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BIC RFID PRIVACY TASK & FINISH WORKING GROUP MEETING – Minutes
Location: CILIP Building, 7 Ridgmount Street, London WC1E 7AE / Conference call
Date and time: Tuesday 18th July 2017, 10am
Minutes taken by: Alaina-Marie Bassett

Present	Apologies
Alaina-Marie Bassett, BIC	Marvin Crisp, D-Tech International
Karen Carden, Uni. of the Arts, London	Philip Farrell, 2CQR
Catherine Cooke, Westminster Libraries	Jim Hopwood, Bibliotheca
Simon Edwards, Consultant (Chair)	
Karina Luke, BIC	
Ian Manson, Infor (dialled in)	
Darren Ratcliffe, Bibliotheca	

1. **Welcome to the call and apologies**
   The Group was welcomed to the meeting and the apologies were delivered. PF was welcomed to the Group in absentia. SE noted that this meeting was set up to discuss both the progress made to date in relation to RFID Privacy and the forthcoming BIC Breakfast on this topic.

2. **Competition Law – conduct reminder**
   The Group was reminded about BIC's Competition Law Policy – please click on the following link for more information regarding this policy: http://www.bic.org.uk/149/BIC-Competition-Law-Policy/.

3. **Review of the minutes and actions from the last meeting**
   The minutes from the last meeting of this Group were approved without corrections. The following actions were discussed:

   - RFID Privacy Policy / Code of Practice (CoP) documents
     SE confirmed that, as per his actions from the last meeting, he circulated a document to this Group which detailed stock suppliers' responsibilities when supplying RFID tagged products to non-RFID libraries. He reported that the CoP documents were signed off by the BIC Libraries Committee at their most recent meeting on Thursday 18th May 2017. As a result of the feedback received during that meeting, the wording of the CoP documents in relation to academic libraries and speciality libraries has been reviewed by members of this Group prior to BIC's meeting with the Information Commissioner's Office (ICO) which took place on Friday 30th June 2017.

   - RFID Privacy Poster template which libraries can use / display
     AMB confirmed that a draft RFID Privacy poster template was produced following the last meeting. She thanked the Group for their feedback on this and noted that she will make the necessary, minor amendments ASAP.
     ➢ **ACTION**: AMB to amend the RFID poster template according to the feedback received to date and circulate to this Group for final comment ASAP.

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- British Standards Institute (BSI)
  - ➢ **ACTION CARRIED OVER:** AMB to liaise with KC to discuss whether a meeting between select members of this Group and BSI is required going forwards.

4. **Feedback on the 'BIC Approach to RFID Privacy' document**
   SE confirmed that no further changes are required for this documentation and as such the item can be removed from the agenda of this Group going forwards.
   - ➢ **ACTION**: AMB to remove this item from the agenda for the next meeting.

5. **Update on the BIC 5-Point Plan and RFID Privacy Code of Practice (CoP)**
   SE noted that the BIC 5-Point Plan forms part of the BIC RFID Privacy CoP document and that this document will be discussed during the forthcoming BIC Breakfast on Wednesday 26th July 2017.

6. **ICO meeting follow-up**
   SE reported that BIC's meeting with the ICO on Friday 30th June 2017 had been a productive session. He noted that at the beginning of the meeting it had become apparent that the ICO representative had not seen the EN 16570 and 16571 mandates and was not fully informed about the risks associated with RFID Privacy. For example, the representative had been aware that any RFID tags which store personal data are considered a risk but he did not realise that seemingly harmless data such as a book being borrowed is (under these EU mandates) considered a potential privacy risk to the person it has been issued to. KC noted that the primary issue here is that we do not (as an industry) know what data is stored on every library's RFID tags but that BIC's advice for several years has been to minimise the amount of data. DR agreed but noted that Bibliotheca's RFID tags do not store personal data.

   SE suggested that a survey could be created for stock suppliers which supply programmed RFID tags to libraries, and this survey could ask if there are any which store the title and author of the book on the tags, however the Group agreed that this may not be necessary. Similarly, RFID Vendors may know if any of their implementations store personal data or contain any additional data such as title and author which would identify the book. KL suggested that BIC's documentation regarding RFID Privacy should clearly state that personal information should not be stored on RFID tags. The Group agreed. KC noted that the term "personal data" should be used so it is in line with the wording used by the ICO.

   - RFID Privacy and General Data Protection Regulation (GDPR)
     SE noted that the EU mandates for RFID Privacy are a separate issue to the General Data Protection Regulation (GDPR) which will come into effect on Friday 25th May 2018. KC noted that this Group will need to be careful not to confuse organisations that have not encountered RFID Privacy before, to ensure they don't inadvertently link RFID Privacy to GDPR. IM commented that, providing they follow the recommendations of BIC's RFID Privacy CoP, libraries will meet the requirements of the EU mandates. SE agreed but noted that it is still a leap of faith for libraries to carry out this work at present when the EU mandates are not yet in legislation.

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SE informed the Group that he will discuss GDPR towards the end of his presentation at the forthcoming RFID Privacy BIC Breakfast. He agreed to put information about GDPR on a separate slide in order to avoid confusion. KC reported that the University of the Arts, London has not carried out a Privacy Impact Assessment (PIA) for GDPR as yet but that it would be useful to know what format the book industry is submitting this information in. SE noted that the PIA specified by the RFID Privacy EU Mandates comes in two sizes for big or small organisations. This is defined by turnover or numbers of employees. This differentiation doesn't help libraries. The smaller organisation would undergo a slightly simplified PIA process. KC informed the Group that ICO has an editable form on their website.

- BSI Privacy Impact Assessment (PIA) for GDPR: Low / High Risk Organisations
  SE noted that, during the last meeting, this Group had proposed that BIC should carry out two PIA applications on behalf of large and small libraries respectively to ascertain the level of risk for each in relation to GDPR. He commented that submitting these applications will help BIC to identify the scale of the issue at hand and any exceptions (in terms of organisation types). KL noted that the application will cover Article 35 of the GDPR, and this should be referred to in the BIC RFID Privacy CoP and policy documents going forwards. SE noted that some organisations may have different practices for which they would need to amend their policy but even in this instance at least half of the work surrounding RFID Privacy would have been done for them by BIC. KL noted that this Group needs to ensure it is clear about what is required to be compliant with Article 35 (GDPR) and what is required for the EU mandates (RFID Privacy) in order not to conflate the two.

  SE suggested that this Group should carry out the PIA for GDPR now, with a view to completing a PIA for RFID Privacy in due course. KL noted that the ICO's advice to BIC member organisations is not to spend money on expensive tools or software for RFID Privacy and follow BIC's CoP and policy documents instead. SE agreed that this should be stated clearly at the forthcoming BIC Breakfast. KL commented that some organisations may question why they need to carry out two PIAs if the difference between the two is not communicated well. KL and SE noted that the BSI has conflated information about the GDPR PIA and RFID Privacy PIA on its website.

- BIC RFID Privacy Sub-Group meeting to discuss BIC's PIA applications
  KL suggested that a Sub-Group meeting should be set up (for those who attended the meeting with ICO in June 2017) to discuss the PIAs for both public and academic libraries, and also whether a meeting between BIC and BSI is required going forwards.
  ➢ **ACTION**: AMB to arrange a meeting of the RFID Privacy Sub-Group ASAP, to discuss the two PIA applications for a public and academic library respectively.
  Post-Meeting Update: this Sub-Group meeting will take place on Tuesday 22ⁿᵈ August 2017.

- Publishing the BIC RFID Privacy CoP and Policy documents
  KL asked whether this Group should publish the RFID Privacy CoP and policy documents now or whether they should be published only if/when the EU mandates come into legislation. SE suggested that the documents should be published now; clearly labelled as draft versions. He commented that, if the mandates come into legislation in due course, libraries' requirements

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will likely be amended and the RFID Privacy CoP and policy documents will need to be revised in accordance with these amendments. However, SE suggested that the current version of each document should be disseminated now to inform libraries about their options, to gain wider feedback on the work done by this Group to date, and to help alleviate concerns about RFID Privacy within the library community.

➢ **ACTION**: SE to amend the CoP so that it states that "personal data" should not be stored on RFID tags and that, at the time of writing, the EU mandates are not legally binding in the UK.

➢ **ACTION**: AMB to ensure that the draft CoP document is branded and published in time to take copies to the BIC Breakfast on Wednesday 26th July 2017.

SE agreed to email the EU Mandate numbers which were discussed at the recent BIC & ICO meeting to the ICO representative by way of a follow-up and request feedback on this information. He noted that ICO may not be willing to give a formal reply as the EU mandates are not yet in legislation.

➢ **ACTION**: SE to send the details which were discussed at the recent BIC & ICO meeting to the ICO representative ASAP, cc-ing the members of the Sub-Group that attended this meeting. SE should also request feedback on these figures in light of the EU mandates.

7. **RFID Privacy Project Update Form**
SE noted that a Project Update Form is used to keep the BIC Executive and Operational Boards and BIC Members informed about the progress made on each project that BIC undertakes.

➢ **ACTION**: SE to update the RFID Privacy T&FWG Project Form ASAP and send to KL for circulation to the BIC Executive and Operational Boards.

8. **Latest from other representative bodies**
SE commented that ICO and BSI were discussed during this meeting previously. IM informed the Group that the Libraries TaskForce will hold its next meeting on Friday 21st July 2017, although RFID Privacy will not be on its agenda.

9. **Watching Brief on NFC Privacy**
SE reminded the Group that NFC (a protocol used to communicate with smartphones, etc.) poses more of a risk to library patrons than RFID tags because it can be used to trace people's whereabouts (and make payments at contactless card machines). He also noted that NFC-capable devices are a potential threat to the security of patrons because they are able to re-write tags, i.e. not just read them. KL noted that Mick Fortune (a consultant for BIC) kindly provided an update on NFC recently however there is nothing new to report at this time.

10. **A.O.B.**
- Presentations for the RFID Privacy BIC Breakfast
SE reported that providing a brief introduction to RFID Privacy is proving to be more difficult than he originally anticipated due to the volume of material that needs to be covered. He noted that his introduction will then lead into KC and CC's joint presentation on how RFID Privacy affects both public and academic libraries (and the differences involved). (The final presentation will be provided by Paul Dalton (PD) of Bibliotheca who will discuss RFID tags from a vendor's

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perspective). CC and KC agreed that some of the material covered in SE's introduction could potentially be repeated in their joint presentation so all of the speakers for this event are in the process of liaising with one another to ensure any duplications are removed or else kept to a minimum. SE commented that it will be reassuring for libraries to see how others are addressing RFID Privacy issues. The Group agreed that SE should concentrate on the issues in his introduction, allowing CC and KC to concentrate on the solutions which are outlined in the BIC RFID Privacy CoP document and the differences between these solutions for public and academic libraries.

Relating to PD's presentation, DR informed the Group that very few regions (outside of the UK) are aware of privacy issues. SE suggested that PD could provide information in his presentation about the regions that use Ultra High Frequency (UHF) RFID tags as these pose more of a threat to library patron privacy as the tags can be read at a much longer range. SE noted that the onus on libraries and RFID vendors to mitigate the risk of RFID tags will become clear when/if it comes into legislation and, as such, library RFID vendors need to be made aware of the risks in advance of this happening.

SE noted that GDPR will be carefully referred to during the event to show the differences between GDPR and RFID Privacy with a view to uncoupling them in people's minds. He commented that he will make it clear that the EU mandates are not related to GDPR. KC suggested that a separate slide should be produced for each topic to ensure they're not confused. The Group agreed that SE should summarise the key points discussed during the BIC Breakfast at the end of the event.

➢ **ACTION**: KC and CC to liaise ASAP regarding their joint presentation for this event and send the final slides to SE + AMB for comment and circulation to the other speakers of this event.
➢ **ACTION**: ALL to consider attending or sending a delegate from their organisation to this event. Ticket sales must end on Friday 21st July. Further information about the event can be found, here: https://www.eventbrite.co.uk/e/bic-breakfast-july-2017-rfid-privacy-in-libraries-revealing-what-librarians-both-public-academic-tickets-35727135825

11. **Date of next meeting**
➢ **ACTION**: AMB to arrange the next meeting of this Group, when required (and in particular after the RFID Privacy Sub-Group's next meeting).

The book industry's supply chain organisation