CPS 230 exercising

To effectively scale readiness under CPS 230, testing must be:

- Efficient
- Realistic
- Inclusive
- Scalable
- Intelligence-driven



True resilience requires the continuous breaking of pre-conceived assumptions. Framing each simulation with psychological safety creates an inclusive environment to learn from each participant's perspective as those assumptions are challenged.

To achieve this, iluminr leverages the following four principles

1 Program planning to build engagement and harness perspective
Schedule testing to harness insights at all levels, without burning out teams.

2 Leverage scenario immersion on severe but plausible events
Create life-like conditions using simulation technology to provoke thought and extract the human factors of resilience.

3 Establish psychological safety to stress-test for performance
Create a safe space for learning to challenge teams with incomplete data, time pressure, and conflicting priorities.

4 Automation of program insights and reporting
Use simulation data from each simulation to strengthen control effectiveness over time.

Program planning to build engagement and harness insights

CPS 230 shifts the goal from “having a plan” to “demonstrating performance.” Testing the resilience of Critical Operations however requires a diverse mix of stakeholders in each exercise. Mapping the exercise program efficiently ensures stakeholders are not over, or under-engaged, which is critical to maintaining momentum and avoiding burnout around peak periods of business activity.

Once complete, the program must validate your ability to:

- ✓ Activate response protocols
- ✓ Assess impacts and prioritise resources
- ✓ Maintain operations within outage thresholds
- ✓ Recover data within tolerance levels
- ✓ Communicate and escalate effectively

☒ Service Tolerance Parameters

 **Maximum period of disruption**
How long can the operation be offline?

 **Maximum data loss**
How much data loss is tolerable before material impact?

 **Minimum service levels**
What baseline capability must be maintained?

Critical Operation			
	ADIs (Banks & Credit Unions)	Insurance	Super Funds & Investment Trusts
Payments			
Deposits			
Custody			
Clearing			
Customer Service			
Claims			
Investment Management			
Funds Admin			

Bringing your CPS 230 Exercise Strategy to Life with Microsimulations

Many organisations already have well-defined strategies for CPS 230 testing. Microsimulations help bring those strategies to life. Making it easier to engage the right stakeholders, validate responses and maintain testing momentum without overwhelming teams. These short immersive exercises streamline execution, while enhancing the depth and impact of your existing approach.

1 Identify stakeholders from each team for each Microsimulation

A disruption to a Critical Operation triggers coordinated response across your organisation. Microsimulations engage the right people, in an integrated format.

Strategic Response Team

Operational Response Team

Critical Operation Owners

Customer Service and Control Teams

Executive & Board-level Stakeholders (as required)

2 Align Microsimulation objectives with regulatory requirements

Tolerance levels define when a Critical Operation is considered disrupted. Each Microsimulation targets one or more CPS 230 testing objectives, including:

Program Objectives

- 1 Test and validate impacts, dependencies and activation protocols
- 2 Validate plans, actions and resources to maintain minimum service levels
- 3 Validate communication protocols and strategy during disruption

3 Select a severe but plausible scenario

Each exercise should simulate a realistic, high-impact event aligned with identified critical operations and tolerance levels.



Loss of a Material Service provider



Geo-Political Turmoil Offshore Centre



Core Platform Failure



Heatwave Havoc Grid Collapse



Ransomware Attack



Climate Disaster

The CPS 230-Ready Tracks

Pre-configured CPS230
Microsimulation tracks empower
your team to focus on high impact
conversations, not administration.

- Customisable to your tolerance thresholds and team structures
- Meets the requirements set in CPS230
- 30-60 mins simulations keep stakeholders engaged and focussed
- Progressive, role-based learning

Each track focusses on a Critical Operation but remains flexible as the program unfolds. Scenarios and focus areas can be swapped or reordered to suit your needs.

Critical Operation: Claims

Q1

#1
Impact Analysis and
Activation

Loss of Material
Service Provider



Q2

#2
Data Tolerance
Contingencies

Ransomware
Attack



Q3

#3
Maintaining minimum
service levels

Natural
Catastrophe



Q4

#4
Communication Plan &
Protocols

Heatwave Havoc
Grid Collapse





Core Platform
Failure





Switch between pre-configured and immersive "Severe but Plausible Scenarios" crowd sourced globally, to fit your threat profile.

Why traditional testing falls short under CPS 230

Legacy methods are slow, siloed, and hard to scale.

Tabletops are familiar and valuable, but they're too resource-intensive to meet CPS 230 expectations.

Common challenges include:

- ? Long lead times for planning and coordination
- ? Difficulty engaging the right stakeholders at the right time
- ? Duplication of effort across critical function teams
- ? Poor traceability of insights, gaps, and decisions
- ? Inconsistent evidence across exercises

Microsimulations are built for speed, scale and insights

Microsimulations deliver the same level of rigour in a fraction of the time, with built in coordination, automation and reporting.

Microsimulations deliver:

- ✓ Significantly faster deployment with no complex planning cycles
- ✓ Repeatable, auditable testing aligned to tolerance levels under severe but plausible scenarios
- ✓ Scalable delivery at Executive, Operational and Technical levels
- ✓ Built-in measurement using real-time data across multiple teams and simulations

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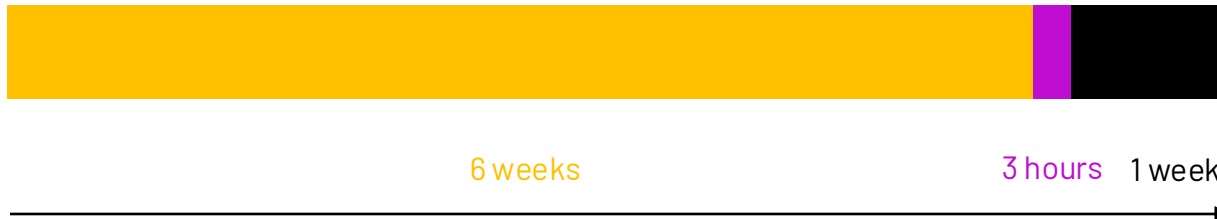
The program must test the effectiveness of the entity's BCP and its ability to meet tolerance levels in a range of severe but plausible scenarios.

From 8 weeks to 2 hours: Microsimulations as the **smarter** alternative

Microsimulations are significantly reducing the time cost of scenario exercising by harnessing the power of crowd sourced severe but plausible scenarios from financial institutions and insurance companies worldwide.

This empowers teams to deliver auditable reporting in real-time.

Traditional tabletop exercise



Total: 7 – 8 weeks

Microsimulation



Total: 2 – 3 hours

Planning &
Design

Simulation

Reporting

Scenario immersion on severe but plausible events

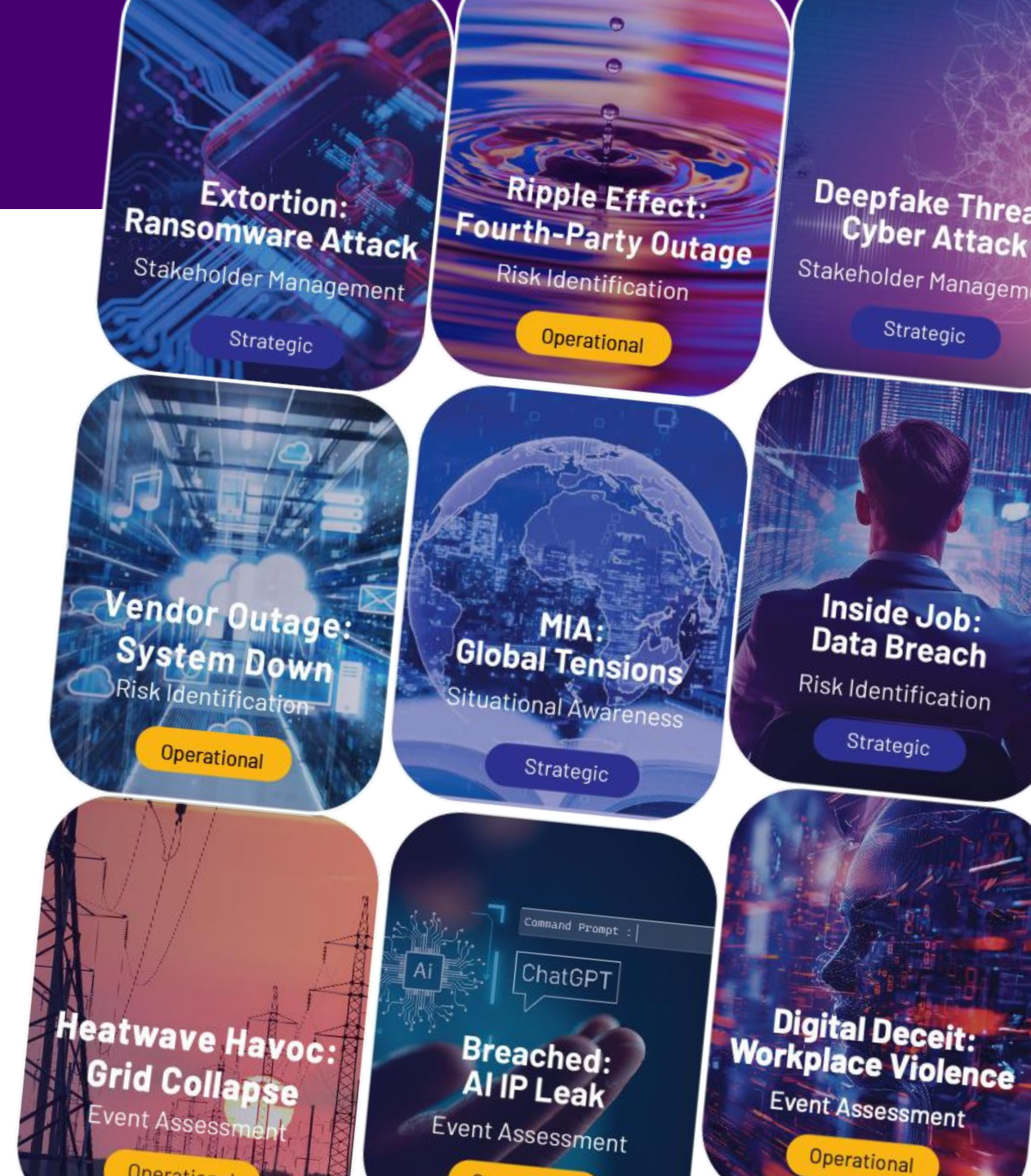
To illuminate the real-life human factors of response, teams need to experience scenario immersion. This goes beyond bullet points on a Powerpoint slide. Scenario immersion creates the tension and realism that comes with a severe but plausible event.

Our pre-built library of severe but plausible scenarios are media rich to create an immersive experience. These include:

- Grid collapse during a heatwave
- Data loss from a cloud misconfiguration
- Loss of a Material Service Provider
- Fourth-party service failure
- Operational crisis from global tensions
- Double extortion ransomware attack



Click or scan the QR code to preview the
Heatwave Havoc: Grid Collapse
Microsimulation



Establish psychological safety to stress-test for performance

Testing for resilience requires the breaking of assumptions and best laid plans. Stakeholder insight can be the difference between an incident and full-blown crisis.

Establishing a safe learning environment is critical for harnessing insight and ultimately performance. Based on Timothy Clark's four stages of psychological safety framework, the following statements will help frame each exercise for success.

1. **Inclusion Safety:** "Everyone in this room was selected to bring valuable insight. Your presence and participation are essential"
2. **Learner Safety:** "Ask questions even if they seem obvious. The best crisis managers are continuous learners"
3. **Contributor Safety:** "We need your perspectives, especially if they challenge conventional thinking. Crisis situations often require creative solutions"
4. **Challenger Safety:** "Groupthink can be fatal. Your job includes respectfully challenging assumptions, processes and decisions"



iluminr's Microsimulation training programs will support you in getting the most out of every engagement, including how to frame scenarios for psychological safety.

Automate program insights and reporting

Exercise reporting under CPS 230 is critical, but often delayed by manual effort, scattered data, and low feedback rates.

Capturing insights across teams can take weeks to finalise, leaving you behind your program's progress.

iluminr automates this process by capturing structured feedback from every participant in real time, turning exercises into an always-on stream of risk, readiness, and control data.

✓ Live tracking of exercise program status

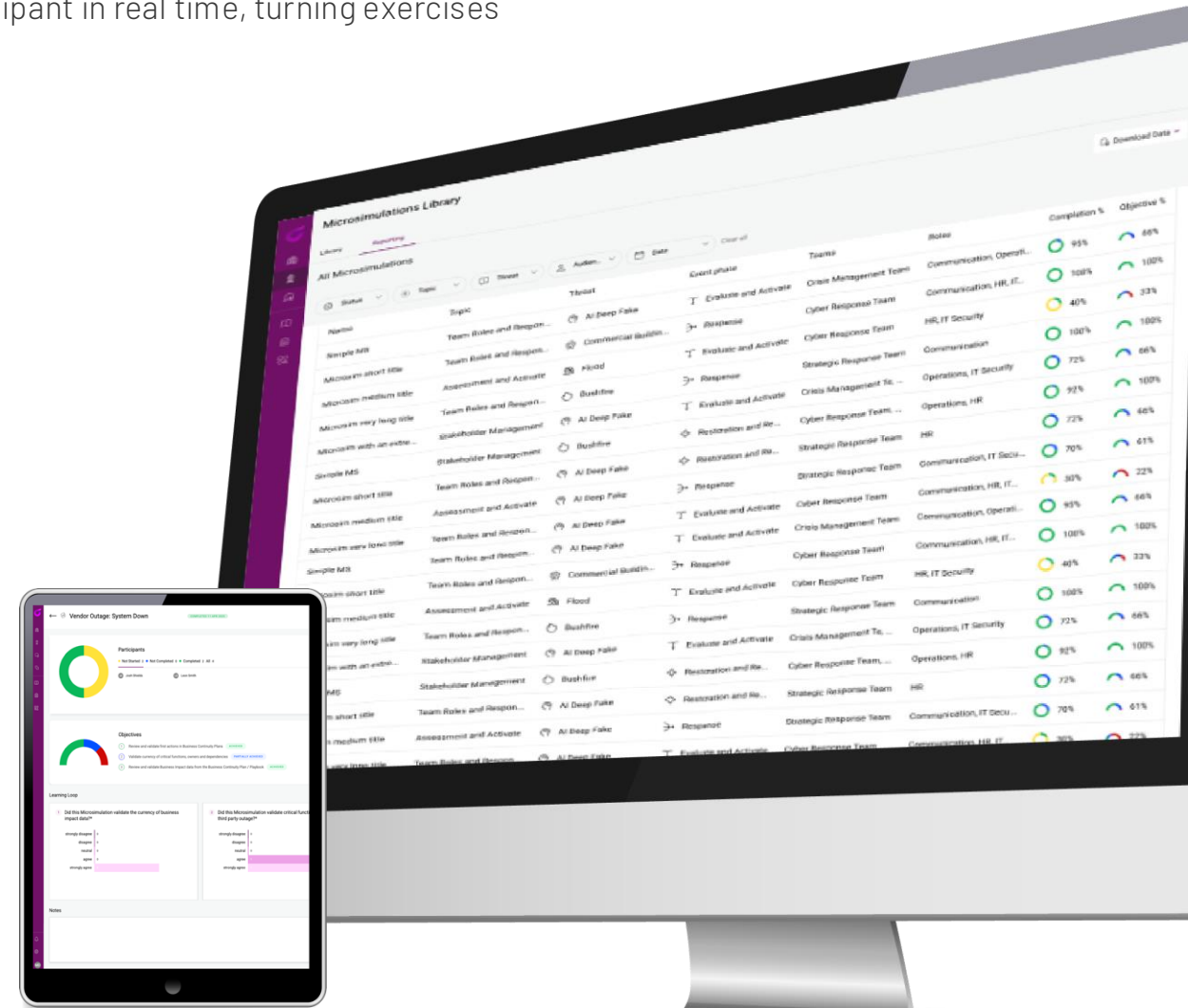
- Monitor participation and readiness in real time across business units, teams, or regions
- Track cadence, frequency, and role-based completion

✓ Automated capture of gaps and controls

- Intelligent learning loops surface control weaknesses and improvement opportunities, in exercise
- Capture actions, assign owners, and track progress directly in-platform

✓ Multi-level reporting in minutes

- Generate simulation-level reports instantly
- Aggregate insights across simulations for internal assurance, Board packs, and APRA reviews
- Export evidence in formats aligned to your governance processes



Supporting all levels of the organisation

Microsimulations that engage every level

Resilience doesn't sit with one team. Under CPS 230, organisations must prove every critical function - from executive to operational to technical - can respond under pressure.

Microsimulations bring teams together in a single test - eliminating overlaps, engaging the right people at the right time and surfacing critical insights across layers.

- Strategic Response Team**
Decision-making, stakeholder management, Communications
- Critical Operations Continuity**
Tolerance testing, supplier dependencies, recovery planning
- Technical Team Exercising**
Incident Response, rollback protocols, data recovery
- Customer-facing and Control Functions**
Frontline validation without duplicated effort

Role	What they gain from Microsimulations
Executives	Confidence in real-time crisis readiness
Risk/Compliance	Evidence of tested controls and tolerance levels
Ops teams	Muscle memory for rapid response and recovery
Board	Assurance of tested CPS230 compliance



CPS 230 demands tested capability across your ecosystem, not just good intentions on paper.

Final word

Prove capability. Capture insight. Report with confidence.

CPS 230 requires tested capability and the evidence to back it up.

iluminr Microsimulations make reporting part of the process, not a separate project.

With iluminr, you can:

-  Track simulation participation and completion in-platform
-  Automatically capture gaps, risks, and control improvement actions
-  Generate reporting at both exercise and aggregate levels in minutes

-  Want to reduce reporting effort and uplift capability?
-  Need clearer evidence for your Board, APRA or audit committee?

Request a walk-through of iluminr's CPS 230-ready Microsimulation tracks. Visit iluminr.io



Compliance is the baseline. Capability and evidence is the goal.



iluminr.io