BIC Task & Finish Working Groups
Monthly Status Report Template

RFID Privacy Project
This monthly status report template is designed in order to give the relevant stakeholders (detailed in each Project Brief) an update on project progress. All reports submitted will be shared on the BIC website and as such made publicly available.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>RFID Privacy Project</th>
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<tbody>
<tr>
<td>Project Leader</td>
<td>Simon Edwards</td>
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<tr>
<td>Date of Start of Project (this should be the date of the first Working Group meeting)</td>
<td>1/10/2013</td>
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| Date of Completion given in Project Brief | “Mid-2014” when EU publishes their requirements. *(Revised completion analysis (see comments below):*  
1. Statement published and promoted 15/1/2015 *(Done)*  
2. Signage guidelines to be published 31/3/2015 *(Guidelines written but not yet published)*  
3. PIA guidelines to be published 31/5/2015 *(Work in progress)*  
*Ongoing EU Privacy issues may require additional work but this can be commissioned later on by the BIC Libraries Committee* |
| Date of this Update | 20/04/2015                                    |
| Update Submitted by | Simon Edwards                                 |
| Overall Project Completeness as a % | Estimated at 90% (see comments below and revised deliverables – This project is dependent on ICO decision to implement mandate’s requirements in UK law. Very nearly all the possible work has been done to prepare guidance for members in the event of this becoming law. A further piece of work is likely to lobby to mitigate the negative and potentially quite serious cost implications of the PIA Process and the labeling of all library stock using RFID but this would be better managed as a future phase of this work rather than as part of this immediate project) |
| % update against each deliverable listed in the Project Brief to show as a % of progress made | A Communications plan to all BIC members and the wider library community, to highlight the EU timeline and the work BIC is undertaking in this regard (this to be done in conjunction with the BIC Training Events and Communications Committee and it depends on hearing that implementation is due. This will be slow and it will provide plenty of time for BIC to produce a plan. There may be a consultative phase whereby the ICO wants to contact stakeholders before this becomes law. BIC may wish to be involved in this process. SE 24/02/2015)  
An overview of the Privacy issue and what BIC is doing has been produced and is with BIC for publication. The timeline is not yet clear and is not needed until a future announcement that the UK Government has decided to implement the EU Privacy legislation in the UK. *(100% complete SE 24/02/2015)*  
A set of guidelines that will enable librarians to comply with a possible implementation of RFID Privacy in UK Law. *(90% complete SE has written draft guides to EN 16570 and EN 16571 see more detailed notes at the bottom of this report expanding* |
on the detail of this deliverable – The T&FWG asked for these to be further revised and summarised and this work has now been done SE 20042015)

Best practice guidelines for protecting existing installations from malicious interference via NFC devices. (Note that this deliverable has been devolved to separate NFC T&FWG which has produced a BIC Advisory and a BIC Bite and was then dissolved by the BIC Library Committee meeting)

Possible revisions to ISO 28560 to secure data from Denial of Service attacks – without comprising operational functionality (No revisions to ISO 28560-2 anticipated)

Consideration & development of a BIC Breakfast/Information Day to share & communicate to stakeholders/BIC members. (No information strategy in place yet as EU publication delayed and ICO not proposing to take action in near future – watching brief maintained)

Documentation of the consequences of organisations failing to adhere to the EU requirements (Consequences unknown at this time. This document may not be required. If roll-out of BIC's solution is poor then this document could help. This is a decision to be taken later.)

Monthly progress reports to the BIC Libraries Committee (RFID Privacy has been reported and discussed at every BIC Library Committee meeting. In addition this form is being updated monthly for the BIC Executive Director. SE 20/04/2015. Next meeting by conference call on 24th April 2015.

Engagement of the T&FWG has been generally good. Members have reviewed guidelines and provided feedback or comments in conference calls. (SE 24/02/2015)

Other Comments

The original project brief did not fully anticipate a number of factors which have affected this project. 1) EU delay and ICO disinterest – the project has effectively been on hold for over a year. 2) The deliverables have been re-focused using recently acquired information: Key deliverables are now:

1) Statement warning libraries of upcoming Privacy issue and re-assuring them that BIC is on the case (Written and agreed by T&FWG. Published by BIC in January) (100% Complete)

2) Work on EN 16570. This guide has been reviewed by the T&FWG and been agreed. Minor changes are still needed to conform stipulations in EN 16571. (100% complete)

3) Work on EN16751: This is much bigger than anticipated
although it is possible that only a subset of its requirements would be implemented into UK Law. The EN16571 document is over 100 pages long and is extremely complicated and detailed. Libraries may need additional help with complying with any legal requirements in due course. For now, the standard has been analysed and an advisory/set of guidelines has been written by SE and reviewed by the T&FWG. There are a number of questions which remain unanswered on EN 16571 and they may have to remain so until clarified by the eventual process of bringing the mandate into UK law. (85% completed)

4) A final deliverable is a walk-through of EN 16571 in detail using a spreadsheet model to enable libraries to calculate their risk and its impact and their appropriate countermeasures in order to produce a Privacy Impact Assessment. The spreadsheet model serves two important purposes.

1. It further explains the PIA process in greater detail and this will provide reassurance to libraries concerned about compliance.

2. The spreadsheet will act as an alternative to purchasing expensive software from external suppliers. It may be that BIC will be able to market a spreadsheet model to libraries as a future product or membership benefit.

(60% Completed 20/04/2015)

Analysis on this spreadsheet has shown how arbitrary the process may be and how time consuming and also how a software solution is not really necessary given the very small amount of calculation required. The PIA looks very impressive and detailed but may be far too elaborate to achieve a sensible balance ie enhanced privacy at reasonable cost and effort. (Simon Edwards 20042015)