



Commission de Contrôle des Fichiers de l'O.I.P.C. - INTERPOL

Commission for the Control of INTERPOL's Files

Comisión de Control de los Ficheros de la OIPC-INTERPOL

لجنة الرقابة على محفوظات المنظمة الدولية للشرطة الجنائية (الإنتربول)

INTERPOL's Independent Authority for the Control and Protection of Personal Data

ACTIVITY REPORT OF THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES FOR 2024

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PREFACE

1. As the Commission for Control of INTERPOL's Files (CCF) celebrates 40 years since the creation of a supervisory authority for INTERPOL, it is an apt moment to reflect on its evolution over the past decades.
2. Since its inception, the CCF has provided three key functions for the Organization:
 - Advice on data-protection rules and INTERPOL projects;
 - Control and oversight of the Organization's data;
 - A quasi-judicial role processing individual requests about personal data.
3. While this core framework remains the same, the size and scope of the work of the CCF today are almost unrecognizable. Its work has never been more important to guarantee that INTERPOL functions effectively and in accordance with its Constitution, in particular with respect to political neutrality and human rights.
4. Initially established in response to developments in data-protection law in its host country, France, and designed to ensure that INTERPOL retained its independence and oversight over data processed within the INTERPOL Information System (IIS) according to INTERPOL's rules, the CCF has developed over the past four decades to reflect both the key role of data in INTERPOL's work and the growing recognition of data-protection rights in the international legal order.
5. The CCF's structure and powers have also evolved to ensure that it operates as an independent supervisory body which can serve as an effective remedy for individuals who may be data subjects. The CCF can serve as a safeguard to protect INTERPOL's tools from being abused by countries that seek to use them inappropriately, such as for political purposes or to support transnational repression, or in ways that do not respect the fundamental principles of human rights, thereby ensuring the protection of the Organization's image, reputation, and credibility.
6. These developments have been recognized internationally, in domestic court systems, and within the Organization. In 2003, the CCF was accredited by the Global Privacy Assembly in recognition of its role guaranteeing data-protection rights at INTERPOL. In multiple instances over the years, the CCF has been found by national courts of various countries to constitute an effective remedy, which has allowed INTERPOL to maintain its immunity from such national courts. In 2008, the CCF was formally recognized as an INTERPOL body in the Constitution, and in 2017, the CCF legal framework and independence were strengthened through the adoption of its current Statute.
7. The evolution of the CCF has been driven by an expansion of its work along with a quickly developing international law landscape. The CCF has also had to adapt and grow to meet the increase in the amount of data processed by INTERPOL and its member countries over the past four decades.
8. In its quasi-judicial role, the figures set out in this year's annual report clearly show how the CCF's work has expanded since its inception. At its first session in 1986, the CCF received five requests from individuals. In 2024, it received 2,586 admissible requests. This reflects the growth in INTERPOL's activity as well as a growing awareness of the CCF as an effective remedy for individuals whose data may be found in INTERPOL's files.
9. In its supervisory and advisory role, the CCF has handled increasingly complex projects related to technological advancements, the expanding number of INTERPOL working groups and committees, the massive growth in available data, and the multiplication of stakeholders involved in international police cooperation.
10. The role of the CCF as an independent supervisory body for projects developed and implemented by INTERPOL, and an independent supervisory body serving as an effective remedy for those who are the subject of data found in INTERPOL's files, will continue to evolve. In addition to ongoing work to ensure that it has the resources needed to fulfil its mandate, the legal structure of the CCF is likely to be modified. Currently, parts of the CCF Statute are under review by the Committee on the Processing of Data ("the CPD"). The CPD has already prepared some proposed amendments which are being presented to the General Assembly at its 93rd session in 2025, while discussions on the other matters still under consideration will continue. The CCF has welcomed the opportunity to engage in this process while supporting efforts to engage with National Central Bureaus (NCBs), civil society and other stakeholders. In evaluating potential amendments to the Statute, it will be crucial to ensure that the CCF's core mandate, to act as an independent body that serves as an effective remedy and protects INTERPOL's powerful tools from abuse, is maintained.



11. As international policing becomes ever more complex and reliant on emerging technologies and the processing of massive amounts of data, the role of the CCF as a guarantor of the rule of law, the Organization's neutrality, and human rights at the heart of INTERPOL has never been more important. We look forward to building on our first 40 years to strengthen the capacity of, and confidence in, the CCF as an effective and independent oversight mechanism for INTERPOL.

Comparison of the CCF between 1984 and the present

	Supervisory Board created in 1984	Current CCF
NAME	- Supervisory Board for the Internal Control of INTERPOL's Archives	- Commission for the Control of INTERPOL's Files
MAIN LEGAL FRAMEWORK	<ul style="list-style-type: none"> - Headquarters agreement between France and INTERPOL, and its exchange of letters (1982) - Rules on International Police Cooperation and on Internal Control of INTERPOL's archives (entered into force in 1985) 	<ul style="list-style-type: none"> - Articles 5, 36 and 37 of INTERPOL's Constitution (2008) - CCF Statute (entered into force in 2017) - CCF Operating Rules, guidelines and procedures (latest update in 2024) - Code of Conduct for CCF members (2023). - RPD (latest update in 2024)
FUNCTIONS	- Supervision, advice, processing of requests	- Supervision, advice, processing of requests
MANDATE	- 3 years, renewable once	- 5 years, renewable once for 3 years
COMPOSITION	<ul style="list-style-type: none"> - 5 members, 4 elected by the INTERPOL General Assembly and one Executive Committee member - Chairperson selected by the members 	<ul style="list-style-type: none"> - Two Chambers - 7 members elected by the INTERPOL General Assembly - Chairperson, Vice-Chairperson, and a Rapporteur for each Chamber, all selected by the members - Independent, with no ties to any INTERPOL organ
EXPERTISE	<ul style="list-style-type: none"> - 3 persons appointed either based on their impartiality and their competence in matters relating to data protection, or because they hold or held a senior judicial post - 1 member of the INTERPOL Executive Committee - 1 electronic data-processing expert 	<p>The Supervisory and Advisory Chamber:</p> <ul style="list-style-type: none"> - A person with expertise in data protection; - A person with expertise in electronic data processing. <p>The Requests Chamber:</p> <ul style="list-style-type: none"> - A lawyer with international criminal law expertise; - A lawyer with recognized international experience in police matters; - A lawyer who holds or has held a senior judicial or prosecutorial position; - A lawyer with data-protection expertise; - A lawyer with human rights expertise.
POWERS	<ul style="list-style-type: none"> - Opinions - Recommendations 	<ul style="list-style-type: none"> - Opinions - Recommendations - Binding decisions
SECRETARIAT	<ul style="list-style-type: none"> - 1 part-time staff; - part of the Office of Legal Affairs but with respect to CCF work, reported to and received instructions from the CCF only. 	<ul style="list-style-type: none"> - 19 full-time staff with wide expertise; - Independent permanent body, reporting and receiving instructions from the CCF only.



I. Executive summary

12. The volume of the CCF's activity in 2024 reflects the overall increased scope of personal data processing for law enforcement purposes globally, as well as the increasing attention focused on international cooperation and data-protection standards.
13. In 2024, the CCF received 2,586 new admissible requests, which includes admissible access requests, deletion requests, or applications for revision, (hereafter "requests"), the highest number ever received.
14. In 2024, the CCF closed 2,717 requests, the highest number of requests ever closed.
15. In its advisory and supervisory role, the CCF reviewed key projects for INTERPOL, supporting INTERPOL by providing requested expertise and opinions.
16. Other work of the CCF in 2024 included: engaging with the INTERPOL General Secretariat and the Executive Committee regarding the proposed review of the CCF Statute, working to increase transparency including by publishing anonymized decisions, engaging with NCBs and civil society, and providing training and tools for NCBs and applicants.
17. Despite implementing various internal measures to increase its efficiency, the increased workload of the CCF and of the General Secretariat entities that provide information to the CCF meant that there were often significant delays in completing requests. In 2024, 70 per cent of access requests took more than four months to complete and 30 per cent of deletion requests took more than nine months. The delays are problematic for applicants, for NCBs and for INTERPOL itself. There are a number of reasons for the delays, with some of the most important reasons described in more detail later in this report.
18. In November 2024, to address the workload of the CCF, the INTERPOL General Assembly authorized additional resources for the CCF to hire additional staff, to allow the members to devote more time to their CCF work, and to develop new technology tools. Although the hiring and integration of new staff and the development and deployment of new technology takes time, the CCF will be using its new resources to the fullest extent possible to address the delay issues.
19. Moving forward, in addition to its work to address delays and its work on INTERPOL projects and broader data-processing issues, such as the appropriate use of AI, the CCF will be involved in the ongoing review by the CPD relating to potential amendments to its Statute and participating in the process to support the election for CCF members that will occur in the fall of 2026.

II. Structure and role of the CCF

20. The CCF is an independent and impartial body within INTERPOL, established by Article 5 of INTERPOL's Constitution. The CCF ensures that the processing of personal data for police purposes complies with INTERPOL's rules, including respect for fundamental human rights, and the Organization's neutrality.
21. The CCF comprises seven members divided into two Chambers. Each member is elected by the General Assembly according to the expertise required by the CCF Statute, for a five-year term renewable once for an additional three years. Although initially nominated by their country of nationality, members are independent and serve in their personal capacity. Members are recused from requests where the data originate from their country of nationality or where for any reason, they may be seen to have a real or perceived conflict of interest.
22. The two Chambers are complementary and work collectively to ensure that the CCF fulfils its functions. The Supervisory and Advisory Chamber focuses on data protection and compliance with data-processing rules in the different INTERPOL projects, and the Requests Chamber decides on requests made by applicants (an individual or entity who may be the subject of data). The members of each Chamber have particular expertise related to the work of their Chamber.
23. The CCF is supported by the CCF Secretariat, which provides expertise and support to the Members. The CCF members are not full time, though the CCF Secretariat staff are.



24. While the CCF communicates with NCBs and applicants in all four working languages of the Organization, the working language of the CCF is English.

BOTH CHAMBERS

- study and draw conclusions on topics applicable to both Chambers. Conclusions can include opinions, recommendations, and binding decisions;
- work collectively to ensure that the CCF can fulfil its functions.

CHAMBER 1

SUPERVISORY AND ADVISORY CHAMBER

COMPOSITION

- Ms Teresa McHenry, Chairperson, international criminal law expertise (United States);
- Mr Yves Poullet, Rapporteur, expert in data protection (Belgium);
- Mr Mohamed Elfadhel Miled, expert in electronic data processing (Tunisia).

ROLE

Supervision and advice on INTERPOL projects, sets of rules or other matters involving the processing of personal information.

CHAMBER 2

REQUESTS CHAMBER

COMPOSITION

- Ms Teresa McHenry, Chairperson, international criminal law expertise (United States);
- Mr Mohamed Kamara, Vice-Chairperson, international experience in police matters, in particular international police cooperation (Lebanon);
- Mr Hamza Es-Said, Rapporteur, senior judicial or prosecutorial position (Morocco);
- Ms Susie Alegre, data-protection expertise (United Kingdom);
- Mr Michel Forst, human rights expertise (France).

ROLE

Process requests made by individuals or entities who may be subject to data. (Requests may be access requests, deletion requests or applications for revision).

CCF SECRETARIAT

COMPOSITION

- The Secretary of the CCF and 18 other staff members (based in Lyon, France), nine nationalities, expertise in different judicial systems;
- Work in all four INTERPOL working languages practiced by native speakers.

ROLE

Support the CCF in effectively carrying out its functions and interface between the CCF and INTERPOL's organs



A. Supervision and advice

25. The CCF plays a crucial role in ensuring that international police cooperation through the various tools developed by INTERPOL respects data-protection principles and adheres to INTERPOL's rules and regulations. The CCF generally provides to the General Secretariat opinions or recommendations, though in its supervisory capacity, and consistent with INTERPOL's rules, internationally recognized data-protection principles and best practices, it can also issue binding decisions.

26. The CCF reviews activities related to new databases, cooperation agreements, IT projects, and regulations or guidelines involving the processing of personal data to verify that they comply with relevant data-protection principles and applicable rules.

27. The CCF generally exercises its oversight authority in two ways: either in response to requests from the General Secretariat when there are new projects that involve the processing of personal data, or through "spot checks" that the CCF conducts on its own initiative to verify data compliance with applicable rules.

28. A "new project" is broadly defined to include any new initiative or development that involves the processing of personal data, and can cover:

- IT projects: the creation of a new system or database to store or process personal data or the establishment of a new analytical file;
- cooperation agreements: the preparation or implementation of a new cooperation agreement with another international, or regional organization, or with a private entity, that involves the sharing or exchange of personal data;
- legal projects: the development or revision of rules, policies, or procedures that govern the processing of personal data within INTERPOL;
- spot checks: data compliance for example on a broad topic, such as mass trials.

29. The CCF examines projects over their life cycle. When reviewing projects, the CCF:

- assesses the project's objectives and scope to ensure that they align with the stated purposes;
- examines other data-protection measures implemented in the project, paying particular attention to the Data Protection Impact Assessment (DPIA) previously prepared by the General Secretariat with a focus on data quality, data minimization or retention policies;
- suggests alternative technical solutions;
- whenever required, verifies that the project includes adequate technical, procedural and legal safeguards for sensitive data, such as biometric data or data related to vulnerable individuals;
- examines the responsibility of stakeholders, as well as the measures in place to ensure the confidentiality, security and integrity of data;
- reviews the dedicated operating rules whenever applicable;
- evaluates the potential impact of the project on individuals' rights and freedoms, as well as on INTERPOL's neutrality.

30. Generally, when reviewing a project, the CCF conducts an initial review to assess the project's overall scope and objectives. The CCF then provides preliminary comments and meets with the General Secretariat to discuss the project in more detail, addressing any questions or concerns that may have arisen during the review. Following these discussions, the CCF draws final conclusions, providing a comprehensive evaluation of the project based on the review and feedback gathered throughout the process. The CCF may be consulted again if significant changes or new developments later occur with the project, ensuring that the project remains aligned with the Organization's goals and strategies. The CCF also regularly monitors the proper implementation of projects, evaluating progress and ensuring that they are executed in accordance with the approved plans and guidelines.



31. The CCF guidance may relate to any number of issues, including interpretation of INTERPOL's rules, best practices, or available options to address issues identified. The CCF can also make suggestions on needed updates of the applicable legal framework or on measures (including security measures) that may be taken to ensure that INTERPOL's data-processing operations are compliant with its legal framework.

32. The initiative to conduct spot checks may come from various sources. Most commonly, while studying a request, the CCF has identified a problem that may be a symptom of a larger or more systemic issue. If so, both Chambers may consult and decide that spot checks would help identify whether there is in fact a larger issue. If so decided, the CCF then conducts spot checks, evaluates the results and, if appropriate, the CCF consults with the General Secretariat concerning the problem and possible solutions.

33. The CCF, along with the INTERPOL Data Protection Officer (DPO), plays a vital role in fostering a culture of data-protection awareness into all facets of international police cooperation, and ensuring that INTERPOL's tools and databases are utilized in a manner that upholds the fundamental rights of individuals. The work of the CCF is part of ensuring the integrity and trustworthiness of INTERPOL's systems.

B. Processing of requests

34. The CCF, functions as an independent quasi-judicial organ of INTERPOL, handling requests filed by individuals or entities ("applicants"). An applicant who believes that a country has used INTERPOL to process data about them, such as by seeking a notice or diffusion, may file with the CCF an access request, a deletion request, or both.

35. An access request is a request to know whether or not INTERPOL holds data about an applicant. A deletion request, also sometimes referred to as a complaint or a case, is a request that data be found non-compliant on the grounds that the data do not comply with INTERPOL's rules regarding their processing. Data found non-compliant are in most cases deleted, though in some cases they may be corrected. For simplicity, this report uses the term "Deletion Requests" to encompass requests involving both deletion and correction.

36. Upon receiving an access request seeking to find out if INTERPOL is processing data, the CCF first ensures that the request is admissible, which generally involves verifying that the admissibility criteria, such as ensuring that appropriate documentation regarding identity or legal representation, are met. The CCF then contacts the General Secretariat to determine whether in fact INTERPOL has any data regarding the applicant. After receiving the General Secretariat's response, the CCF then will contact the NCB identified by an applicant, if any, to determine whether the NCB seeks to restrict the information that would be provided to the applicant. Even when there are no data, some NCBs may seek to restrict the reporting to the applicant that there are no data. If an NCB seeks to restrict information given to the applicant, under the CCF Statute, they shall provide both their motivation and the case specific justification which supports their restrictions. The CCF and the NCB may often have several exchanges regarding requested restrictions and whether they have been appropriately substantiated. After the issue of restrictions has been resolved, the CCF will then reply to the applicant, with the substance of the reply depending on the nature of the data and the nature of the substantiated restrictions from the NCB, if any. Under the CCF Statute, access requests should be completed within four months of being declared admissible, unless there are exceptional circumstances.

37. For deletion requests, the beginning of the process is the same as that for access requests: the CCF requests information from the General Secretariat as to whether there are data regarding the applicant. After obtaining confirmation from the General Secretariat about the existence of data, the CCF contacts the relevant NCB(s) to verify the validity of the data and to solicit their feedback on the substantive arguments presented by the applicant. Specifically, the CCF seeks the NCB's assessment on whether the data remain relevant and accurate, as well as their response to the applicant's claims that the data are not compliant. This step allows the CCF to gather more detailed information and insights from the NCB for its subsequent evaluation and decision-making process. The CCF then evaluates the information from both parties, and sometimes from other stakeholders, such as the General Secretariat or other NCBs, often needing to return to the applicant and/or the NCB, sometimes multiple times, to obtain clarification or more information. If, as is often the case, the



NCB imposes restrictions on what information may be disclosed to the applicant and/or as is also sometimes the case, the applicant imposes restrictions on what may be disclosed to the NCB, the CCF must go through the process of determining whether there are appropriate motivation and justifications for the requested restriction, as required by Article 35(3) and (4) of the CCF Statute. The Commission may take into account the impact of fully unjustified restrictions to the communication of information when conducting the necessary evaluation to reach a final decision on the compliance of data with INTERPOL's rules.

38. Some cases, such as those where an NCB does not respond to the CCF at all, are fairly straightforward to resolve and may be decided relatively quickly by the Rapporteur under a delegation of power. For the other cases, the CCF will review the pertinent materials and make a determination on the compliance of the data at a CCF session, ensuring a thorough and deliberative evaluation of each case.

39. In deciding requests, the CCF's role is limited and is not similar to a national court deciding a criminal case. As it regularly underlines in its decisions, the CCF is not empowered to investigate, to weigh evidence, to resolve disputed issues of fact, to make general assessments about a country's judicial systems or its overall human rights situation, determine guilt or innocence, or evaluate the appropriateness of extradition. Its mandate is only to evaluate compliance with INTERPOL rules regarding the processing of data.

40. According to its Statute, the CCF must have at least three sessions a year, and often, it has four sessions a year. The Commission may also, when necessary, hold remote meetings between sessions in order to take certain decisions, address specific matters, or deliberate on issues that cannot be postponed. At the sessions, the CCF members will decide on requests. As also required by the Statute, the CCF prepares a reasoned written decision that is provided to both the applicant and the NCB, subject as necessary to restrictions of information by one or both parties. In cases where the data have been found non-compliant, the decision will be implemented by the General Secretariat deleting the data or ensuring its correction. Deletion requests are to be decided within nine months absent exceptional circumstances.

41. The CCF's decisions are final and not subject to appeal, though if either an applicant or NCB discover at any point new facts that could have led the CCF to a different conclusion if that fact had been known at the time at which the request was being processed, they may make an application for revision within six months after the discovery of the new fact.¹

42. Because the role of the CCF in considering deletion requests and that of the Notices and Diffusions Task Force (NDTF) are often confused, it is worth distinguishing the two. The NDTF is part of the Executive Directorate of Legal Affairs (EDLA) within the General Secretariat, and the NDTF process is usually initiated by an NCB or an international entity seeking to have a notice or diffusion published. After review, the NDTF will either find the data compliant, in which case it is published and recorded in INTERPOL's databases, or non-compliant, in which case it is not published, and the data are deleted. The NDTF does not contact the individual who is subject to the data, and normally (unless an applicant has made a pre-emptive request) will not have any information from the individual. Further information is available on INTERPOL's website about the review conducted by the NDTF and yearly statistics concerning the number of notices and diffusions they process, and the number found non-compliant.²

43. By contrast, the CCF is an independent body, and its process for handling deletion requests is initiated by an individual or an entity (the applicant), who believes they are subject to data processed in the INTERPOL Information System. The CCF serves as a second level review of the NDTF's decision that data are compliant. In considering a request, the CCF engages with and considers information provided by both the individual and the NCB, as well as other stakeholders, such as the General Secretariat and other NCBs, and may also consider open-source material. After making its decision regarding compliance, the CCF is required to provide the parties with a reasoned decision explaining its rationale for finding data compliant or non-compliant.

¹ Article 42 of the CCF Statute.

² <https://www.interpol.int/How-we-work/Notices/Compliance-and-review>.



C. Additional work

44. Although there are two Chambers in the CCF each with different roles, there are several areas where all the CCF members work together. Most notably, if there are policy issues that must be decided by the CCF, they are generally decided by all members. Examples include deciding upon the Operating Rules of the CCF, development of the Code of Conduct for the members, or development of the CCF's position regarding potential amendments to the Rules on the Processing of Data (RPD) or the CCF Statute. And as pointed out above, all CCF members may also work together on issues such as spot checks. Decisions such as those involving the timing and organization of the sessions are also taken by all members.

III. CCF's work in 2024

A. Supervision and advice

45. In 2024, the CCF was consulted on several projects including draft cooperation agreements, new databases, and new technical developments, all of which required numerous meetings with entities within the General Secretariat, notably the Executive Directorate of Legal Affairs (EDLA) and the INTERPOL units concerned with the project. In many cases, the CCF also consulted with INTERPOL's Data Protection Officer (DPO). For example, the CCF examined particular aspects of the proposed INTERPOL cooperation agreement with the European Union. It also worked on the Standard Cooperation Agreement between INTERPOL and private entities aimed at providing the INTERPOL "Worst of" List (IWOL) of websites publishing child sexual abuse material to private entities, aiming to limit the dissemination of child sexual abuse material on the Internet. Among other benefits, this project helps prevent the revictimization of child victims. The CCF sought clarification on key topics, including the roles and responsibilities of participating entities to ensure that the project was in accordance with data-protection standards. The CCF's recommendations were then taken on board by the General Secretariat and resulted in positive changes to the projects. The final version of the standard agreement was later approved in 2024 by the INTERPOL General Assembly.

46. In addition to its project work with the General Secretariat, in 2024 the CCF also engaged in a variety of ad hoc subjects which developed over the year. Perhaps most significantly, the CCF contributed to the discussions led by INTERPOL's Committee on the Processing of Data ("the CPD") regarding the review of INTERPOL's Rules on the Processing of Data (RPD) and provided its conclusions on the following topics reviewed by the CPD:

- The processing of publicly available information and other information received from persons or entities;
- The processing of biometric data;
- The role of the General Secretariat in direct data exchange between NCBs;
- The settlement of disputes involving NCBs, international entities, national entities, private entities, or the General Secretariat concerning compliance decisions that arise in connection with the application of the RPD. This topic has resulted in the drafting of implementing rules.

47. The CPD's review of these topics ultimately resulted in updates to the RPD.

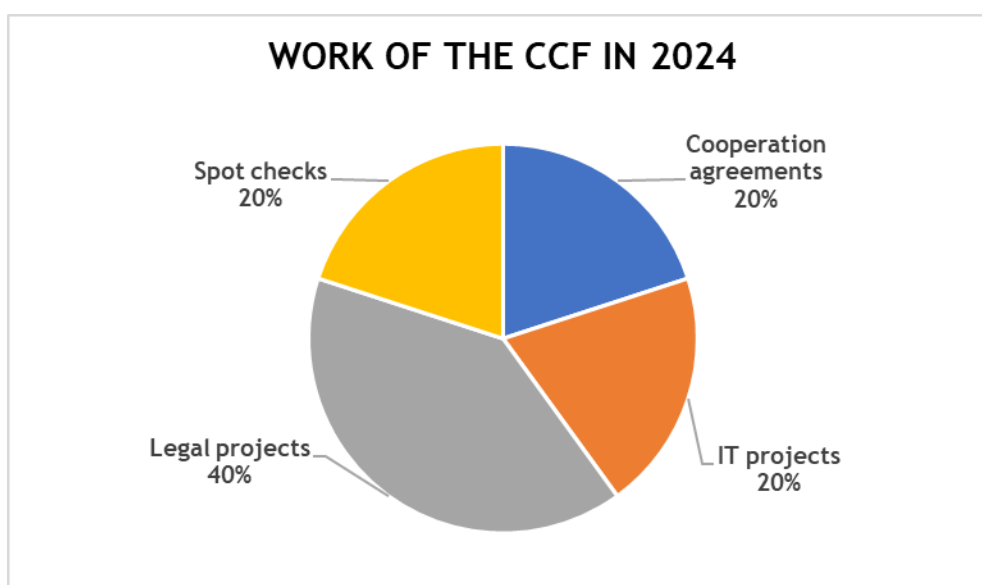
48. The Chamber also explored the implications of emerging technologies, including artificial intelligence (AI), on INTERPOL's operations and the development of new tools like INTERPOL platforms for processing personal data for the benefit of different departments. This involved evaluating the impact of artificial intelligence (AI) on data protection, ensuring compliance with data-protection principles and INTERPOL's rules and regulations, and considering the potential effects on individuals' rights.



49. In its supervisory capacity, in 2024 the Chamber 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. One example involved checks on certain records created by the General Secretariat with nominal data, i.e., the records were identified with a person's name. These records had been created by the General Secretariat using information previously shared by NCBs in the context of projects or analysis files. The CCF assessed whether these new General Secretariat records were established in compliance with existing rules, criteria, and procedures for such nominal data. Following its review, the CCF made recommendations, including requesting that the General Secretariat provide clarification on its procedures for notifying NCBs when their data were used for the creation by the General Secretariat for such records, to ensure transparency and consistency in data management practices.

50. The Chamber also conducted checks to review whether the use of INTERPOL's tools or the projects for which the General Secretariat consulted it had been developed in line with its recommendations and with operating rules and procedures established by the General Secretariat. This includes verifying that the projects' implementation complies with data-protection principles and visiting different departments within the General Secretariat, such as its Data Centre or the Security Operations Centre.

51. Given the nature of the work including overlap between projects, precise figures on the supervisory and advisory activity of the CCF are not possible. However, the CCF estimates that this activity is divided as represented below.

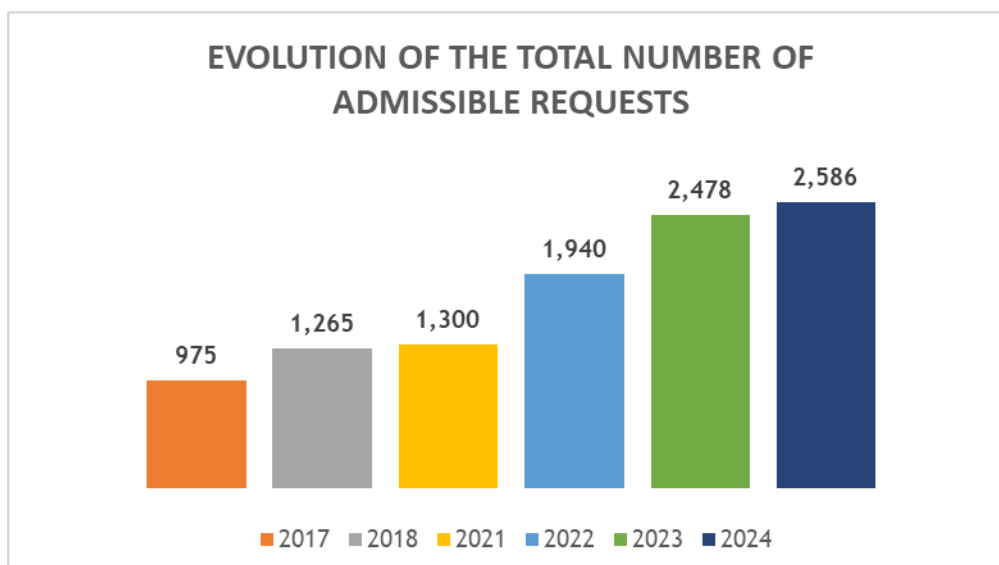


B. Processing of requests

52. The CCF processes requests made by applicants, including access requests, deletion requests and applications for revision (requests), as described in more detail above.

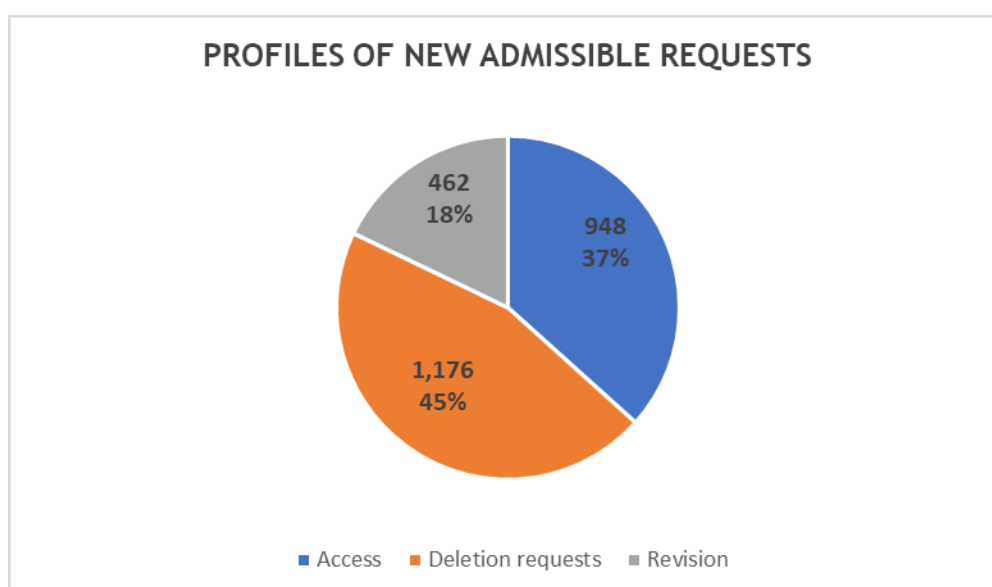
53. In 2024, the CCF received 2,586 new admissible requests.³ This is the highest number ever recorded by the CCF.

³ In May 2024, as part of new procedures to increase efficiency, the CCF decided that new requests that do not meet admissibility requirements will no longer be registered and cataloged by the CCF. The statistics provided this year thus reflect only new admissible requests. In prior annual reports, the CCF had registered and reported on all requests received, and then broken down which were admissible, and which were inadmissible. In this report, for the sake of consistency and to allow meaningful comparisons, the statistics from prior years will also be only for admissible requests.



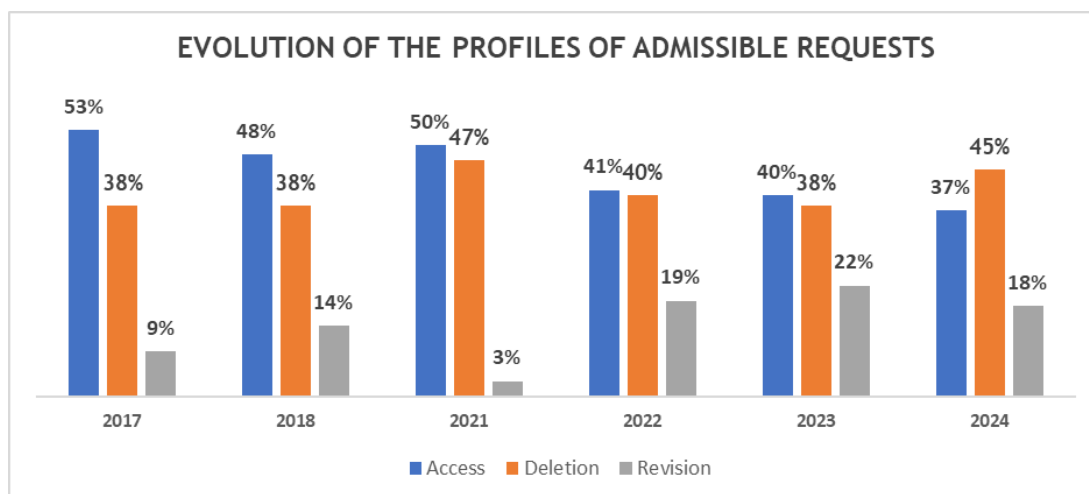
54. Although the number of new admissible requests in 2024 was higher than in 2023, it is noteworthy that the rate of increase from 2023 to 2024, four per cent, was not as high as the rates of increase seen in some prior years.

55. Of the new admissible requests, approximately 37 per cent were access requests, 45 per cent were deletion requests, and 18 per cent were applications for revision.⁴

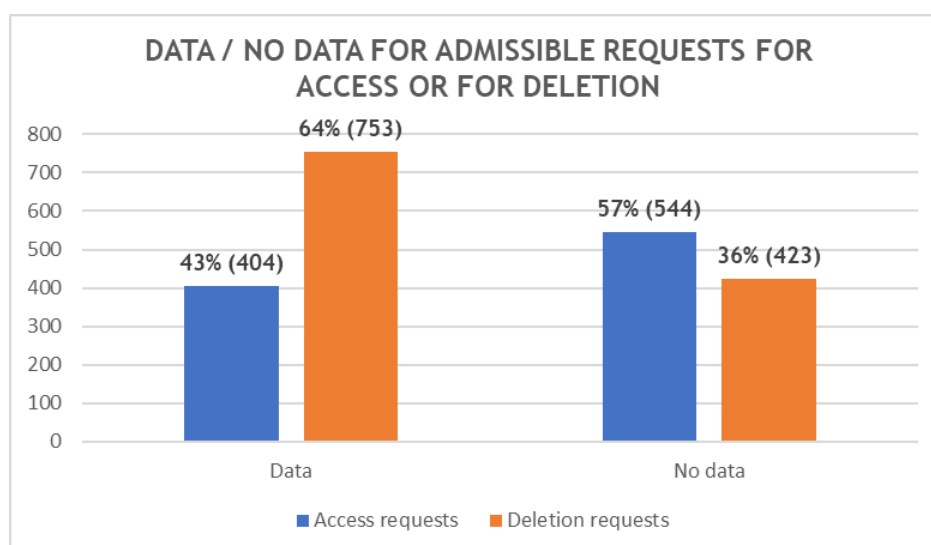


56. Compared with prior years, the number of deletion requests as compared to access requests is slightly higher. The number of applications for revision has been rising over the years, though this year was slightly lower than last year.

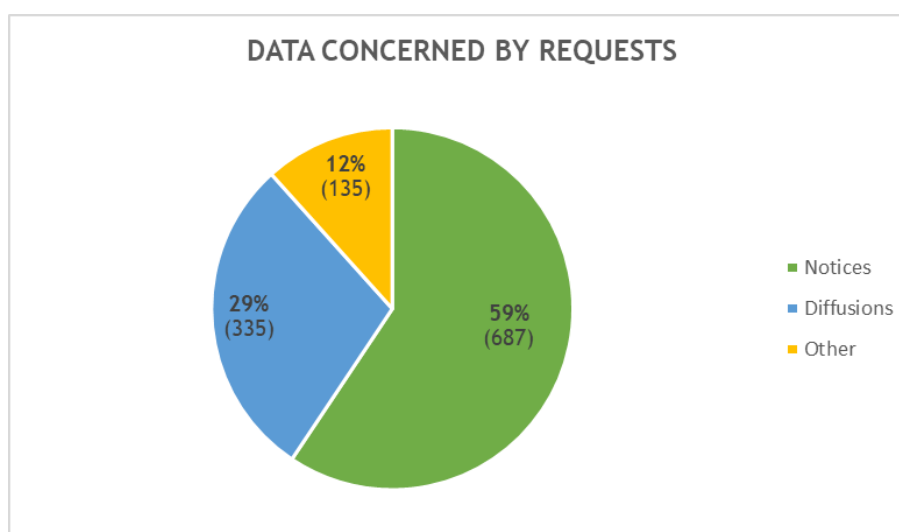
⁴ When the CCF receives a request that combines both access and deletion, for statistical purposes, it will be counted solely as a deletion request. However, the CCF will address both aspects of the request.



57. Of the 948 admissible access requests, there was a total of 43 per cent (404) concerning persons that were subject to data and 57 per cent (544) who were not. Of the 1,176 admissible deletion requests, 64 per cent (753) were subject to data and 36 per cent (423) not.

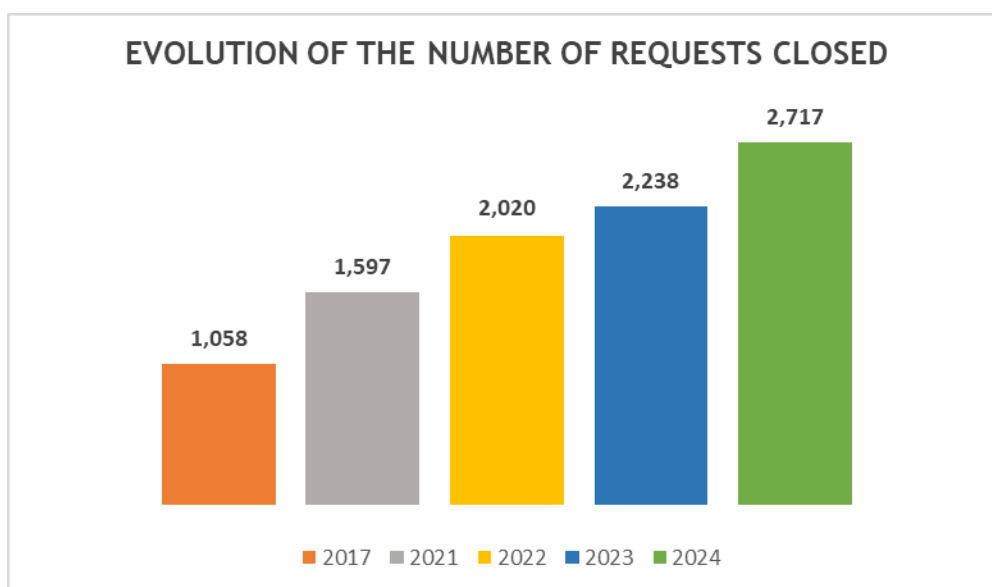


58. Of those 1,157 admissible access requests or deletion requests where the applicants were in fact subject to data, 59 per cent (687) were notices, 29 per cent (335) were diffusions and 12 per cent (135) were other categories of data (such as data on stolen vehicles or on lost or stolen travel documents).

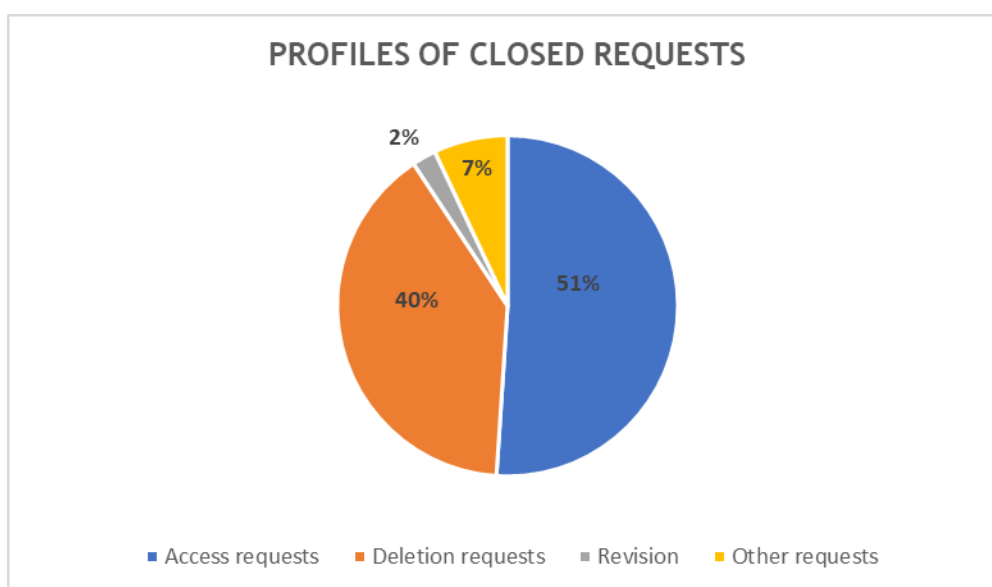




59. The number of requests closed in 2024 was 2,717. This is the highest number of requests ever closed in the history of the CCF. This represents a 21 per cent increase from 2023.



60. Most closed requests comprised access requests, totalling 1,387, followed by deletion requests, which accounted for 1,077. Additionally, there were 62 applications for revision and 191 other requests, making up a smaller proportion of the overall total.⁵



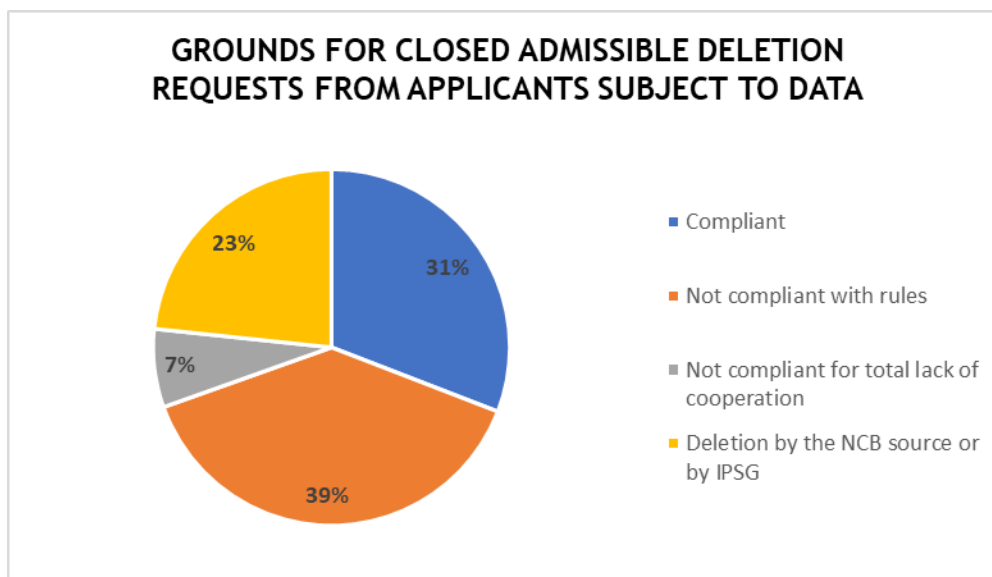
61. Out of the 1,077 closed deletion requests, 703 were admissible requests submitted by applicants subject to data in INTERPOL's files. A breakdown of these 703 requests shows that:

- 164 requests resulted in data deleted by the NCBs source or by the General Secretariat prior to a CCF decision.
- for the remaining 539 admissible deletion requests concerning applicants subject to data, the CCF's decisions were as follows:
 - o In 217 requests, the CCF found the data to be compliant with rules;
 - o In 272 requests, the CCF found the data to be not compliant with rules;

⁵ The term "other requests" usually refers to requests that are presented as admissible deletion requests (and therefore registered as such) but addressed for purposes that go beyond the CCF's mandate (e.g., requests for the cancellation of proceedings involving an applicant at the national level).

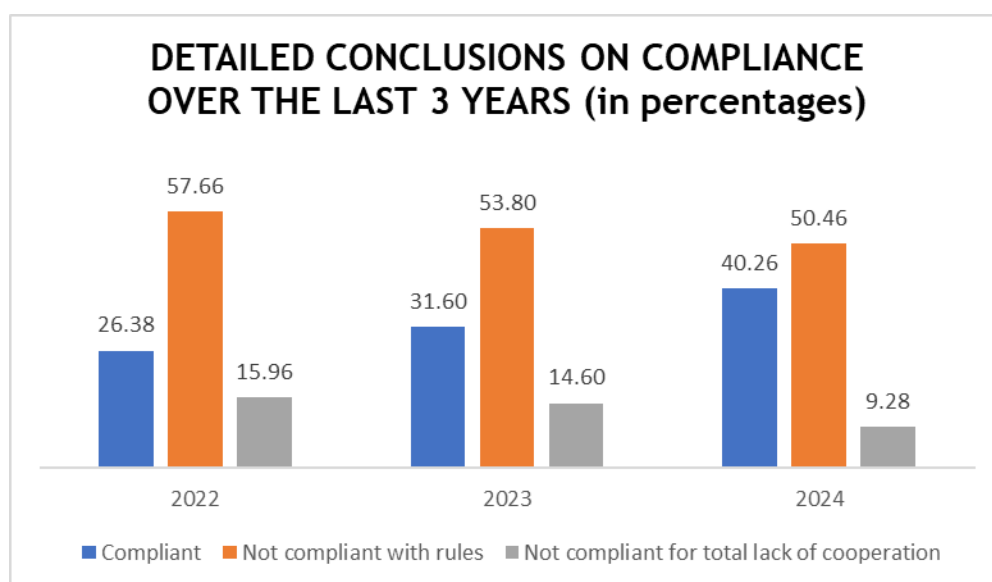


- In 50 requests, data were found non-compliant for the reason of a total lack of cooperation from the NCB source.



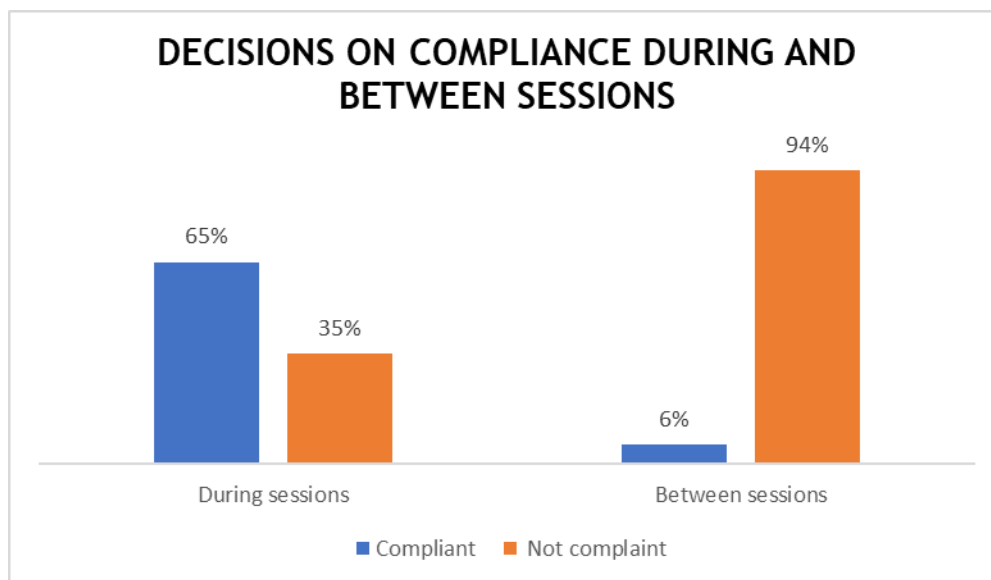
62. Overall, for the 539 deletion requests decided by the CCF, the level of compliance was 40 per cent. The 322 deletion requests found non-compliant include 211 requests decided between the sessions by delegation of power to the Rapporteur or Chairperson, such as the 50 requests where there was a total lack of cooperation, or where the data were not compliant with a clear rule or practice of INTERPOL (including those involving people wanted on the sole basis of the issuance of unfunded checks with no link to a fraud, or application of INTERPOL's policies for refugees).

63. The percentage of compliant cases was higher than in recent years, while the percentage of cases deemed non-compliant based on a total lack of cooperation from the NCBs was less than in recent years.





64. Of the 225 requests decided in between sessions by the Rapporteur (straightforward requests decided by the Rapporteur, see §62 above), 94 per cent (211) were found not compliant and six per cent (14) were found compliant.⁶ Of the 314 cases decided during the four sessions of the CCF in 2024, 65 per cent (203) were found compliant and 35 per cent (111) were found not compliant. A very small number of requests (less than one per cent) were postponed for further information and/or study.

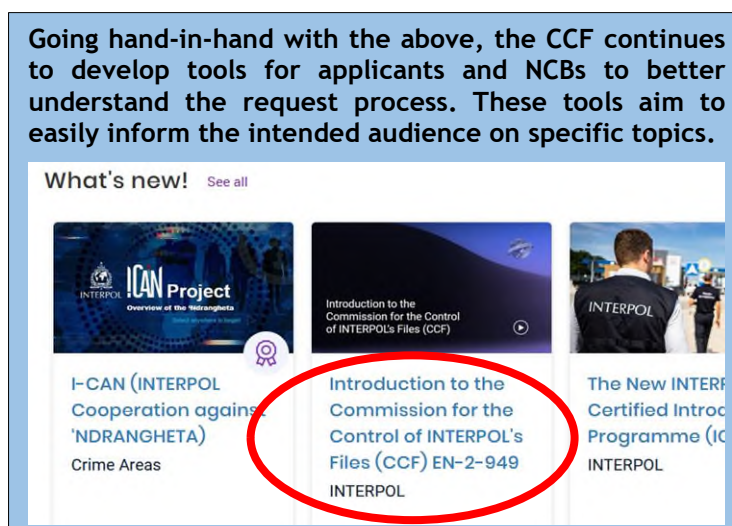


C. Additional work

(a) Transparency, outreach and training

65. In addition to the internal INTERPOL meetings, such as the CCF sessions, the CPD meetings, meetings with the Executive Committee, and the INTERPOL General Assembly, the CCF engaged with both NCBs and civil society as part of its efforts to increase transparency and ensure that NCBs and applicants have information that will assist them in efficiently presenting relevant information to the CCF.

66. In 2024, the CCF actively participated in the annual conference of Heads of NCB, and continued to engage in training of NCBs, building upon its work from 2023 when it introduced an online training module for NCBs (see the image below), which included guidance on how NCBs may most effectively respond to the CCF's queries, further facilitating the processing of requests.



⁶ Usually, when a case is found to be compliant by the Rapporteur, it is because the CCF had previously reviewed the case during one of its sessions and determined that the data were compliant subject to updates or corrections. In such instances, the Rapporteur verifies whether the updates or corrections align with the CCF decision.



67. In 2024 the CCF also had a few external engagements with civil society, attending various meetings, conferences and panels. For instance, the CCF attended global conferences concerning the latest developments and challenges in the field of data protection,⁷ including engaging with representatives of other international organizations on topics pertinent to INTERPOL such as artificial intelligence, data security, and right of access to information. Members of the CCF engaged with legal practitioners at the Defence Extradition Lawyer's Forum, the International Bar Association, and the European Criminal Bar Association, discussing topics relevant to the work of the CCF.

68. The CCF regularly updated its website to ensure that it contained information about its processes and practices, as well as information about delays in processing requests. It also engaged in regular consultation with the INTERPOL Press Office regarding inquiries related to the CCF and participated in trainings given by the General Secretariat to media representatives.

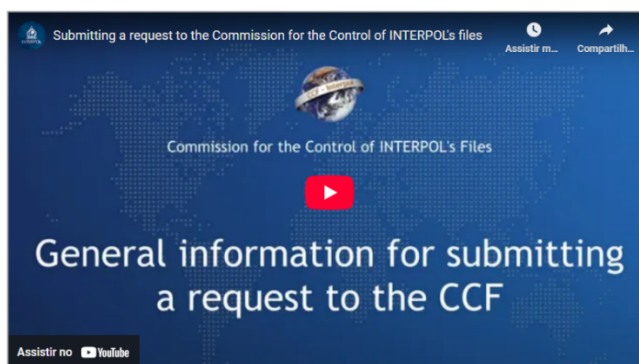
69. 2024 also saw the beginning of publication of informational videos aimed at applicants. The initial video provides applicants with information on how to submit a request to the CCF. The aim of this video is to provide clear information on the mandate of the CCF, what it can and cannot do, as well as general guidance and templates on how to submit a request and what information or documents are necessary. 2024 also saw the updating of the Procedural Guidelines for Applicants document available on the CCF web page as well as ad hoc additions on specific topics.

About the CCF
How to submit a request
CCF sessions and decisions
Frequently Asked Questions

Application for revision

An applicant can submit an application for revision of a Decision of the Commission, according to Article 42 of the Statute of the Commission. For these applications, in addition to the usual admissibility criteria, the applicant must provide:

- a description of a newly discovered and relevant fact(s), within six months of its discovery; and
- the reasons for which such new fact(s) could have led the Requests Chamber to a different conclusion if known at the time at which the request was being processed.



70. Finally, its transparency efforts included publishing new anonymized decisions, so that NCBs and Applicants can understand the CCF's interpretation and application of specific INTERPOL rules.

(b) Beginning of the review of the CCF Statute

71. In 2023, the General Secretariat proposed a review of the CCF Statute as it had been seven years since its enactment, and the CCF agreed that a review was appropriate (though it expressed its hope that the review could be slightly delayed so that the CCF could obtain and integrate new resources to address its workload issues). The specifics of what topics should be reviewed were the subject of much discussion between the CCF, General Secretariat and the Executive Committee. Everyone has agreed that changes to the Statute should not threaten the CCF's independence, although everyone has not always been in agreement concerning what that means in practice. The CCF identified areas where it believed statutory amendments might be appropriate and where in the CCF's view, they would not be appropriate. Ultimately, in 2024, the Executive Committee requested that the CPD review the CCF Statute, and since that time, as set forth in more detail below in the section relating to the way forward, the CCF has worked to constructively engage in the CPD process.

⁷ The International Organisations Workshop on Data Protection and the Global Privacy Assembly.



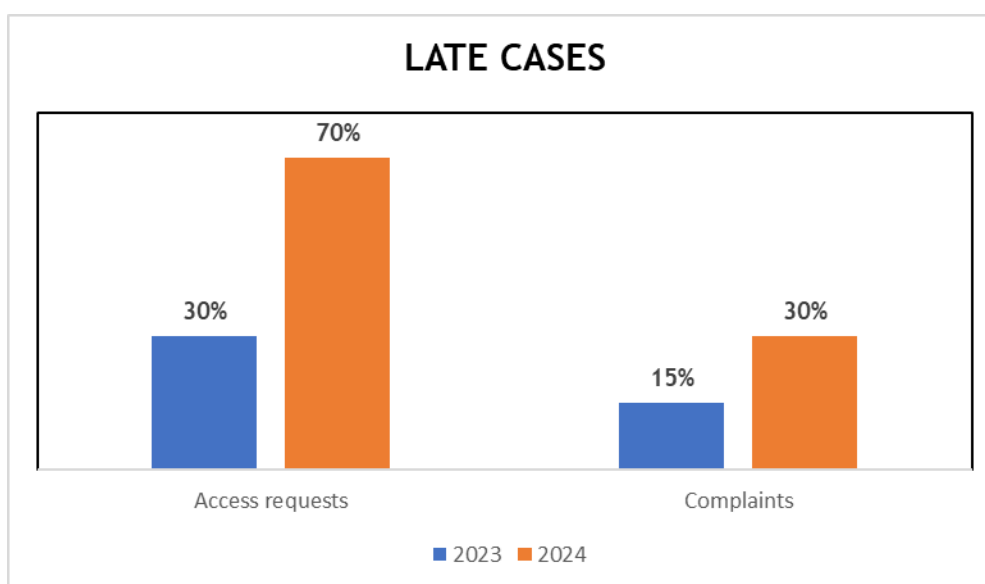
(c) Discussion on reprisals

72. In 2024, it was brought to the CCF's attention from members of civil society that applicants, their families or their legal representatives were on rare occasions being threatened with acts of retaliation or intimidation because of the applicant's request in front of the CCF. This situation was discussed by both Chambers as undermining the credibility of the CCF and as a serious breach of a person's right to request access to and/or the deletion/correction of data about them held in INTERPOL's files. The CCF has been discussing, both internally and with the General Secretariat, how such situations might be addressed.

IV. Challenges

(a) Increased processing times

73. In recent years, the CCF has faced significant challenges in processing requests within the time periods set out in the Statute. Absent exceptional circumstances, access requests should be finalized within 4 months and deletion requests within nine months. In 2024, 30 per cent of access requests were finalized within four months and 70 per cent were not. For deletion requests, 70 per cent were completed within nine months, and 30 per cent were not. As set out below, there are a myriad of reasons for the delays, and the CCF has taken multiple steps to address the situation. Furthermore, it is important to note that a portion of the cases which have surpassed the statutory timeframe are cases where the CCF established that circumstances of a particular request constituted exceptional circumstances warranting an extension of the time limit, as established in Article 40(3) of the CCF Statute.



(b) Reasons for delays

74. As described previously, the number of requests made to the CCF has dramatically increased over recent years. In 2024, the CCF had the highest number of requests ever made, as well as a significant backlog of requests from prior years.

75. Further, in addition to the CCF's resources not being sufficient to handle the increase, the General Secretariat entities upon which the CCF relies to process requests also had their own resource challenges. In particular, the General Secretariat entities which inform the CCF in the beginning of the process whether there are data about an applicant were often not able to provide timely responses to the CCF. These late responses to the CCF in turn made it difficult and even sometimes impossible for the CCF to comply with its time requirements. The lack of timely response was in part due to the General Secretariat's own workload linked to the increase in the number of requests and the absence of efficient tools to easily identify whether data exists on applicants in the INTERPOL system.



76. Even once the CCF has information regarding whether data exist, and as explained more fully above (§36), the CCF must then engage with the NCB regarding what information may be released to the applicant. If an NCB seeks to restrict the information provided to the applicant, there then may be multiple exchanges regarding the restrictions, whether they are appropriately justified and whether some of the information may be provided. Particularly with deletion requests, the back and forth with NCBs and with applicants regarding restrictions and whether they are appropriately motivated and justified as required by Article 35 of the CCF Statute can be extremely time-consuming. And in some cases, the restrictions may be such that the CCF is not in a position to share its reasoned decisions with the parties.

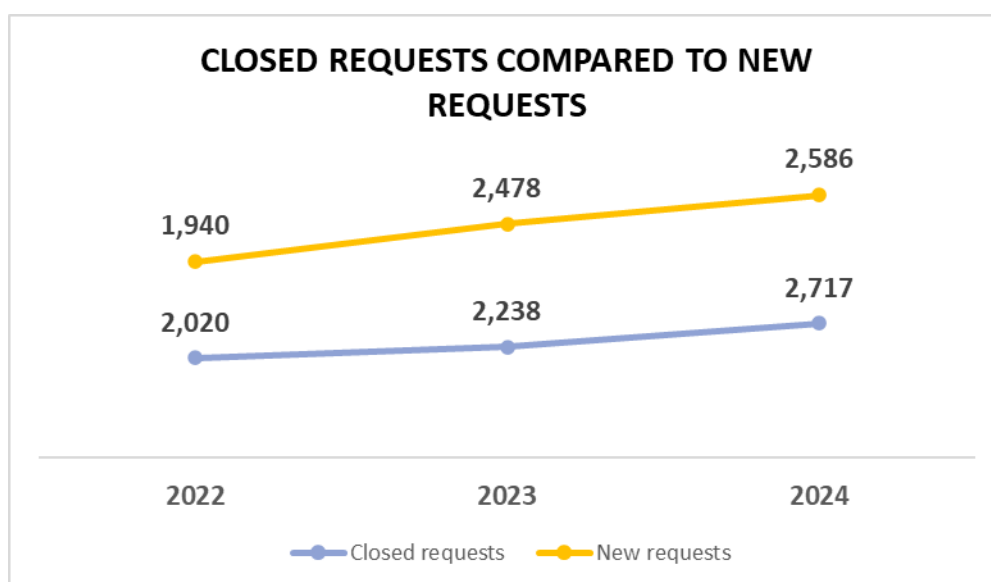
77. Additionally contributing to delay is the increased complexity of many of the deletion requests, requiring significant time to study and understand each request including sometimes review of a large number of additional documents and materials that are provided in support of individual requests. Many requests involve multiple countries, allegations of complicated financial schemes, and potential political dimensions.

78. The CCF's review process involves multiple exchanges with the parties as the CCF seeks and considers information from the parties, including their responses and counterarguments. The parties, particularly NCBs which may have to go back to domestic authorities to obtain a response to the CCF's questions, may seek extensions of the deadlines they are given to respond.

79. During the processing of requests, the CCF receives a large volume of submissions from stakeholders⁸ which can include extensive attachments. The CCF expends significant resources in the review, assessment and prioritization of these submissions, even in those cases where the submissions end up being deemed not relevant or lacking in reliable information.

(c) Steps to address delays

80. The CCF has taken steps in several different areas to increase its efficiency. As described in §14 above, its efforts resulted in the CCF closing the highest number of requests in its history. Unfortunately, because the number of new requests was still high and for the reasons mentioned above, the number of cases that have exceeded statutory deadlines has grown.



81. It would not be possible to describe all the steps taken by the CCF to increase efficiency, but procedural steps taken include the following:

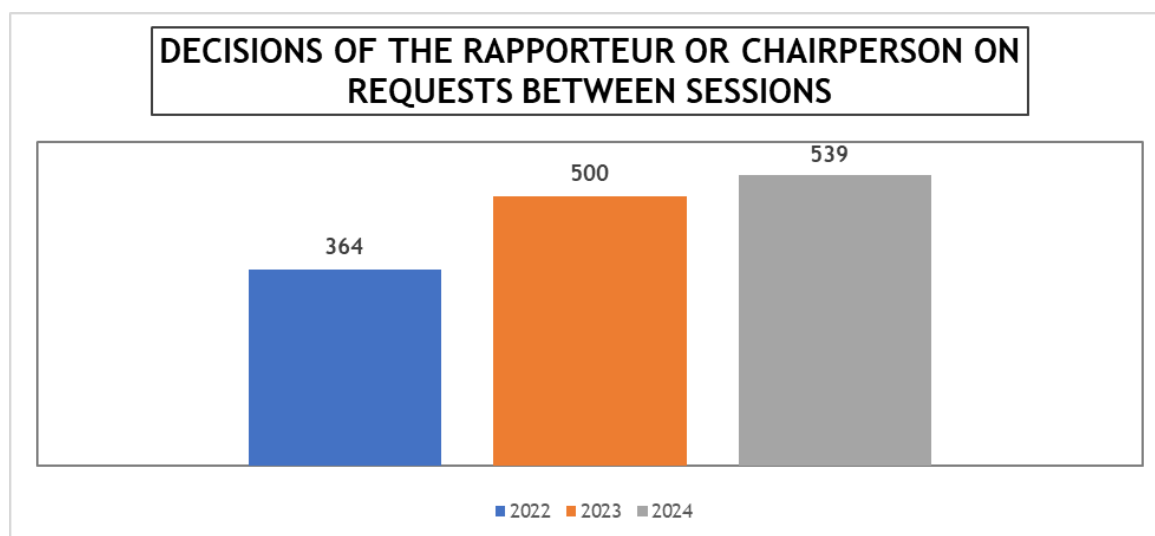
- Calling for applicants to provide concise arguments in a maximum of ten pages, and, if large amounts of additional documents are necessary to support the arguments, provision of clearly annotated appendices;

⁸ In a year, the CCF received more than 82,000 e-mails.



- Stricter enforcement of deadlines and stricter consequences for problematic situations, such as failing to answer questions or providing documents in a language other than one of the INTERPOL working languages;
- Amendment of its Operating Rules to allow electronic signatures;
- Creation of more standard templates for use in communicating with the parties;
- Provision of more detailed information to the parties on general procedures, deadlines and frequently encountered situations;
- Enhancement to the CCF's dropbox tool, allowing applicants to more easily submit documents electronically.
- Provision of information on the CCF's website regarding the delays, etc.

82. The CCF has continued to develop its delegation of power to the Rapporteur and Chairperson of the CCF. The delegation of power is based on specific criteria and regularly updated. It allows the Chairperson and Rapporteur to make interim or final decisions on a significant volume of requests between CCF sessions. This process enables the Commission to take decisions throughout the year, streamline its work, and focus on the more complex issues during sessions.



83. Perhaps the most notable development in addressing the CCF workload and delay problems is the decision, in November of 2024, taken after completion of a long-awaited in-depth study by independent consultants confirming that the CCF was in dire need of additional resources, by the INTERPOL General Assembly to increase the resources for the CCF. The additional resources obtained provide for:

- additional staff for the CCF Secretariat;
- additional paid days for CCF members, allowing for more extensive participation in CCF work;
- dedicated resources to develop and implement adequate IT tools to streamline processes and improve overall efficiency.

(d) Misuse/misconduct

84. As the CCF has previously noted, including in its 2023 annual report, there have been several instances involving suspected misuse of the CCF process. Most seriously, instances of suspected misuse involved provision of forged documents, provision of documents obtained by fraud, or submission of false information in circumstances indicating that the submitter knew of their falsity. Sometimes the misuse or misconduct appeared to be an individual situation and sometimes it appeared to be part of a wider scheme. Suspected cases of misconduct came by applicants or their representatives, and from NCBs. The CCF continues to be diligent in identifying possible misuse and taking appropriate measures in response.



85. The nature of the CCF's response to suspected misconduct varies depending on the particular case. The CCF has also been working on amendments to the CCF Statute, including with the CPD, and to its Operating Rules.

V. The road ahead

86. As described more fully above, one of the CCF's highest priorities moving forward will be continuing to address the delay problem in processing requests, including through integration of new staff and new technology tools.

87. The other highest priority will be to continue to engage with the CPD regarding the ongoing review of the CCF Statute. The CCF expended considerable resources in 2025 engaging in this process, and it expects continued work in 2026 and potentially beyond. The issues, including the ways in which the CCF's independence might be compromised, can be complex and subtle. The CCF will strive to ensure that the CCF remains independent, impartial, productive, and an effective remedy for applicants and for INTERPOL.

88. The review process, including the input from NCBs and from civil society, has had the benefit of identifying some areas where the CCF practice might be improved through the adoption of new operating rules or practices short of a statutory amendment. The CCF will be exploring those areas, as well as continuing to solicit feedback from NCBs and civil society regarding additional ways it might improve its work.

89. One specific area that the CCF plans to continue working on is the misuse of CCF process, ensuring that if new measures are adopted, they are structured in a way that does not discourage vigorous advocacy by an applicant or an NCB, and that they provide an appropriate process in the event that the CCF considers imposing sanctions, such as preventing an applicant's representative from continuing to represent persons before the CCF.

90. Finally, resources permitting, the CCF also hopes to continue its work towards increased transparency including through publication of additional anonymized decisions.

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APPENDIX: CCF EVENTS IN 2024

January

29 Jan - 2 Feb, Lyon, France - 127th session of the CCF: Decision to accept electronic signatures

May

3-4, Brussels, Belgium - European Criminal Bar Association: The CCF panel held discussions with specialized lawyers to raise awareness of, and increase transparency around, CCF's activities.

6-7, Lyon, France - Working Group on Governance

23-24, Lyon, France - 10th meeting of the Committee on the Processing of Data

September

18-20, Lyon, France - Working Group on Governance

23-24, Washington DC - Participation in the International Organisations Workshop on Data Protection

November

4-7, Glasgow, United Kingdom - General Assembly session: Decision to increase members' working days, staff and IT resources

20, Online - 1st Video for Applicants on how to submit a request to the CCF

● CCF sessions

● Meetings of the Organization

● External meetings

February

14-16, Lyon, France - 9th meeting of the Committee on the Processing of Data

April

15-19, Lyon, France - 128th session of the CCF: Decision to not register non-admissible requests

23-25 - 19th Heads of NCB Conference

June

24-28, Lyon, France - 129th session of the CCF

July

Decision to accept only electronic submissions

October

11, London, United Kingdom - Participation in the Defence Extradition Lawyer's Forum

14-18, Lyon, France - 130th Session of the CCF

28-1, Jersey - Global Privacy Assembly

December

2-4, Lyon, France - 11th meeting of the Committee on the Processing of Data: Initial discussion of the Review of CCF Statute

