

Dear David Moss,

We are writing on behalf of the Privacy and Consumer Advisory Group (PCAG) in response to your emailed question to the Group. You ask whether PCAG agrees that GOV.UK Verify abides with the nine PCAG identity assurance principles.

As you will be aware, the nine principles “*assume that an Identity Assurance Service is mature and well established*”, which is clearly not yet the case. The principles also explicitly acknowledge that “*in the early stages of its development there may well be a phasing-in period in relation to each Principle, or that in some cases a Principle might need a degree of initial flexibility*” (para 2.4 of the Identity Assurance Principles V3.1 available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/361496/PCAG_IDA_Principles_3.1_4.pdf).

It might also be helpful to clarify a number of points in the (updated) post you referred to in your emails.

You assert that the Post Office isn't accredited by tScheme and that their application for approval has lapsed. The Verify team point out that the Post Office is utilising an existing tScheme certified service that has been re-badged. Since the underlying service is unchanged, it was not necessary to certify the “front end” company.

You note that “*Having applied for approval fairly late, the chances of Barclays and Morpho being accredited by tScheme by April 2016 are slim to non-existent.*” The Verify team has recently provided greater detail about the certification process <https://identityassurance.blog.gov.uk/2016/02/08/gov-uk-verify-february-update-on-progress-towards-objectives-for-live/> and <https://identityassurance.blog.gov.uk/2016/02/25/becoming-a-gov-uk-verify-certified-company/>. These posts point out the reality that the full certification process can only be completed “*after a period of live operation*”.

In answer to your question – do PCAG agree with Janet Hughes's assertion that GOV.UK Verify abides by the nine PCAG identity assurance principles – the answer is currently “Yes”.

We will, of course, continue our close scrutiny of the work of Verify as it moves from Beta to Live. We are continually reviewing the scope and applicability of the nine identity assurance principles as experience of using the Verify service grows.

Yours sincerely,

Dr Jerry Fishenden and Dr Edgar Whitley
Co-Chairs, on behalf of the Privacy and Consumer Advisory Group (PCAG)