

Open Identity Exchange

HM Land Registry draft requirements for digital ID verification

OIX Comments

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1 What is OIX?

OIX is a community for all those involved in the ID sector to connect and collaborate, developing the guidance needed for inter-operable, trusted identities. Through our definition of, and education on Trust Frameworks, we create the rules, tools and confidence that will allow every individual a trusted, universally accepted, identity.

Our Vision:

A world where we can all prove our identity and eligibility anywhere, using a simple universally trusted ID

Our Purpose:

To create a community for all those involved in the ID sector to connect and collaborate. Together we create the rules, tools and confidence to support the acceptance of universally trusted IDs and eligibility information

How we Achieve this:

We are uniquely dedicated to ID Trust. We are a membership organisation, offering education, information and collaboration around the topic of universally trusted identity. We bring together buyers of ID Services (reliant organisations or relying parties) with ID Service organisations such as tech vendors, consultancies, along with regulators and market influencers to work together to drive adoption of ID Trust.

Our papers and guides form the bedrock of Trust Frameworks that supports the creation and use of inter-operable, universally trusted identities.

OIX has a wide programme of events, thought leadership and working groups.

Members access a suite of resources including support for Pilot Projects and Business Case Development.

Through the OIX Guide to Trust Frameworks and associated Papers, members build an understanding of the wider ecosystem required to create and rely upon trusted identities.

The OIX Directory explains where member services sit within this ecosystem.

2 General Comments on the Consultation

The use of a cryptographically secured document is a very secure way of verifying the authenticity of a document and, through cross check of the photo from the chip, its holder.

GPG45 defines a methodology to verify such a document and its holder. The process described in the Safe Harbour standard would achieve a GPG45 level of confidence of “High”.

The exclusive use of cryptographically secured documents in the Safe Harbour standard means that UK citizens who do not hold a passport will be excluded from the process.

GPG45 is designed to allow multiple different ways to achieve a level of confidence for a more inclusive approach to ID Proofing. A level of “High” can be achieved using 9 different combinations of evidence and verification techniques, known as profiles.

In OIX’s view, the Safe Harbour approach suggested meets one of the profiles, specifically H1A.

OIX would suggest that Land Registry should accept identities proofed to any of the other 8 profiles defined for confidence level “high” in GPG45. This would be a more inclusive approach that is in line UK government defined best practise. This would allow, for example, user who has a driving licence, but not a passport, to achieve the Safe Harbour level of assurance.

To ensure a robust identity proofing process by an “identity check provider” there are usually many other rules that providers must follow alongside the identity proofing rules outlined in the Safe Harbour standard. This collection of rules is referred to as a Trust Framework. The recommended contents of a trust framework can be found in the OIX Guide to Trust Frameworks available on our website:

<https://openidentityexchange.org/guide-trust-frameworks-interopability>

Key considerations in this respect, are additional obligations that Land Registry might want to put on identity check providers in respect of:

- Fraud Controls and Procedures
- Security
- Record Keeping and Recording of Proofs
- Liability (in the event of fault)

Can requirement 4 – Obtain evidence to ensure the transferor, borrower or lessor is the same person as the owner – also be carried out by an identity check provider? If so, additional rules and procedures around access to data to validate and verify documents, or the recording of manual processes to validate and verify documents, may be required.

Will identity check providers be accredited to the Safe Harbour standard? If so, who will be the accreditation body?