

# Practice Note: Obligation to tell the Trust Framework Authority of changes to key information or specified information

## Purpose

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Section 33 of the Digital Identity Services Trust Framework Act 2023 requires that applicants and accredited providers must inform the Trust Framework Authority (TFA) of changes to key information or specified information within five working days of the change. Failure to do so is an offence under the Act.

This practice note provides guidance to Trust Framework providers on how to identify changes the TFA must be informed of.

## Changes

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You must inform the TFA of changes to key or specified information provided to the TFA.

Key information or specified information includes the information provided in support of an application for accreditation as well as information otherwise communicated to the TFA.

Broadly, this covers information provided in the application form and the demonstration of the service, considered in independent evaluations, and provided to the TFA at any point while accredited.

Below are *some examples* of changes that need to be notified to the TFA:

- Applicant or provider details; including contact details, type of organisation, business information, overseas defence interests, data breaches, criminal convictions
- Product and service details; such as changes to the way a service is designed or delivered
- Ownership structure, and key personnel or their duties and responsibilities
- Identification management risk or processes as evaluated by an independent evaluator or the DIA's Identity team
- Privacy risk or processes as evaluated by the independent evaluator during an application for accreditation
- Security risk or processes as evaluated by the independent evaluator during an application for accreditation
- A change in the risk profile of the provider or service, or updated processes due to emerging risk
- A new investigation or proceeding by or taken by the Privacy Commissioner.

## Informing the TFA

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The TFA can be contacted at [tfa@dia.govt.nz](mailto:tfa@dia.govt.nz). If there is doubt about whether a change should be notified to the TFA, please contact the TFA to discuss.

Depending on the change, and the extent of the change, the TFA may require:

- Further information from the provider
- A new independent evaluation in the area(s) of privacy, security and/or identification management to be completed
- A new application for accreditation to be completed.

Or the TFA may update its records and determine that no further action is required from the provider.