# DIACC TFEC PCTF Verified Person – Expedited Review

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| **Prepared By:** | **IMSC PCTF Working Group** |
| **Date Prepared:** | January 28, 2020 |
| **Date Reviewed and WG Feedback Solicited:** | January 28, 2020 |
| **Date Finalized:** | January 30, 2020 |

The expedited review has two parts:

1. **Cross-Reference Review** of the **DIACC TFEC PCTF Verified Person** Component Conformance Criteria
2. **Global Review:** outlining key observations and issues related to the **DIACC TFEC PCTF**

Please note that due to the short turnaround requested, there may be additional feedback that has not yet been received from the IMSC PCTF WG.

## Cross-Reference Review A cross-reference of the **DIACC TFEC PCTF** **Verified Person Conformance** criteria to the **IMSC PSP-PCTF Version 1.0** (July 4th, 2019).

* **55** requirements are specified in total
* **37** can be mapped back to **IMSC PSP-PCTF Version 1.0** (with some minor variations in wording)
* **18 new** requirements are in the Verified Person
  + 6 are attributed to a new trusted process call **Establish Source**,
  + 6 are attributed to **Identity Information Validation**
  + The 6 remaining are spread throughout.

**Key Observations:**

* Mostly aligned, however there are new requirements and atomic processes – likely originating from a difference in perspectives.
* New requirements could be easily incorporated into the master spreadsheet for **IMSC PSP-PCTF Version 1.1**
* The IMSC/DIACC versions are not 100% conceptually aligned on the atomic process models. This likely can be resolved at the working level.
* Validating the conformance criteria will take some work. This can only be done through testing in the assessment process.
* Thus, the priority is to make sure we are aligned on the atomic process model.
* The **DIACC TFEC PCTF** is structured as many separate deliverables. It has not gone through a holistic review process as we have done in the **IMSC PCTF Working Group**. This separated structure will it make the DIACC version difficult to maintain and to apply.

## Global Review:

A global review of **DIACC TFEC PCTF** Verified Person outline key observations and issues:

1. **DIACC TFEC Verified Person and Conformance Profile are separate deliverables from the other components leading to a complex and hard to apply product.** 
   1. At last count, the **DIACC TFEC PCTF** is approximately ten different deliverables to date (in Word format). **Verified Person** is two deliverables.
   2. In contrast the **IMSC Public Sector Profile of the PCTF** (**IMSC PSP PCTF**) has been simplified and consolidated into two deliverables – a **single integrated document** and an **accompanying spreadsheet** containing all of the conformance criteria structured and cross-referenced in a way to facilitate the assessment process.
2. **DIACC TFEC PCTF has not been tested in practice.**
   1. To our knowledge, the **DIACC TFEC PCTF** artifacts have not been tested – they only have been developed by **DIACC TFEC** working group and circulated for comment for the purposes of DIACC Board Approval.
   2. In contrast, the **IMSC PSP PCTF** has gone through two major iterations: 1) **Province of Alberta** in mid-late 2018, and 2) **Province of BC** in late 2019/early 2020, Based on these experiences, a formalized methodology document is now being developed. Further iterations will result from other assessments.
3. **DIACC TFEC PCTF has not yet integrated Verified Person and Verified Organization**
   1. In the **DIACC TFEC PCTF**, Verified Person and Verified Organization remain separate discrete components (and separate documents).
   2. With the release of the **IMSC PSP PCTF** in July 2019, a key thematic issue was identified: that **verified persons**, **verified organizations** and **verified relationship** can be generalized into digital representations. Significant effort was invested to ensure inclusive discussion and definition of terms related to **verified organization** (work continues on **verified relationship**).
4. **IMSC PSP PCTF is being aligned with emerging global frameworks. DIACC TFEC PCTF is not yet at this stage.**
   1. While the Pan-Canadian context is the primary target for implementation, the **IMSC PSP PCTF** is being aligned to established and emerging frameworks, in particular **eIDAS**, the **Digital Identity Guidance** developed by the **Financial Action Task Force** (FATF), the **World Bank ID4D**, and **Digital Nations**.
   2. To our knowledge, the **DIACC PCTF TFEC** has not undertaken any alignment exercise (still at working group development – see point 2a)
5. **Conformance Criteria decided at the working group (and then approved by a committee) needs considerable testing and validation**
   1. A major lesson learned during the **IMSC PSP PCTF** application is that the conformance criteria need to be adjusted and tailored for the assessment context. For example, the notification and consent criteria were not applicable to the BC and AB assessment process, because these programs are operating under authorities that do not require consent.
   2. Similarly, the **DIACC TFEC PCTF** working group developed **TFEC Privacy Conformance Criteria**. Similar to the above point, these were not incorporated in the **IMSC PSP PCTF** because privacy requirements are addressed by the **Privacy Impact Assessment Process**.
   3. At present, further work needs to be carried out to validate and refine the conformance criteria (including alignment to other frameworks), but this has to be done in a fair and transparent way that ensures that it is done in the public interest first.
6. **The trust world is evolving - the IMSC PSP-PCTF is at the forefront.**
   1. By applying the **IMSC PSP-PCTF** and having weekly working group meetings where participants can reflect and share on what they are doing/learning, has put the Canadian Public Sector into an unexpected global leadership position.
   2. Due to the weekly calls, and application of the **IMSC PSP-PCTF**, significant learnings have been incorporated into the IMSC PSP PCTF or captured as thematic issues to be addressed, for example:
      1. **Defining the PCTF:** Is it a standard, or is it a tool to apply standards?
      2. **Digital Relationships**: Recognizing that this area needs further focused effort.
      3. **Evolving State of Credentials and Claims:**  Recognizing the changing technology landscape.
      4. **Stakeholder, Roles and Actors:**  Clarifying for the emerging ecosystem.
      5. **Informed Consent:**  recognizing the change of narrative from consent to digital rights.
   3. While, there is value in providing feedback to the **DIACC TFEC PCTF Verified Person**, much of this value has already been generated by the IMSC PCTF Working Group. Additional value can be easily incorporated into the IMSC PSP PCTF (see cross-reference section)
   4. The **IMSC PSP-PCTF** has been developed in the open (hosted on GitHub) **IMSC PSP-PCTF** will be posted as Version 1.1. DIACC may wish to consult and incorporate what the public sector has developed.

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