



**Submission for the 2022 Pre-Budget Consultations,
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List of Recommendations

That the government:

1. Secure adoption of the [Pan-Canadian Trust Framework](#) by businesses and governments.
2. Act on the [Finance Committee's 2021 Pre-Budget Consultation](#) Recommendations 128, Implement a digital identity system that empowers Canadians to control their data that is held by the federal government, and 129, Create a national data strategy.
3. Work with provincial and territorial partners and Immigration, Refugees and Citizenship Canada to ensure that all Canadians have access to an ISO-compliant government-issued digital ID credential with economy-wide utility by December 2022.
4. Make digital identity-enabled services available to all Canadians by December 2022.
5. Prioritizes funding and integration of digital ID as part of the [Digital Technology Supercluster](#) Initiative.

The Key to Unlocking an Inclusive Digital Economy: Investing in Digital ID

To re-start the economy and deliver inclusive services to all Canadians, governments must invest in unlocking digital. Digital ID empowers Canadians with the choice to safely share their existing credentials (e.g.: passports, driver's licenses, health cards) for digital transactions.

Investing in digital ID offers economic benefits to citizens, businesses, and governments and also establishes digital tools to support societal trust, security, privacy, and fraud mitigation. This is a win for all.

Few budget items have the potential to impact every government initiative - digital ID is one such investment with broad impacts and encompassing benefits. Digital ID offers service improvements across all government services and priority areas. This initiative has the potential to empower individuals, increase government efficiency, strengthen companies, and unite communities across the country with secure access to resources, economic development, trust, and support.

Canadians understand the potential. The pandemic has been an intense and polarizing experience, leading many Canadians to lose faith in institutions. The Edelman Trust Barometer reports that 46% believe government leaders purposely misled them¹. Concurrently, Canadians are relying more on technology, with the digital sector growing 3.5% in 2020, while the economy as a whole shrunk by 5%². With digital transformation happening across the country, Canadians are aware that online privacy is crucial. The Office of the Privacy Commissioner of Canada's recent poll reports that 89% of Canadians are concerned about people using information about them online to steal their identity³.


How can the government build trust, enhance privacy, and demonstrate that citizens' rights are top priority? The answer is clear: 9 in 10 Canadians are supportive of digital

¹ "2021 Edelman Trust Barometer: Canada." Edelman. February 17, 2021. <<https://www.edelman.ca/trust-barometer/edelman-trust-barometer-2021>>

² "The digital transformation and Canada's economic resilience." Timothy Lane. June 10, 2021. <<https://www.bankofcanada.ca/2021/06/digital-transformation-canada-economic-resilience/>>

³ "Canadians concerned about access to their online personal information: poll." Office of the Privacy Commissioner of Canada. June 15, 2021. <https://www.priv.gc.ca/en/opc-news/news-and-announcements/2021/nr-c_210615/>

ID⁴. Citizen-centric, standards-aligned Digital ID offers an ecosystem that reopens doors closed by the pandemic and unlocks entirely new paths to economic resiliency, cohesion, and social trust.

 **Recommendation 1: Implement adoption of the [Pan-Canadian Trust Framework](#) by businesses and governments to ensure Canadians are empowered post-pandemic and have clarity in building a secure, interoperable, and privacy-respecting digital ID.**

The Pan-Canadian Trust Framework™ (PCTF) is a co-created framework that any jurisdiction and industry sector can work with to ensure business, legal, and technical interoperability to realize the full benefits of a digital ecosystem. Instead of a single solution, the PCTF promotes choice and offers a shared hub that distinct solutions can interoperate through. Developed by public and private sector experts over a decade, the PCTF provides organizations across sectors and locations with shared principles and guidelines for a digital ID ecosystem⁵. Built based on recommendations from the federal government's Task Force for the Payments System Review in 2011, this has been identified as key for Canada's economic resilience but remains underfunded.


While regions and countries around the world set up COVID credentialing and proof of vaccination systems, the need for these systems is urgent. The credentials issued must be designed with common principles and security to enable acceptance across various jurisdictional and sector-specific solutions for their unique context. The PCTF makes this possible, working as a foundation to connect systems without dictating a single technological architecture.

The PCTF includes adaptable recommendations that are currently being tested in-market, including standards for Notice and Consent, Authentication, Privacy, Verified Person, Verified Organization, Credentials (Relationship and Attributes), Infrastructure (Technology and Operations) and Assessment. A Model, Overview, and Glossary have been published for ease of use across industries and sectors⁶. Developed with Canadians in mind, the PCTF is technology-agnostic, encouraging innovation while prioritizing privacy, safety, security, and supporting digital economic growth on a global scale.

⁴ "Covid has accelerated Canadians' demand for digital ID." DIACC. February 16, 2021. <<https://diacc.ca/2021/02/16/covid-has-accelerated-canadians-demand-for-digital-id/>>


⁵ Pan-Canadian Trust Framework. DIACC. June 28, 2021. <<https://diacc.ca/trust-framework>>

⁶ DIACC. <<https://diacc.ca/trust-framework>>

 **Recommendation 2: Put citizens first and integrate cross-government priorities. Act on the [2021 Pre-Budget Consultation Recommendations 128](#), Implement a digital identity system that empowers Canadians to control their data that is held by the federal government, and 129, Create a national data strategy.**

Empowering individuals to control their data, understand available services, and have convenient and secure access to government services offers a direct path to rebuild trust. A recent Leger survey commissioned by Postmedia reports that the pandemic has eroded trust in the federal government, either some or a lot, for 63% of Canadians⁷. After a challenging year, it is critical that the budget puts citizens first. Digital ID is a proactive initiative that offers immediate and long-term benefits. It has the potential to restore confidence, act on Canadian values, and empower citizens.

Providing Canadians with the digital ID credentials necessary to access, manage, and share their own data ensures citizens have control over the important information they need to manage their health, business(es), and digital services. A national data strategy ensures all Canadians benefit from these advances. It also clarifies accountability for those who seek to use technology and personal information with malicious intent. A pan-Canadian strategy evens the playing field for businesses looking to operate digitally across provincial, territorial, and global borders. This approach also enhances Canadians' ability to compete economically on a global scale, travel, and seek care with the virtual mobility afforded by a secure, verifiable digital ID.

 **Recommendation 3: Ensure all Canadians benefit from digital connections, opportunity, and the right to be recognized with digital ID. Work with provincial and territorial partners and Immigration, Refugees and Citizenship Canada to ensure that all Canadians have access to an ISO-compliant government-issued digital ID credential with economy-wide utility by December 2022.**

Digital ID is the key, as the pandemic has built and opened new doors for Canadians navigating their safety, financial security, health and relationships. According to a study by Brookfield Institute, 9% of Canadian businesses made 60% or more of their total sales online, up from 6% in 2019 — but this digital success has been difficult for small to medium-enterprises to adopt⁸. As digital service adoption grows, citizen and employee expectations have also shifted to demand more reliable and secure digital alternatives. Digital ID can encourage sustainable, long-term adoption of digital


⁷ “COVID Pandemic corroded Canadians’ trust in politicians - even their neighbours, poll finds.” Ryan Tumilty. National Post. May 21, 2021. <<https://nationalpost.com/news/politics/covid-pandemic-eroded-canadians-trust-in-politicians-science-and-even-their-neighbours-poll-finds>>

⁸ “How are Canadian businesses adapting to the Pandemic?” Creig Lamb. Brookfield Institute. March 30, 2021. <<https://brookfieldinstitute.ca/how-are-businesses-adapting-to-the-pandemic/>>

platforms and help organizations of all sizes to benefit from these systems. It also presents a more flexible and streamlined strategy for pan-Canadian notification systems, service delivery, and community safety initiatives.

Provinces and territories are establishing their own digital ID initiatives. [Alberta](#) and [BC](#) have launched digital IDs, with BC including a mobile card and a [Verify by Video](#) option. Significant investments have been made in [Ontario](#) and [Québec](#), where [proof of vaccination credentials](#) have been launched. [Saskatchewan](#), Yukon, Nova Scotia, Newfoundland, Prince Edward Island, and New Brunswick are launching pilots, proof of concepts and digital ID components.

This prioritization demonstrates demand for this enabling capability across the country — but unequal funding and approaches developed in departmental silos pose a risk. Without cohesive federal leadership, these systems will be disjointed and miss the opportunity to be truly interoperable, efficient, and useful for all Canadians. Unlocking these opportunities in a synchronized and equitable manner will ensure Canadians can all access economic opportunities, required public services, and the chance to manage their own personal information.

 **Recommendation 4: Collaborate for the highest and most equitable impact. Make digital identity-enabled services available to all Canadians by December 2022.**

As the provincial and territorial governments take action to simplify and secure digital identities, private companies are also taking note of this massive market opportunity. Notably, Apple is teaming up with the TSA to be a trusted source of ID for Americans⁹ and Stripe is pursuing digital ID services partnering with other apps, including Discord, for user verification¹⁰. Many more companies are entering the digital ID space in hopes of earning users' trust and capturing market share. As the issuer of identity in Canada, the public sector is uniquely positioned to empower Canadians and enable the private sector — but the government needs to act now.


While offering numerous economic and social benefits locally and globally, a Canadian digital ID builds citizen trust and mitigates risk. As the Canadian Centre for Cyber Security noted, “the number of cyber threat actors is increasing, and... Cybercrime will

⁹ “Apple pushes ahead with digital identity services.” Dr. Tim Sandle. Digital Journal. July 2, 2021. <<https://www.digitaljournal.com/tech-science/apple-pushes-ahead-with-digital-identity-services/article>>

¹⁰ “Stripe goes beyond payments with Stripe Identity to provide AI-based ID verification for transactions and much more” Ingrid Lunden. TechCrunch. <<https://techcrunch.com/2021/06/14/stripe-goes-beyond-payments-with-stripe-identity-to-provide-ai-based-id-verification-for-transactions-and-much-more/>>

almost certainly continue to be the cyber threat most likely to affect Canadians.¹¹ This vulnerability means that Canadians urgently require an encompassing, policy- and leadership-driven approach to implementing and enforcing Privacy by Design principles. A McKinsey report confirms this, suggesting that, for national governments to address the heightened risks presented by cyber threats, “organizations can move from a ‘trust but verify’ mindset to a ‘verify first’ approach.”¹² Pressures and requirements for proof of vaccination, contact tracing, and social distancing are also made possible, digitally secure, and more user-friendly through universal data minimization standards¹³.

Digital ID offers the key to unlocking secure digital services and pathways. With opportunities to boost job creation, economic growth, citizen wellbeing, COVID-19 planning, support, and mitigation, and reconciliation efforts, digital ID is a budget line that prioritizes and directly benefits all Canadians. Digital ID offers Canadians more personalized control over personal information and convenient access to services. It can increase mobility and connect intra-provincial and territorial systems. It offers an opportunity to strengthen innovation and establish a secure foundation for international collaboration.

 **Recommendation 5: Embed within existing ecosystems. Prioritize the funding and integration of digital ID as part of the [Digital Technology Supercluster Initiative](#). Digital ID supports and intersects its areas of focus including health, sustainable natural resource applications, and digital training.**

Strides are already being made by Canadians. Purpose-built solutions, like the COVID Alert App, demonstrate that Canada has the talent and innovation to adapt and develop market-leading solutions. Unfortunately, the \$20 million price tag and reactive nature of these innovations could be improved¹⁴. The app has also not been approved by data authorities in all provinces, making it an incomplete solution that doesn’t account for different provincial regulations¹⁵. Due to the nature of the pandemic, a pan-Canadian

¹¹ “Canadian Centre for Cyber Security Releases the Canadian National Cyber Threat Assessment 2020.” Cyber Center. November 18, 2020. <<https://cyber.gc.ca/en/news/canadian-centre-cyber-security-releases-canadian-national-cyber-threat-assessment-2020>>

¹² “Building cyber resilience in national critical infrastructure.” Rich Isenberg, et al. McKinsey & Company. June 30, 2021. <<https://www.mckinsey.com/business-functions/risk/our-insights/building-cyber-resilience-in-national-critical-infrastructure>>

¹³ “Our digital future and economic recovery rests on getting digital ID right.” Joni Brennan. DIACC. May 31, 2021. <<https://diacc.ca/2021/05/31/our-digital-future-and-economic-recovery-rests-on-getting-digital-id-right/>>

¹⁴ “Ottawa spent nearly \$20 million on COVID-19 tracking app with inconclusive results.” CTV News. Pierre Saint-Arnaud. January 5, 2021. <<https://www.ctvnews.ca/politics/ottawa-spent-nearly-20-million-on-covid-19-tracking-app-with-inconclusive-results-1.5497296>>

¹⁵ “COVID Alert.” Canada.ca. May 20, 2021. <<https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/covid-alert.html>>

solution isn't a nice to have — it's a must. Digital ID is a proactive investment that could provide similar benefits in contact tracing and offer lasting impacts on service delivery.

Digital ID has the potential to add \$4.5 billion of added value to SMEs and reinvestments in the economy¹⁶. It also directly meets the needs and preferences of consumers, with Signicat reporting that 68% of consumers expect complete digital onboarding in the wake of COVID-19 and 60% would value digital identities to access services internationally¹⁷. Canada has an opportunity to lead, recover, and take a future-focused position by making an investment in digital ID.

Prioritizing digital ID is putting Canadians first, and reflects responsible investment that offers benefits across departments. Its utility and impact apply to health or environmental crises. Digital ID delivers an adaptable foundation to deliver new services, security, citizen engagement opportunities, and economic growth.

DIACC members work in partnership with the Government of Canada and all levels of government and welcome further conversations and collaboration.

¹⁶ "Setting up digital ID regime could provide boost to post-pandemic recovery." Joni Brennan and Antoine Normand. The Hill Times. April 21, 2021. <<https://www.hilltimes.com/2021/04/21/digital-id?i=e2a651476f984d378ed43975666ffcc9>>

¹⁷ "The Battle to Onboard 2020: The impact of COVID-19 and beyond." Johanna Puustinen. Signicat. June 19, 2020. <<https://www.signicat.com/blog/the-battle-to-onboard-2020-the-impact-of-covid-19-and-beyond>>