

Commission de Contrôle des Fichiers de l'O.I.P.C. - Interpol
Supervisory Board for the Control of Interpol's Archives
Comisión de Control de los Ficheros de la OIPC-Interpol
لجنة الرقابة على محفوظات الم د ش ج - انتربول



**SUMMARY OF THE WORK OF THE COMMISSION FOR
THE CONTROL OF INTERPOLE'S FILES
2002**

Original: French	ENGLISH
Available in: Arabic, English, French, Spanish	
Reference: CCF/52/S04-2.03	

CONTENTS

Page

1.	COMPOSITION OF THE COMMISSION IN 2002.....	1
2.	THE COMMISSION'S ROLE, ITS INDEPENDENCE AND FUNCTIONING	2
3.	BASIC TEXTS OF INTERPOL AND THE CCF CONCERNING THE CONTROL OF THE ORGANIZATION'S ARCHIVES	2
4.	THE PROCESSING OF REQUESTS.....	3
4.1	Significant increase in the number of requests	3
4.2	Main stages in the processing of requests	3
4.3	Conditions for accessing Interpol's files and admissibility of requests	3
4.4	General questions raised about the processing of requests	4
5.	SPOT CHECKS	8
5.1	Purpose of spot checks	8
5.2	Procedures for spot checks.....	8
5.3	General issues raised by spot checks	8
6.	ADVICE AND OPINIONS FROM THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES TO THE ORGANIZATION	10
6.1	Draft Rules on the processing of police information	10
6.2	Guidelines on the notion of the international importance of an item of police information	11
6.3	Essential identification particulars for issuing a red notice	11
7.	MISCELLANEOUS.....	11
7.1	The Commission's name and logo.....	11
7.2	The Commission's budget	11
7.3	Meeting of Europol's Joint Supervisory Body	11
7.4	Presence of the Commission on the Interpol Website	12
7.5	List of Interpol's files.....	12

1. COMPOSITION OF THE COMMISSION IN 2002

Article 16 of the Rules on International Police Co-operation and on the Internal Control of Interpol's Archives (henceforth referred to as the Rules on Police Co-operation), which takes up the provisions of the Exchange of Letters concerning organization of the internal control of the archives held by the ICPO-Interpol, states that "The Commission for the Control of Interpol's Files shall be composed of five members of different nationalities...".

The terms of office of the current members began in January 2002 for a period of three years. Since that date, the composition of the Commission has been as follows.

<u>POSITION</u>	<u>MEMBER</u>	<u>ALTERNATE</u>
Chairman	Mr Peter HUSTINX (Netherlands) President of the Dutch Data Protection Authority	Mr Josef RAKOVSKY (Czech Republic) Judge at the Supreme Court of the Czech Republic
Member appointed by the French Government	Mr Michel GENTOT Chairman of the <i>Commission Nationale de l'Informatique et des Libertés</i> , (Chairman of the French Commission on EDP and Freedom) <i>Président de section honoraire du Conseil d'Etat</i> (Honorary Section Chairman, Council of State)	Mr Pascal GIRAULT Secretary General of the <i>Ecole Nationale d'Administration</i> (training college for senior civil servants) and former <i>Adjoint au sous-Directeur des libertés publiques et de la police administrative</i> (deputy to the assistant director for public freedoms and administrative police), French Ministry of the Interior
Data-protection expert	Ms Elizabeth FRANCE (United Kingdom) Office of the Telecommunications Ombudsman	Ms Kinga SZURDAY (Hungary) Senior Counsellor at the Public Law Department, Hungarian Ministry of Justice
Executive Committee member	Mr Neal PARKER (Canada) Superintendent, Royal Canadian Mounted Police, International Liaison Branch	Until October 2002: Mr Eduardo MOLINA FERRARO (Uruguay) Director of national police and assistant director general of the Uruguayan Ministry of the Interior Replaced by: Mr René Eduardo DOMÍNGUEZ CALDERÓN (El Salvador)
Computer expert	Mr Iacovos THEMISTOCLEOUS (Cyprus) Head of the Information Technology Department of the Central Information Service, Cyprus Police	Mr Oleg BLUDOV (Russian Federation) Sub-Division head, Information and Technical Development Division, Interpol Moscow

2. THE COMMISSION'S ROLE, ITS INDEPENDENCE AND FUNCTIONING

In conformity with the provisions of the Exchange of Letters between the French Government and Interpol, and of the Rules on International Police Co-operation, the Commission has a dual role: a supervisory role in the processing of requests from private individuals and of spot checks that it carries out in Interpol's files, and an advisory role vis-à-vis the Organization.

The Commission stressed the need to continue to foster a relationship of advice and transparency between it and the General Secretariat. This would enable both to be aware of - and thereby gain a better understanding of - each other's obligations and constraints, so that the Commission can advise the Organization better, playing both a preventive and a leading role with regard to the processing of information by Interpol, bearing in mind that the Commission has the power to make recommendations to the General Secretariat, and to the Organization's Executive Committee.

In the context of today's world, where new technologies and international-crime trends have given rise to new requirements for international police and judicial co-operation regarding the processing of police information, the Commission's opinion has been sought by the Organization.

By virtue of its composition, and as laid down in Article 1.3 of the Agreement between the Commission for the Control of Interpol's Files and the ICPO-Interpol General Secretariat and in Article 19 of the Rules on International Police Co-operation, the Commission acts entirely independently. It holds two four-day sessions a year at the Organization's Headquarters in Lyon. Its sessions are held *in camera*.

3. BASIC TEXTS OF INTERPOL AND THE CCF CONCERNING THE CONTROL OF THE ORGANIZATION'S ARCHIVES

The following texts contain the main rules on the processing of information by Interpol, and the supervision thereof:

- The Exchange of Letters between the Government of the French Republic and the ICPO-Interpol concerning the organization of the internal control of Interpol's archives
- The Rules on International Police Co-operation and on the Internal Control of Interpol's Archives
- The Rules on the Deletion of Police Information held by the General Secretariat
- Rules Governing the Database of Selected Information at the ICPO-Interpol General Secretariat and Direct Access by NCBs to that Database
- The Rules Governing Access by an Inter-Governmental Organization to the Interpol Telecommunications Network and Databases
- Interpol's Constitution
- The Rules of Procedure of the Commission for the Control of Interpol's Files
- The Agreement between the Commission for the Control of Interpol's Files and the ICPO-Interpol General Secretariat.

4. THE PROCESSING OF REQUESTS

4.1 Significant increase in the number of requests

The number of requests processed by the Commission in 2002 was 120, compared with 45 in 2001. This increase in the number of requests is probably due to the ease with which Interpol can now be contacted via the Internet, together with the increase in the number of countries with rules on data protection and national supervisory boards for the control of files. The number of requests is likely to increase significantly when the Commission features on the Interpol Website (see Point 7.4 below).

4.2 Main stages in the processing of requests

The Commission processes requests sent either directly to it or via Interpol. All requests received by the Organization are automatically forwarded to the Commission.

As soon as it receives a request, the Commission proceeds as follows:

- First, it checks the admissibility of the request (see Point 4.3 below).
- It then checks whether there is any information in Interpol's files on the person who is the subject of the request.
- Where necessary, it initiates an exchange of views among the requesting party, the body which originally supplied the information in Interpol's files and the General Secretariat (in the interests of giving a proper hearing to all parties).
- It informs the General Secretariat, and possibly the Executive Committee if it proves impossible to reach agreement with the General Secretariat, of its opinion concerning any changes to be made in the processing of information which has been checked.
- It asks the Interpol National Central Bureau(s) of the member country/countries concerned if it is possible to disclose, to the requesting party, whether or not there is any information in Interpol's files on the person who is the subject of the request (see Point 4.4.6 below). Member countries are the owners of any information they send to Interpol and they alone may determine whether an item of information or the absence of any information concerning the person may be passed on to a requesting party.
- It passes on the results to the requesting party. It may be necessary for the Commission to direct a requesting party towards the authorities capable of supplying an appropriate response.

4.3 Conditions for accessing Interpol's files and admissibility of requests

4.3.1 *Free, unrestricted access to Interpol's files*

The Commission agrees that access to Interpol's files is free of charge and unrestricted to the extent that anybody may ask to access the Organization's files without fear that the request may be used for international police and judicial co-operation (see Points 4.4.1 and 4.4.6 below).

4.3.2 Admissibility of requests

To be admissible, requests for access to personal information must:

- "...emanate from persons who may actually be the subject of such information or from the duly authorized or legal representatives of such persons". (Article 9(6) of the Rules of Procedure of the Commission for the Control of Interpol's Files). Hence, requesting parties' representatives must be able to supply proof of capacity and the right to act on behalf of requesting parties;
- Be accompanied by a copy of an identity document belonging to the person who is the subject of the request so that his/her identity may be formally established.

The Commission also stated that:

- In order for requests to be admissible, the reasons for them do not have to be stated in requests from persons concerned or from their legal representatives;
- Requests from the representatives of corporate bodies are admissible (see Articles 2(b) and 23 of the Rules on Police Co-operation);
- Where there is a conflict of interests between the requesting party and the person being represented (e.g. involving an employer and an employee), it is preferable not to give a positive response to the request, but instead to direct the requesting party towards the national authorities capable of supplying a relevant response;
- All requests are subject to spot checks in Interpol's files, whether admissible or not;
- When a request is inadmissible, the Commission informs the requesting party, stating the conditions governing its admissibility.

4.4 General questions raised about the processing of requests

4.4.1 Requests must not be recorded in Interpol's files

Given that certain requests had been recorded in Interpol's files, usually when they had been sent by an NCB, the Commission pointed out that the right to access to Interpol's files was not restricted (see Point 4.3.1 above). The General Secretariat therefore could not record individual requests in Interpol's files, even if they had been sent by NCBs, or if the name of the requesting party was already recorded in Interpol's files, or if the requests contained information of interest to international police co-operation:

- In conformity with Article 1.2 of the Rules on International Police Co-operation, it is necessary "*to protect police information processed and communicated within the ICPO-Interpol international police co-operation system against any misuse, especially in order to avoid any threat to individual rights*".
- In conformity with Article 2(a) of Interpol's Constitution, the Organization's aim is "*To ensure and promote the widest possible mutual assistance between all criminal police authorities within the limits of the laws existing in the different countries and in the spirit of the "Universal Declaration of Human Rights"*"; so,
- All individual requests are confidential documents containing information which is itself confidential and which has not been sent to Interpol with the aim of providing assistance to police bodies, but simply in execution of the right to access Interpol's files. The failure to respect the confidentiality of a request constituted a violation of this right.

- The same applies to information sent by NCBs for the processing of the request; entry into ICIS of information sent by NCBs for the processing of requests should be studied on a case-by-case basis and authorized by the Commission's Secretariat;

as access to Interpol's files is unrestricted (see Point 4.3.1 above).

4.4.2 Article 3 of Interpol's Constitution

(a) Role of the Commission for the Control of Interpol's Files

The Commission noted that Article 3 raised questions of both general policy and procedure (between the different members and bodies of Interpol and with the Commission for the Control of Interpol's Files), which could be linked to the role of the Commission. Given that it was responsible for verifying that "*personal information contained in the archives is obtained and processed in accordance with the provisions of the Organization's Constitution*" (Article 22(a) of the Rules on International Police Co-operation and Article 5 of the Exchange of Letters appended to the Headquarters Agreement), the Commission considered that it was responsible for checking that Interpol applied the provisions of Article 3 when processing information.

Since the Commission was also responsible for dealing with any matter related to the processing of personal information, it wished to be consulted by the General Secretariat about:

- any study on the subject, so as to encourage and help the Organization to establish criteria for assessing the application of Article 3 and a file management procedure;
- decisions adopted and procedures established by Interpol so as to be able to give enlightened advice.

To conclude, the Commission said that it would continue to give independent opinions, particularly about Article 3 of the Constitution, but that, insofar as it was important that the General Secretariat and the Commission interpret the subject in the same way, those two bodies had to co-operate.

(b) Guidelines for the Commission

The Commission considered that the report on Article 3 of Interpol's Constitution prepared by the previous members reflected the situation in 2001. It confirmed that the guidelines which were for its own internal use:

- should be regularly updated to take account of the new cases the Commission encountered and of the developments in Interpol's relevant rules and procedures;
- was a provisional internal working document which was not to be disclosed, but could be communicated to Interpol and specifically the General Secretariat to co-ordinate its own work with that of the Commission.

(c) Recommendations to the General Secretariat and opinion about the General Secretariat's report to the Executive Committee

The Commission said that, although it was true that it was not up to the Commission or Interpol to determine the validity of national procedures relating to people, and although it was difficult to decide whether or not a country's motives for prosecuting a requesting party were politically motivated, the following points seemed to be very important:

- the various opinions on the subject should be included in the file of the person concerned so that the requested country could take an informal decision on what action to take with regard to a request for assistance from the requesting country;

- in the database to which the NCBs had direct access, the General Secretariat should indicate clearly that a file was being studied because it was possible that it might infringe Article 3, so that each NCB could assess what precautions it should take;
- the attention of entities with access to the information should be drawn to the fact that there were different points of view on the matter;
- the person concerned should be clearly indicated as having obtained the status of political refugee in a country, if that was the case;
- notices issued for reasons likely to infringe the provisions of Article 3 do not appear in the public section of Interpol's Internet site.

The Commission studied the report on Article 3 which the Executive Committee had produced in June 2002. It had noted on the one hand a willingness on the part of the General Secretariat to develop Interpol's policy on the matter and on the other hand a certain status quo with regard to decision-making and a real difficulty in establishing assessment criteria regarding Article 3 of the Constitution and therefore recording the information concerned in the ICIS. The Commission noted that, unfortunately, no mention had been made of the Supervisory Commission in Point 4 of the document.

4.4.3 Accuracy of information

(a) Reminders to countries originally supplying information

Having noted that the countries did not always follow up the information they communicated to Interpol, the Commission reminded the General Secretariat that the countries which originally provided the information contained in Interpol's files should be made more aware of their responsibility to ensure the information was of high quality and that they should be sent reminders as often as seemed necessary.

(b) Red notices and new information

The Commission recommends that, when the General Secretariat receives new information about a person for whom a red notice has already been issued, it should begin by checking that the information contained in the red notice is adequate and is of real international importance to the police in order to justify producing a red notice and recording it in Interpol's files.

(c) Charges against a person

The Commission stressed that it is essential for countries to indicate the charges against a person on the notice request form and for those charges to be entered in the ICIS exactly as they appear on the arrest warrants and other official documents.

4.4.4 Warnings transmitted by requesting parties

The Commission felt that, when a requesting party drew its attention or that of the Organization to the possible violation of one of his rights if information about him (such as the cancellation of an arrest warrant issued for him) was processed, the General Secretariat should be informed and he should be sent a reply indicating that due note had been taken of the information he had transmitted.

4.4.5 Obligation to request authorization to disclose information to an NCB - Exceptions

The Commission felt that it was not necessary to ask the countries concerned for authorization to disclose to requesting parties police information concerning those parties (see Point 4.2 above) in the following cases:

- to indicate that the fact that the requesting party had been granted political refugee status in a particular country had been added to Interpol's files, insofar as he had provided proof that he knew of the existence of information concerning him in those files;
- when requests are made in the interest of families and the information requested was not in Interpol's files, the Commission considered that Article 23 of the Rules on International Police Co-operation and on the Control of Interpol's Archives, which laid down the principle of indirect access to Interpol's files, was intended to be applied with regard to information about criminal cases;
- the Commission felt that press releases issued by Interpol could be communicated to requesting parties even if their requests were inadmissible, so long as no doubt was raised as to the inadmissibility of the request when that was the case;
- the Commission stressed that when information recorded about requesting parties had originally been provided by several countries, authorization to disclose that information had to be given by all the countries concerned.

4.4.6 Principles to be observed by the Commission and the General Secretariat when corresponding with requesting parties

The Commission has laid down a number of principles to be requested by the Commission itself and by the General Secretariat when corresponding with requesting parties to prevent requesting parties obtaining information which was either different from that which the other body might communicate or which they could not obtain from the other body.

- Replying to a requesting party (or his lawyer) that he will only be informed of action taken by the Organization on any information concerning him if he communicates his (or his client's) address to the General Secretariat would be a clear violation of Interpol's rules on the subject, and in particular of Article 23 of the Rules on International Police Co-operation.
- Exercising the right of access to Interpol's files is not restricted (see 4.3.1 above), and disclosing to a requesting party the fact that there is (or is not) information about him could not be made conditional on agreeing to help international police co-operation by supplying personal information, such as his address, in exchange for the right of access to Interpol's files.

The Commission stresses that the rules on correspondence with requesting parties will have to be clearly set out and published on the Commission's future Internet site.

4.4.7 Flagging of homonyms

A warning message is recorded for all files containing the name of a person who might suffer prejudice as a result of having the same name as someone being sought through Interpol channels. The message asks anyone with access to the information to contact the General Secretariat for further details.

The Commission recommended also suggesting consulting the NCBs which originally sent in the information, since only they could guarantee that the information sent to the General Secretariat was up to date.

4.4.8 Destruction of information once the purpose for processing it has been achieved

On the subject of keeping files created to obtain information about a specific event (such as the official visit of a President), the Commission pointed out that, once the purpose for processing the information had been achieved (i.e. once the event had taken place), the information should be destroyed, unless a particular item of information linked to the information recorded for that purpose allowed that item to be retained (for instance, in the case of organized crime: see Article 7 of the Rules on the Deletion of Police Information).

5. SPOT CHECKS

5.1 Purpose of spot checks

The purpose of spot checks is to gain a better understanding of the Organization's system for processing police information, the problems it encounters, and the risks and requirements of international police and judicial co-operation, so as to be able to effectively carry out its role of adviser to the Organization.

As the composition of the Commission changed completely in 2002, it began by looking into the general functioning of Interpol's police-information system, and particularly into the security measures implemented to ensure the integrity of the system and the information contained in the system. This included aspects such as the overall technical architecture of Interpol's information system; Interpol's protocols in the area of security, especially with regard to guaranteeing and controlling access to Interpol's network and databases; information security audits carried out by Interpol; security policy for Interpol's new information system currently being developed.

The Commission reached the conclusion that the current system offered satisfactory data-protection guarantees, and that the future system Interpol was in the process of developing should offer even greater guarantees in that connection.

The Commission only carried out actual spot checks at its fourth session in 2002, as indicated under Point 5.2 below.

5.2 Procedures for spot checks

The Commission wished to establish a spot-check procedure which would enable it to fulfil its advisory role vis-à-vis the General Secretariat in session, either by responding to its concerns, or with a view to assisting it in increasing the quality of its processing of police information (particularly from the point of view of information security).

In an attempt to achieve increased efficiency in its sessions, the Commission asked for spot checks to be prepared in advance by its Secretariat on the basis of search criteria communicated by the Chairman one month before the following session. The Secretariat was charged with informing the Commission of the results of its checks one week before the Commission's following session, in order to highlight not only the percentage of errors, but also any material difficulties the General Secretariat encountered when processing the police information it received.

5.3 General issues raised by spot checks

5.3.1 Information concerning corporate bodies or legal entities

From the processing of requests and spot checks, it transpired that information concerning corporate bodies was not processed in the same way as information relating to natural persons.

Given that certain information was specific to corporate bodies, the Commission considered that the principles governing the processing of information should be the same for both corporate bodies and natural persons. Therefore, certain rules - such as respecting the purpose for which the information was processed, its accuracy, and the length of time for which it could be kept - should also apply to corporate bodies.

The Commission asked to receive a report on the matter.

5.3.2 Accuracy of information

(a) Maximum penalties and non-consecutive sentences

Checks had highlighted a number of difficulties in completing the "maximum penalty possible" field for a wanted person in Interpol's database when member countries referred to sentences of various durations without specifying whether or not they were consecutive. The Commission considered that the longest sentence should be entered in the appropriate field, and all the information as supplied by the member country indicated in the free-text field for the arrest warrant.

(b) Exact nature of offences and actions by judicial authorities (arrest warrant, court decision, etc.)

The Commission noted that the General Secretariat did not always accurately enter the offences with which individuals were charged by member countries, or the information given on an arrest warrant or court decision, owing to:

- the variety of expressions used by member countries to describe an offence or collection of offences, and the diversity of offences covered by one term depending on the country;
- the design of ICIS itself which obliged the General Secretariat to qualify a court decision or to choose an offence from a predetermined drop-down list, etc.

The Commission stressed that the General Secretariat had considerable responsibility to ensure that information concerning a court decision or an offence was processed accurately. It submitted several proposals to the General Secretariat and asked to be kept informed of developments regarding such information made available to NCBs via direct access.

(c) Obligation to give reasons for cancellations

The Commission noted that countries did not always give the reasons for cancelling a notice. The Commission felt that was regrettable because, depending on the reasons for the cancellation, the file could either be kept for a further five years or be deleted completely. It recommended that the reason for cancelling a notice concerning an individual should be systematically indicated, whether or not that individual was the subject of a red notice.

5.3.3 Information directly accessible by authorized countries

In connection with a file relating to an unidentified body, the Commission noted that when opening files concerning persons - especially unidentified bodies - the criminal-data compilers entered a large number of details relating to the person's physical description, clothing, objects found in their possession etc., in order to assist in identifying the individual concerned. The Commission therefore considered that the information made available to the NCBs via direct access should be as complete as possible, even if the person concerned was not the subject of a notice, to ensure the accuracy of the information and achieve the purpose for which it was being recorded, namely to identify a dead body.

6. ADVICE AND OPINIONS FROM THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES TO THE ORGANIZATION

6.1 Draft Rules on the processing of police information

6.1.1 *Main innovations*

- The Commission studied the draft "Rules relating to the processing of police information, to the control of and access to the information processed" as provided for in Interpol's rules and as requested by the Strategic Development Sub-Committee (2 and 3 May 2002) and the Executive Committee (18 to 20 June 2002).
- The Commission noted that the draft rules were not only aimed at restructuring the existing rules, but also at providing a set of new rules modifying the existing rules in depth and enabling the Organization to process a greater amount of information in more varied forms. By adopting a new set of rules, the Organization would definitely be entering into a new phase which was essential for combating international ordinary-law crime. In order to give it a better idea of the context of the draft rules, the Commission asked to be given a document describing the Organization's aims and its strategy in terms of international police co-operation in general, and the processing of police information in particular.
- The Commission felt that gathering together general provisions on the processing of police information, the control of Interpol's processing of personal information and access to that information in a single set of rules (to be approved by the General Assembly) was sensible and rational. The Commission took a similarly positive view about such rules referring to the creation of specific implementing rules to be approved by the Executive Committee. The Commission added that such an approach made the rules flexible and durable, and therefore approved the structure of the draft.
- The Commission pointed out that, given that it would have to be involved in all draft implementing rules, those drafts would determine the schedule of its activities for forthcoming sessions.
- The Commission agreed with the general data-protection principles included in the draft rules. It had already made a number of comments on the form and content of the Rules, which had been sent as an opinion to the Executive Committee.

6.1.2 *Creation of a working group*

- The Commission warmly welcomed the General Assembly's decision to create a working group and the fact that the reports on the activities of the Working Group were to be sent to it for information or possibly an opinion.
- The Commission noted with satisfaction that the Organization intended to guarantee a real "interface mechanism", in which it should participate actively, between the Working Group studying the draft rules and itself.

6.1.3 *Examination of a project*

- The Commission was surprised that Interpol had given authorization, albeit on an experimental basis, to launch an information processing project with the private sector, when that was not covered by the Organization's current rules and anticipated the situation under some future set of rules. It asked to be sent a report on the implementation of the project with regard to the way in which information was processed.

- The Commission emphasized that the project demonstrated that Interpol was being confronted with new requirements and that it was becoming essential for the Organization to adapt its rules very rapidly.

6.2 Guidelines on the notion of the international importance of an item of police information

The Commission studied the draft guidelines, drawn up the previous year at the request of outgoing members of the Commission, in the light of specific examples of difficult situations with which the General Secretariat had been confronted. The Commission stated that it wished to resume its study of the draft guidelines on the notion of the international importance of an item of police information.

6.3 Essential identification particulars for issuing a red notice

The General Secretariat had asked the Commission for its opinion about the identification particulars which were essential for a red notice to be issued. Whilst it awaited further examples of cases which were difficult to assess, the Commission felt that if the person concerned by the notice was clearly identified by his family name and forename, or was the subject of a valid national arrest warrant or a relatively detailed composite picture, the notice could be issued, provided the other criteria required under Interpol's rules were met.

7. MISCELLANEOUS

7.1 The Commission's name and logo

The Commission considered it necessary to change the English version of its name (which appeared in the Exchange of letters appended to the Headquarters Agreement between the French authorities and Interpol), partly to make the English name more up to date and partly so that the same initials (CCF) could be used in English, French and Spanish. The Commission thus confirmed its proposal to use the name "*Commission for the Control of Interpol's Files*" instead of "*Supervisory Board for the Control of Interpol's Archives*".

The Commission also adopted a logo to give it an identity and avoid any confusion between it and Interpol. Its name, in the Organization's four official languages, was an integral part of the logo. The Commission asked the General Secretariat to take the necessary steps to register the logo.

7.2 The Commission's budget

After examining the expenditure engendered by its running costs over the previous two years, the Commission noted that its budget was inadequate, particularly with regard to the high travel costs incurred by members' attendance at the Commission's meetings. The Commission therefore requested and was granted an increase in its budget for 2003.

The Commission pointed out that it was a very reasonable amount. To avoid exceeding the budget, it had taken a number of measures aimed at limiting its running costs (e.g. travel arrangements and correspondence).

7.3 Meeting of Europol's Joint Supervisory Body

The Commission had taken part in the meeting organized by Europol's Joint Supervisory Body with third parties which had concluded a co-operation agreement with Europol. The Commission would follow the Body's activities with interest, particularly with regard to checking the quality of

information communicated through Europol channels, monitoring work on analysis carried out by Europol and the problems posed by the fact that Europol premises housed databases which were not covered by the Europol Convention and which could only be controlled by the State responsible for the relevant project.

7.4 Presence of the Commission on the Interpol Website

The Commission wondered about the advisability of having its own website as opposed to a section on the Interpol site and felt that a section on the Interpol site was preferable since it did not have the necessary staff to control and manage an independent site. The section would contain information about the Commission's regulations, its operation and the results of its work. It would be impossible to identify the persons concerned. The section was under development.

7.5 List of Interpol's files

The General Secretariat has sent the Commission a list of its main files for 2002.

- - - - -