



To: United Kingdom Department for Digital, Culture Media & Sport, Digital Identity

Date: 2021-05-14

Re: Kantara high level comments on the draft certification documents

Kantara is pleased to provide comments on the draft Certification Documents.

Unfortunately, Kantara was unable to provide comments on the document released last week as, due to the short turn around time, it was unable to gather comments.

We continue to invite the United Kingdom team to keep Kantara apprised of its progress.

Kantara has the following overall general comments on the set of thirteen certification documents proposed by the United Kingdom. If these comments do not apply to the entire set of documents, they apply to multiple documents in the set.

- 1) Kantara would recommend that the documents include references to existing work that has been utilized to develop these documents. Where external work is used, the certification document should identify if the existing work has been incorporated in its entirety or if it has been extended or modified in some manner. With this addition readers will be able to identify what new thoughts / ideas have been incorporated into the certification documents.
- 2) Kantara would recommend that the body that develops and maintains the certification scheme (e.g., maintains the assessment criteria used by assessors to assess a service against requirements) and the body that grants certification to a service should be independent of each other. As you are aware, our recommendation is based on ISO 17065.
- 3) Kantara finds that the terminology used across the certification document set is somewhat ambiguous at times. In document 7, for example, the term 'integrity' is used (7.4 and 7.5). While the term is used correctly in both cases, the term has two different meanings - adherence to moral and ethical principles in one case, and in the other, the state of being in a sound, unimpaired, or perfect condition. Kantara would recommend that the use of

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dual-meaning terms such as this be avoided if possible as they could be interpreted in different ways. The term is also used in documents 6,12, and 13.

- 4) Kantara recognizes that the certification documents provide a framework to govern the certification of services. As such, Kantara recognizes that the discussion in the documents will be at a high level. This being said, Kantara would recommend that the proposed forms (e.g., the application forms) be focus-group or pilot tested to ensure that 1) they are useable by organizations that wish to submit their services for certification and 2) they contain enough information to enable certification bodies to undertake the certification of a service with consistent results. Kantara believes that focus-group testing will likely point out shortcomings in the forms (e.g., the form for accepting the terms of the framework should explicitly identify the specific version and date of the framework to which the applicant is agreeing).
- 5) Kantara recommends that the documents include a process for cross-certification. That is, the process by which the UK will recognize certifications that have been granted in other jurisdictions (e.g., Canada or the United States).
- 6) Kantara recommends that the concept of “self assessment” be expanded. In Kantara’s opinion, several unstated assumptions seem to have been made with respect to self assessment. For example, is there a time limit associated with a self assessment? That is, does a certification granted through self assessment lapse after a certain period of time unless a third-party assessment is conducted? In addition, what are the consequences to the subjects that find themselves not covered by a service whose service self asserted certification lapses? The question of what happens to subjects when any certification lapses should also be addressed.
- 7) Kantara recommends that the Government plan to ensure that a trust mark is not fraudulently used. Kantara believes that deploying tools such as ETSI TS 119 612 Electronic Signatures and Infrastructures (ESI) Trusted Lists, and the functionality seen in OpenBadges.org, would be beneficial in promoting the merits of being granted the trust mark and guarding against mis-use.

At this time, Kantara does not have comments on individual documents. Kantara will be pleased to provide comments on future versions of these documents.

About Kantara

[Kantara](#) is the leading global consortium whose mission is to grow and fulfill the market for trustworthy use of identity and personal data. To fulfill this mission Kantara operates an

independent third-party conformity assessment program for the digital identity and personal data ecosystems. In addition to this Kantara has, since its inception in 2009, provided real-world innovation through its development of specifications, such as UMA 2.0, Consent Receipt, applied R&D, and its Identity Assurance (Trust) Framework (IAF). More information is available at <https://kantarainitiative.org/trustoperations/> or [contact us](#).

This submission was developed by participants in Kantara's Identity Assurance Work Group (IAWG). The IAWG consists of individuals from both the public and private sectors with extensive experience in the identity industry including assessing identity services for conformance to established requirements, developing requirements for identity services, and implementing and providing identity related products and services.