

27 November 2025

Practice Note: Individuals to be identified in an application for TF accreditation

Purpose

Schedule 3 of the Digital Identity Services Trust Framework Regulations 2024 requires an applicant to provide details to the Trust Framework Authority about the individuals involved, or proposed to be involved, in the governance, management, design or delivery of the service(s) for which they are seeking accreditation. Correctly identifying these people is an essential part of demonstrating compliance with the DISTF.

This practice note provides guidance to applicants seeking Trust Framework accreditation on how to identify salient individuals within their organisation.

Responsibilities of individuals

Under Section 25 of the DISTF, these individuals must provide details about:

- Any convictions, whether in New Zealand or overseas;
- If they have been the subject of a formal investigation or proceeding by or taken by the Privacy Commissioner.

Defining key individuals

An individual should be identified in an application for TF accreditation if they meet any of the following criteria:

1. Decision-making authority – could make or influence strategic or operational decisions affecting compliance with the Trust Framework.
2. Risk responsibility – is responsible for managing or mitigating risks relating to security, privacy, confidentiality, or reliability of the accredited service(s) and anything that could otherwise impact the safety of information of any Trust Framework participants or the integrity of the Trust Framework.
3. Operational accountability – oversees or directs staff involved in service delivery of the accredited services.
4. Technical oversight – designs or maintains critical systems used for accredited services.

Providers must identify individuals who are involved, or proposed to be involved, in the governance, management, design or delivery of the service(s). This includes project members, contractors and other transient staff who are actively involved with the service(s).

Providers only need to identify individuals who have responsibilities relating to the service(s). If an individual has a role in the governance, management, design or delivery of the organisation but has no proximity or interaction with the service(s) then they do not need to be identified to the TFA.

Identifying individuals

When applying for accreditation under the DISTF, organisations should take a holistic and pragmatic approach when identifying these individuals. The number and type of individuals to be identified in an application may vary depending on the size and complexity of the organisation and its services.

Category	Description	Examples of roles
Governance	Individuals with strategic decision-making authority over the service and the ability to influence and exercise control of the service(s)	Board Members, CEOs, Trustees, Partners
Management	Individuals who run the day-to-day management of the service(s) and who are responsible for operational decision making	Managers, Heads of Operations, Directors
Design	Individuals who lead the technical or operational systems central to the service(s)	Chief Technology Officer, Chief Information Security Officer, Senior Architects and other technical specialists, consultants and analysts
Delivery	Individuals who are integral to and are responsible for the delivery of the service(s).	Project and Programme Managers.