

Identity Assurance Framework: IAF-1340 Service Approval Handbook

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Contributors ARB Members, voting and non-voting, current as of the date of approval.

Abstract

This document describes the ARB's Policy for handling applications for Approval of various services operated by Kantara Members, and assessed against specific selections of available Kantara Service Assessment Criteria (SAC). It defines the obligations upon Applicant and Approval-holding CSPs, the ARB and its Secretariat, and Accredited Assessors, with regard to the Approval Assessment and application processes.

Reference Standard

References to ISO/IEC 17065:2012 "*Conformity assessment* — *Requirements for bodies certifying* [...] *services*" [IS17065] are made within this text for the purposes of showing a conformity mapping. They are placed right-justified after any clauses (single or multiple) to which the conformity cross-reference applies, always at the lowest indexed level to which they apply, as follows:

IS17065: §«clause no.»

This specification overall supports Kantara Initiative's broad alignment towards IS17065 §6.1.2 but is not intended to demonstrate a complete nor a formal conformance to IS17065.

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1 INTRODUCTION

1.1 Status and Readership

This document sets out **Normative** Kantara requirements and is required reading for all ARB Members, applicant Credential Service Providers and Kantara Accredited Assessors. It will also be of interest to those wishing to gain a detailed knowledge of how the Kantara Initiative's Identity Assurance Framework handles the receipt and processing of applications for Grants of Approval.

Statements within this document are therefore to be taken as having Normative status unless they appear under a heading such as 'Guidance', or are included in either an in-line 'note' or as footnotes.

IS17065: §7.1.2, 7.1.3, 7.4.1

1.2 Key words

The key words "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", and "MAY", when used in capitals within this Specification, are to be interpreted as described in RFC 2119, the applicable parts of which are re-stated hereafter.

- a) SHALL This word means that the statement is an absolute requirement of this specification;
- b) SHALL NOT This phrase means that the statement is an absolute prohibition of this specification;
- c) SHOULD This word means that there may exist valid reasons in particular circumstances to ignore a particular item, but the full implications must be understood and carefully weighed before choosing a different course;
- d) SHOULD NOT This phrase means that there may exist valid reasons in particular circumstances when the particular behavior is acceptable or even useful, but the full implications must be understood and the case carefully weighed before implementing any behavior described with this label;
- e) MAY This word means that an item is truly optional. One party may choose to include the item for a particular reason while another party may omit the same item. An implementation which does not include a particular option SHALL be prepared to interoperate with another implementation which does include the option, though perhaps with reduced functionality. In the same vein an implementation which does include a particular option SHALL be prepared to interoperate with another implementation which does not include the option (except, of course, the feature for which the option provides).

1.3 Purpose

The ultimate goal of the Kantara Initiative's Trust Framework Operations Program (TFOP) is the facilitation of intra- and inter-Federation transactions based upon a range of identity credentials in which Relying Parties can have the confidence that the credentials issued under the Kantara Initiative Trust Mark are being managed to address identified risks. Some of these credential management services may include differing levels of rigor, generally referred-to as Assurance Levels (LoA). Kantara grants

Approvals against a number of specific Classes of Approval. The Classes of Approval and their parameters (AL, etc.) are described at <u>https://kantarainitiative.org/trustoperations/classes-of-approval/</u>.

To accomplish this Kantara Initiative's TFOP assesses against strict criteria the management and technical operating practices of Credential Service Providers in the Privacy, Identity and Credential Management space, and Grants to conformant Credential Service Providers Approval for their specified Service and the right to use in that context a Kantara Initiative Trust Mark. Kantara's Trust Marks are symbols of trustworthy management and operation of services (at applicable Assurance Levels, where applicable). There are two documents describing the TFOP and its operation. These are:

a) IAF-1340 "Service Approval Handbook" - this Specification.

This present document, which defines the types of Assessments required and establishes rules governing how they are to be performed and how the status of service Approvals is managed and published, whilst also describing the processes required to be followed by the parties involved to make application for service Approvals, to have Assessments performed, to maintain those Approvals, and how Approvals may be terminated;

b) IAF-1350 "Assessor Accreditation Handbook"

This document is intended to complement the Service Approval Handbook by describing the additional rules and processes required to be followed for Assessors to make application for being Accredited, to maintain their Accreditation, to perform Assessments and how Accreditations may be terminated.

An overall description of Kantara's operations can be found on the TFOP web page - <u>https://kantarainitiative.org/trustoperations/</u>. The latest versions of each of the above-referenced documents can be found on Kantara's Identity Assurance Framework web page - <u>https://kantarainitiative.org/identity-assurance-framework/</u>

1.4 Effectiveness

This document MAY be applied immediately upon its publication.

It SHALL become fully effective from the first day of the fourth month following the month of its publication (notionally a minimum 90-day period), whereupon application of this document SHALL be mandatory and any preceding versions SHALL be withdrawn from publication unless clearly marked as being 'WITHDRAWN" if left available in the public domain, e.g. for reference purposes.

IS17065: §7.10.1

1.5 Review

The ARB SHALL review this document as a whole:

- a) whenever it is revised to accommodate any material changes it deems necessary;
- b) at least annually, by the end of the month of publication of any version resulting from material changes; and
- c) whenever the ARB becomes aware of any circumstances which may require modification of its service Assessment operational practices.

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IS17065: §7.10.1

1.6 Changes in this revision

v3.1 - This revision incorporates these material changes:

- a) Remove the membership requirement as a prerequisite for the assurance program; and
- b) Updated the approval flow and appeals process $(\S5.2.4)$

IS17065: §7.10.1

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2 TERMINOLOGY

Excepting those terms defined below, all other special terms and abbreviations used in this document are defined in the <u>*IAF Glossary & Overview*</u>.

Initial Application Package: the collection of documentation required to make an initial application to Kantara to have a service registered and to be able to engage an Accredited Assessor for the performance of an Assessment.

Approval Package: the collection of documentation required to apply for Kantara's Approval of a registered service following its Assessment and a finding of conformity.

3 OVERVIEW

3.1 **Principles**

Kantara offers a range of Classes of Approval, each being determined according to the choice of Service Assessment Criteria against which the service is assessed. Kantara extends Grants of Approval on a perservice basis, for that service as operated by the specific Applicant Credential Service Provider (CSP) and as applicable to the specific set(s) of Service Assessment Criteria (SAC) against which the CSP elects to have its service Assessed.

A service SHALL be designated as one of the following:

- a) a 'Registered Service', after being accepted on its Initial Application, pending its first Assessment; or
- b) as an 'Approved Service' once a Grant of Approval has been made by the Kantara Initiative Executive Director.

Further service attributes are addressed in later parts of this Handbook.

Assessments are performed by Accredited Assessors who are tasked with determining a service's conformity to the selected SAC(s). The available sets of SAC are described at <u>https://kantarainitiative.org/trustoperations/classes-of-approval/</u>. SAC may cover a range of assurance levels and the applicable management and organizational practices. Depending upon the nature of the service and the selected SAC(s) (e.g. the assurance levels at which it is offered– assuming the selected SAC has such; the range of functional capabilities which it provides; ...), the CSP may select a sub-set of the full criteria, based upon the scope of its offering.

Each service SHALL have associated with it a 'Statement of Criteria Applicability' (SoCA) that identifies the selected SAC(s) and the specific criteria within those SAC(s) against which the CSP intends to demonstrate the conformity of its specific service. §3.3 describes how a SoCA SHALL be documented CSP.

Approval is granted against a specific scope (in terms of the specification of the service and the applicable criteria), on the basis of on-going conformity with the terms of Approval and operation within the defined scope, and resolution of any non-conformities, as agreed¹. After the performance of the first Triennial Assessment, and after each subsequent Assessment (be it a Triennial or an Annual Conformity type), a Statement of Conformity SHALL be prepared, recording the Assessor's findings with respect to the applicable criteria (per the SoCA). §3.4 describes the Statement of Conformity more fully.

¹ Plus any over-riding agreements, such as the TMLA which the CSP will have signed on its initial application.

3.2 Applicable Service Assessment Criteria

Kantara supports a number of specific sets of Service Assessment Criteria (SAC), which accommodate various reference bases for the criteria therein. Some of these SAC are developed by Kantara, others may be hosted by Kantara on behalf of third parties who wish to enjoy the benefits of Kantara's Trust Framework Operations Program.

Each available (i.e. formally released) version of any specific SAC has a published date and an effective date. When a new version of a SAC is published it MAY be applied immediately although the preceding version (assuming there is one) SHALL remain available and usable until the effective date of the newer version, after which the preceding version SHALL be withdrawn and the new version SHALL be applicable in all cases.

Kantara also supports additional sets of Assessment criteria, known as Assessment Profiles, that applicants MAY voluntarily choose for conformity Assessment and approval.

The available sets of SAC and associated Assessment Profiles are described at "Available Approvals, Service Assessment Criteria & Profiles".

At any given Assessment, the applicable version of each selected SAC SHALL be identified by the CSP, subject to the following conditions:

- a) for Initial Application Packages, the latest effective version of the selected SAC at the <u>date of</u> <u>application;</u> OR
- b) for all other Application Packages, the latest effective version of the selected SAC on the date on which the Assessment is concluded and the Kantara Assessor's Report (KAR) is published.

Any Assessment Profiles applied during an Assessment are selected entirely at the CSP's discretion.

The remainder of this document refers to a singular SAC, but readers should assume the same processes to be applicable when multiple SACs are 'bundled' by Kantara (see "Available Approvals, Service Assessment Criteria & Profiles") or selected by the CSP.

3.3 Statement of Criteria Applicability

3.3.1 Requirements

The Statement of Criteria Applicability (SoCA) SHALL, for the specific service, identify the selected SAC(s) and the applicable version of each. The SoCA SHALL include all criteria from each of the applicable SAC sets accounting for the Assurance Levels claimed and class(es) of Approval being sought.

The SoCA SHALL then, for each complete criterion within each SAC and accounting for the service scope, state whether the criterion is or is not in scope of the service and if in scope, whether the criterion is applicable or not (either in part or whole).

Where a criterion is applicable but fulfilled by a Pre-Approved Service, the criterion SHALL be included in the SoCA as being in scope and the unique reference of the Pre-Approved Service's Grant ID SHALL be provided.

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Each criterion (or part thereof) deemed <u>not</u> to be applicable SHALL state a justification for the claim of non-applicability.

The SoCA SHALL be reviewed and made up-to-date by the CSP prior to each submission to the ARB and SHALL be published by Kantara as a part of its <u>Trust Status List</u>.

Thus, a SoCA SHALL provide the following information:

Applicability Expression:	Applicability		
SAC reference, title and applicable version «repeated for each applicable SAC»			
	In scope – Applicable (either for a full criterion or the specified sub-part thereof, as scope and applicability require)		
SAC criterion tag / title / requirement (in full) «repeated for each criterion	In-scope – Not applicable with justified non-applicability (either for a full criterion or the specified sub-part thereof, as scope and applicability require)		
in each SAC»	In scope – Applicable – fulfilled by « reference to the Grant ID of a Pre-Approved Service employed by the subject service »		
	Not in scope		

3.3.2 Guidance

'In scope – Applicable'

means that the functionality, activity or status that is required (or a sub-part thereof) applies to the scope of the subject service and that the CSP will provide adequate evidence of conformity.

'In scope – Not applicable'

means that the functionality, activity or status that is required (or a sub-part thereof) inherently applies to the scope of the subject service but that there is a reason with justification why the clause does actually not apply, and therefore no evidence of conformity will be tendered.

As a simple example, a criterion could state that "*The CSP SHALL do one of a*), *b*) or *c*)", in which case one of a), b) or c) must be complied with (therefore that sub-part is 'In scope – applicable') and the other two options are declared as being 'In scope – not applicable' with the justification that 'another mutually-exclusive option is chosen (stating which). If a group of additional criteria depended on the choice made then two of the three groups of additional criteria would be not applicable by the same justification, and one would apply. A similar case can be seen if the requirement was to do "*at least one of a*), *b*) or *c*)".

ARB Policy <u>www.kantarainitiative.org</u> IPR – Option Patent and Copyright 'In scope – Applicable – fulfilled by ...'

means that the functionality, activity or status that is required applies to the scope of the subject service and that the CSP employs a Pre-Approved Service to accomplish the required need. The Grant ID which is assigned to the Pre-Approved Service must be cited and the SoCA for that service must be one which shows this criterion to be completely 'In scope – applicable' (see above).

'Not in scope'

means that the functionality, activity or status that is required is expressly outside the scope of the subject service, at least as far as concerning its consideration for Approval.

It may not be immediately apparent why a Full Service would have criteria which were out of scope, but as just a simple example, consider a service which offered ONLY unsupervised proofing. Thus all criteria pertinent to supervised proofing would be out of scope but it would nonetheless be a legitimate (if limited) service.

It is necessary that the applicability of each discrete criterion within each included SAC be asserted, not least to allow all parties to ensure that if there have been changes to criteria, these have been taken into account.

The Kantara publication <u>KIAF-1405 Service Assessment Criteria – Overview</u> provides guidance for the creation of a SoCA.

3.4 Statement of Conformity

3.4.1 Requirements

The Statement of Conformity (SoC) SHALL identify the selected SAC(s) and the applicable version of it/them. For each criterion (and at each applicable Assurance Level(s), if the selected SAC has such) the SoC presents for the benefit of the Assessor and the evidence which the CSP believes demonstrates their conformity to each criterion (or that evidence which may have been requested by the Assessor, e.g. records of events, etc.).

After reviewing the evidence presented to them by the CSP the Assessor SHALL record their findings using one of the following 'finding' expressions. Use of these defined expressions ensures that each criterion receives a definitive finding expression from the Assessor, rather than being left blank with no explicit statement, which could lead to uncertainty as to the final outcome of the Assessment. This also ensures consistency between the CSP's SoCA and the Assessor's findings, which in turn gives the ARB confidence in their review. The finding expressions SHALL be limited to those described in the following table.

SoCA expression:	Assessor's SoC finding		
SAC reference, title and applicable version «repeated for each applicable SAC, with one of the following finding expressions being used for each criterion (or if necessary, its sub-parts) within the SAC»			
	Conformant		
In scope – applicable	Fulfilled by Pre-Approved Service « <i>ref</i> .»		
	Not assessed in this ACR		
	Minor Non-Conformity		
	MAJOR Non-Conformity		
	RTO – Deferred, pending PoT Assessment		
In-scope – not applicable	Non-applicability accepted - with justified non-applicability stated in the SoCA		
Not in scope Not in scope			

The precise meanings and required actions to determine each of the finding expressions used above are explained further in §3.4.2.

Recognizing that some persons may have different color perception, the use of color-coding is suggested but not absolutely mandated. However, adoption of these colors if possible would provide consistent use of colors, so the ARB is provided with uniform presentation.

Kantara prescribes the required minimum content of the SoC but not a specific structure. The SoC MAY be a stand-alone document or MAY be incorporated into another document if that is justified and effective. Kantara's requirement is that a specific documented source of the required information SHALL be available and labeled as the SoC.

3.4.2 Guidance

'Conformant'

means that, for a criterion (or a sub-part thereof) which the SoCA defines as being 'In scope – applicable' the Assessor has been presented with sufficient evidence to determine with all reasonable confidence that the functionality, activity or status is being met;

'Fulfilled by Pre-Approved Service «ref.»'

means that, for a criterion (or a sub-part thereof) which the SoCA defines as being 'In scope – applicable' the Assessor has been presented with sufficient evidence to determine with all reasonable confidence that the functionality, activity or status of the complete criterion is being met by the referenced Pre-Approved Service.

ARB Policy www.kantarainitiative.org 'Not assessed in this ACR'

means that, based on the notional 50-50 split of criteria between the two ACRs executed within a triennial cycle, this criterion *in toto* has been omitted from the ACR being executed.

'Minor Non-Conformity'

means that, for a criterion (or a sub-part thereof) which the SoCA defines as being 'In scope – applicable' the Assessor has been presented with insufficient evidence to justify a determination of 'Conformant' for the functionality, activity or status that is required, such that they find there to be a non-conformity which presents a **minor but non-negligible risk** to the assurability of the service.

'Major Non-Conformity'

means that, for a criterion (or a sub-part thereof) which the SoCA defines as being 'In scope – applicable' the Assessor has been presented with insufficient evidence to justify a determination of 'Conformant' for the functionality, activity or status that is required, such that they find there to be a non-conformity which presents an **unacceptable risk** to the assurability of the service.

Although extremely unlikely that a CSP would submit to the ARB an SoC with a 'Major Non-Conformity' finding (since the ARB would not recommend Approval for such a service) this provides for a consistent manner in which it should be presented by the Assessor to the CSP.

'RTO - Deferred, pending PoT Assessment'

means that the assessment has not been able to review operational records and hence a 'Period-of-Time' assessment is yet to be completed. Refer to §6.1.2.2 'Ready To Operate'.

'Non-applicability accepted'

means that for a criterion (or a sub-part thereof) which the SoCA defines as being 'In scope – not applicable' the Assessor has verified and accepted the justification for its non-applicability.

Irrespective of the ARB's acceptance of a SoCA, an Assessor is entitled to challenge a claim of non-applicability and where necessary to provide an alternative finding according to the CSP's ability to fulfil the requirement where it is agreed to be applicable. Correspondingly, the CSP is responsible for amending its SoCA to reflect the changes to applicability.

'Not in scope'

is a repetition of the assertion in the SoCA and needs no Assessment.

The Kantara publication <u>KIAF-1405 Service Assessment Criteria – Overview</u> provides guidance for the creation of an SoC.

3.5 The Overall Application / Approval Process

The overall process that governs the application for service approval and the granting and maintenance of approval consists of seven key stages. These are summarized below, are

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shown in Figure 1 and each numeric symbol in the list below is hyper-linked to the respective descriptive section of this Handbook.

- \bigcirc CSP's Initial Application;
- **(2)** ARB review of the Application;
- **3** Service Assessment Review;
- (4) 'Ready To Operate' procedures;
- **(5)** Annual Conformity Reviews;
- **(6)** Unscheduled Assessments;
- \bigcirc Approval Termination.

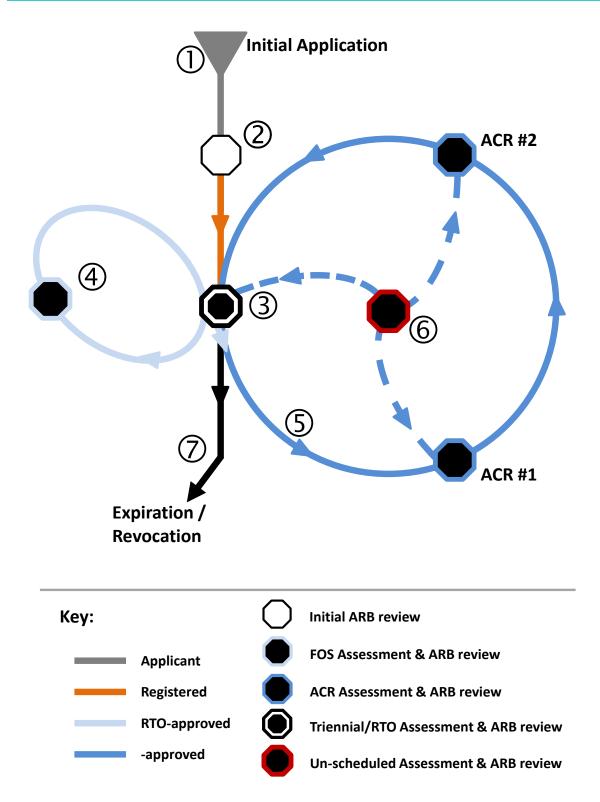


Figure 1 - High-level view of the CSP Application / Approval processes.

ARB Policy www.kantarainitiative.org IPR – Option Patent and Copyright The Kantara IAF's Assessment model is based on established best practice as defined in ISO/IEC 17065:2012 "*Conformity assessment* — *Requirements for bodies certifying* [...] *services*" [IS17065], which allows for annual reviews to be less demanding than the initial Assessment, subject to the three-year cycle being re-commenced when the Grant of Approval is renewed on the third anniversary of it being last granted (or reset).

Each of the key stages, as identified above in Figure 1, is described in a dedicated section (following), in two parts.

The first part, 'x.1', describes the purpose and place in the overall scheme of the key stage in question and sets out the 'rules' for the processes involved.

The second part, 'x.2', presents a 'script' that describes the sequential actions required of each of the involved parties. To ensure clarity as to how the parts of the defined processes relate to specific parties the text is indented at discrete levels, each level being specific to a particular party. Note that any interaction between these parties for the purposes of clarifying matters is not explicitly scripted but is expected to be conducted in accordance with the assigned responsibilities.

The following passages show how this scripting is laid out.

CSP:

Text assigned to the Credential Service Provider (CSP) defines actions that are the responsibility of the CSP to enact.

ARB:

Text assigned to the Assessment Review Board (ARB) defines actions that are the responsibility of the ARB to enact.

NOTE: For the purposes of this Handbook, the activities of the Secretariat to the ARB, KI Executive Director and of the KIBoD are also included at this level because of their more intimate relationship to the ARB, but the script makes it clear which of these parties are responsible for any given actions.

Assessor:

Text assigned to the Assessor defines actions that are the responsibility of the Assessor to enact.

NOTE: Only actions directly pertinent to the approval process are described in this Handbook. A separate Handbook, 'IAF-1350 Assessor Accreditation Handbook' will address the details of the performance of assessor accreditation and assessor-specific aspects of Assessments.

These roles are described in <u>IAF Overview</u>.

3.6 Assessor selection and Assessment

The SAC declared as being 'In Scope' in the SoCA SHALL be the minimum basis against which the Service Subject to Assessment SHALL be assessed. That is, at least the applicable criteria

from the selected SAC SHALL be assessed-against. The CSP MAY have other criteria included in the Assessment, e.g. related Assessment Profiles, technical profiles, etc.

Actual Assessment SHALL be carried-out by a Kantara-Accredited Assessor, which will perform an Assessment of the service(s) referenced in the Application, with the objective of determining the specified service as being conformant to the selected SAC.

The CSP MAY, by agreement with its selected Assessor, identify further criteria and profiles to be included in the scope of the Assessment so long as these do not conflict with the selected SAC and the Assessor has the competence to assess the full scope required by the CSP.

IS17065: §6.1.1.2, 7.4.2

CSPs are at liberty to select a different Accredited Assessor for successive Assessments, if they so choose.

Following an Assessment the Assessor SHALL provide to the CSP a KAR. A KAR attesting to a finding of conformity will be one of the documents required of the CSP to support any application for Approval of their service.

IS17065: §7.4.3, 7.4.6

3.7 Trust Status List

The Kantara Secretariat SHALL maintain a register of all Grants of Approval (see §3.6), their service type, their Class of Approval, their status and termination date, and other essential information.

Kantara SHALL publish and maintain the status of all its Registered Services and Approved Services, and its Applicant and Accredited Assessors, in a Trust Status List (TSL).

Status changes SHALL be posted by published process within two calendar weeks of them being formally-approved or determined.

IS17065: §7.7.1

Notice of status changes SHALL be 'pushed' to any statutory, industry or other bodies requiring such notification, and to any other interested parties who have signed-up to receive such notifications.

3.8 Effective dates of Approval

Effective dates of Approval termination, fulfillment of remedial actions and any other specific events SHALL be set to be the last day of the month in which an event is due. For example, a Grant of Approval issued on any day of a given month SHALL naturally terminate on the last day of that same month, in the following year (in the absence of any other actions being taken which might affect the status of the Grant).

3.9 Exceptions

In the event that any circumstances arise, concerning the processing of applications for and maintenance of a Grant of Approval, which are not directly or not adequately covered by this handbook the ARB SHALL have the authority to determine and prosecute a resolution at the time

of the event which is in keeping with <u>Section 1.2 (Purpose)</u> and <u>Section 3.1 (Principles)</u> of this handbook, subject to due notice being given in the case of changes to procedures and practices which affect an Applicant.

After the event the Secretariat SHALL either:

- a) if it is considered unlikely that the circumstances could arise again, retain a record of the circumstances and their resolution, as a basis for applying 'precedence' in that unlikely event; OR
- b) take steps to ensure that there is a revision to this handbook to accommodate the circumstances when and if they do arise again.

4 STAGE 1 - CSP's INITIAL APPLICATION PACKAGE

4.1 **Purpose and processes**

4.1.1 General description

An Initial Application Package for Approval by a CSP is required as the first submission for a service, i.e. one which is not already Approved and not already Registered.

CSPs SHALL submit an Initial Application Package, essentially to introduce themselves and their service to Kantara, defining the scope and nature of their service, and other essential information, including the SoCA, specifying which SAC and specific criteria therein against which they wish their service to be assessed.

CSPs are encouraged to make contact with the Secretariat during the preparation of their Approval package to give themselves the best chance of getting through Assessment of their application with minimal, if any, difficulties. CSPs can also at this time discuss their requirements for Assessment with Kantara-Accredited Assessors, though they should note that Assessors are prohibited from performing Assessments until such time as the CSP can provide copy of its Trust Mark License Agreement, countersigned by Kantara Initiative.

4.1.2 Supporting templates

The Secretariat SHALL be responsible for ensuring that the necessary supporting *pro formæ* documents are reviewed as circumstances dictate and are maintained at a current status. These *pro formæ* SHALL be available as templates on the KI web site such that they can be readily located and downloaded by any interested parties. These documents shall comprise:

- a) Application for Service Approval (ASA);
- b) Specification of a Service Subject to Assessment (S3A);
- c) Statement of Criteria Applicability (SoCA);
- d) Statement of Conformity (SoC);
- e) Kantara Assessor's Report (KAR).

In addition the Secretariat SHALL liaise with the KIBoD to ensure that the latest versions of applicable agreements are on the KI web site such that they can be readily located and downloaded by any interested parties. These documents SHALL comprise:

- f) Membership Agreement;
- g) Trust Mark License Agreement (TMLA).

4.1.3 Acceptance of applicable terms

Kantara Initiative protects against the potential misuse of its Trust Mark by requiring all applicants to sign the Trust Mark License Agreement (TMLA) prior to seeking Assessment of their service(s). Each Application includes the CSP's commitment to the terms and conditions defined in the TMLA. These terms and conditions address the complete life-cycle of participation in the IAF

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and SHALL be re-signed at the commencement of each three-year cycle and confirmed on the first and second anniversaries of that signature.

Application for a Grant of Rights of Use, withdrawal of Application (without receipt of a Grant of Rights of Use) during the period in which a Grant of Rights of Use is awarded, after termination of a Grant of Rights of Use, and the CSP's signature to the <u>TMLA</u> at the time of Application shall bind the CSP to the terms and conditions at all stages of participation in the IAF thereafter.

4.2 Required actions

CSP:

The CSP SHALL download and review the latest versions of the template documents referenced above. If, after review, the CSP has any questions concerning the documents and their implications, they are advised to contact the Secretariat to discuss them.

Assuming the CSP finds the terms etc. acceptable they SHALL complete the documents, noting that the SoCA has to be completed according to the type of service the CSP wishes to have approved and the applicability of all criteria in its selected SAC must be stated.

All of these documents give guidance for their completion.

When all documents are ready for submission they SHOULD be submitted to the Secretariat.

IS17065: §7.4.3

5 STAGE 2 - ARB REVIEW OF INITIAL APPLICATION PACKAGES

5.1 **Purpose and processes**

This stage is the ARB's first formal notification of the CSP's intentions to have their service assessed and is the ARB's opportunity to ensure that, prior to any Assessment commencing, the CSP understands what is expected of them, that they have accepted their obligations through the appropriate agreements, that the service is, in principle, suitable for Approval by Kantara, subject to the service being found conformant to the applicable criteria, and that an appropriate set of criteria have been identified and which align to the description of the service.

Depending on the SAC which the CSP has selected, the CSP MAY be required to state at the time of their initial application whether they are submitting for Approval a Full Service or a Component Service. In addition, when it comes to performing the Assessment, the CSP will have to indicate whether it has a fully-operational service to be assessed or have one which is ready for, but not actually engaged in, operations. These types of service scope and Assessment type are addressed in §6.1.1 and §6.1.2, respectively.

On Kantara's acceptance of the initial application the Applicant can request that their service be recorded and published through the TSL as a 'Registered Service'. Irrespective of whether published or not, the 'Registered Service' status SHALL be effective for a period not exceeding twelve months, at the end of which the registration SHALL become lapsed, if it has not been replaced by a Grant of Approval.

IS17065: §7.7.1

5.2 Required actions

5.2.1 Handling of Initial Application Packages on receipt

ARB:

On receipt of an Initial Application Package the Secretariat SHALL review its contents and undertake the following validations:

- a) review all documents associated with the package for completeness, including the accessibility of any linked documents;
- b) send the CSP's Point of Contact (PoC) confirmation of receipt of its application, and request of the CSP any revisions or explanations necessary to resolve problems identified during the validation;
- c) where possible, validate any claims made in the package; such as certifications, insurance policies, etc.;
- *d)* form the ARB Review Team, accounting for the ARB's Recusal policy (see ARB Charter);
- e) pass the package to the ARB Review Team, setting a target completion date of not more than three weeks hence;

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f) during the course of the Review Team's evaluation of the package (see §5.2.2), advise the CSP's PoC of any irregularities with the package and seek whatever clarification is necessary.

The ARB reserves the right to reject an Initial Application Package without any effort to evaluate it if, within the preceding three-month period, the ARB has rejected an Initial Application Package from the Applicant for the same service.

5.2.2 ARB Review Team Evaluation

ARB:

On notification that an Initial Application Package is ready for evaluation, the ARB Review Team SHALL review the package within their terms of reference as assigned by the Chairperson of the ARB (who can choose to assign specific focuses to specific ARB members, as their particular experience might apply to the package).

The Review Team's evaluation of the package SHALL progress as follows:

- *a)* the S3A SHALL be reviewed to determine whether it provides a sufficient description of the CSP's service;
- b) the SoCA SHALL be reviewed to determine whether, based upon the description provided in the S3A, the CSP's selection of criteria against which its service is to be assessed is a good 'fit';
- c) where the Application makes use of a Pre-Approved Service, that the overlay of the collective criteria covered by the combination of the Applicant's SoCA and those of the included Pre-Approved Services encompasses the full set of criteria declared as being 'In scope', for all chosen Assurance Levels, where applicable;
- d) if the Review Team finds the material submitted in support of the Application insufficient to allow it to reach an understanding of the service or to determine a finding, requests for clarification or additional information SHALL be made to the Secretariat, who SHALL communicate with the CSP's PoC;
- *e)* such requests (see d), above) SHALL be recorded, as SHALL be the Applicant's response, in whatever form;
- f) the Review Team's findings and its recommendation as to whether the Application be accepted or rejected, with justification, SHALL be communicated to the Secretariat;

CSP:

CSPs are entitled to withdraw their Application at any time during this review period, and need not give any reason.

ARB:

If the CSP advises that they wish to withdraw their application the Secretariat SHALL record the application as withdrawn and close the file.

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5.2.3 Post-ARB Review actions

ARB:

Upon receipt of the Review Team's decision, the Secretariat SHALL advise the CSP's PoC of the outcome, either that the Initial Application has been accepted as being fit for Assessment, or that the application has been rejected, with reasons why²;

If the ARB's recommendation is to accept the application the Secretariat SHALL:

- a) further advise the CSP that their 'Registered Service status will be valid for 12 months from the date of notification of the ARB's decision;
- b) unless the CSP has requested otherwise in its Application package, update the Kantara TSL to include the CSP and its service as a 'Registered Service'.

IS17065: §7.7.1

Notification of a rejection shall:

- *c) state the reasons for rejection;*
- *d)* describe any conditions which if fulfilled would enable the ARB to find reason to accept a resubmission of the Application;
- e) advise the CSP of their entitlements as to lodging an Appeal (see §5.2.4).

Unless an appeal is lodged by the CSP within the permitted period, the Secretariat SHALL record the application as 'rejected' and close the file.

5.2.4 Appeals

CSP:

CSPs SHALL have the right to appeal against the KI Executive Director's decision to reject its application, conditional Grant or a denial by submitting an appeal to the Secretariat stating the grounds and arguments on which their appeal is founded. Appeals SHALL be submitted within four weeks of the date of notification of the KI Executive Director's decision. All Appeals SHALL be handled by the KIBoD.

ARB:

Upon receipt of an appeal the Secretariat SHALL acknowledge its receipt to the CSP and request that the KIBoD gives the appeal consideration and selects three of its members, without current involvement in the assurance program, to act as

² It is expected that any irregularities or omissions will have been addressed by 5.2.1 f) (above), exercised multiple times if necessary, and hence any rejection at this stage shall be for cause which has not been resolved by the CSP.

ad hoc KIBoD committee members, thereby constituting an Appeals Board. This Appeal Board SHALL be subject to ARB confidentiality procedures, for the duration of the conflict resolution process.

The appeal SHALL be heard within a two-week period of the Appeal Board being established. The Appeal Board SHALL hold a meeting of all parties in order to hear the arguments from the KI Executive Director and the Applicant, before determining their findings in camera. The Appeal Board SHALL make one of the following recommendations: uphold the KI Executive Director's decision; override the KI Executive Director's decision; or, propose a remediation that is agreeable to the Applicant and put that recommendation to the KI Executive Director for action.

The outcome of the Appeal SHALL be formally recorded and notification of the final determination given to the Applicant.

IS17065: §5.1.3 l)

6 STAGE 3 - SERVICE ASSESSMENT REVIEW

6.1 **Purpose and processes**

This stage is the nucleus of the Assessment Framework (see Figure 1). Although there are different types of Assessments, the required actions described for this stage (see below in §6.2) are generally representative of those required for Triennial Assessments (see §6.1.2 for a description of all Assessment types). The steps described might require to be adjusted in small degrees to accommodate other Assessment types.

Assessments might also differ according to the scope of functionality included within a specific service, and that aspect of an Assessment is dealt with first, below.

6.1.1 Scope of Service

6.1.1.1 General

A CSP SHALL be required to show conformity of its service to all criteria within the applicable SoCA, for the applicable Assurance Level(s). A Credential Service can have all criteria classified in the applicable SoCA as 'In scope' as being met by the service itself or they can be met by the inclusion of any number of Pre-Approved Services.

The Applicant's SoCA SHALL state which criteria (if any) are met by any Pre-Approved Services, which SHALL be identified in the SoCA by their Kantara Grant ID (see §3.3).

This Assessment SHOULD NOT include re-examination of the conformity of included Pre-Approved Services, unless circumstances suggest there is a justified reason to do so, but the Assessment SHALL establish that:

- a) where any criterion happens to fall into more than one Pre-Approved Service, that there is a clear responsibility on the part of the applicant Credential Service that reliance upon such a criterion is being appropriately met or that its dual operation does not present any conflicts in the overall provision of the service;
- b) the provider of each Pre-Approved Service has, within the thirty calendar days preceding the start of the Assessment, provided an attestation to the CSP to the effect that the scope, description, operation and conformity of their Pre-Approved Service has not materially changed³ since the last Assessment.

³ A material change would be one which required a change to the scoping statement, involved a change of functionality provided or the manner of provision of defined functionality, or which had changed to the point where conformity to any applicable SAC requirement could no longer be upheld or had been replaced by a means of conformity which had not been reviewed in the course of the Assessment on which the present Approval was granted.

6.1.1.2 Special Provisions - Pre-Approved Services

The concept of a Pre-Approved Service is intended to permit flexibility wherein a CSP offers their service as a core function for the clients of that service to build upon, in the provision of their own service (e.g. to satisfy different market sectors or to permit operations in different jurisdictions). This approach allows significant flexibility in how services are developed by no longer imposing a specific dominance of any particular aspect of the service's provision. Such services are submitted as Component Services and are referred-to as Pre-Approved Services when they become incorporated into another CSP's service. It is therefore to be expected that the SoCA applicable to a Component Service would have omissions in the set of criteria to which it claimed conformance in comparison to the full set of criteria for a given set.

6.1.1.3 Special Provisions - Full Services

Whereas the Provider of a Full Service SHALL ordinarily be conformant with all criteria within the applicable SACs which are within the scope of its service a CSP MAY exclude specific criteria, but in order to do so it SHALL show that the responsibility for meeting those criteria is assumed by the CSP's customer(s). This provision allows for the CSP's customers to efficiently leverage information and processes already in their hands. CSPs who claim such exclusions SHALL demonstrate how the excluded requirements are communicated to their customers and how their customers are obliged to fulfill them and the measures by which they SHALL be held accountable (typically through explicit notices and sections in service agreements).

6.1.2 Assessment types

6.1.2.1 Triennial

Triennial Assessments (i.e. those conducted for the purposes of an initial Grant of a three-year Approval and for subsequent renewal of that Grant each three years) SHALL require Assessment against all criteria specified in the Applicant's SoCA. They are effectively Period-of-Time assessments.

Triennial Assessments SHALL address the full set of applicable criteria, including review of operational performance and records. Such Assessments shall cover at least a <u>minimum</u> operating Period-of-Time of 60 days if the service has not operated for any longer and shall otherwise review an operating Period-of-Time up to a maximum of twelve months, prior to the date on which the Assessment commenced.

6.1.2.2 Ready To Operate

Experience has shown that, prior to becoming operational, some CSPs might desire a Kantara Approval in advance of there being any operational history on which a Triennial (i.e. Period-of-Time) Assessment could be based. Kantara provides for such circumstances by granting a Ready To Operate (RTO) Approval (i.e. one resulting from an Assessment for which there is no operational record to underpin the quality of the Assessment) as an interim measure, conditional upon a follow-up Fully Operational Service (FOS) Assessment (see §6.1.2.3) being provided within a specific period (see below) after the point in time at which operational records begin to be generated.

RTO Assessments SHALL require that the service meets all applicable criteria to the fullest extent practicable but for the provision of proof of effective operation through the furnishing as evidence of records accumulated during the service's operations.

Consequently, a RTO Assessment will conclude with some criteria, which fall within overall scope of the service's fully operational provisioning, being determined as fully or partially out of scope for the RTO Assessment because the CSP's demonstration of full compliance is pending the availability of sufficient operational data to support those claims.

When Approval is granted on the basis of a RTO Assessment the published status of the Approval SHALL carry the qualifier 'Ready To Operate'.

If no application for Approval based upon a FOS Assessment is received within twelve months of the granting of a RTO Approval, the Approval SHALL lapse and the CSP shall be required to re-start the whole Application process.

6.1.2.3 Fully Operational Service

When the subject Service becomes operational after previously undergoing a RTO Assessment, the service SHOULD be operating for a <u>minimum</u> 60 days <u>before</u> a Fully Operational Service (FOS) Assessment can commence (i.e. one addressing a Period-of-Time over which the Service has been operational and therefore has established logs and records of operations which can provide adequate supporting evidence). This minimum period MAY be varied by the Assessor, who SHALL document the reasons for doing so in the associated KAR, and the final acceptability of this shall be the responsibility of the ARB.

Until such time as Approval is granted on the basis of a FOS Assessment, any 'Ready To Operate' Approval status based upon a RTO Assessment will remain, subject to its normal termination terms.

Subject to the following provision, the scope of the FOS Assessment SHALL be limited to only those criteria which were specifically excluded, fully or partially, from the RTO Assessment by its nature. However, Assessors SHALL have discretion to include within the FOS Assessment such additional criteria as were already included in the RTO Assessment as they deem necessary to ensure that, at conclusion of the FOS Assessment, the subject Credential Service is effectively at the same state of assurance as if a Triennial Assessment had been performed. This provision accounts for instances where there is a significant lapse between the two Assessments, taking into account the fact that a full Triennial cycle will commence on the conclusion of the FOS Assessment. Assessors SHALL document the reasons for setting a broader scope for the FOS Assessment in the associated KAR.

At the conclusion of a FOS Assessment the ARB SHALL recommend unqualified Approval to the KI Executive Director, on the Grant of which the 'three year' triennial cycle SHALL commence.

6.1.3 Site visits

No site visits are required at AL1 or xAL1.

ARB Policy <u>www.kantarainitiative.org</u> IPR – Option Patent and Copyright At AL2/xAL2 and above, when performing either Triennial Assessment or a Fully Operational Service Assessment, the Assessor SHALL conduct an on-site visit sufficient to ensure that operations are being adequately executed.

Although site visits are not mandatory when a RTO Assessment is being performed, Assessors SHALL consider whether, in their review of risk associated with the Assessment and the reason for its performance, an on-site visit is necessary. The Assessor's reasoning as to whether the on-site visit is performed SHALL be documented in the KAR.

6.2 Required actions

This section applies to all scopes and types of service Assessments against any selected SAC.

CSP:

The CSP SHALL contract for its Assessment with an Assessor selected from Kantara's published Trust Status List (which includes both Approved Services and Accredited Assessors).

The CSP SHALL provide to its selected Assessor copy of its Application Package and/or of any preceding KAR/S3A/SoCA/Application Package documents, in order that the Assessor can understand the nature and scope of the Assessment.

The CSP SHALL provide to the Assessor references to documented evidence of conformity and allow the Assessor access to its records, physical locations and other materiel, as the Assessor reasonably requests in order to perform the Assessment.

Assessor:

The CSP's selected Assessor SHALL perform the Assessment in accordance with:

- *a) the terms of their Accreditation;*
- b) the requirements of the <u>IAF Assessor Accreditation Handbook</u>;
- c) the scope determined by the CSP's S3A, the associated SoCA and the applicable SAC.

It must be noted that, in accordance with the <u>IAF Assessor Accreditation</u> <u>Handbook</u>, an Assessor SHALL report as a Major non-conformity any prior Minor non-conformity which the CSP has not resolved by the conclusion of the Assessment in hand.

On completion of the Assessment the Assessor SHALL furnish the CSP with a completed SoC recording its findings and a Kantara Assessor's Report (KAR), prepared in accordance with the requirements of the <u>IAF Assessor Accreditation</u> Handbook.

6.2.1 Submission of the KAR

A KAR can record a finding of conformity citing no, one or more **minor** non-conformities, OR a failure to find conformity, citing one or more **major** non-conformities. Each of these cases is addressed below.

6.2.1.1 Finding of conformity

CSP:

The CSP SHALL submit to the Secretariat its Approval Package, consisting of:

- a) the KAR and supporting SoC (which must align to the applicable SoCA see b), below), which MAY be redacted, if the CSP considers details of evidential sources to be sensitive, to show only the Assessor's specific findings, whether they be unqualified conformity or finding of a Minor non-conformity;
- b) updated SoCA and S3A, <u>if</u> any of the information in either or both of them has changed since the last time it was submitted. Since each document is a source of information that will be posted on the Kantara TSL, the CSP SHALL ensure this information continues to reflect the service as assessed.

The CSP SHALL highlight any part of their SoCA which has changed since the last submission to the ARB.

IS17065: §7.7.1

ARB:

On receipt of an Approval Package the Secretariat SHALL review its contents and undertake the following validations:

- *c) review all documents associated with the package for completeness, including the accessibility of any linked documents;*
- *d) ensure consistency with information previously submitted;*
- e) ensure that there are no Major Non-Conformities recorded in the KAR;
- *f) if any Minor Non-Conformities are recorded in the KAR, ensure each has an acceptable remedial action and completion date stated;*
- g) if a prior Assessment has been conducted, that the KAR being reviewed refers to the previous Assessment's KAR and explicitly reports on how those non-conformities have been satisfactorily resolved;
- *h*) *ensure that application fee has been paid and cleared.*

If any of these conditions are not fulfilled or show irregularities the Secretariat SHALL return the Approval Package to the CSP's PoC with a request that the discrepancies be resolved and the package re-submitted.

Once an Approval Package has met the above requirements the Secretariat SHALL inform the ARB Chairperson of its status.

The ARB Chairperson SHALL form the ARB Review Team, accounting for the ARB's Recusal policy (see ARB Charter). When the Review Team members have

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been confirmed the Chairperson SHALL set a target completion date of not more than three weeks hence.

The Secretariat SHALL then:

- *i)* pass the Approval Package to the ARB Review Team;
- *j)* during the course of the Review Team's evaluation of the Approval Package (see §6.2.2), advise the CSP's PoC of any irregularities with the package and seek whatever clarification is necessary.

Assessor:

By issuing a KAR that includes minor non-conformities and remedial actions the Assessor is asserting their satisfaction that the defined actions are likely to yield a conformant result.

CSP:

By its submission of the KAR, the CSP SHALL commit to applying its best efforts to resolve the non-conformity by the actions stated in the KAR and to perform such actions within the specified period of time.

6.2.1.2 Finding of non-conformity

CSP:

If the CSP receives a KAR that states that the Assessor has not found conformity (which SHALL be determined by there being one or more **major** nonconformities), or if the CSP chooses to terminate the Assessment because of adverse findings during the course of it, the CSP is advised to strive to resolve the non-conformities and re-engage with the Assessor to achieve a finding of conformance and then proceed with submission of its Approval package as described in §6.2.1.1.

If the CSP chooses not to proceed with the Assessment it need do nothing more its 'Registered Applicant' status will terminate twelve months after its granting. The CSP MAY however, at any time until its termination, request the Secretariat to remove from the TSL with immediate effect the service's 'Registered Applicant' status.

ARB:

If the Secretariat receives an Approval package that includes a KAR stating a finding of a Major non-conformity it SHALL be rejected and returned to the CSP, citing the above two paragraphs which address the CSP's choice of actions in such cases.

The Secretariat SHALL record the rejection in its files.

6.2.2 ARB Review Team Evaluation

ARB:

On notification that an Approval Package is ready for evaluation, the ARB Review Team SHALL review the package within their terms of reference as

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assigned by the Chairperson of the ARB (who MAY choose to assign specific focuses to specific ARB members, as their particular skills apply to the package).

The Review Team's evaluation of the package SHALL progress as follows, taking into account the type of service Assessment which has been conducted (see the introductory paragraph to \$6):

- *a)* review the SoCA to ensure that the applicable criteria continue to be appropriate for the service definition given in the S3A;
 - *b)* review the SoC for any Assessor comments that might be a cause for concern as to the findings;
 - c) if there are non-conformities cited in the KAR, review the proposed remedial actions for their appropriateness in terms of solution and timescale;
 - d) whether there are such a number of non-conformities or a number of non-trivial (but nonetheless **Minor**) Non-Conformities that the Review Team cannot accept the finding of conformity;
 - e) if the Review Team finds the material submitted in the package is insufficient to allow it to reach an understanding that would support a recommendation for Approval, requests for clarification or additional information SHALL be made to the Secretariat, who SHALL communicate with the CSP's PoC;
 - *f)* such requests SHALL be recorded, as SHALL be the Applicant's response, in whatever form;
 - g) the Review's Team's findings and its recommendation as to whether Approval be recommended/continued to the KI Executive Director or whether the package be rejected, with justification, SHALL be communicated to the Secretariat;

The Assessment could have been based on either a 'Ready To Operate' (RTO) status or a 'Fully Operational Service' (FOS) status. In the case of the former, the next step is 3; in the case of the latter, it is 5.

6.2.3 Post-ARB Review actions

ARB:

If the Review Team's recommendation is for Approval the Secretariat SHALL notify the KI Executive Director of the ARB's recommendation, with any conditions which the Review Team have also recommended;

The KI Executive Director SHALL make a decision, based upon the ARB's recommendation and any other considerations the KI Executive Director deems necessary, that SHALL be conveyed to the Secretariat. The KI Executive Director SHALL also advise on any conditions it chooses to apply.

If the KI Executive Director's decision is to extend a Grant of Approval, the Secretariat SHALL:

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- a) advise the CSP's POC that the Service has been extended a Grant of Approval (or that the Grant remains in effect, as appropriate to the type of Assessment being reviewed);
- *b)* record the CSP's service as being 'Approved', with any qualifications;
- *c)* unless the CSP has requested anonymity in its Application package, update the Kantara TSL to include the CSP's service as being 'Approved', with any qualifications;

IS17065: §7.7.1

In all other cases the Secretariat SHALL:

- d) advise the CSP's PoC that Approval has been denied, with reasons why;
- e) unless an appeal is lodged by the CSP within a calendar month:
 - *i) if the service has not already been issued a Grant of Approval as a FOS service, Terminate the Approval, record the application as 'rejected' and close the file.*

IS17065: §7.4.6 - '4.9 inc.

6.2.4 Appeals

A CSP can only appeal decisions against either a conditional Grant or a denial. The process for handling an appeal SHALL follow that set out in §5.2.4.

IS17065: §5.1.3 l)

6.2.5 Assessor Evaluation

Whenever a review is finally concluded the ARB SHALL ensure that its obligations under [AAH] \$10 are fulfilled.

7 STAGE 4 - 'READY-TO-OPERATE' PROCEDURES

7.1 Purpose and processes

The 'Ready To Operate' status of a service is a 'holding' stage while the service commences operations and accumulates operational records etc. as evidence of its adherence to the terms of its Service Definition, policies, processes and procedures, etc.

7.2 Required actions

CSP:

The CSP SHALL contract for its Assessment with an Assessor selected from Kantara's published Trust Status List (which includes both Approved Services and Accredited Assessors). It is expected, but not mandatory, that a CSP will retain the services of the same assessor that conducted its 'RTO' Assessment for its 'Fully Operational Service' (FOS) Assessment, simply for reasons of efficacy.

Once the CSP has accumulated the requisite minimum period of operations the CSP SHALL advise the Assessor that it is ready for the performance of the FOS Assessment.

From hereon, the process for the CSP is the same as that described for stage ③, noting that the Application package SHALL be amended if there have been any changes since the RTO Assessment, so as to reflect the service as it is at this time of Assessment.

ARB:

When an RTO application is issued a Grant of Approval the Secretariat SHALL set a deadline 12 months forward, by which date the Secretariat must have received a KAR based on a FOS Assessment (i.e. the CSP re-enters the process at 3 on the FOS path) or the Secretariat SHALL terminate the Approval (see 7).

8 STAGE 5 - ANNUAL CONFORMITY REVIEWS

8.1 **Purpose and processes**

Once approved on the basis of a Triennial or FOS Assessment the CSP SHALL then undergo two successive Annual Conformity Reviews to confirm continued Approval, before undergoing a full Assessment to re-start the triennial Approval cycle. Annual Conformity Reviews MAY have a reduced scope, as defined below.

CSPs have the responsibility for ensuring that they have performed an annual Assessment in order to maintain their Approved status, whether that be by an Annual Conformity Review or a Triennial Assessment.

IS17065: §7.9

8.1.1 AL1/xAL1 ACRs

For ACRs conducted at AL1/xAL1, no actual Assessment SHALL be required. CSPs SHALL submit to the ARB a self-assertion of their continued conformance with all applicable criteria (per their SoC).

8.1.2 AL2/xAL2 AND HIGHER ACRs

For ACRs conducted at AL2/xAL2 and higher, the scope of criteria to be assessed SHALL be:

- a) all applicable CO_SAC criteria, when that SAC is included in the SoCA;
- b) all criteria which Kantara has revised through re-publication of the applicable SAC prior to 120 days of the commencement of the ACR;
- c) any criteria addressing areas of risk that are of concern to either the CSP itself or to its Assessor;
- d) any criteria against which a non-conformity was identified and subsequently remediated (or for which remediation is outstanding) at the preceding Assessment (of either type);
- e) any criteria where there has been a significant change to how the service is operated and needs to be assessed (e.g. changes to outsourcing arrangements, or to applicable policies);
- f) sufficient of the remaining criteria (inclusive of those indicated as being 'Not applicable, which SHALL be re-validated as such) not already included within the preceding categorizations to make up a nominal 50% of the selectable (i.e. non CO_SAC) criteria, subject to ensuring that each selectable criterion is assessed at least once in either ACR#1 or ACR#2 of the triennial cycle.

For ACRs conducted at AL2/xAL2 and higher, CSPs SHALL submit to the ARB a KAR confirming continued conformance with all 'In scope' criteria (per the CSP's SoCA).

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8.1.3 Site visits

No site visits are required at AL1/xAL1.

Although site visits are not mandatory at AL2/xAL2 and above, when an ACR is being performed, Assessors SHALL consider whether, in their review of risk associated with the Assessment, an on-site visit is necessary. The Assessor's reasoning as to whether the on-site visit is performed SHALL be documented in the KAR.

8.2 Required actions

The process for going through these ACRs is essentially that defined at $\underline{3}$, subject to the variances noted below.

ARB:

The Secretariat SHALL notify a CSP of the pending renewal date for each of its approved services.

CSP:

On receipt of its KAR and prior to submission to Kantara, the Application package SHALL be amended if necessary to reflect the service as it is at this time of Assessment.

CSPs SHALL have their necessary Assessment performed and submit to Kantara the appropriate documents by the renewal/termination date.

9 STAGE 6 - UNSCHEDULED ASSESSMENTS

9.1 **Purpose and processes**

9.1.1 CSP-notified

An unscheduled Assessment might arise because the context or specification of the service changes such that it no longer meets the scope for which it has been Approved and therefore a modification or extension of the scope is required. The CSP commits to Kantara to monitor its conformance against scope and to initiate actions when it believes that a service is no longer in scope.

9.1.2 ARB-requested

The ARB could be presented with information from which it concludes that an unscheduled Assessment is necessary. If so, it SHALL instruct the CSP of the need to perform an unscheduled Assessment, define the scope of that Assessment and set a deadline for the submission of a revised Application Package which addresses the required scope.

IS17065: §7.11.1

9.1.3 Site visits

No site visits are required at AL1.

At AL2/xAL2 and above, the need for a site visit SHALL be determined by the Assessor, taking into account the nature of the need for the Assessment and the risk associated with the Assessment, or it may be requested by the ARB. The Assessor's reasoning as to whether the onsite visit is performed SHALL be documented in the KAR.

9.2 Required actions

At any time during the period over which a service is Approved, in any capacity, there could be an unscheduled Assessment required, either because of something which causes the ARB to request such an event, or because the CSP determines that there have been changes surrounding the provision of the service in question that put it beyond the scope of its current Approval. This MAY lead to a continuation of the triennial cycle already in progress or require a 'reset' by undertaking a full Assessment (see stage ③).

9.2.1 CSP-notified

CSP:

The CSP SHALL document the changes that it believes require re-Assessment and discuss these with its Assessor.

Assessor:

The Assessor SHALL review the changes and, depending on their scope and where in the annual cycle the service sits, make a determination as to whether there is a

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need to perform re-Assessment, and if so the scope and timing of that Assessment. It SHALL communicate its determination to the CSP.

If an Assessor determines that an Assessment is required but is not contracted to perform that Assessment within four weeks of the date on which it recommended that the Assessment commence, it SHALL send a notification to the CSP stating that the Assessment is overdue and copy that notification to the Kantara Secretariat.

ARB:

If the Secretariat receives notice from an Assessor that, to the best of its knowledge, a recommended re-Assessment has not been performed by the recommended date then it SHALL notify a CSP of the matter and attempt to determine the circumstances, before deciding what further action is required.

CSP:

The CSP MAY, either independently or after discussion with its Assessor, elect to undergo a full Assessment (i.e. Triennial or ACR, whichever is next due, as determined by its point in the annual cycle at the time), in which case the Assessment SHALL be treated as such and on conclusion, the 'annual cycle' date for the specific service SHALL be reset.

From this point on, the performance and review of an Assessment follows that described for stage $\underline{3}$, with allowance being made for the fact that the scope of an un-scheduled Assessment might be significantly less than that of even an ACR.

9.2.2 ARB-requested

ARB:

The ARB SHALL provide the CSP its justification for requesting an unscheduled Assessment, and allow reasonable time for the CSP to submit a response.

If the ARB considers that the CSP's response is satisfactory, the ARB SHALL close the matter, keeping a record of it in the file.

If the ARB considers that the CSP's response is <u>not</u> satisfactory, the ARB SHALL document the scope of the required Assessment and set a date by which it wishes to receive a KAR which finds the area of concern to be conformant. This SHALL be communicated to the CSP, with dates and durations modified to suit the circumstances.

If the circumstances are deemed by the ARB to be sufficiently grave, it SHALL put the service into a 'Suspended' status until a satisfactory resolution is arrived at.

CSP:

The CSP MAY, either independently or after discussion with the ARB, elect to undergo a full Assessment (i.e. Triennial or ACR, whichever is next due, as determined by its point in the annual cycle at the time), in which case the Assessment SHALL be treated as such and on conclusion, the 'annual cycle' date for the specific service SHALL be reset.

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From this point on, the performance and review of an Assessment follows that described for stage $\underline{3}$, with allowance being made for the fact that the scope of an un-scheduled Assessment might be significantly less than that of even an ACR.

9.2.2.1 Appeals

A CSP MAY appeal against an ARB-requested unscheduled Assessment. The process for handling an appeal SHALL follow that set out in §5.2.4.

IS17065: §5.1.3 l)

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10 STAGE 7 - APPROVAL TERMINATION

10.1 Purpose and processes

At any time a CSP MAY elect to terminate its Approval for any specific service(s) simply by submitting such a request. Alternatively, the ARB MAY determine that an approved CSP has not met the conditions for continued Grant of Approval and take action accordingly, including action to terminate the Grant.

A CSP may also allow Approval of a service to naturally terminate without seeking its renewal.

Termination of an Approval will also bring about the termination of the TMLA, excepting any enduring terms, but only for the specific service being terminated (i.e. if the CSP has more than one Approved service, the TMLA will remain in effect with respect to those other services for the continuing duration of their respective Approved status).

IS17065: §7.11.3, '.4

10.2 Required actions

CSP:

At any time a CSP MAY elect to terminate its Approval for any specific service(s) simply by submitting such a request, which SHALL be signed by its nominated PoC. The request SHALL be for immediate termination or for a specific date on which it is to be effective, which SHALL be on or before the current termination date.

ARB:

The Secretariat SHALL acknowledge the CSP's request.

On the selected date the Secretariat SHALL send a confirmatory notification to the CSP and SHALL update the TSL to show the service's status as 'Terminated'.

In the event that an Approval reaches its termination date without the CSP indicating any intention to submit an application for renewal of a service's Approval then the Secretariat SHALL send a confirmatory notification to the CSP and SHALL update the TSL to show the service's status as 'Terminated'.

IS17065: §7.7.1

11 RECORDS

11.1 Record types to be retained

For each CSP and their application(s) for Service Approval, the ARB SHALL maintain records of each application, included all associated supporting documents. This requirement extends to Initial Application Packages which may be rejected. Records SHALL capture the status of each application through its life, including:

- 1) each subsequent application for an ACR or Triennial Assessment;
- 2) the ARB's findings, including any conditions upon Approval;
- 3) all material communication and notifications between the ARB and the Applicant;
- 4) all material communication and notifications between the ARB and the KI Executive Director;
- 5) the applicable Class(es) of Approval;
- 6) the identity of the Assessor;
- 7) all Appeals processes.

11.2 Minimum record retention period

The ARB SHALL maintain the above records for the duration of each service's Approval plus 42 months (this being 36 months to cover the period of any formal recognition under [IS17065] which may in future be sought, plus a further period of six months during which any pending need for access might be notified and prosecuted)

11.3 Intentionally Blank

IS17065: §7.10.3, §7.12 (all of this SAH \$11)

12 REFERENCES

[AAH]	Kantara IAF-1350 "Identity Assurance Framework: Assessor Accreditation Handbook", at its latest published and effective version
[IS17021-1] ⁴	ISO/IEC 17021-1 (2015) "Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements"
[IS17065]	ISO/IEC 17065 (2012) "Conformity assessment - Requirements for bodies certifying products, processes and services"

⁴ IS17021-2 and '-3 deal specifically with environmental and quality management systems respectively, and hence have no applicability to Kantara Initiative's IAF.

13 REVISION HISTORY

Vn.	Date	Status	Notes	Approved
1.0	2018-01-29	Final	Approved for publication	ARB
2.0	2019-05-28	Final	Approved for publication	ARB
3.0	2020-07-20	Final	Approved for publication	ARB
3.1	2022-06-09	Final	Approved for publication	ARB

IS17065: §7.10.3

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