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EESSI Conformity Assessment Guidance - Part 4: Signature-creation applications and general guidelines for electronic signature verification

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Foreword

Successful implementation of European Directive 1999/93/EC on a Community framework for electronic signatures (Directive 1999/93/EC) requires standards for services, processes, systems and products related to electronic signatures as well as guidance for conformity assessment of such services, processes, systems and products.

In 1999 the European ICT Standards Board, with the support of the European Commission, undertook an initiative bringing together industry and public authorities, experts and other market players, to create the European Electronic Signature Standardisation Initiative (EESSI).

Within this framework the Comité Européen de Normalisation / Information Society Standardisation System (CEN/ISSS) and the European Telecommunications Standards Institute / Electronic Signatures and Infrastructures (ETSI/ESI) were entrusted with the execution of a work programme to develop generally recognised standards to support the implementation of Directive 1999/93/EC and development of a European electronic signature infrastructure.

The CEN/ISSS Workshop on electronic signatures (WS/E-SIGN) resulted in a set of deliverables, CEN Workshop Agreements (CWA), which contributed towards those generally recognised standards. The present document is one such CWA.

The purpose of this CWA is to provide guidance with a view to harmonise the application of the standards for services, processes, systems and products for Electronic Signatures. The CWA is intended for use by certification-service-providers, manufacturers, operators, independent bodies, assessors, evaluators and testing laboratories involved in assessing conformance to the related EESSI deliverables.

This CWA is provided as a series of discrete documents, each a part of the overall CWA, the present part being Part 4, Signature creation applications and general guidelines for electronic signature verification, providing guidance on conformity assessment of signature creation/verification applications.

Details of all applicable parts can be found in Part 1.

This version of this CWA Part was published in 2004-03.

A list of the individuals and organizations which supported the technical consensus represented by this CEN Workshop Agreement is available to purchasers from the CEN Central Secretariat.

1 Scope

This document provides guidance on conformity assessment of products, systems and applications against the specifications CWA 14170 “Security Requirements for Signature Creation Applications” and CWA 14171 “General Guidelines for Electronic Signature Verification”. The guidance is intended for use by manufacturers and operators.

2 Definitions and abbreviations

2.1 Definitions

For the purposes of the present document, the following terms and definitions apply:

Process	<i>A series of procedures and actions that have to be conducted in order to manage and enable the provision of an electronic trust Service.</i>
Product	<i>A good (hardware, software, or both) which performs against a particular specification and which can contribute towards the construction of a System built to fulfil a particular, service-focused function.</i>
Service	<i>The carrying-out of a function (or a series of functions) that provides a definable benefit to an end user. In the context of this document we are concerned primarily with electronic trust services, such as those associated with (Digital) Certificate Management.</i>
System	<i>The composition of Information Technology products and components (both hardware and software, and including processors, storage, networks, telecommunications, etc.) organised to support the provision of a particular electronic trust Service. This requires that the system be specifically, configured, integrated, installed in a physical environment and operated according to defined Processes. The term application is considered synonymous with System.</i>

2.2 Abbreviations

For the purposes of the present document, the following abbreviations apply:

<i>CEN</i>	Comité Européen de Normalisation (European Committee for Standardization)
<i>CEN/ISSS</i>	CEN Information Society Standardization System
<i>CMM</i>	Capability Maturity Model for software processes
<i>CWA</i>	CEN Workshop Agreement
<i>EC</i>	European Commission
<i>EESSI</i>	European Electronic Signature Standardization Initiative
<i>ETSI</i>	European Telecommunications Standards Institute
<i>ETSI TC ESI</i>	ETSI Technical Committee Electronic Signatures and Infrastructures
<i>ISO</i>	International Organization for Standardization
<i>SPICE</i>	Software Process Improvement and Capability dEtermination
<i>WS/E-SIGN</i>	CEN/ISSS Electronic Signatures workshop

3 Guidance on conformity assessment of Signature Creation Applications and General Guidelines for Electronic Signature Verification

3.1 Introduction

This chapter is based upon the texts of the specifications CWA 14170 “Security requirements for Signature Creation Applications” and CWA 14171 “General Guidelines for Electronic Signature Verification”. Because of the complexity of processes required to perform the signature creation and verification functions, and the very wide potential for the actual implementation of those processes, such applications and general guidelines are not suited to a formal assessment process until their integration into an operational system / application enabling these functions. This is further justified by the informative nature of the recommendations made in the CWA 14171.

It is therefore determined that, insofar as the requirements of CWA 14170 and recommendations of CWA 14171 deal with applications and general guidelines which are effectively ‘off the shelf’, the process best suited to demonstrate compliance with these specifications is a manufacturer’s declaration of conformity. In the specific instance of the signature creation or verification application being installed in a ‘public’ environment (i.e. multi-user, possibly with limited or absent access control) the manufacturer’s declaration should be supported by an additional declaration issued by the operator of the signature creation or verification application.

In addition, a system used by an operator and integrating either signature creation applications or signature verification general guidelines which conform to the relevant quoted CWAs should be considered for inclusion within a broader system-wide assessment, e.g. as covered by the CWA for ‘Trustworthy systems managing certificates for electronic signatures’, as addressed by Part 3 of this present document.

The guidance is intended for use by manufacturers and operators.

This chapter is composed of six sections:

- Section 3.1, Introduction; is an overview of the guidance and explains the numbering of guidance statements.
- Section 3.2, Introduction to Self Declaration of Conformity; explains the concept of supplier declarations as defined in the standard EN 45014.
- Section 3.3, provides guidance for manufacturers making Declarations of Conformity concerning signature creation applications and defines the format of such declarations.
- Section 3.4, provides guidance for operators of signature creation applications in ‘public’ environments and defines the format of operator declarations.
- Section 3.5, provides guidance for manufacturers making Declarations of Conformity concerning applications for signature verification and defines the format of declarations.
- Section 3.6, provides guidance for operators of signature verification applications in ‘public’ environments and defines the format of operator declarations.

To uniquely identify the guidance elements within the series of guidance documents, each element is numbered **G.<guidance document Part number>.<sequence number>**. The part number of this document is 4.

3.2 Introduction to Self Declaration of Conformity

The basis on which this chapter provides guidance for declaring conformance to the specification CWA 14170 or CWA 14171 is EN 45014: 1989, specifying ‘general criteria’ for declarations of conformity. In

the following guidance those criteria are extended in order to address the specific needs of signature creation/verification applications (as is recognised as likely to be necessary by EN 45014: 1989 itself).

EN 45014: 1989 defines “supplier” as the party that is responsible for the product, process or service and is able to ensure that quality assurance is exercised. EN 45014: 1989 stipulates that the definition may apply to “manufacturers, distributors, importers, assemblers, service organizations, etc”. In this guidance, the notion “supplier” is considered to cover manufacturers of signature creation/verification applications and operators of public environments in which signature creation/verification applications are installed.

The objective of the declaration is to indicate that the signature creation/verification application is in conformity with those specifications and other normative documents referred to in the declaration (i.e. with CWA 14170 or CWA 14171 and any others underpinning them).

Conformity may be determined by the declaring party either on the basis of their own assessment or possibly by their seeking the opinion of a third party/parties, e.g. one(s) whose services are specifically focused on performing the appropriate assessments. However, the basis of a declaration of conformity is that it is the declarer who takes sole responsibility for that declaration, irrespective of the basis of their decision to make that declaration.

By implication, the liability as to the veracity or otherwise of their declaration falls solely upon the declarer.

Making a declaration of conformity is not a mandatory measure: however, it is likely that those systems carrying such a declaration will be regarded as being fundamentally more trustworthy than those from manufacturers who for whatever reason do not make such a declaration.

Those relying on such declarations should understand that, whilst the declarer may be acting in all good faith, the nature of the process and the fact that it is less rigorous than a formal assessment, may lead to differences of interpretation of the conformance requirements and hence not all declarations can be considered to be equal. Where the declaration is based upon some recognised independent assessment, which may be a formalised scheme, there may be greater confidence as to the consistency of what a declaration means.

This present guidance document encourages the establishment of industry practices that facilitate the comparison of declarations against any specific Code of Conduct.

3.3 Guidance for manufacturers making Declarations of Conformity concerning signature creation applications

G.4.1 The manufacturer claiming conformance of a signature creation application to CWA 14170 should have in place a quality management system (QMS) that is certified to ISO 9001. This QMS should have within it identifiable processes and procedures which ensure the conformance of all trusted and application-specific components (ref. CWA 14170 clause 6.2) of the signature creation application during their specification (design and development), manufacture and delivery, together with the provision to purchasers/end users of appropriate and accurate product-related supporting information in an accessible format. This should pay particular regard to the application-specific aspects of its installation. In the case of manufacturers of software products, alternatives to ISO 9001 certification are certification to CMM (Capability Maturity Model) or SPICE (Software Process Improvement and Capability, ISO/IEC 15504).

G.4.2 For their declaration of conformity the manufacturer should adopt the extended form shown in Annex 2a, “Signature Creation Application Manufacturer’s Declaration of Conformity”. The medium and layout of the declaration are less important than its accessibility, clarity and content.

In addition to the criteria for a general declaration of conformity (ref. EN 45014: 1989) the manufacturer’s declaration should also state:

- a) a contact point, should there be any enquiries regarding the declaration;
- b) that the manufacturer has in place a currently certified QMS (with identification of the certification body and the certificate number);
- c) that the manufacturer vouches for the whole application, that is for all trusted and application-specific components therein;

- d) the references of additional supporting standards conformance with which is claimed in order to underpin the basic declaration of conformance to CWA 14170;
- e) any specific independent or industry schemes which have been used and the purpose of their assessment;
- f) any limitations as to the use of their signature creation application under which the conformance might not be valid;
- g) the use if any of an accredited (EN ISO 17025) manufacturer in-house or third party testing laboratory confirming successful testing against referenced standards, specifications and/or normative documents.

3.4 Guidance for operators making Declarations of Conformity concerning signature creation applications

G.4.3 CWA 14170 distinguishes between two different physical environments where a signature creation application might be used (CWA 14170 clause 6.5 - Control and possession of Signature Creation Systems). One is where the user is either an individual or business, where a manufacturer's declaration should be sufficient. The other environment is a public place, effectively made available by a service provider, to whom this present document refers to as the "operator", by which it is intended the party who bears the liability associated with any failure of the application to function in a conformant fashion. In such circumstances there should be a declaration by the organisation responsible for installation and management of the signature creation application.

G.4.4 The operator claiming conformance of a signature creation application to CWA 14170 should have in place a quality management system (QMS) that is certified to ISO 9001. This QMS should have within it identifiable processes and procedures which ensure the conformance of the signature creation system during its installation and operation, together with the provision to the users of the installed system of appropriate and accurate supporting information relating to the operator, and use of the system, in an accessible format. This should pay particular regard to the application-specific aspects of its installation.

G.4.5 For their declaration of conformity the operator should adopt the extended form shown in Annex 2(b), "Signature Creation System Operator's Declaration of Conformity". The medium and layout of the declaration are less important than are its accessibility, clarity and content.

In addition to the criteria for a general declaration of conformity (ref. EN 45014: 1989) the operator's declaration should also state:

- a) a contact point, should there be any enquiries regarding the declaration;
- b) that the operator has in place a currently certified QMS (with identification of the QMS standard, the certification body and the certificate number);
- c) a reference to the respective manufacturer's declaration(s) of conformity (may be multiple if an installation includes multiple applications under the control of a single management system);
- d) the references of additional supporting standards conformance with which is claimed in order to underpin the basic declaration of conformance to CWA 14170;
- e) any specific independent or industry schemes which have been used and the purpose of their assessment;
- f) any limitations as to the use of the installed system(s) under which the conformance might not be valid.

3.5 Guidance for manufacturers making Declarations of Conformity concerning general guidelines for electronic signature verification

G.4.6 The manufacturer claiming conformance of a signature verification application to the guidance given in CWA 14171 should have in place a quality management system (QMS) that is certified to ISO 9001. This QMS should have within it identifiable processes and procedures which ensure the conformance of the signature verification application during its specification (design and development), manufacture and delivery, together with the provision to purchasers/end users of appropriate and accurate product-related supporting information in an accessible format. In case of manufacturers of software products, alternatives to ISO 9001 certification are certification to CMM (Capability Maturity Model) or SPICE (Software Process Improvement and Capability, ISO/IEC 15504).

G.4.7 For their declaration of conformity the manufacturer should adopt the extended form shown in Annex 3(a), "Signature Verification Application Manufacturer's Declaration of Conformity". The medium and layout of the declaration are less important than its accessibility, clarity and content.

In addition to the criteria for a general declaration of conformity (ref. EN 45014: 1989) the manufacturer's declaration should also state:

- a) a contact point, should there be any enquiries regarding the declaration;
- b) that the manufacturer has in place a currently ISO 9001-certified QMS (with identification of the certification body and the certificate number);
- c) the references of additional supporting standards conformance with which is claimed in order to underpin the basic declaration of adoption of guidance from CWA 14171;
- d) any specific independent or industry schemes which have been used and the purpose of their assessment;
- e) any limitations as to the use of their application under which the conformance might not be valid;
- f) the use if any of an accredited (EN ISO 17025) manufacturer in-house or third party testing laboratory confirming successful testing against referenced standards.

3.6 Guidance for operators making Declarations of Conformity concerning general guidance for electronic signature verification

G.4.8 CWA 14171 states (clause 9 - Conformity assessment) that where a signature verification application is "under an organization's control (e.g. an application in a public environment)" there should be a declaration by the organisation responsible for installation and management of the device, the party to whom this present document refers to as the "operator", by which it is intended the party who bears the liability associated with any failure of the application to function in a conformant fashion.

G.4.9 The operator should have in place a quality management system (QMS) that is certified to ISO 9001. This QMS should have within it identifiable processes and procedures which ensure the conformance of the signature verification application during its installation and operation, together with the provision to the users of the installed application (s) of appropriate and accurate supporting information relating to the operator, and use of the application, in an accessible format.

G.4.10 For their declaration of conformity the operator should adopt the extended form shown in Annex 3(b), "Signature Verification Application Operator's Declaration of Conformity". The medium and layout of the declaration are less important than its accessibility, clarity and content.

In addition to the criteria for a general declaration of conformity (ref. EN 45014: 1989) the operator's declaration should also state:

- a) a contact point, should there be any enquiries regarding the declaration;

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- b) that the operator has in place a currently ISO 9001-certified QMS (with identification of the certification body and the certificate number);
- c) a reference to the respective manufacturer's declaration(s) of conformity (may be multiple if an installation includes multiple applications under the control of a single management system);
- d) the references of additional supporting standards conformance with which is claimed in order to underpin the basic declaration of adoption of guidance from CWA 14171;
- e) any specific independent or industry schemes which have been used and the purpose of their assessment;
- f) any limitations as to the use of the installed applications (s) under which the conformance might not be valid.

Annex 1 References and bibliography

References

The following normative documents contain provisions that, through reference in this text, constitute provisions of this CWA. For dated references, subsequent amendments to, or revisions of, any of these publications do not apply. However, parties to agreements based on this CWA are encouraged to investigate the possibility of applying the most recent editions of the normative documents indicated below. For undated references, the latest edition of the normative document referred to applies.

CWA 14170	<i>Security Requirements for Signature Creation Applications</i>
CWA 14171	<i>General Guidelines for Electronic Signature Verification</i>

Bibliography

The following material provides supporting information.

- BSI IT-Grundschutzhandbuch "Bundesamt für Sicherheit in der Informationstechnik - IT-Grundschutzhandbuch Standard-Sicherheitsmaßnahmen", January 2000.
- CCIMB-99-031 "Common Criteria for Information Technology Security Evaluation - Part 1: Introduction and general model", Version 2.1, August 1999
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- CCIMB-99-033 "Common Criteria for Information Technology Security Evaluation - Part 3: Security assurance requirements", Version 2.1, August 1999
- CMM: "The Capability Maturity Model: Guidelines for Improving the Software Process", Carnegie Mellon University, Software Engineering Institute (Principal Contributors and Editors: Mark C. Paulk, Charles V. Weber, Bill Curtis, and Mary Beth Chrissis), ISBN 0-201-54664-7, Addison-Wesley Publishing Company, Reading, MA, 1995.
- Directive 1999/93/EC "Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures."
- EN 45014:1998: "General Criteria for Suppliers Declaration of Conformity (supersedes EN 45014:1989)" (ISO/IEC Guide 22:1996)
- EN 45020:1998: "Standardization and Related Activities - General Vocabulary; Corrected 1998-02-26" (ISO/IEC Guide 2:1996)
- EN ISO/IEC 17025: 1999 "General requirements for the competence of calibration and testing laboratories."
- ISO 9000:2000: "Quality management systems - Fundamentals and vocabulary."
- ISO 9000-3:1997: "Quality management and quality assurance standards - Part 3: Guidelines for the application of ISO 9001:1994 to the development, supply, installation and maintenance of computer software."
- ISO 9001:2000: "Quality management systems - Requirements."
- ISO 9004:2000: "Quality management systems - Guidelines for performance improvements."
- ISO 15408-1:1999 "Information technology - Security techniques - Evaluation criteria for IT security - Part 1: Introduction and general model"
- ISO 15408-2:1999 "Information technology - Security techniques - Evaluation criteria for IT security - Part 2: Security functional requirements"

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- ISO 15408-3:1999 "Information technology - Security techniques - Evaluation criteria for IT security - Part 3: Security assurance requirements"
- ISO/IEC TR 15504:1998: "Information technology - Software process assessment" (9 parts), SPICE.

Annex 2 Declarations of conformity regarding Signature Creation Applications

The two following recommended forms of declaration of conformity are derived from the general form given in Annex A (informative) of EN 45014:1989.

Part a: Manufacturer's declaration

MANUFACTURER'S DECLARATION OF CONFORMITY **FOR A SIGNATURE CREATION APPLICATION**

We <<manufacturer's name>> of

<<manufacturer's address>>

do hereby declare under our sole responsibility that the Signature Creation Application reference

<<brand name & specification, type or model (including revision/version information)>>

to which this declaration relates is in conformity with the following specification [*if applicable*: and the stated supporting normative documents]:

CEN CWA 14170: <<version/issue and date as applies at the time>>

[*if applicable*: and supported by

<<title and/or number and date of issue of the standard(s) or other normative document(s)>>]

following the provisions of

EC Directive 1999/93/EC on a Community framework for electronic signatures.

<<manufacturer's name>> has designed, developed, manufactured and supplied this <<brand name & specification>> application under its ISO 9001 [*if applicable*: or CMM or SPICE] certified Quality Management System, certificate no. <<cert ref. and issue date>> issued by <<identification of the certification body >> and vouches hereby for the conformance of the whole application, that is for all trusted and application-specific components thereof.

[*if applicable*: This declaration of conformity is based in part upon the following recognised schemes having been used for the assessment of appropriate parts of the application:

<<list of schemes and who applied them (name and country)>>]

Limitations:

None - entirely conformant [or]

<<statement of any limitations as to the extent of the declaration of conformity>>

Contact information:

<<manufacturer's name>> may be contacted at the following co-ordinates for any clarification regarding this declaration:

<<postal address / tel. no. / url & email>>

Part b: Operator's declaration

OPERATOR'S DECLARATION OF CONFORMITY FOR A SIGNATURE CREATION APPLICATION

We <<operator's name>> of

<< operator's address>>

do hereby declare under our sole responsibility that the Signature Creation System reference

<<service name>> located at <<location>>

and using the following application(s)

<<service name & specification, type or model (including revision/version information)>>

to which this declaration relates is in conformity with the following specification [*if applicable*: and the stated supporting normative documents]:

CEN CWA 14170: <<version/issue and date as applies at the time>>

[*if applicable*: and supported by

<<title and/or number and date of issue of the standard(s) or other normative document(s)>>]

following the provisions of

EC Directive 1999/93/EC on a Community framework for electronic signatures.

This/these application(s) has/have been declared as conformant to these same specifications according to the following manufacturer's/manufacturers' declaration(s):

<<list of manufacturers' declarations>>

<< operator's name>> has installed and manages this <<service name>> application under its ISO 9001 [*if applicable*: or CMM or SPICE] certified Quality Management System, certificate no. <<cert ref. and issue date>> issued by << identification of the certification body >> and vouches hereby for the conformance of the whole <<service name>> application, that is for all trusted and application-specific components thereof.

[*if applicable*: This declaration of conformity is [based in part] upon the following recognised schemes having been used for the assessment of appropriate parts of the application:

<<list of schemes and who applied them (name and country): relevant part of the process/service>>]

Limitations:

None - entirely conformant [or]

<<statement of any limitations as to the extent of the declaration of conformity>>

Contact information:

<<operator's name>> may be contacted at the following co-ordinates for any clarification regarding this declaration:

<<postal address / tel. no. / url & email>>

Annex 3 Declarations of conformity regarding Signature verification applications

The two following recommended forms of declaration of conformity are derived from the general form given in Annex A (informative) of EN 45014:1989.

Part a: Manufacturer's declaration

MANUFACTURER'S DECLARATION OF CONFORMITY **FOR A SIGNATURE VERIFICATION APPLICATION**

We <<manufacturer's name>> of

<<manufacturer's address>>

do hereby declare under our sole responsibility that the Signature Verification Application reference

<<brand name & specification, type or model (including revision/version information)>>

to which this declaration relates has adopted guidance from the following guidance document[*if applicable*: and the stated supporting normative documents]:

CEN CWA 14171: <<version/issue and date as applies at the time>>

[*if applicable*: and supported by

<<title and/or number and date of issue of the standard(s) or other normative document(s)>>]

following the provisions of

EC Directive 1999/93/EC on a Community framework for electronic signatures.

<<manufacturer's name>> has designed, developed, manufactured and supplied this <<brand name & specification>> application under its ISO 9001 [*if applicable*: or CMM or SPICE] certified Quality Management System, certificate no. <<cert ref. and issue date>> issued by <<identification of the certification body >>.

[*if applicable*: This declaration of conformity is based in part upon the following recognised schemes having been used for the assessment of the application:

<<list of schemes and who applied them (name and country)>>]

Limitations:

None - entirely conformant [or]

<<statement of any limitations as to the extent of the declaration of conformity>>

Contact information:

<<manufacturer's name>> may be contacted at the following co-ordinates for any clarification regarding this declaration:

<<postal address / tel. no. / url & email>>

Part b: Operator's declaration

OPERATOR'S DECLARATION OF CONFORMITY FOR A SIGNATURE VERIFICATION APPLICATION

We <<operator's name>> of

<< operator's address>>

do hereby declare under our sole responsibility that the Signature Verification Application reference

<<service name>> located at <<location>>

and using the following system(s)

<<service name & specification, type or model (including revision/version information)>>

to which this declaration relates has adopted guidance from the following guidance document [*if applicable*: and the stated supporting normative documents]:

CEN CWA 14171: <<version/issue and date as applies at the time>>

[*if applicable*: and supported by

<<title and/or number and date of issue of the standard(s) or other normative document(s)>>]

following the provisions of

EC Directive 1999/93/EC on a Community framework for electronic signatures.

This/these application(s) has/have been declared as conformant to these same standards according to the following manufacturer's/manufacturers' declaration(s):

<<list of manufacturers' declarations>>

<<operator's name>> has installed and manages this application under its ISO 9001 [*if applicable*: or CMM or SPICE] certified Quality Management System, certificate no. <<cert ref. and issue date>> issued by << identification of the certification body >>.

[*if applicable*: This declaration of conformity is [based in part] upon the following recognised schemes having been used for the assessment of the application:

<<list of schemes and who applied them (name and country): relevant part of the process>>]

Limitations:

None - entirely conformant [or]

<<statement of any limitations as to the extent of the declaration of conformity>>

Contact information:

<< operator's name>> may be contacted at the following co-ordinates for any clarification regarding this declaration:

<<postal address / tel. no. / url & email>>