

M1/03-0468

Response to DOC: M1/03-0427

Call for Review and Comment on ISO/IEC JTC 1 SC37 N302, SC 37/SG 4 Proposal for a New Work Item for Biometric Profiles for Interoperability and Data Interchange Part 2: Biometric Profile for Employees

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Background

The document scope states in part:

“Part 2 Biometric Profile for Employees

This part of the standard will define the specific profile for use by employers for employees. It will define the functions necessary to use a set of base standards; it will list the optional fields and parameters of the base standards and identify the elements of the base standard used to perform the functions; and will provide an implementation conformance statement proforma for use in determining conformance, interoperability, and data interchange.”

Comment

It seems that defining a specific profile “or use by employers for employees” may be an excessively broad undertaking, as the basic facets of interaction between employers and employees may be highly variable across industries and applications. Many of the assumptions that underlie profile development in the area of transportation workers, for example, may be non-applicable, if not directly contradictory, to other employee-employer interactions. Biometric systems may be opt-in or mandatory; biometric background checks may be compulsory or forbidden; the definition of an employer and employee may vary as well.

An employer not well-versed in the nuances of standards development may assume that this standard can be applied in a meaningful fashion to his or her use of biometrics in employee-facing applications, when that may not always be the case. Similar misinterpretation of standards’ applicability happens in US Federal Government procurements on a regular basis. Furthermore, there may be employee applications in which interoperability and interchange of information is undesirable; however, the employer, in an effort to avoid deploying proprietary systems, might incorporate compliance with this standard when procuring a system.

To ensure that Part 2 of the standard is provides maximum value and relevance to its target audiences, we recommend that the standard incorporate careful consideration of differing employer-employee concepts of operation and that the types of applications and usage scenarios to which this standard should apply be defined precisely.