

# ENISA & ETSI WORKSHOP REMOTE IDENTITY PROOFING

# THE CHALLENGE OF AUDITING DEEP LEARNING BASED IDENTITY PROOFING PROCESSES

MAY 3<sup>RD</sup>, 2022



Clemens Wanko - TÜV TRUST IT / TÜV AUSTRIA CERT

I. What's audited?

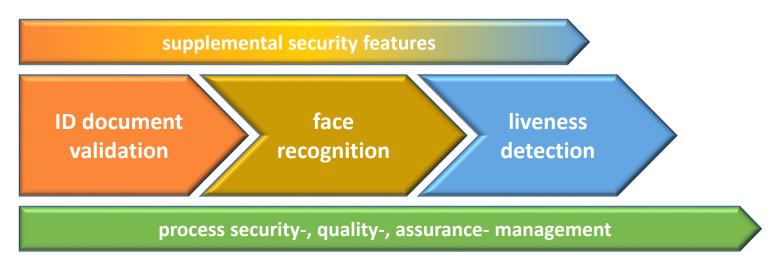
- II. What's the challenge?
- III. What's lacking!

# O. Notes and definitions

- 1. The term "audit" in the sense of these slides is <u>not meant to follow a certain normative definition</u>. Its rather meant to describe in general the process of checking whether specific relevant security-, quality-, assurance- or other goals are fulfilled and for this purpose making use of appropriate tools and techniques in order to gain corresponding evidence.
- 2. "Audits" always are <u>tailored to support a **specific use case** or <u>implementation</u> (e.g. EU Regulation 910/2014 for Trust Services under eIDAS) with regard to the question whether specific relevant security-, quality-, assurance- or other goals are fulfilled.</u>

# I. What's audited?

Process flow of the <u>overall</u> identification process!



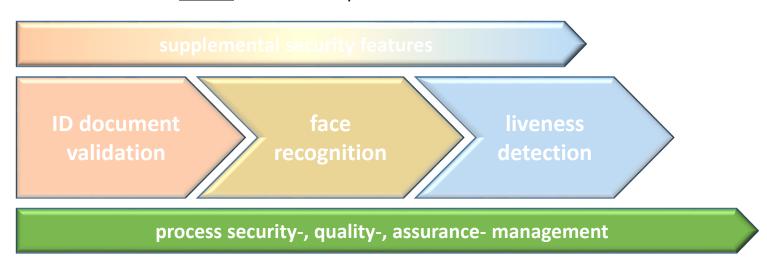
# II. What's the challenge?

 Per use case: identification of Key Security-, Assurance-, Quality- Identifier within the process
 We need reference values to target at!

Deep learning based processes are "moving targets"! How do we audit these?

# I. What's audited?

Process flow of the overall identification process!



# III. What's lacking! (1)

Key Security-, Assurance-, Quality- Identifier
 We need CLEAR reference values to target at!



# **Examples:**

ETSI TS 119 461 as of July 2021, e.g.:

A.3 Application for issuance of QCP certificates as specified in ETSI EN 319 411-2:

Reference values missing, shall vs. should requirements, uses softeners in crucial areas (e.g. BIN-8.4.3-07, "FAR at the level of industry best practice") but without KAI depending on use case. And: it's a TS...

# III. What's lacking! (1)

Key Security-, Assurance-, Quality- Identifier
 We need CLEAR reference values to target at!



# **Examples:**

### eIDAS 2 DRAFT as of March 2022

Art. 24 1(c) by using other identification methods which ensure the identification of the person with a high level of confidence, the conformity of which shall be confirmed by a conformity assessment body;

# III. What's lacking! (2)

 Process management MUST become audit focus point



Specific deep learning process related

- security,
- assurance and
- quality management
  to be addressed by standards for ident-processes,
  like ETSLTS 119 461!

# **Accredited Conformity Assessment Body**

elDAS elD schemes and Trust Services



# Clemens Wanko

TÜV TRUST IT Waltherstr. 49-51 51069 Cologne Germany

Phone +49 170 80 20 20 7 clemens.wanko@tuv-austria.com





www.it-tuv.com