



BIC Task & Finish Working Groups
(BIC) RFID and Privacy Task & Finish Group Briefing
Document

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BIC Committee Review

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1. PURPOSE

To demystify EU requirements, and provide neutral unbiased communications and/or guidance to the industry on those matters relating to RFID and privacy.

2. BACKGROUND

RFID has caused privacy concerns for many years. In the United States these concerns prompted the American Library Association to issue a declaration defining their position on RFID privacy as long ago as 2006, and concerns about possible infringements of human rights have surfaced repeatedly over the last 15 years or more.

In the UK – and in Europe – the public’s attitude to the technology and to personal freedoms in general, has been rather more relaxed. The more pragmatic RFID users have never viewed the technology with anything like the suspicion prevalent in other markets and most are fairly certain that none of the data they store on tags used either on stock or in membership cards infringes on an individual’s right to privacy.

More recently however there have been two developments that may give rise to a rethink of this position. The first of these began in 2008 when the EU began looking at the use of RFID in a number of business areas – including libraries. Under its mandate M/436 experts were invited to bid for the work of drawing up guidance for organisations using RFID to ensure that individual privacy was not being compromised.

The second phase of this project is now set to deliver – in 2014 – a recommendation for librarians using RFID to submit to an audit of their use of the technology. The sole representative representing European libraries in this process is Professor Paul Chartier who is not only advising the EU on which questions should be asked but also developing a commercial service to assist librarians in providing the answers.

The second development concerns the arrival on the market of Near Field Communication (NFC) enabled smartphones capable of reading and modifying both personal and item information stored in tags.

3. PROJECT DEFINITION

3.1. PROJECT OBJECTIVES

- To determine the scope and potential consequences of EU legislation in the area of RFID use in libraries.
- To develop guidance on best practice and regulations compliance.
- To quantify and find solutions for the threat posed by NFC to existing RFID library solutions.

The major deliverables will be a set of guidelines for librarians to meet the requirements of any future recommendations or legislation and best practice guidelines for protecting existing installations from malicious interference via NFC devices.

The major part of the work will be to gather information about immediate EU plans for regulation of the library market and to formulate guidelines for librarians in meeting possible future EU legal requirements.

In addition the group will need to liaise with external agencies, such as the standards bodies, to formulate best practice guidelines for protecting stock against Denial of Service attacks using NFC whilst at the same time allowing for the continuing development of NFC-based library applications.

The business benefits will be the continued use of RFID for the streamlining of library management services and the introduction of new, smartphone-based applications all operating within a secure environment meeting the requirements of international legislation.

Costs: Liaison with standards agencies may require attendance at face-to-face meetings on occasions.

3.2. PROJECT SCOPE

The scope of this project is limited to the Library market in the UK (both academic & public), RFID technology and smartphone-based applications in light of the EU requirements. It is expected that there will be liaison with the EU working party developing M/436 and possibly the UK Information Commissioner's office.

The external dependencies are contact with and feedback from the EU working party developing M/436 and possibly the UK Information Commissioner's office. Karen Carden is already working on a document that will inform this process further.

3.3. OUTLINE PROJECT DELIVERABLES AND/OR DESIRED OUTCOMES

- 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)
- A set of guidelines that will enable librarians to complete a future audit request from the EU.
- Best practice guidelines for protecting existing installations from malicious interference via NFC devices.
- Possible revisions to [ISO 28560](#) to secure data from Denial of Service attacks – without comprising operational functionality.
- Consideration & development of a BIC Breakfast/Information Day to share & communicate to stakeholders/BIC members.

- Documentation of the consequences of organisations failing to adhere to the EU requirements
- Monthly progress reports to the BIC Libraries Committee

3.4. CONSTRAINTS

BIC Budget

Time – project needs to be completed in readiness for the EU privacy requirements “go-live” date

Persuading the EU’s chosen library expert to share the details of his work on the library community’s behalf.

3.5. INTERNAL/EXTERNALINTERFACES

EU working group on M/436;

ISO WG11 – the International Standards Organisation working group (WG) charged with the responsibility for developing data standards for RFID in libraries.

BIC Training, Events & Communications Committee.

All BIC’s Library Community members

Society of Chief Librarians.

4. OUTLINE BUSINESS/INDUSTRY CASE

Please refer to sections 1 and 2 above.

5. QUALITY EXPECTATIONS

It will be up to the BIC Libraries Committee to accept the findings of the T&F WG and approve its recommendations. It is expected that prior to sign off, all stakeholders will have been consulted and will have provided feedback on all of the documented deliverables.

6. ACCEPTANCE CRITERIA

Guidelines must meet the EU legal requirements to be defined by Mandate M/436.

Guidelines must be easy to understand by those unfamiliar with the EU Privacy requirements

The BIC Libraries Committee has final sign off on the T&F Working Groups deliverables: this sign off must happen before any documentation or communication is made public.

7. RISKS

In order to gain a full understanding of the challenges to be met by the library community in satisfying the, as yet unknown, EU requirements we will need the co-operation of the EU expert currently drafting them.

The commercial aims of the EU expert may give rise (understandably) to a reluctance to co-operate with a body seeking to provide free advice.

The risks to organisations not complying with EU requirements in this area are as yet unconfirmed – but will form part of the brief for this Working Group.

8. OUTLINE PROJECT PLAN

The emerging threat from NFC suggests a short timeline for obtaining sign-off for this briefing document from the Library Committee – May 31st 2013.

First meeting of the group to be held in June 2013 with monthly meetings for the first three months and quarterly thereafter up to mid-2014 (when the EU publish their requirement)

Delivery dates:

Detailed project plan to be submitted to BIC Libraries Committee by the T&F working Group within 2 months of its first meeting.

Guidelines for librarians to complete a future audit request from the EU - draft by October, approval by November, publication January 2014.

Best practice guidelines for protecting existing installations from malicious interference via NFC devices – draft and approval by August, publication September 2013.

Possible revisions to ISO 28560 to secure data from Denial of Service attacks – without comprising operational functionality. – subject to ISO procedures.

Consideration & development of a BIC Breakfast/Information Day to share & communicate to stakeholders/BIC members. – Propose a date in January 2014 – closer to the EU document's publication.

Documentation of the consequences for organisations failing to adhere to the EU requirements to be prepared for publication in November/December 2013.

9. BUDGET/COSTS

The BIC costs of this project are likely to be as follows:

Room bookings at CILIP x 5 (*first meeting targeted for June*)

Mick Fortune: consultancy fees as per agreed daily rates (estimate 8 days over 10 months)

All costs associated with holding an Information Day (if deemed a requirement) This should be a free to attend event and could be run in conjunction with SCOUNL and/or SCL.

10. AUTHORITY RESPONSIBLE

Executive Director of BIC.

11. PROPOSED TASK & FINISH WORKING GROUP LEADER/PROJECT MANAGER

Mick Fortune – to be approved by the BIC Libraries Committee

12. CUSTOMERS AND USERS

2CQR, 3M, Axiell, Bibliotheca, Capita, D Tech, Infor, SirsiDynix, Librarians, Chartered Institute of Library and Information Professionals, Society of Chief Librarians, Local Government Association, Society of College, National and University Libraries (SCOUNL) etc.

13. REPORTING

When a formal budget is produced (*depending on feedback from MF on item 9*) then the T&F WG will be expected to report into the BIC Library Committee on progress against timelines and budget on a monthly basis. T&F WG Project Leader will report into both the BIC Libraries Committee and BIC's Executive Director.