RFID & PRIVACY TASK & FINISH WORKING GROUP – Minutes
Conference Call
Friday 24th April 2015, 2pm

Present
Catherine Cooke, Westminster Libraries
Simon Edwards, Consultant (Chair)
Mick Fortune, Consultant
Katy Gibson, BIC
Jim Hopwood, Bibliotheca
Ian Manson, Infor
Mike Chambers, 2CQR
Nick Stopforth, SCL

Apologies
Alaina-Marie Bassett, BIC
David Brett, 3M
Karen Carden, University of the Arts, London
Marvin Crisp, D-Tech International
Paul Dalton, Bibliotheca
Karina Luke, BIC

1. Introductions and Apologies
SE welcomed the Group to the meeting and delivered the apologies.

2. Review of minutes and actions from the last meeting
The minutes of the last meeting were approved by the Group.

3. BIC Privacy Statement – update
The Group discussed the target audience of the BIC Privacy Statement Press Release. It was noted that the document was circulated to the SCL network. However, the Group agreed that it would be useful to know exactly where this Press Release has been sent to date, to determine if any further promotion needs to be done.
ACTION: AMB to report at next meeting who the Privacy Statement Press Release was sent to.

4. RFID & Privacy Project Update Form
SE noted that the new Project Update Form is for the Group to record progress against the objectives agreed at the start of the project and this can then be circulated to the BIC Operational Board and published on the BIC website. It will be attached to the minutes.
ACTION: KG to attach Project Update Form to Minutes for Group’s convenience.

5. BIC Advisory EN16570 and 6. BIC Advisory EN16571
The Group agreed that the advisories were ready for publication once they had a final check, and with the permission of KL. The Group noted that they were happy with the documents as they were and were happy to sign them off. It was also noted that they could be included on the RFID listings via BIC and that KL and the BIC Training, Events and Communication Committee could help with promoting the advisories. Members of the Group noted that they would also circulate the documents to their own customers and would await permission before they did so.
SE noted that the Advisories emphasise exactly what is reasonable in the circumstances surrounding RFID and look to pragmatic and efficient methods of addressing concerns with privacy and RFID. CC noted that any costs to libraries that may be involved in any proposed solution need exploring and that this could provide evidence as a critical point of negotiation in future discussions with the relevant authorities if these directives were to become UK law.

The Group noted that solutions used in the retail sector (including product signage which must be at least 5mm by 5mm) can be accommodated easily on price labels and tags which are printed in huge volumes for all new products. This would not be practical for the library sector as there would be very significant one off costs in placing labels on all library books which are currently fitted with RFID tags. Ongoing servicing could include an RFID label (logo) but at extra cost as each item of servicing is charged. The group doubted that the RFID warning logo could be included in the current spine labels used on library books due to size constraints. Additional costs would arise for signage on entrances and at ‘points of service’ but this was considered reasonable and a more cost efficient way to warn library users of the active use of RFID and therefore the risk to privacy.

The Group did question the extent of public concern surrounding this issue e.g. that no one had ever heard of a query raised by a member of the public re RFID on library books and any potential threat to privacy but noted that it was probably worth addressing and providing a solution to RFID and privacy concerns now to dispel any future public anxieties. Furthermore, SE noted that it would be a positive move for libraries to be seen to be active in protecting the privacy of their users even if the threat may be insignificant compared to much greater threats offered by the use of smart phones, credit cards, travel cards etc.

**ACTION:** SE to discuss with KL the signing off of the advisories ready for their publication.

*Post Meeting Update:* Since the meeting, KL has reviewed the advisories and agreed to their publication and use by members.

### 7. Latest from SCL

NS informed the Group that there was nothing new to report with regard to SCL activity. There is continued work with regard to the Universal Digital Platform, which will involve more work with BiblioCommons. NS also informed the Group that the Digital Leadership Skills programme will, at some point, focus on RFID and asked the Group if anyone would be interested in speaking at such a session. Furthermore, the e-lending pilot will be winding up its work soon and publishing its final report on its findings.

NS also noted that MF (on behalf of BIC) has been on the agenda of SCL local councils making them aware of the issues surrounding RFID, as well as the implications of NFC (Near Field Communication).

### 8. Latest from other representative bodies

MF noted that on behalf of BIC, he had delivered presentations at three SCL regional council meetings. He has also been approached by Carl Clayton, of the Arts Council, England and will talk to Brian Ashley, the Director of Libraries for the Arts Council, England, in May. Furthermore, MF noted he will deliver two more presentations on RFID in June. However, he was concerned that there
appears little interest among London Libraries concerning RFID. MF informed the Group that he will also conduct a Workshop on behalf of BIC at the CILIP Wales conference (14-15th May) and has received invitations to speak at SCURL in the Summer and at the CILIP Scotland Conference.

9. Information Commissioners Office (ICO) latest
KC was not present on the call to deliver an update on ICO activity but the Group noted that there appears to have been no change and no imminent adoption into UK law.

10. BIC Privacy Action Plan/Project Deliverables
Having agreed the advisories previously, SE talked the Group through the rest of the Privacy Action plan he had sent to the Group prior to the meeting. This is in the format of an Excel Spreadsheet which helps to calculate and quantify the risk to customer privacy. It helps to illustrate a number of issues: 1) Is calculating risk worthwhile? 2.) Is it meaningful to have a risk level calculated at say 5? 3) Is software actually required to do this i.e. is there any actual calculation or is it just a whole series of yes/no questions? 4) Organisations undertaking the privacy impact assessment have lighter or alternatively more onerous requirements depending on the size of the organisation as measured in turnover and staff. How should libraries be measured given library budgets and volunteer staff? And at what level; branch library, central library, authority or consortium?

Threats are analysed in accordance with the data inputted concerning the size of the organisation. However, there are very few values that relate to analysing library assets. The threat value and the vulnerability value are taken from the existing standard as specified by the EU and the formula used is the asset value added to the maximum of the other risks taken into consideration. Further complications to this include the fact that, as yet, no threshold has been defined as to what constitutes a threat. The threshold may have to be different for the library sector than it is for the retail sector. However, the Group discussed exploring appropriate thresholds themselves to prevent any unreasonable thresholds being set by another organisation without consultation. SE and MF noted that this could form part of BIC’s wider role in setting best practice guidelines and might prevent any unrealistic thresholds set by other organisations which might be too onerous on libraries.

The Group noted that it would be useful to have a legal perspective on how this threshold could be set and what it could be. SE noted that it would be more practical for many similar libraries to be grouped e.g. by size and then the fields of the spreadsheet filled in accordingly. This would mean that perhaps only 6 Privacy Impact Assessments would have to be developed and libraries could use the one which covers their particular size and technical set up. This would prevent every single library in the UK have to establish their risk individually at enormously wasteful cost. The Group agreed that already it has discussed practical and less onerous methods without risks to data protection and privacy. All libraries appear high risk in terms of privacy and RFID as books are taken out of libraries by the very nature of lending; there are therefore high risks to consider. It might be sufficient simply to accept these levels of risk and alert users to them rather than spend a large amount of scarce resource on attempting futile mitigation.
MF noted that further complications may arise with the use of smart phones and their ability to read RFID tags and suggested that the project broaden its scope to develop further research on the risks within the industry, including the role of NFC here. This is a risk if a person is in proximity to another with an NFC reader – the private data can be extracted by the owner of the NFC reader. He noted further research is needed here as to the exact risks posed by this technology.

The Group discussed their concerns that due to the length and complexity of the proposed Privacy standard EN 16571 and the fact that it looks thorough, UK legal agencies may just accept this as law, without further consultation without ensuring that the standard is fit for purpose. Therefore this Group’s recommendations could be vital in ensuring that any legal measures implemented are practical and suitable for the library sector.

11. Watching brief on NFC (in scope of this Project)
The Group noted that NFC had already been mentioned above with regard to potential risks it may pose with regard to RFID and privacy, including the use of NFC readers to extract information from RFID tags. NFC readers could also potentially track the movement and lifestyle of library users and thus pose a threat to privacy.

12. A.O.B.
The Group discussed that its next steps were to confirm and clarify when and to whom the advisories can be published. SE noted that in releasing these advisories the Group is not endorsing the EN standards but recommending an approach to prepare libraries in case the mandates are implemented as is.

13. Date of next meeting
The next conference call will be held on Friday 29th May 2015.