

Speech by CCF Chairperson Teresa McHenry and Vice-Chairperson Mohamed Kamara
INTERPOL General Assembly (93rd session – 24th to 27th November 2025)

CCF Chairperson Teresa McHenry:

Mr. President,
Mr. Secretary-General,
Distinguished Delegates,

My name is Teresa McHenry and I am honored to address you today as the Chairperson of the Commission for the Control of INTERPOL's Files. We thank the Kingdom of Morocco for being such a wonderful host. I am accompanied by the Commission's Vice-Chairperson, Colonel Dr. Mohamed Kamara. We also have the honor of having our CCF member from Morocco here with us, Dr Hamza Es Said, who serves as Rapporteur of the Requests Chamber.

As you know, the CCF is an integral part of INTERPOL, and quoting the wise words of the Secretary General, "the CCF is key to keeping INTERPOL a neutral, trusted platform for global police cooperation." Dr. Kamara will now provide information about the CCF's functions and some of the work conducted by the CCF in 2024. I will then return to talk about some of the case work, the CPD review of the CCF statute and the way forward.

Vice-Chairperson Mohamed Kamara:

As we reflect on our accomplishments and challenges over the past year, I would like to take a moment to celebrate a significant milestone: 40 years since the implementation of the 1st Rules on International Police Cooperation and on Internal Control of INTERPOL's archives. These foundational regulations marked the beginning of the CCF and have since defined our composition, functions, and ensured our independence and impartiality.

Pursuant to the CCF statute adopted by the General Assembly in 2016 and in force since March 2017, the CCF oversees the processing of personal data in INTERPOL's files and allows individuals to access and request deletion of data held by INTERPOL. The basis of all our work is set out in the CCF Statute and some of you may already be familiar with it. For time reasons, I will only briefly discuss some essentials.

In practical terms, the Commission has a Supervisory function, an Advisory function, and a quasi-judicial function through its processing of individual requests by Applicants who seek to find out if INTERPOL processed data concerning them or who seek to have such data deleted.

In its Supervisory and Advisory capacity, the CCF conducts various checks on INTERPOL's activities related to the processing of personal data. The primary objective of these checks is to ensure that the Organization's data processing practices align with applicable rules. Most of the time, these reviews result in guidance on potential solutions to address any identified concerns. However, in certain instances, the CCF findings may also lead to binding decisions.

In its quasi-judicial role, the Commission has by design the difficult task of deciding on the application of INTERPOL's rules in circumstances of conflicting interests between the Applicants (individuals who have lodged a request) and the NCB (National Central Bureaus) sources of these challenged data, while ensuring a fair and impartial process. The Commission is required under its Statute to decide on requests for access within four months and on requests for deletion within nine months, starting from the date they become admissible, with these deadlines being extended in cases where an extension is necessary.

We want the relationship between NCBs and the CCF, and between Applicants and the CCF, to be efficient, of mutual respect and understanding of each other's roles and competencies, understanding that we may not always agree. In that regard, we continue to work with NCBs and with IPSG to ensure that NCBs understand the different roles of the NDTF and the CCF, with the CCF's role in deciding cases being limited to deciding requests made by Applicants for access, correction or deletion of data.

As we have said before, although the Commission decides cases, we do not operate in the same manner as a judicial tribunal at national level. In requests before the CCF, Applicants and civil society sometimes raise concerns about general conditions in a country or allege that the evidence against them has been falsified. The CCF Statute does not generally empower the CCF to address such concerns. The Commission cannot decide guilt or innocence, it cannot make general pronouncements regarding the entirety of a judicial system, and it cannot decide whether the facts as presented by the Applicant or the NCB are actually true. The entirety of the Commission's work focuses on one question: whether the data under review are compliant with INTERPOL's rules.

Now we will discuss briefly some information about the Commission's work in 2024. Starting with the Supervisory and Advisory Chamber, which was very active, with a high volume of meetings, discussions, and decision-making activities. It provided advice and oversight on a number of INTERPOL key projects, including draft cooperation agreements and IT projects. The CCF also contributed intensively to the discussions led by the INTERPOL Committee on the Processing of Data (CPD) regarding the review of INTERPOL's Rules on the Processing of Data (RPD) and provided its conclusions on various topics detailed in the annual report.

Moreover, the CCF continued to engage regularly with the INTERPOL Data Protection Officer (IDPO) and the Chief Information Security Officer (CISO) regarding key issues related to data protection and security procedures within the Organization. The CCF also conducted three spot checks on data processing issues and on the implementation of projects to ensure that INTERPOL's data processing operations are compliant with its rules and regulations.

To continue, as you may know, the CCF is made up of two Chambers: the Supervisory and Advisory Chamber and the Requests Chamber. In some work, the Chambers work separately, and in many areas, they work together. So let me now mention some other work of the CCF as a whole.

In 2024, the CCF continued to participate in statutory meetings, ensuring its ongoing engagement with key stakeholders. As part of our continued efforts to have better communication with NCBs, we developed in 2023 a detailed questionnaire sent to NCBs asking what sort of additional information or training about the CCF they would like. Using what we learned from the 62 NCBs that responded, we put online an e-learning module about the CCF. We also delivered some training for various national delegations remotely and in Lyon. We have also in 2024 participated in various exchanges with civil society, worked on videos for Applicants, updated the information available online, as well as provided more information to Applicants about the CCF processes. In addition, as part of its efforts to increase transparency, the CCF has published new anonymized decisions on its website, to help stakeholders better understand its policy and jurisprudence.

In 2024, the CCF also put significant work into issues relating to potential misuse of its proceedings. As was previously indicated the CCF has seen in recent years examples of persons, be they Applicants, Applicant's representatives or members of NCBs, who have engaged in conduct that the CCF believes may constitute misconduct. The types of misuse that the CCF sees ranges in seriousness but can include presentation of false or fraudulent documents. The CCF is always alert to such misuse. In addition to direct measures in individual cases in response to suspected abuses, the CCF has also worked to limit the risks of further abuse. The CCF has also made suggestions to the CPD to clarify and strengthen its ability to deal with misconduct. If the proposed amendments are adopted to clarify the CCF's ability to respond to suspected misuse, the CCF will continue working to supplement its Operating Rules and practices to ensure that there is a clarity and an appropriate process regarding possible sanctions.

CCF Chairperson Teresa McHenry:

Let's talk about the CCF work on requests in 2024. The number of requests before the CCF continued to increase, with the highest number of new admissible requests ever received in a year (2586 admissible requests). I am happy to report that although the numbers have continued to increase, the rate of increase (4%) was not as great as in the last couple of years.

The number of requests dealt with and completed by the CCF in 2024 was also the highest number ever finalized annually by the CCF (2717). Although we've seen a 21% increase in closed cases compared to 2023, which is a more significant rise than the number of new requests, unfortunately, our backlog is still very large. As I mentioned last year, because of the backlog and increased workload, the CCF has had significant delays in resolving cases, which is a problem for Applicants, for NCBs, for the CCF and for INTERPOL as a whole. It is worth noting that the delays are not only because of the CCF's own limitations but are also due to limitations of other parts of INTERPOL, in particular the entity that provides information to the CCF regarding whether data in fact exist about a particular Applicant.

Thankfully, last year, in response to the CCF requests and after completion of a time-consuming and in-depth review by independent consultants hired by the INTERPOL General Secretariat, who agreed with the prior reports by the CCF that there was a dire need for additional resources, the General Assembly voted in 2024 to provide more resources to the CCF. Thus, in 2025, we have been working hard to identify and hire new staff for the CCF Secretariat, and we have been working closely with the INTERPOL General Secretariat to develop new technological tools. We had four new staff join the CCF Secretariat in September and October 2025, and we hope the new tools, including a portal for the submission of requests and a case management system will be progressively introduced throughout next year. I am also happy to report that IPSG also worked on its end to address the issues of delays in providing information to the CCF on the existence or absence of data relating to Applicants, and thus we are now receiving prompt responses from IPSG, which allows us to start our process in a timelier manner.

The CCF thus anticipates improvements in the processing time moving forward in 2026. The CCF sincerely thanks the General Assembly for responding to its need last year, providing resources for the Secretariat staff, for CCF members, and for new tools. I assure you we are working hard to ensure responsible use of the additional resources.

With respect to the decisions of the CCF, you can see that, approximately 40% of the deletion requests have been found compliant and 60% have been found not compliant with INTERPOL's rules. The non-compliant cases include cases where there has been a total lack of cooperation, simpler cases involving a straightforward application of INTERPOL's rules which might be decided by the Rapporteur, and more difficult cases decided during the CCF plenary sessions evaluating complex issues such as whether there is a political predominance to the case.

You may notice that both in 2023, and in 2024, there has been an increase in the number of cases found compliant. That is in part due to a decrease in the number of cases where the data were found non-compliant because the NCB didn't respond at all to CCF inquiries. Further, if you look at the less straightforward cases decided by the CCF during sessions, you will see that the statistics indicate that 65% of those cases were found compliant.

We believe it is a good thing for INTERPOL that we are having fewer instances of NCBs not responding at all to CCF inquiries. We know that your NCBs are often pressed and dealing with limited resources themselves and we appreciate their work. In seeing NCB responses to the CCF inquiries over time, it appears to us that NCBs now have a better understanding of what the CCF does and doesn't do. That may also be part of why the compliance rate has improved.

One area where we think there is continued potential confusion relates to restriction by NCBs of information accessible to the Applicants. Our rules provide that information can be restricted, and indeed, it is the nature of police work that sometimes information should be restricted. Both NCBs and Applicants request that information be restricted from the other party but NCBs do so much more often than Applicants. Dealing with restrictions is very resource consuming, and it causes delays in the processing of the cases.

We believe there is not always good understanding by the parties of the importance of providing sufficient information to enable the CCF to make informed decisions regarding restrictions. The CCF thus hopes to work in the coming year to provide more clarity on the information needed to justify and motivate requests for restrictions, thereby ensuring that it can fulfill its obligations to provide reasoned decisions and effectively discharge its role in providing an effective remedy, ultimately safeguarding INTERPOL's judicial immunity.

With respect to the CCF's work in 2025 and moving forward into 2026, among the highest priorities will be to continue to address the workload and associated delay issues. Unfortunately, I believe that in 2025, our numbers will be even worse in terms of delays in resolving cases, for a variety of reasons including an increase in the number of cases and the time and resources needed to hire new staff and develop new tools. As I said before, however, we just got some new staff on board and hope soon to have some new IT tools starting to be operational early next year, so we hope and expect that the 2026 numbers will start showing improvement.

Another high priority going forward that I want to mention relates to the ongoing review of the CCF Statute by the CPD. In 2024, the INTERPOL General Secretariat suggested, and the Executive Committee agreed that the CCF Statute, whose current form was adopted in 2016, should be reviewed to see if any parts should be amended. The full review is expected to take 2-3 years. As I mentioned last year when discussing the review process, I believe everyone agrees with the overall goals to improve the Statute without compromising the CCF independence and its ability to serve as an effective remedy for INTERPOL and ensure INTERPOL's commitment to preventing abuse. In practice, however, these are hard issues and there may not always be agreement including regarding what independence means in practice, for instance regarding information sharing or relations with stakeholders including the General Secretariat, NCBs and Applicants.

The CPD process really started in 2025, and the CPD, the General Secretariat and the CCF have been working hard, with some very helpful input from civil society. In 2026, I am confident that the CCF will continue to be heavily involved with the CPD process - which is so important for the CCF's future and for its ability to protect INTERPOL. As part of reviewing the CCF Statute, the CCF has also identified some improvements that might be made in its internal rules or practices, in other words, changes that would improve the functioning of the CCF, but which do not require amendments to the Statute. Civil society has also provided helpful input on possible non-statutory improvements, and I remind NCBs that the CCF is also interested in receiving your ideas and input.

The final issue that I wanted to raise involves the election of new CCF members that will occur during next year's General Assembly. All seven positions within the CCF will be up for election. I want to urge countries from all parts of the world to pay attention to this well in advance of the General Assembly, including in considering potential candidates to nominate with expertise and proficiency, and in evaluating the candidates, whether they be current members running for reelection or new candidates.

It is so important to the CCF's functioning that the members be of the highest caliber, in terms of expertise, work ethic, and integrity. Members should also be (and perceived to be) impartial and independent from external influences and as far as possible represent the global footprint that is INTERPOL. For the good of the CCF and of INTERPOL, please think about the nomination and election process including looking at how your country identifies potential candidates, nominates strong candidates, and ultimately supports the best candidates, so that the CCF is the best it can be.

On behalf of the Commission, I thank you for your attention and for your continued support for our work in support of our shared goals.