

Review of the 2024 CCF Activity Report (published December 2025)

The Commission for the Control of INTERPOL's Files just published its activity report for the year 2024 - summed up as follows:

◆ Key Statistics

-  **2,586 new admissible requests** received — the highest ever
-  **2,717 requests closed** — also a record (+21% vs. 2023)
-  **40% compliance rate** for deletion requests decided by the CCF
-  **70% of access requests** took over 4 months
-  **30% of deletion requests** exceeded 9 months

◆ Major Achievements

- Review of key INTERPOL projects, including the EU cooperation agreement
- Spot checks on data-processing compliance
- Publication of anonymized decisions to enhance transparency
- Launch of online training modules for National Central Bureaus (NCBs)
- Development of informational videos for applicants

◆ Key Challenges

- Processing delays driven by a sharp increase in workload
- Ongoing resource constraints at both the CCF and the General Secretariat
- Growing complexity of multi-country cases
- Instances of suspected misuse or misconduct in the CCF process
- Reports of reprisals against applicants or their representatives

◆ Major Development

 November 2024 marked a turning point, with the General Assembly approving:

- Additional staff for the CCF Secretariat
- More paid working days for CCF members
- Development of dedicated IT tools

◆ Looking Ahead

The focus remains on:

- Reducing processing delays
- Engaging in a CPD review of the CCF Statute
- Addressing misuse of the CCF process
- Preserving independence and effectiveness as a global remedy mechanism

💡 **Concerning issues from a practitioner's point of view:**

◆ **A majority of uncompliant published data**

40% of data compliant with INTERPOL's rules means 60% were found not compliant.

Put in perspective, we're talking about people flagging in the INTERPOL's Information System everytime they're controlled by the police, with a risk of arrest, detention, and extradition, often to countries where fundamental rights are not respected, for those concerned by a red notice/diffusion.

In other words, the CCF recognised that 60% of individuals who applied for deletion of data concerning them had been wrongly restricted or deprived from their freedom of movement. Keeping in mind that deletion processes before the CCF (from the moment the client hires an attorney to the CCF issuing its decision) usually take around a year, a year and half - sometimes more, numbers amounting to a dozen of years (like it was the case of our client Paul Watson for example, to mention a public case, but not an isolated occurrence). And this is only for people who actually applied for deletion of data - a lot don't, due to lack of resources.

◆ **Prolonged delays**

70% of access requests took more than 4 months, and 30% of deletion requests more than 9 months. Interestingly, the CCF did not indicate how much longer. The firm has cases in which we've waited for a decision on a deletion request for an entire year.

These delays mean that persons against who uncompliant data is registered remains for that much time, effectively preventing them from travelling and putting them at risk of being unduly arrested, with all detrimental consequences on their lives (on their family, their job...).

From our experience, this has not improved in 2025, on the contrary.

◆ **Lack of transparency**

The CCF has put as one of its major achievements the increase of publication of decisions. It published 5 decisions in 2024 (same number in 2025). This hardly characterizes transparency, when almost 3000 decisions were delivered that year, for a total of 0,2% of decisions published.

The lack of publication of CCF decisions is a major issue for legal practitioners, who rely on them to know what standards are applied by the body examining their requests for deletion and to which they must refer and base their legal reasoning.

➡ **Overall:** although the increase of applications filed is an indicator that the CCF is an accessible remedy when data is published concerning a person in the INTERPOL's Information System, the other statistics are concerning as to its efficiency as a redress mechanism.

This is especially problematic, as INTERPOL systematically refuses granting other forms of compensation than the deletion of the data to applicants who have been wrongfully targeted by notices/diffusions, despite grave and prolonged consequences on their daily lives.