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**DUBAI, UNITED ARAB EMIRATES, 18-21 NOVEMBER 2018**

## **Report No. 3**

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### **ACTIVITY REPORT OF THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES FOR 2017**

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**Report submitted by the Commission for the Control of INTERPOL's Files**

**English**



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<b>Prepared by:</b>	The Secretariat of the Commission

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## INTRODUCTION

The purpose of the present report is to provide a summary of the work of the Commission for the Control of INTERPOL's Files in 2017.

This report is intended for circulation to the general public, by publication in the Commission's section of the INTERPOL website, once it has been submitted to the General Assembly in November 2018.

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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)



## ACTIVITY REPORT OF THE COMMISSION FOR THE CONTROL OF INTERPOL'S FILES FOR 2017

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## INTRODUCTION

1. The Commission for the Control of INTERPOL's Files (the Commission, or the CCF) is an independent, impartial body, officially responsible for ensuring that the processing of personal data by INTERPOL complies with the applicable INTERPOL rules.
2. The Commission has a supervisory and an advisory role, and it is responsible for processing requests for access to, and correction and/or deletion of data processed in, the INTERPOL Information System. The Commission's functions are defined in INTERPOL's Constitution (Article 36) and in the Commission's Statute (Article 3) which entered into force on 11 March 2017, replacing the Rules on the Control of Information and Access to INTERPOL's Files on that date.
3. This new Statute is the result of a comprehensive review of INTERPOL's supervisory mechanisms in the area of data processing, aimed at strengthening them in light of the technological advancements and the increase in the volume of data processed in the INTERPOL Information System. The Statute is aimed at ensuring compliance with INTERPOL's rules, and at providing applicants with an effective remedy with regard to data concerning them processed by INTERPOL.
4. The present report will focus essentially on the new challenges that the CCF has to face, and explain how the CCF has started implementing the new Statute that governs its functioning. Statistics on the work of the CCF and on its evolution are also attached to the present report.

### 1. ORGANIZATION OF THE COMMISSION

5. From 1 January to 10 March 2017, the Commission was composed of five members :
  - Ms Vajic (Croatia), Chairperson;
  - Ms Madhub (Mauritius), data-protection expert;
  - Mr Frayssinet (France), data-protection expert;
  - Mr Harris (United States), international police cooperation expert;
  - Mr Patrick (Canada), information-technology expert.
6. They met twice in 2017 (98th and 99th sessions), and conducted a one-day meeting with the newly-elected members, in order to prepare and facilitate the implementation of the new CCF Statute.
7. Since 11 March 2017, the Commission has been structured in two Chambers, composed of seven members:
  - 7.1 The Supervisory and Advisory Chamber, which carries out the necessary checks and draws conclusions on INTERPOL's projects, operations or sets of rules involving the processing of personal data, composed of three members:
    - a lawyer with data protection expertise: Mr Pirlog (Moldova);
    - a member with expertise in data protection: Mr Frayssinet (France);
    - a member with expertise in electronic data processing: Mr Mira (Algeria).
  - 7.2 The Requests Chamber, which is responsible for processing requests for access to, or correction and/or deletion of, data processed in the INTERPOL Information System, composed of five members:
    - a lawyer with data protection expertise: Mr Pirlog (Moldova);
    - a lawyer who holds or has held a senior judicial or prosecutorial position: Ms Palo (Finland);
    - a lawyer with human rights expertise: Mr Despouy (Argentina);
    - a lawyer with international criminal law expertise: Mr Gorodov (Russia);
    - a lawyer with recognized international experience in police matters, in particular international police cooperation: Mr Trindade (Angola).

8. During their first meeting (100th session, 27 to 29 March 2017), the new members of the Commission elected Mr Pirlog as their Chairperson from among the members of the Requests Chamber. He presides over both Chambers of the Commission, as provided for in Article 7 of the Statute.
9. During its first meeting and as per Article 25 of its Statute, the Commission also adopted its new Operating Rules, which abrogated and replaced those in force since 2008:
  - 9.1 As provided for in Operating Rules 6 to 9, the Commission elected Ms Palo as Vice-Chairperson, to assume the functions of Chairperson whenever necessary.
  - 9.2 As provided for in Article 17 of the Statute and Operating Rules 10 and 11, the Commission also appointed a Rapporteur from among the members of each Chamber to facilitate the Commission's work in between its sessions: Mr Frayssinet was appointed Rapporteur for the Supervisory and Advisory Chamber, and Ms Palo was appointed Rapporteur for the Requests Chamber.
10. The new members of the Commission met three times in 2017 (March, June and October).

## 2. GENERAL ISSUES RELATING TO THE CCF'S WORK

11. **Operating rules:** The first action taken by the Commission in March 2017 was the adoption of its new Operating Rules. The text was drafted in the form of simple and short rules in order to facilitate the immediate implementation of the new Statute, taking into consideration the Statute itself, the previous practice of the Commission, and standards applicable to other comparable international bodies. The CCF also paid particular attention to the strengthening of the guarantees of impartiality and independence.
12. **Impartiality and independence, confidentiality and security:** Since the creation of the CCF in 1985, INTERPOL's rules have established and developed the principle of independence of the CCF, its members and its Secretariat. Since the adoption of its first Operating Rules in 1996, the CCF has also adopted measures to ensure that such independence is effective and protected. The new Statute of the Commission, adopted in 2016, strongly reaffirms this principle in conjunction with the principle of impartiality.
13. In its Operating Rules adopted in March 2017, the Commission reinforced the provisions and procedures governing independence and impartiality guarantees for the CCF as a body and for its members. For example, at the beginning of his/her term of office, each member of the CCF must sign a solemn declaration in this respect. Likewise, Operating Rule 2 provides that a member may not take part in the consideration of a case if he/she is seen to have a real or perceived conflict of interest. Access by members of the Commission to the information connected with requests is now managed in order to take into account restrictions linked to the withdrawal of members.
14. Other rules interconnected with the independence of the CCF and its members have also been elaborated on in the Statute and the Operating Rules, such as the binding character of the CCF's decisions, and the principle of confidentiality and secrecy of the CCF's work and files.
15. **New challenges:** The implementation of its new Statute has created new challenges for the Commission.
  - 15.1 The creation of two Chambers has an impact on the organization of its work. As many issues addressed by the Commission are of common interest to the missions of both Chambers, the Commission has developed its procedures for appropriate collaboration between the two Chambers.
  - 15.2 The Statute requires more transparency of the Commission's work. Accordingly, the Commission provides the parties to a case with regular information on the status of the case and with detailed and reasoned decisions. It regularly publishes anonymized abstracts of its decisions on its website making efforts to communicate more frequently with the parties.

- 15.3 The principle of communicating to applicants information connected with a request, subject to any restrictions placed by the parties on such communication, requires the Commission to strike a balance between complying with any restrictions, and guaranteeing a fair and transparent procedure.
16. **Ever-growing activity of the Commission:** The Commission's workload continued to increase in 2017. The growth in its activity is due to the implementation of its Statute and to the permanent increase in the number of requests, and to the significant escalation in the volume of data processed through INTERPOL channels, causing a knock-on effect in the number of individuals affected by the processing of data.
17. Therefore, the Commission constantly updates and adapts its procedures. The challenge is even greater given the relatively short timeframes for processing requests laid down by Article 40 of the Statute. The CCF had anticipated this increased workload and took numerous measures to optimize the processing of requests, in terms of both quantity and quality.
18. The CCF Secretariat was also built up, with staff able to work in all of INTERPOL's languages, representing the principal legal systems of the world, and competent in the various fields of expertise required by the Commission's work.
19. **Relationship with the IDPO:** THE Commission established regular contact with the INTERPOL Data Protection Officer, to share experiences and discuss issues of common interest.

### 3. ACTIVITY OF THE SUPERVISORY AND ADVISORY CHAMBER

20. In 2017, the Commission studied several projects concerning new or improved databases, including a project of new analytical file, and draft cooperation agreements.
21. **Project Watchmaker:** The Commission studied the plan to create an analysis file aimed at enabling INTERPOL's member countries to identify and track known or suspected individuals involved in the manufacture or use of explosives. This is to be achieved via the exchange of personal data (including biometric data) on persons involved in the manufacture or use of explosives, including chemical improvised explosive devices (IEDs); document records; and technical information on chemical IEDs.
22. The processing of data concerning analysis files is governed by Articles 68 to 72 of INTERPOL's Rules on the Processing of Data (RPD).
23. The Project is specific in that it involves the processing of biometric data, which are considered as particularly sensitive data as referred to in Article 42 of the RPD. The Commission considered that the processing of such data was "*necessary for the typology of bomb-makers*", and therefore complied with the requirement of the RPD that they are "*relevant and of particularly important criminalistic value*". However, the Commission reminded the INTERPOL General Secretariat of the importance of ensuring that such data are recorded in the analysis file "*in a way which enables them to be identified as such*", and "*shall not be processed, in any form whatsoever, for any discriminatory purpose*".
24. The Commission also drew the General Secretariat's attention to the need to add this analytical file to the register of the Organization's police databases, along with the general characteristics of the analysis file, in accordance with Article 33(1) of the RPD.
25. Project Watchmaker will use data processed in the INTERPOL Criminal Information System (INTERPOL's nominal database) as well as other data provided for the purpose of the Project and registered in the analysis file. In order to ensure the quality of data, as referred to in Article 12 of the RPD, and in particular their accuracy, the Commission has invited the General Secretariat to create dynamic links between the analysis file and INTERPOL's nominal database.



26. **iARMS database:** The INTERPOL Illicit Arms Records and tracing Management System (iARMS) is a database in operation since 2013 that facilitates information exchange and investigative cooperation between law enforcement agencies in relation to the international movement of illicit firearms, as well as licit firearms that have been involved in the commission of a crime. All INTERPOL National Central Bureaus (NCBs) have direct access to this system composed of three functional modules, including the “Trace Requests Management Module” which allows trace requests made by INTERPOL member countries seeking additional information about a firearm to be sent to specific law enforcement officers, and responses to these requests to be submitted.
27. In 2017, the Commission was consulted on the creation of new fields in the Trace Requests Management Module of the iARMS database and in the Request and Response forms, to include personal data on those in possession of firearms and on other persons linked to these firearms, such as manufacturers, purchasers, exporters, importers, sellers, buyers, and end users (in the Trace Response form).
28. In order to clarify the new functionalities, the Commission asked for additional information on planned improvements and on interconnections. The Commission received several documents between 11 and 18 September 2017, including a handbook prepared by the General Secretariat, which describes the procedure for querying the US NCIC database from iARMS, a memorandum from OLA dated 21 November 2014, the Executive Committee’s Approval on the interconnection of iARMS with the US NCIC database, and screenshots of the new functionalities of iARMS.
29. The Commission observed that the iARMS database allows for the management of any restrictions that could be imposed by the country to access by other countries to the personal data it has recorded. The Commission insisted on the need to take appropriate actions to ensure that retention periods applicable to personal data will be observed not only for data recorded in the Trace Requests Management Module, but also for data recorded in any free fields of the iARMS database. It also invited the General Secretariat to establish appropriate supervisory mechanisms, including random checks at regular intervals to ensure that data recorded by member countries complied with INTERPOL’s rules.
30. **SLTD: revoked travel documents:** the Stolen and Lost Travel Documents database (SLTD) was created in 2002 to enable INTERPOL National Central Bureaus (NCBs) and other authorized law enforcement entities - such as immigration and border-control officers - to ascertain the validity of a travel document. In 2017, the General Secretariat consulted the Commission on the creation of a new category of document in the SLTD: revoked travel documents.
31. The Commission recalled that the SLTD database was put in place to enable law enforcement entities to prevent lost/stolen travel documents from being used in an illegal manner. It welcomed the General Secretariat’s proposal to provide INTERPOL members with a limited list of appropriate purposes to record data in that database in order to avoid any misuse, and asked to be provided with the list of identified appropriate purposes.
32. The Commission insisted on the need to ensure that the definition of “revoked travel documents” is clear enough to prevent the possible misuse of the SLTD database, in particular to locate a person where a diffusion or a notice could not be issued. It also invited the General Secretariat to clarify the purpose of the SLTD and of the processing of revoked travel documents in the SLTD standard operating procedures.
33. **Interconnections of ICSE database:** The International Child Sexual Exploitation database (ICSE) is a database housed at the General Secretariat as part of Project Baseline, which aims to empower public and private entities to recognize, report and remove child (sexual) abuse material from their networks. The ICSE contains personal data, but no nominal data.
34. In 2015, the Commission was consulted on the conditions for cooperation with private entities in this context and its recommendations have been incorporated into the standard agreement prepared. As part of the ongoing upgrade of the ICSE database, new functionalities have been added in order to improve its performance and thereby assist INTERPOL Members in their actions against child sexual abuse, in particular by interconnecting the ICSE with INTERPOL

member countries' relevant systems. The interconnection of databases should in particular help to rapidly identify cases that have to be dealt with and to provide robust and standardized solutions for sharing alerts, metadata and hash signatures.

35. The Commission welcomed the fact that, in this project, the people in charge of recording data at national level are trained by the General Secretariat, which keeps a register of interconnection operations. Quality control is performed at national level and by the General Secretariat where a staff member is designated to perform this task each month. The Commission further underlined the importance of providing the sources of the data recorded in the ICSE database with the settings and conditions of these interconnections, and to report to the General Assembly the authorizations granted for interconnection operations, in accordance with Article 55(6) of the RPD.
36. **Cooperation agreement with ECPAT:** The Commission was consulted on a draft cooperation agreement with the NGO End Child Prostitution Child Pornography and Trafficking of Children for Sexual Purpose (ECPAT), concerning the prevention of child sexual exploitation through programmes to confront: trafficking for sexual purposes; the exploitation of children through prostitution and child sexual abuse; online child sexual exploitation; and the sexual exploitation of children in the travel and tourism sector.
37. Under INTERPOL's rules, ECPAT is considered as a private entity as referred to in Article 28 of the RPD, which sets out the conditions for INTERPOL's cooperation with private entities: "insofar as it is relevant to the accomplishment of its aims, the Organization may establish relations with private entities wishing to cooperate with it in data-processing matters [...]".
38. This draft cooperation agreement provides for the exchange of personal data of a particularly sensitive nature which must be processed carefully, as required by Article 42 of the RPD. In this specific context, the Commission invited the General Secretariat to determine precisely and with the utmost care the responsibilities of the parties, the conditions required for the security and confidentiality of the data, and the supervisory mechanisms in place to ensure compliance with INTERPOL's rules. It also invited the General Secretariat to keep a list of the logs of access by ECPAT to INTERPOL's files.
39. **Project Gateway on cybercrime:** Within the scope of INTERPOL's global strategy to combat cybercrime (February 2017), INTERPOL seeks to safely and securely receive large quantities of unrelated information from multiple sources, including cyberthreat intelligence and cybercrime information from external parties, in order to create links between originally non-related data and ultimately to produce analytical outputs. Project Gateway on cybercrime aims to articulate the operational, legal, technical and procedural framework for all activities within the Project.
40. The General Secretariat consulted the Commission on this project and forwarded a draft model cooperation agreement with private entities. The purpose of the draft cooperation agreement is to facilitate and develop cooperation between INTERPOL and the private entities in the prevention and fight against cybercrime, and to determine the mutual provision of data relevant to criminal trends in cyberspace, malicious cyberthreats and cybercrime, and of additional information or expertise for preventing or investigating cybercrime.
41. First, the Commission invited the General Secretariat to define the criteria to be met by a private entity to become a partner of INTERPOL in the context of Project Gateway, and to ensure that any new private entity has indeed undergone a due-diligence assessment, with positive results, before any agreement is signed with INTERPOL. Second, it recalled that under Article 1(3) of the RPD, personal data are defined as "*data about an identified natural person or a person who may be identified by means that may reasonably be used*". Therefore, having in mind the aims of the Project, it invited the General Secretariat to consider data-protection risks, including when processing non-personal data, and to consider the fact that seemingly non-personal data, when aggregated and analysed on a large scale, could reveal new personal and sensitive data on individuals or their relatives.

42. **Cooperation agreement with INHOPE:** In 2014, INTERPOL signed a cooperation agreement with the International Association of Internet Hotlines (INHOPE) in order to achieve the best use of all available information to more efficiently deal with online child exploitation. In 2017, INTERPOL and INHOPE considered extending their cooperation to allow INTERPOL to host INHOPE's information system, and to access particularly sensitive images and videos recorded by INHOPE.
43. The Commission considered that, because of INHOPE's specific nature and mandate, INHOPE should be required to keep an updated register of the operations performed in the context of this Project. It also considered it necessary to add provisions to the draft agreement with INHOPE concerning the security of the data exchanged, explaining that INTERPOL was responsible for the physical security of the equipment as host, while INHOPE would have full responsibility for the data security. The Commission considered that it might be necessary to further study how to detect any misuse of the data provided.

#### 4. ACTIVITY OF THE REQUESTS CHAMBER

44. In 2017, the Commission continued to receive a growing number of requests. It received 1,217 new requests, including 671 requests for access to INTERPOL's files and 486 requests for correction or deletion of data. The number of applications for revision for decisions also increased, to 90 requests.
45. Additional statistics on these requests, their profiles, and the result of the checks made by the Commission are attached in the Appendix to this report.
46. **Access by the CCF to INTERPOL databases:** The CCF Statute provides that the Commission shall have free and unlimited access to all data processed in the INTERPOL information System, irrespective the place, form or medium involved for the purpose of carrying out its functions (Article 19).
47. The effective implementation of this disposition is crucial to the effectiveness of the checks carried out by the Commission. Therefore, in cooperation with the General Secretariat, it has set up appropriate procedures in order to ensure that all databases are checked to identify whether information concerning an applicant is processed in INTERPOL's files, including standalone databases and analysis files.
48. **Reasoned decisions:** In order to meet the standard of due process, the Commission has taken several measures to ensure that the parties to a case can be provided with comprehensive and clear decisions, as provided for by its Statute. In this respect, the Commission has to comply with Article 35 of its Statute which governs the conditions under which the parties can have access to the information connected with a request, i.e. that *"information connected with a request shall be accessible to the applicant and the source of the data, subject to the restrictions, conditions and procedures set out in this article"*.
49. The CCF has increased its communication efforts with parties to explain the applicable texts and the importance of dealing with restrictions on a case-by-case basis. The rules do not authorize the Commission to disclose data to one party when the other party has restricted such communication. This is consistent with its practice. However, when dealing with a request, the Commission carefully takes into consideration the impact of restrictions. The definition of a balance between confidentiality requirements, inherent to INTERPOL's activity, and the guarantees of a fair, transparent and adversarial procedure, is complex but indispensable.
50. **Article 2:** The number of files involving an assessment of compliance with Article 2 of INTERPOL's Constitution continued to increase in 2017. Indeed, the functioning of the police and judicial systems of Member States involves complex questions making it challenging to distinguish between specific issues concerning the respect of the applicant's rights and the systemic malfunctions and violations of individual rights in a country, especially when an NCB as the data source refuses to disclose information to the applicant.

51. **Refugee policy:** The Commission receives an increasing number of requests from individuals who have been recognized as refugees. It applies the Organization's Refugee Policy, in the light of other applicable INTERPOL rules (such as Article 2 of its Constitution) as set out in the General Assembly Report accompanying the Resolution adopted by INTERPOL's General Assembly at its 86th session in September 2017.
52. The Commission studies each of these requests carefully, on a case-by-case basis, to determine the applicability of the Refugee Policy. Whenever data concerning a refugee are deleted from INTERPOL's files in application of its decision, the Commission informs the individual's host country and reminds it of its responsibility to inform INTERPOL if the protective status is later revoked or otherwise cancelled by its national authorities.
53. **Article 3:** The Commission continued to deal with several cases challenging compliance with the principle of the Organization's neutrality, as established in Article 3 of its Constitution.
54. While a few of these cases involve former high-ranking politicians, most of them concern people involved in business activities and charged with various fraud-related offences.
55. **Quality of data:** Each time the Commission deals with a request, it verifies the quality of the data, within the meaning of Article 12 of the RPD.
56. When the checks reveal that the data are not accurate, it does not automatically result in the deletion of the information concerned. Rather, these checks result in updates being made to INTERPOL's files, either directly by the NCBs consulted in the context of processing a request, or by the General Secretariat.
57. **Misuse of INTERPOL's channels:** The Commission dealt with cases where the sources of data have sent a diffusion to INTERPOL members to request the arrest of an individual, whereas a request for a red notice has previously been refused. It also processed requests which highlighted the use of the SLTD database where a diffusion or a notice to arrest a person was considered not to comply with INTERPOL's rules.
58. These cases raised questions of compliance with INTERPOL's rules that have been addressed by the Commission and the General Secretariat. In such cases, the data concerned (if they were still recorded in INTERPOL's files when the Commission studied them) are deleted, and the INTERPOL member countries which received the information are also informed that INTERPOL's channels cannot be used in the case concerned.
59. **Applications for revision:** As a result of Article 42 of its Statute, the Commission regularly faces situations where, after a final decision was taken regarding compliance/non-compliance of data, either the source of the data challenged or the applicant request a "revision" of the case.
60. The Commission considered an increased number of applications for revision of its decisions. The study of these applications requires specific attention to ensure observance of the rights of the parties to a case, while at the same time ensuring that this process is not misused by the party which did not succeed during the first review of the case.
61. **Applications for remedies:** Article 39 of the CCF Statute establishes that the Commission may decide on any appropriate remedies to be granted to the applicants where it finds that data have not been processed in accordance with applicable rules. In 2017, in accordance with the terms of its Statute, the Commission studied several requests raising the question of remedies. In such cases, and as provided for in Article 39(4,e), it consulted the General Secretariat.
62. From the cases concerned, the Commission generally established that the appropriate remedies had been provided by taking the necessary corrective actions in INTERPOL's files, and by issuing a certificate prepared by the General Secretariat indicating that the applicant concerned is not recorded in INTERPOL's files.
63. The Commission also considered specific cases where the applicants were subjects whose data had been copied from the INTERPOL website to other websites. While these data were deleted from INTERPOL's website, they remained available on the other websites. In such cases, the Commission also requested the General Secretariat to take further actions to request the deletion of the data concerned from those websites.

64. **Publication of extracts of decisions:** In order to comply with its commitment to ensure better transparency and understanding of its decisions by the public, the Commission has started publishing anonymized extracts of its decisions in all the Organization's working languages.

## 5. NEXT STEPS

65. The Commission is in the process of reviewing its website in order to provide further clarifications on its work, in particular on the processing of requests. The Commission is also developing a repository of its own case-law on selected legal issues regularly raised in the context of individual requests.

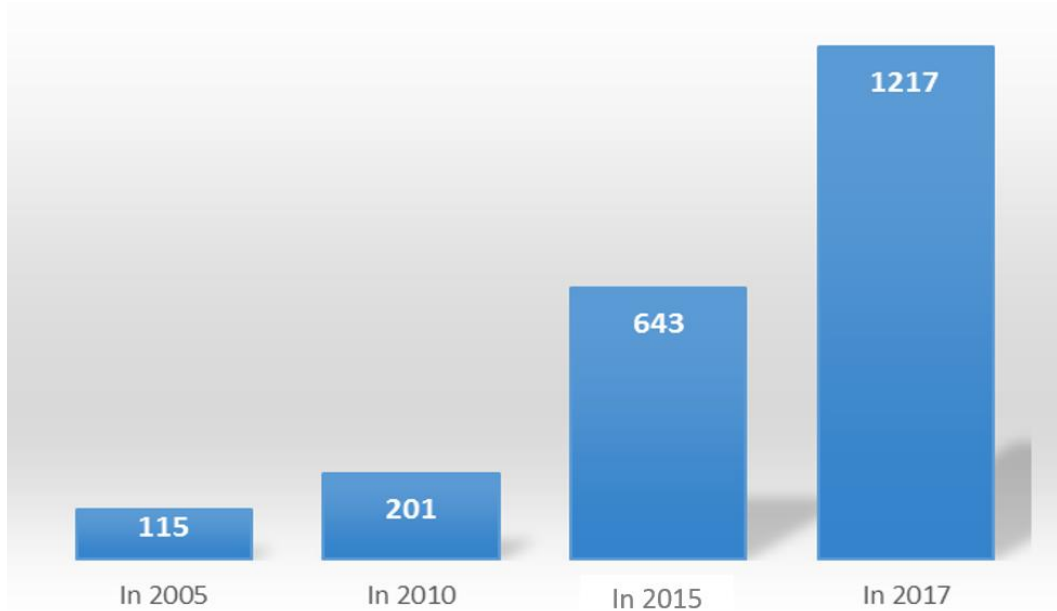
66. In addition to its role with regard to requests, the Commission intends to fully embrace its advisory role to support the Organization efficiently, and it has decided to focus its work on identified risks inherent to specific data-processing operations, for instance in the context of diffusions and crime analysis files.

67. Moreover, the Commission is committed to continue to bolster the guarantees of its independence and impartiality, through such measures as formalizing new ethical standards, adopting improved security measures during its session, and protecting of the secrecy of its deliberations and communications.

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APPENDIX  
STATISTICS OF REQUESTS FOR 2017

I. Trend in the number of new requests per year since 2005



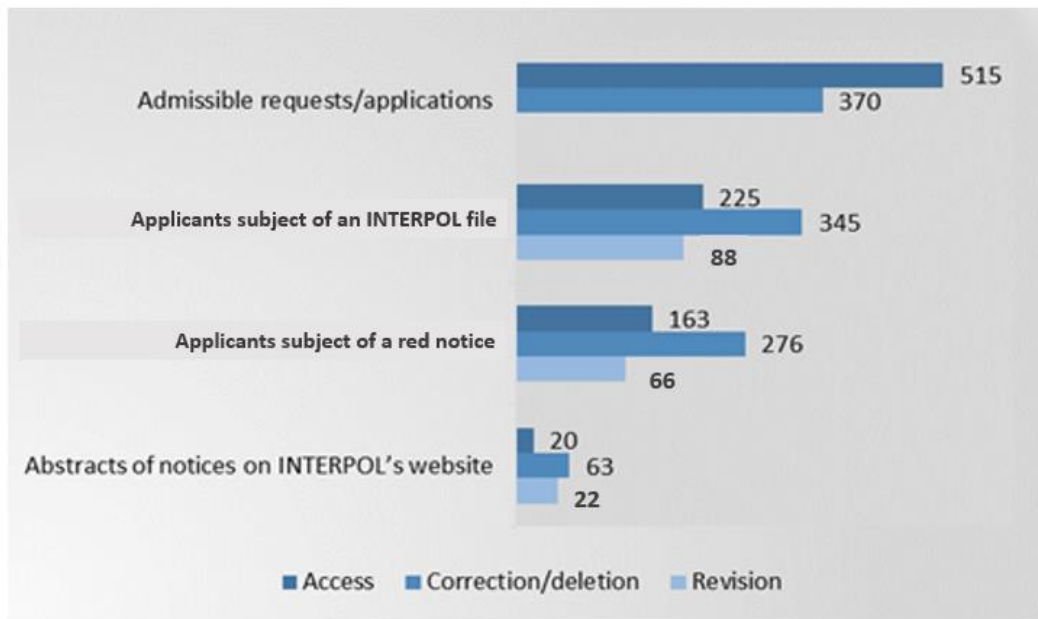
II. New requests received in 2017

In 2017, the Commission received 1,217 new requests or applications for revision.

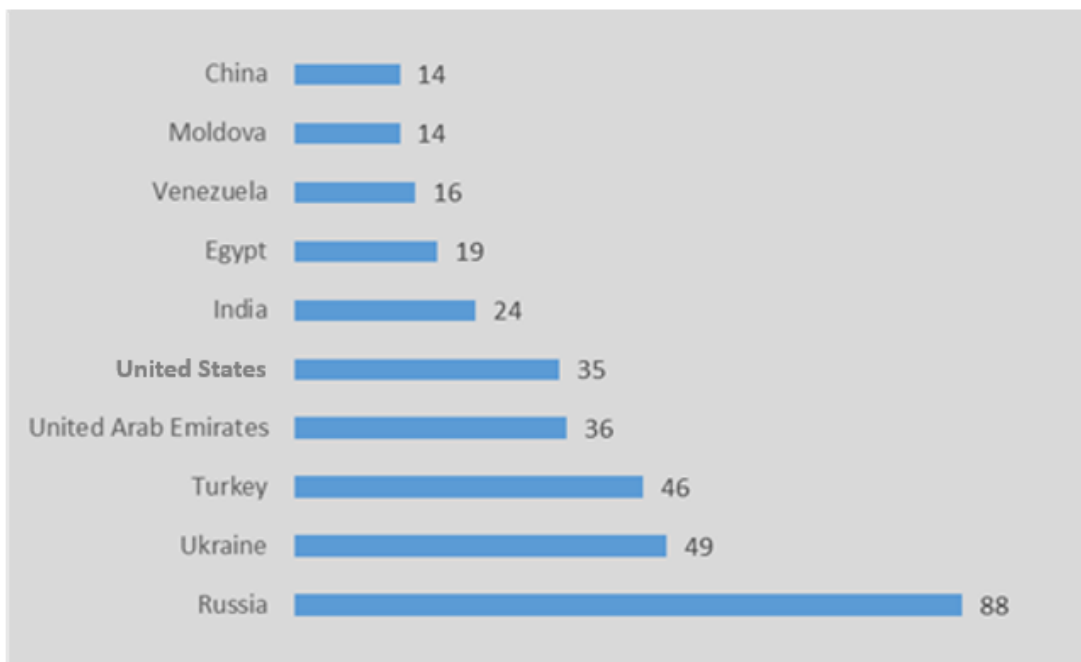
(a) Nature of requests



(b) Profiles of requests



(c) The 10 main sources of data concerning applicants



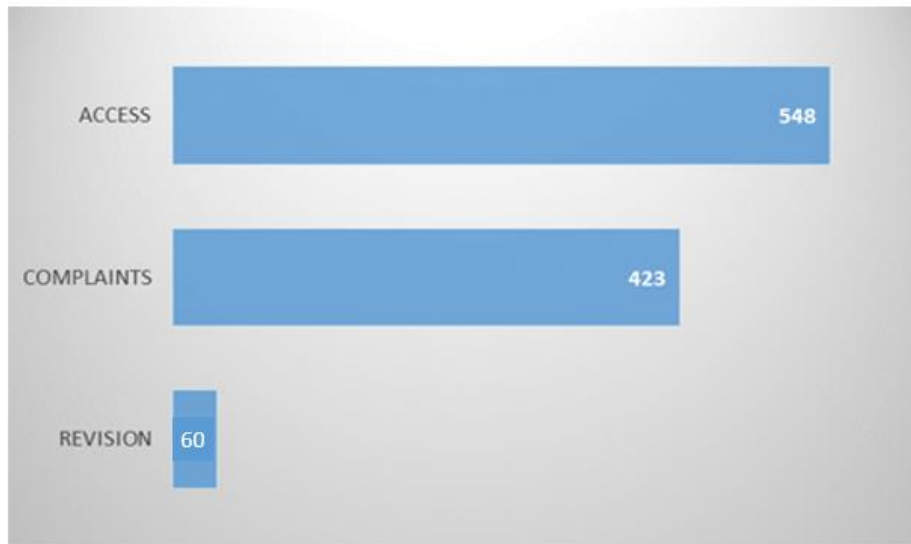
- Remark: While these figures indicate the main sources of data concerning the new requests received in 2017, they do not necessarily reflect the conclusions of the Commission on the compliance or otherwise of the data processed in INTERPOL's files from these countries.

### III. The Commission's conclusions in 2017

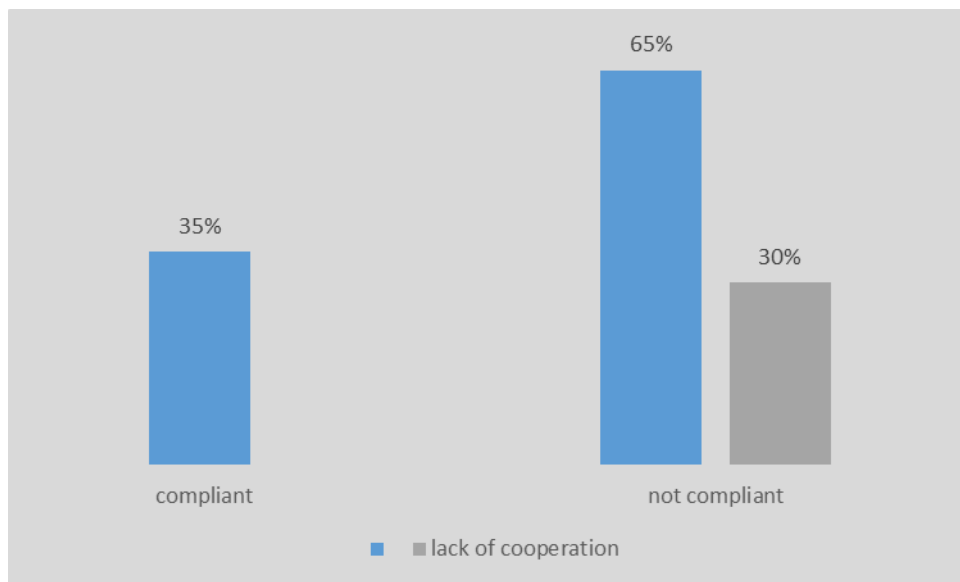
- The conclusions reached by the Commission on compliance of data with the applicable rules apply to requests received in 2017 or earlier.

#### (a) Number of requests completed

- The Commission completed the processing of 1,058 requests in 2017.<sup>1</sup>



#### (b) Conclusions of the Commission on complaints



#### (c) Average timeframe

- In 2017, the average timeframe for processing a request was six months.

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<sup>1</sup> The other completed requests were either preemptive requests or requests out of the Commission's scope of action.