

**CALL FOR CONTRIBUTIONS FROM CIVIL SOCIETY TO THE COMMITTEE ON THE PROCESSING OF DATA  
FOR THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES STATUTE REVIEW  
(Lyon, France, February 11, 2026)**

**Deadline for submissions: 11 March 2026**

The Commission for the Control of INTERPOL's Files (CCF) is an independent body that ensures that all personal data processed through INTERPOL'S channels conforms to the rules of the Organization.

The Committee on the Processing of Data (CPD) is responsible for reviewing and making recommendations on INTERPOL's processing of data to promote international police cooperation and prevent and suppress ordinary law crimes, in accordance with Article 2 of the Organization's Constitution. It is a standing committee of INTERPOL's General Assembly and meets at least once a year.

In 2025, the CPD has launched a process to review [the Statute of the CCF](#) that defines its work. To that end, the CPD has been seeking contributions from civil society concerning selected topics related to the work of the CCF and the CCF Statute.

In preparation for its next meeting in April 2026, the CPD is seeking contributions on all topics related to the review of the CCF Statute that will be addressed in the April CPD session.

**Topics for consideration**

This third call for contributions is addressed to interested representatives of intergovernmental and non-governmental organizations, academia and the legal sector from INTERPOL's member countries, with existing working relations with the CCF or recognized expertise on CCF related matters.

They are invited to submit their input on one or all the following two areas currently being considered by the CPD:

**1. Cooperation with the Commission and Consultations (Articles 5 and 34 of the CCF Statute)**

Article 5 of the CCF Statute requires Members of the Organization to respect the competence and independence of the Commission and to cooperate with it in a timely manner. It further calls upon Members to ensure that their national authorities – including national courts and data-protection bodies – do not interfere with the Commission's work or the Organization's in matters falling within the Commission's competence, thereby safeguarding the Commission's operational integrity.

This obligation reinforces the broader duty of cooperation enshrined in Article 31 of the INTERPOL Constitution, which underscores the necessity of continuous and active engagement between member countries and the Commission.

Article 34 of the CCF Statute provides that if additional information or clarifications are needed in the context of examining a request, the Requests Chamber shall seek such information or clarification from the source of data, the General Secretariat or any national or international entity with access to the INTERPOL Information System.

Some member countries have suggested that these provisions should not be limited to the Members of the Organization, since all parties involved in the proceedings – including applicants – should also

have the obligation to cooperate with the Commission to ensure the effective functioning of its mandate. As a key stakeholder in CCF proceedings, applicants are not explicitly mentioned in Articles 5 and 34.

While the Statute does not currently reference applicants directly, their cooperation and respect for the Commission's independence are essential to the effective functioning of the review process.

This item seeks to examine whether explicitly referencing applicants in Articles 5 and 34 of the CCF Statute could enhance cooperation, reinforce respect for the Commission's independence, and strengthen the overall effectiveness of its mandate.

## **2. Communication of information (Article 35 of the CCF Statute)**

Article 35 of the CCF Statute sets out the rules for disclosing information connected with a request.

Article 35(1) establishes that information connected with a request shall be accessible to the applicant and the source of data, subject to restrictions. Before any information is shared, the Requests Chamber shall consult the owner of the data (either the source of data or the applicant). Communication of such information could be restricted at the initiative of the Commission or at the request of the source of data, the General Secretariat or the applicant, for one or more of the following specific grounds stipulated in Article 35(3) of the CCF Statute:

- To protect public or national security or to prevent crime;
- To protect the confidentiality of an investigation or prosecution;
- To protect the rights and freedoms of the applicant or third parties;
- To enable the Commission or the Organization to properly discharge their duties.

Any request to restrict disclosure must be supported by a clear justification under Article 35(4). The absence of a justification alone will not lead to the disclosure of the content of the information, but may be taken into consideration by the Commission when making its decision. Where appropriate and without compromising confidentiality, the Chamber may also advise the applicant to contact the relevant authorities in the country that provided the data.

The purpose of this article is to ensure that both parties to the procedure have a fair opportunity to argue for or against the processing of data, while taking into consideration, on the one hand, the principle according to which the source of data retains control over its data and the fact that the data processed in the INTERPOL Information System are, by their very nature, frequently confidential, and that confidentiality requirements are also applicable for submissions by applicants, on the other.

Some member countries have requested to revisit this article with a view to determining whether the current rules and procedures should be maintained, adjusted, or elaborated-upon.

### **How inputs will be used**

Relevant contributions will be first reviewed by INTERPOL's General Secretariat and if they meet the submission criteria and are deemed relevant, they will be shared with the CPD for its consideration. INTERPOL maintains the full discretion on whether to share contributions with the CPD. INTERPOL is not obliged to accept any suggestion put forward in any contribution received.

### **Neutrality of INTERPOL**

Article 3 of the [INTERPOL Constitution](#) explicitly forbids INTERPOL from engaging in matters of political, military, religious and racial character. Any contributions that contain such elements will be automatically excluded from consideration.

**SUBMISSION GUIDELINES**

- Contributions must not mention specific cases and countries.
- Contributions must be submitted in one of INTERPOL's working languages, namely English, French, Spanish, Arabic.
- Contributions must not contain inappropriate or offensive language.
- Contributions should not exceed 10,000 characters per topic.
- Any contribution that does not meet the required criteria will not be taken into consideration.
- In the event of a technical issue when submitting your contribution in the designated space on the form, you may attach a file containing your contribution, provided that the content remains within the specified character limit per topic.

Please complete **all relevant fields** to ensure examination of your contribution.

The form must be returned **by 11 March 2026**, to the following e-mail address: [ccfsr@interpol.int](mailto:ccfsr@interpol.int)

**A. PARTICIPANT**

**IF the participant is a person**

- **FAMILY NAME:** .....
- **FORENAME(S):** .....
- **NATIONALITY:** .....
- **E-MAIL ADDRESS:** .....
- **HAVE YOU PREVIOUSLY SUBMITTED A REQUEST TO THE CFF?**    No ☐    Yes ☐

**IF the participant is an entity**

- **FULL NAME OF THE ENTITY:** .....
- **PLACE OF INCORPORATION OR REGISTRATION:** .....
- **OFFICIAL ADDRESS:** .....  
.....  
.....
- **E-MAIL ADDRESS:** .....

**B. INPUTS REGARDING THE FOLLOWING TOPICS**

- 1. Contribution concerning the Cooperation with the Commission and Consultations (Articles 5 and 34 of the CCF Statute)**

**2. Contribution concerning the Communication of information (Article 35 CCF Statute)**

COMMITTEE ON THE PROCESSING OF DATA  
APPLICATION FORM FOR CONTRIBUTION TO THE CCF STATUTE REVIEW

DATE: .....

FAMILY NAME AND FORENAME (or name of entity): .....

Signature: .....

The duly completed form should be sent by 11 March 2026, by e-mail: [ccfsr@interpol.int](mailto:ccfsr@interpol.int)