



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.

Project Name	RFID Privacy Project
Project Leader	Simon Edwards
Date of Start of Project (this should be the date of the first Working Group meeting)	1/10/2013
Date of Completion given in Project Brief.	“Mid-2014” when EU publishes their requirements. <i>Note that this project has an on-going brief to monitor activity in the EU and ICO to track movements towards implementation of legislation designed to protect EU citizens from invasions of their privacy from the deployment and use of RFID technology in libraries. By 31st May 2015 this project had delivered a number of advisories and statements on the subject to inform and alert BIC members and the library sector as a whole to the above privacy issue. A proposal for BIC to design and implement a simpler more library friendly RFID Privacy process was submitted to The BIC Library Committee in September. If the committee agrees then this will be a further strand of work.</i>
Date of this Update	11/09/15
Update Submitted by (name)	Simon Edwards
Overall Project Completeness as a %	Estimated at 99% on current deliverables, 60% assuming BIC Library Committee approval of alternative BIC Privacy Process. (see comments below and revised deliverables – 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 proposed to mitigate the negative and potentially quite serious cost implications of the PIA Process e.g. 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 Please detail as much information as possible, with particular attention to updating against timeline, engagement of Working Group etc.	<p>In the event of the announcement of upcoming legislation, this group will lead the library sector's efforts to lobby the ICO to avoid expensive and damaging measures which will affect libraries disproportionately for the potential gain in protecting privacy. (SE 18/5/2015)</p> <p>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)</p> <p>A set of advisories that will alert libraries and other interested parties to the possible impact of RFID Privacy in UK law as it pertains to library signage and a proposed over-complicated privacy impact assessment process. (100% complete SE has written draft guides to EN 16570 and EN 16571 and a higher</p>



	<p><i>level joint summary for both standards. SE 18052015)</i></p> <p><i>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)</i></p> <p><i>Possible revisions to ISO 28560 to secure data from Denial of Service attacks – without comprising operational functionality (No revisions to ISO 28560-2 anticipated)</i></p> <p><i>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)</i></p> <p><i>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.)</i></p> <p><i>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.) (Now awaiting approval from BIC Library Committee of phase 2 of this project – SE 11/9/2015)</i></p> <p><i>Engagement of the T&FWG has been generally very good. Members have reviewed guidelines and provided feedback or comments in conference calls. All three advisories have been passed by the group and published by BIC (SE 18/05/2015)</i></p>
<p>Other Comments</p>	<p><i>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:</i></p> <ol style="list-style-type: none"> <i>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)</i> <i>2) Work on EN 16570. This advisory has been reviewed by the T&FWG and been agreed. (100% complete and published by BIC. SE 18052015)</i> <i>3) Work on EN16751: The EN16571 document is over 100 pages long and is extremely complicated and detailed.</i>

	<p><i>Libraries would need additional help with complying with any legal requirements in due course. For now, the standard has been analysed and an advisory has been written by SE, reviewed and accepted by the T&FWG and published by BIC. (100% completed - SE 18052015)</i></p> <p><i>4) Another deliverable was to develop a walk-through of EN 16571 in detail using a spreadsheet model to show how libraries would calculate their risk and its impact and their appropriate countermeasures in order to produce a Privacy Impact Assessment. (100% - This work has been cut short due to the extraordinary over-complexity of the standard. SE 18052015)</i></p> <p><i>5) The spreadsheet analysis of EN16751 has been replaced by a critique of EN 16571 and a proposal for a simplified process to be undertaken by BIC which it is hoped will be a big improvement and more suitable for libraries and their suppliers. This proposal is with the BIC Library Committee for approval and then with BIC Management. (100% SE 18052015)</i></p> <p><i>6) Assuming this proposal is approved and the resources made available, the project will move into a phase 2 to deliver the new simplified process. This will involved the BIC Website and potentially a workshop to agree the new process. A communications plan would then be necessary to publicise this solution.(0% complete SE 11/9/2015)</i></p>
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