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**GPA**

Global Privacy Assembly

# Compendium of GPA Working Group Report Executive Summaries and Forward Looking Plans

GPA Closed Session 2022

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# Global Frameworks and Standards Working Group

## Executive Summary

The Global Frameworks and Standards Working Group (GFSWG, formerly the Policy Strategy Working Group Workstream 1) has made good progress in 2021-22 in contributing towards the delivery of the GPA's strategic priorities and plan.

Building on our comprehensive analysis of global privacy and data protection frameworks from 2020, and our supplementary pieces of work on cross border transfers and data protection terms and their meanings in 2021, we have continued to develop our work on cross border transfers, have now completed our work on data protection terms and have started a new piece of work to articulate the GPA's view of high data protection and privacy standards.

### **High standards of data protection and privacy**

In 2021-22, the GFSWG has started work on an allocated action from the GPA's Strategic Plan 2021-23<sup>1</sup> to work towards a resolution or policy statement to articulate the GPA's view of high data protection and privacy standards. This goes to the core of the GPA's work, as the setting out of a common view on high standards will support regulatory cooperation, as well as promote high standards globally. The GFSWG has carried out foundational work on this item in 2021-22, and we aim to submit a resolution or policy statement on high standards in 2023.

### **Cross border transfers and mechanisms**

In line with GPA priorities, the GFSWG recognises the importance of protecting personal data wherever it flows as the global digital economy continues to develop, and we continue to work on this topic to support the secure and smooth flow of personal data across borders. In 2021-22, the GFSWG has continued to build on work relating to cross border transfers, to assist authorities and stakeholders better understand available mechanisms and current issues. We have completed a literature review and report, are currently working on more detailed analyses and comparisons of transfer mechanisms and will continue this into 2023. We are also considering developing a repository of helpful documents in 2023.

### **Data protection terms and their meanings**

The GFSWG has worked over the past two years to analyse and understand what is meant by core data protection and privacy terms, and to develop shared meanings. In 2021-22 we have added to our existing list of core terms with a list of data protection principles and their meanings and have collated the shared meanings of both core terms and principles into a glossary to publish on the GPA website. This work is now completed.

### **Stakeholder engagement**

The GFSWG has engaged with other GPA member authorities, the GPA Reference Panel and other organisations such as the OECD in our work this year. We will continue to map and identify other stakeholders to engage with to enhance our work, and to promote it, as needed in 2023.

At this half way point in the current GPA Strategic Plan 2021-23, the GFSWG submits this annual report, and other outputs from the above work items in annexes, for adoption by the Closed Session.

## Forward looking plan 2021-2022: GFSWG

The current GPA Strategic Plan 2021-23<sup>5</sup> notes the need for mechanisms to ensure that personal data is protected wherever it is processed and flows, the importance of promoting high standards of data protection and privacy, and the role the GPA can play in doing this.

As per the Plan, in 2022-23 the GFSWG will continue work on the following items:

- **Work towards a resolution or policy statement to articulate the GPA's view of high data protection and privacy standards.**

This will involve finalising and circulating the GPA member survey for their views of high data protection and privacy standards. Work will then focus on developing and engaging with members on the draft resolution or policy statement to be submitted in 2023.

- **Continue work on cross border transfer mechanisms**

This will involve aiding understanding of current and emerging mechanisms, by carrying out further comparative work on various types of mechanism. GFSWG will also consider collating a repository of helpful documents to assist understanding of transfer mechanisms and related issues. Finally, we will continue to monitor developments of new mechanisms and frameworks.

- **Develop formalised relationships with other fora undertaking similar work, taking into account work done by SDSC on stakeholder engagement where appropriate.**

In the context of our work items above, we will renew efforts to map and engage with stakeholders outside the GPA, especially those undertaking similar work.

## Conclusion

In 2021-22, the GFSWG has made good progress against our work plan and actions allocated to us by the GPA Strategic Plan 2021-23. We have:

- Started foundational work in preparation for submitting a GPA resolution or policy statement to articulate the GPA's view of high data protection and privacy standards;
- Carried out further work on cross border transfers and mechanisms, and have completed a literature review and report.
- Delivered the second and final phase of work on data protection terms, delivering a list of shared meanings of terms relating to data protection principles, and a glossary to put the first and second-phase lists of terms and their meanings together for publication on the GPS website.

As global frameworks and standards continues to be a crucial element of the GPA's work towards a global regulatory environment with clear and consistently high standards of data protection, we look forward to continuing to progress in 2022-23.

The chair would like to thank the members of the Working Group, and in particular those who have worked within the sub groups, for their contributions this year.

# Digital Economy Working Group (DEWG)

## Executive Summary

The digital economy is, today, a vector of growth, productivity and competitiveness of companies and countries. Its transversal character impacts all sectors of the economy, it is also at the origin of new innovative sectors and has made others dependent on it.

The establishment of the DEWG (Digital Economy Working Group) results from the [2019 Resolution on the Conference's Strategic Direction](#). Its past activities include:

1. [The activity report of 2020](#) which also includes a background paper developed to explain how data protection and privacy regulation provides safeguards for the public and supports trust in the digital economy. This report also provided some examples which might also be relevant to the topic of surveillance in the context of the digital economy, such as consumer wearables, virtual assistants and micro-targeting;
2. [The activity report of 2021](#) which summarises the main engagement activities that were undertaken, using the background paper as a basis for the engagement.

Following its appointment to chair the Working Group on March 30<sup>th</sup>, 2022, Mr. President Seghrouchni of the CNDP of Morocco has held a scoping meeting on May 19<sup>th</sup>, 2022 with Mr. Brendan Van Alsenoy, former Chair of the DEWG, in order to review the latest work of the group, provide an overview of current tasks, draw up a list of members, discuss relevant stakeholders and provide any other information that the CNDP may need to conduct its first meeting as Chair of the DEWG

This Working Group has not met since May 2021. The CNDP of Morocco has tried to revitalize this group by organizing a meeting, but to no avail since it had some difficulties to reach all the members.

For this reason, we have proposed to hold the first meeting of the DEWG since the appointment of the CNDP alongside the GPA's Annual meeting, in Istanbul.

Furthermore, the following pages outline the core elements of the DEWG, namely its mandate, objectives, key issues to be covered and its members.

## Forward looking plan 2021-2022: DEWG

As stated in the report of July 2021, the Digital Economy Working Group intends to focus on surveillance technologies, as outlined in the GPA strategic plan for 2021-2023.

In particular, the Working Group intends to identify and consider topics of focus relating to surveillance of citizens and consumers in the digital economy, such as advertising technologies, web scraping, smart cities and connected vehicles, and monitoring of mobile workers.

As part of its new mandate, the Working Group will also consider emerging technologies relating to this area of work and any potential privacy or data protection concerns.

Finally, the Working Group aims to deepen engagement with existing stakeholders by actively seeking new activities for more significant impact, voice and influence, in coordination with the Strategic Direction Sub-Committee.

## Data Protection and Other Rights Freedoms Working Group (DPORFWG)

### Executive Summary

The work of the Data Protection and Other Rights and Freedoms Working Group (DPORF) first began following the Global Privacy Assembly's (GPA) 41st Annual Conference in 2019, where the [Resolution on privacy as a fundamental human right and precondition for exercising other fundamental rights](#) was adopted. That resolution committed our group and its members to "developing a narrative to highlight the integral relationship of data protection to other rights and freedoms" in 2020-21. Our research of that report, consultation and writing culminated in the publication and adoption of the [narrative](#) at the 2021 GPA conference.

Additionally, at that same event, GPA members adopted the [Resolution on the Conference's Strategic Direction](#) which introduced our Strategic Plan for 2021-23, and set out new roles and responsibilities for the Working Groups. As a result, the DPORF was charged with promoting the narrative and its recommendations on behalf of the GPA. In particular, we recommended strengthened protection of privacy rights at the domestic level, as well as further investment and development of existing international data protection instruments.

In the first year of our renewed mandate, the DPORF has developed promotional materials (based on the narrative) and begun identifying outreach events at which to promote our report. We have also developed presentation materials, infographics, briefings and video content based upon the narrative. In terms of specific projects to date this past year:

- The working group has also engaged in several promotional events. In April, we presented the narrative report at the Venice Privacy Symposium and gave a presentation at [RightsCon](#) in June. In November, we will be presenting to the Council of Europe Consultative Committee of the Convention for the Protection of Individuals With Regard to the Automatic Processing of Personal Data (T-PD).
- Presentation materials and infographics are being shared with all DPORF Members for their own promotional purposes and will be made available to GPA members soon.
- Beyond this, the DPORF has also continued to develop a pilot project for a Privacy and Human Rights Award, which will recognize outstanding public work done at the intersection of protecting both privacy and other fundamental human rights. This award will build upon the GPA's voice and influence, by working with other global rights organizations and their networks.
- The award's concept note has been finalized and will be presented to the GPA Executive Committee to seek their views and approval.

## Forward looking plan 2021-2022: DPORFWG

In 2022-2023, the DPORF will continue to focus on opportunities for outreach and propagation of the narrative report. Additionally, following the adoption of the GPA's Privacy and Human Rights Award, the working group will work with Access Now to establish the award selection committee. The DPORF will also focus its efforts on completing its parallel actions.

## Conclusion

The DPORF Working Group recognizes the significance of the right to privacy and is committed to promoting this right internationally. We look forward to continuing our work on this important issue in 2023. We would also like to thank all working group members for providing vital feedback, time, and efforts in order to finalize our Privacy and Human Rights Award Concept Note as well as the DPORF's two-year work plan.

# International Enforcement Working Group (IEWG)

## Executive Summary

The International Enforcement Cooperation Working Group (IEWG) is pleased to present this report to the Global Privacy Assembly (GPA) on its activity, progress, and successes between July 2021 and June 2022.

Heading towards its third year in operation as a permanent Working Group of the GPA, the IEWG is co-chaired by the Office of the Privacy Commissioner of Canada, the Superintendence of Industry and Commerce of Colombia, the Norwegian Authority for data protection and the Office of the Privacy Commissioner of Hong Kong. It has increased its membership considerably since the GPA's virtual conference in 2021, with a total of 36 members and observers.

The IEWG's work continues to be integral to the GPA, particularly in advancing its objectives to promote and support enforcement cooperation in Pillar 2 of the Policy Strategy in the GPA Strategic Plan. To that end, the IEWG co-chairs are pleased to report that due to the interest of diversifying the contributions and members of the group, since the year 2021 the co-chairs are representatives from Europe, North America, Asia and Latin America. The new co-chairs are keen to continue to focus on practical activities which has been reflected in the publication of guidelines and manuals to materialize the cooperation; and in tools that highlight the importance of enforcement cooperation in different regions of the world.

The combination of tangible products has been the group's strength, such as the publication of the updated Enforcement Cooperation Handbook, the Closed Enforcement Sessions, Ad-hoc sub-working groups that focuses on hot topics of mutual interest such as Data Scrapping, Credential Stuffing, AdTech and FRT.

Moving forward, and in line with the strategic priorities of the GPA over the next year, the IEWG aims to maintain the momentum of its work, while also broadening its scope with a particular focus on capacity building activities; more inclusiveness of regional and linguistic authorities by facilitating the use of French and Spanish ; and exploring collaboration and coordination opportunities, with other GPA's working groups and other networks such as: Global Privacy Enforcement Network (GPEN), Asia Pacific Privacy Authorities (APPA), IberoAmerican Data Protection Network (RIPD) and the Organization for Economic Cooperation and Development (OECD).

## Forward looking plan 2021-2022: IEWG

During the second semester of 2022 and in 2023 the co-chairs and the secretariat of the IEWG look forward to work and strengthen the ongoing projects, such as:

- Capacity building workshops (with our members and with other regional networks).
- Display the map in different scenarios so that it can begin to fulfil its role as a source of information for the community.
- Continuing the four lines of work of the AdTech SubGroup.
- Finalize follow-up actions on the data scraping and smart glasses closed enforcement sessions and on the FRT resolution.
- Identify the important and urgent topics for our closed enforcement sessions.
- Help our members to better understand and use our recently updated Cooperation Handbook, and add further case studies.
- Maintain and promote the enforcement cooperation repository.
- Develop cooperation and coordination with other networks in the privacy realm or other areas whose activities are complementary to or/and overlapping with IEWG's activities.



## Conclusion

The IEWG has managed to maintain its Closed Enforcement Sessions initiative and has demonstrated its importance by convening various authorities around the world to address different issues.

Thanks to the efforts of the former secretariat and the co-chairs together with the commitment of all the members of the group, it has been possible to materialise in this last period the ideas and initiatives that have been shaped more than a year ago, such as: the guidelines on Credential Stuffing, the Resolution on FRT, the publication of the Updated Enforcement Cooperation Handbook and the launch of the new initiative regarding the Transnational Map, among others.

We are aware that achievements will always lead to new challenges within the same group. One of our main objectives is the diversification of the group and we strongly believe that this starts with the sharing of material and sessions in various languages, as well as encouraging regional efforts and networks that would help to reinforce cooperation through shared experiences and similarities.

Looking ahead, the four co-chairs will maintain their position until 2023, as will the secretariat. During this period, it is expected that more authorities will join this committed and promising group.

# Data Protection in Ethics and AI Working Group

## Executive Summary

In early 2021, the AI Working Group (the Group) agreed on its objectives for the year and organised itself in teams of rapporteurs and co-rapporteurs for the implementation of its work packages.

Among the work projects and deliverables of the Working Group, we are pleased to present a quick summary of the key outputs of the Group:

- **A repository of AI related documents accessible by all GPA Members and Observers:** this is regularly updated with new documents, and all members and observers of the GPA are invited to inform the Group's Secretariat at the EDPS with information of new documents to be added to the repository.
- **Preparation of an analysis of the risk to data protection, especially data minimisation, as brought about by the demands to maximise personal data collection on the grounds of 'eliminating' bias and discrimination:** the work on this item will be presented in the 2022 GPA annual meeting. The aim of the analysis is to also cover other relevant risks considered in the Declaration on Ethics and Data Protection in Artificial Intelligence, in particular risks for the whole society, giving basic indications for managing these risks with reference to the various stakeholders involved. The inclusion of the risks to sustainability and inequality at global level will also be evaluated. The WG will present the document for adoption at the Closed Session of the 2022 GPA.
- **A survey on authorities' capacity and expertise in addressing ethical and data protection issues in AI systems applications:** As part of its work programme 2019-2021, the GPA AIWG undertook to conduct a survey on members' capacity and expertise in addressing ethical and data protection issues in AI systems applications. This survey constituted a first step in order to pursue the working group work in the future on capacity and expertise in the field of AI, supporting the development of a gap analysis and relevant recommendations in order to improve knowledge sharing and capacity building within the GPA in this field. A preliminary analysis of the survey will be presented at the Closed Session of the 2022 GPA.
- **Use of AI in the employment context:** As part of its Work Programme, the GPA AIWG will prepare a high-level report on how data protection may intersect with employment in general and with employers monitoring in particular. A survey has been conducted and preliminary results will be presented at the Closed Session of the 2022 GPA.
- **IEWG-AIWG FRT sub-group:** The GPA in 2020 adopted a resolution to follow up on its FRT declaration. The resolution tasked the IEWG and AIWG with developing a set of principles and expectations for the use of personal data in FRT. With coordination from the IEWG Secretariat, an IEWG-AIWG FRT sub-group was established in late 2020 to progress work mandated by the resolution. The sub-group comprises the EDPS, the FDPIC (Switzerland), the ICO (United Kingdom), the Japan Personal Information Protection Commission, the OAIC (Australia), and the OPC (Canada). A set of FRT principles and draft Resolution will be presented and adopted at the Closed Session of the 2022 GPA.

Additional information on the work and deliverables of the Group will be presented in more detail in the report. In general, the identified priorities appear still valid. The next work phase of the Group will on the one hand be characterized by the monitoring of concrete legislative initiatives by some national, regional and international entities, and on the other by the need to take account of long term challenges to human rights, such as environmental developments and global inequality.

## Forward looking plan 2021-2022: Data Protection in Ethics and AI WG

The challenges of the pandemic have made some of the issues, which are already addressed in the founding Declaration and in the Work Programme, more visible. They have highlighted some of the ethical questions. The potential conflicts or interferences between various individual rights, or between individual freedoms and societal needs, require a thorough analysis at general level. GPA members should consider what guidance they might be able to provide to organisations and individuals faced with such difficult decisions in concrete situations related to the development of AI and its ethical and data protection aspects. The work packages on the relationship between ethics, human rights and data protection and on the capacity and expertise of data protection and privacy authorities in addressing ethical and data protection issues in cases of application of AI systems will allow to look deeper into this context.

The continuous extension of the repositories on documents and on cases will allow a stocktaking exercise to inform the GPA membership community in 2022 about any new developments in AI that may be relevant for its future work. The Group will work with the Executive Committee to determine whether selected information from the repositories may become accessible to the public, and what an appropriate format could be.

As part of its upcoming activities, and in line with the GPA's strategic direction 2021-2023 the Group will also continue, in the year to come, further reflection on how data protection and privacy are essential to sustainable digital growth and AI innovation.

In the light of the GPA's Strategic Direction 2021 - 2023, the Group will conclude the discussion about the challenges on which it had postponed a decision.

The Group will further aim to make suggestions to the GPA on a way forward in addressing the future development of AI technologies and their use, considering their impact on data protection and privacy rights.

Lastly, the Group will continue its cooperation with the IECWG on the FRT activities; it will also explore further opportunities in terms of outreach towards external stakeholders.

## Conclusion

The rollout of systems using technologies from the domain of Artificial Intelligence has illustrated the need for a strategic approach to the challenges for data protection and privacy as human rights.

The occurrence of the COVID-19 pandemic has accentuated even more the urgency to address complex challenges with a longer-term perspective.

The common work on these matters demonstrates that the Global Privacy Assembly has the unique potential to contribute to the determination of global strategies to address global problems.

## Digital Education Working Group (DEWG)

### Executive Summary

The Global Privacy Assembly of data protection authorities gathered in October 2021 in Mexico for their 43rd Closed Session unanimously adopted a key resolution on children's digital rights submitted by the French CNIL and the Italian Garante, and co-sponsored in a pro-active way by other DPAs worldwide.

This resolution is in line with national and international initiatives completed in 2021 which highlighted a real growing concern about digital practices of young people [see the 2020-2021 Activity report]. The DEWG is actively monitoring and participating in international organisations and working groups promoting the implementation of codes of conduct and instruments for children, parents, educators and developers of digital services.

Since the issue of children's rights online was made a priority in the 2021-2023 GPA Strategic Plan, all working groups were asked to take it into consideration in their action plans.

The DEWG's work has made it possible for several of their members to be part of international events<sup>1</sup> over the past year so as **to maximise the GPA voice** to OECD, UNICEF or UNESCO organisations and to the Network of African Data Protection Authorities (NADPA/RAPDP). These contacts have made it possible to initiate new collaborations that strengthen the expertise and know-how of the working group. These could result in a greater capacity to engage with governmental actors and digital service providers to take technical and awareness-raising measures to protect children in the digital environment.

The implementation of the Resolution on the rights of the child in the digital environment, in accordance with the Action Plan 2021-2022, encompassed three priority areas:

- Strengthen education in the digital environment for children in a way that is appropriate to their maturity, by developing specific digital resources;
- Undertake support initiatives to facilitate information on the exercise of children's digital rights and their legal parents/ guardians in an appropriate manner that respects privacy and best interests of the child;
- Assess the need of educators to benefit for support in their awareness-raising and training activities on data protection and responsible digital use.

In this context, it is worth noting that there has been a very strong **pooling of new educational resources and good practices** designed to support education on data protection and digital rights. In this respect, the CIRCABC online platform of resources has recorded the downloading of almost 150 new links and innovative educational tools, bringing the total number of resources shared between member authorities in various languages on these themes to over 350.

In this respect, the CIRCABC online library received almost 150 new links and innovative educational tools, bringing the total number of resources on these topics shared between member authorities in various languages to over 350.

In conjunction with this, the DEWG circulated an overview of a sample of websites hosted by 24 DPAs and 23 Ombudspersons for children of the European Network (ENOC), which highlighted relevant tools

to capture the attention of children and young people and to guide them in the exercise of their digital rights.

In the end, this inventory aims to support and strengthen the action of data protection authorities in the effective implementation of assistance, redress or request mechanisms to DPAs that proved to more accessible to children and/or their legal representatives *[see Action 1.1 of the sub-group in charge of this action, composed of the CNIL (the leader) and two co-leaders, namely the SIC, Colombia and the CNPD, Morocco]*.

In addition, a qualitative survey project is being prepared on the key role of teachers/ educators in raising awareness on data protection for their students and their respective training. This survey aims to interview teachers of all grade levels about:

- Their perception of their knowledge of and interest in data protection issues, and about their students' awareness of responsible and civic-minded digital use during class
- Their expectations to better address these issues.

This topic will be further developed, subject to the agreement of the DPA members resulting from the 44th conference, which will recommend to adhere to this project and to make it a national strategic priority *[see Action 2.1 of the sub-group in charge of this action, composed of the CNIL, the lead and three co-leaders namely the CNPD, Morocco, the CNPDCP, Gabon and the UODO, Poland]*.

Finally, the work of evaluating online parental control devices on the market required consultation with other public actors. This objective to promote guidance for parents, children and operators and recommend a list of devices that respect the best interests of children and their privacy could not be undertaken this year by the DEWG.

Indeed, the experts of the lead DPA have been engaged on other related priority topics, in particular the methods of age verification online. This issue, which remains complex, will have an impact on the analysis to be made of parental control devices.

## Forward looking plan 2021-2022: DEWG

In 2022-2023, the DEWG plans to pursue the objectives of implementing and accompanying the resolution on children's digital rights in accordance with the 2021-2023 GPA Strategic Plan. This action plan has two main objectives: **On the one hand, to strengthen the exchange of experiences between data protection authorities in the field of awareness-raising activities among children and the public audience and on the other hand, to encourage collaboration with international bodies and actors.** In this way, these initiatives can be promoted on a large scale to all relevant public and private stakeholders.

To this end, the DEWG will focus on **four priority areas of action:**

### **Objective 1:**

Support and strengthen the action aiming at effectively implementing assistance, redress, request or complaints mechanisms by competent data protection authorities that are made more accessible to children and/or their legal representatives about violation of their rights.

Description of the activities:

- *For example, provide children and families with a "toolbox", e.g. infographics, flyers, and other information or specialised websites to guide them in exercising their digital rights and addressing DPAs to report their outstanding requests*
- *The DEWG will monitor the pooling of such good practices provided by each country on the CIRCABC platform.*

### **Objective 2:**

Launch a survey with a questionnaire on a common basis on teachers' perception of the dimensions of digital citizenship and how they put into practice these specific topics in their data protection awareness-raising activities with their students, and on assessing their needs for improving their capacity to deal with these subjects.

Description of activities:

- *The DEWG's ready-to-use questionnaire is designed to survey teachers at all school levels*
- *The survey consists of a MCQ and some open-ended questions with a free field to collect a diversity of point of views and focus on national resources in each country (with the possibility for countries to translate the questionnaire into their national language)*
- *The survey will be conducted at national or regional levels as part of a DPA strategy for the coming year, involving education authorities or education partners*
- *The DEWG will collect the consolidated national/regional responses (in English or French) to produce an international report and communicate about results and lessons learned.*

### **Objective 3:**

Share challenges or awareness-raising communication actions with young people and the general public, **on a large scale, on the value of personal data**, which can produce measurable and quantifiable results in the following directions:

[1] TRANSPARENCY

[2] AWARENESS

[3] EDUCATION

Description of activities:

- *School competitions, charters for education in digital culture and citizenship, manifestos or public commitments, campaigns on digital parenting, etc.*

### **Objective 4:**

Publish guidance and other practical tools, and where appropriate, draft a letter on a common basis on behalf of DPA, for providers of online services used by children to improve **transparency** in accessible and child-friendly formats adapted to their age and maturity that respect their own rights to:

[1] Access to online services

[2] Make it easier to understand the terms and conditions of use of their personal data

[3] Access appropriate mechanisms in place to report any problems and exercise their rights to notify privacy breaches.

Moreover, the increased use of the CIRCABC platform of resources keeps on the interest in learning feedback from the visitors and the downloads experience on the platform. It will focus on the priorities aimed at updating the online library for the benefit of the GPA members who are current users and not yet users.

## Conclusion

I would like to congratulate the Data Protection Authorities who have made it a priority to protect the rights of minors and to teach children how to protect their personal data. The many initiatives identified and shared within our forum of DPAs this year provide further evidence of this.

Children remain vulnerable in the digital world because they are not always aware of the risks to which they are exposed. Every day, without being aware of it, they give personal data, even sometimes sensitive data to platforms, without measuring the potential consequences.

However, children are not yet able to understand the value of their data that is so coveted, and one of the levers is to equip them with knowledge and understanding of digital technology.

More broadly, this also means training their supervisors, teachers and parents in digital rights and responsibilities online.

One of the missions of our authorities is to ensure that educators benefit from data protection awareness and training. This particular effort is justified by the fact that raising young people's awareness about personal data protection is sometimes only one subject among others in education. However, it is crucial because today given their increasingly early and frequent use of a range of technologies, we are facing a societal challenge without any mediation among young people. A regular evaluation of teachers' needs will enable us to adapt our tools and initiatives to the issues at stake, which makes it a priority.

In conjunction with the development of tools and the implementation of strong educational policies, the legislation put in place to protect users, particularly young people, has to be implemented.

However, if the GDPR provides for the first time in European data protection legislation specific provisions applicable to minors, some of them need to be clarified in order to define their scope, and we remain involved in Europe and across the Atlantic with regard to the adoption of guidelines and other frameworks that would strengthen the obligations of the private sector.

Today, it is parents who address complaints to data protection authorities. Children do not exercise their rights on platforms very often, as in practice it is particularly difficult for them to exercise their rights because they do not have access to clear and appropriate information. This is why several DPAs are interested in improving the design of platforms, i.e. how to promote the information and rights of minors through appropriate design.

To this end, we must continue to work together on the key issue of transparency, which is essential for minors to be informed about the processing of their data and their rights. At a time when digital technology is accelerating, it is essential that minors are able to use accelerated procedures to delete their data from a database or social network on a simple request, as well as to get delisted from a search engine or to seek redress from our data protection authorities.

The work which is at the core of our DEWG's activities over the coming year is intended to disseminate on a broader scale messages and educational kits focusing on the protection of personal data, but also to further develop consultations with the industry in order to create a digital environment adapted to minors, in particular by developing technically operational tools.

This is the purpose of the action plan that I propose to develop, as you can see, through the launching of many large-scale initiatives based on a number of events at national or regional levels, in the media and in digital formats, where the content will be made up with the expertise of the GPA members.



# The Digital Citizen and Consumer Working Group (DCCWG)

## Executive Summary

In 2021 the Digital Citizen and Consumer Working Group (DCCWG) became a permanent working group of the Global Privacy Assembly (GPA). As the digital economy continues to blur and challenge traditional regulatory boundaries, the GPA recognised the importance of exploring the intersections of, and promoting regulatory cooperation between, the regulatory spheres of privacy, consumer protection and competition/anti-trust. The work of the DCCWG goes to the heart of Pillar #2 in the GPA's Strategic Plan: regulatory and enforcement cooperation.<sup>1</sup> As social and economic interactions increasingly take place in the digital environment, concerns about the use of, and access to, personal information by global digital platforms have emerged. The GPA recognises that data protection and privacy authorities cannot regulate alone, particularly where the regulated activities fall within the scope of intersecting regulatory regimes. The work of the DCCWG to identify, explore and develop links between regulatory spheres to advance cross-regulatory cooperation has never been more important in achieving the best possible outcomes for individuals.

In the past year, the DCCWG has continued to observe growing interest in cross-regulatory cooperation in panel discussions, workshops, conferences and other international forums. Regulators across the globe are grappling with data protection issues that overlap with competition, consumer protection and a range of other regulatory spheres that are yet to be explored. The role of the DCCWG in unravelling these issues, identifying opportunities for coordination and developing practical tools for cooperation will prepare and equip GPA members to approach regulatory counterparts with understanding and purpose.

The growing relevance of the DCCWG's work is reflected in the growth of our members. Over the past year our network of members and observers has grown to 20 agencies. The DCCWG is sought after for domestic and international speaking engagements that explore the value of cross-regulatory cooperation, providing an opportunity to promote awareness of intersection issues in various forums. This includes conferences, network meetings, professional association events and government presentations. The value of this sensitisation work in maximising the effectiveness of regulatory actions concerning the digital economy is reflected in the DCCWG's 2021–2022 workplan.

Looking ahead, the DCCWG is eager to build on the work it has done in 2022 to deliver our mandate under the 2021–2023 GPA Strategic Plan and foster 'a global regulatory environment of high standards of data protection and privacy'.

## Forward looking plan 2021-2022: DCCWG

In 2022–23 the DCCWG will continue to implement our workplan, with a particular focus on delivering the items set out in the 2021 – 2023 GPA Strategic Plan<sup>1</sup>.

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<sup>1</sup> Global Privacy Assembly, Strategic Plan 2021–2023, GPA, 2021, pp 15–16.

	Objective	Forward Plan Activities
1.	To explore, map and better understand the growing intersection of the regulatory spheres of privacy, consumer protection and competition.	<p>DCCWG Report analysing potential implications of M&amp;A on individuals' privacy.</p> <p>The DCCWG will continue to map and analyse cases whether there is overlap between privacy, consumer protection, competition or anti-trust.</p>
2.	To sensitise authorities across regulatory spheres to the intersection, such that a privacy authority recognises a competition issue when they see it, and vice versa.	<p>The DCCWG will continue to sensitise key external stakeholders to intersection issues, as an important ongoing activity, which contributes to the GPA's Strategic Priority of maximising the GPA's voice and influence.</p> <p>The DCCWG will reach out to relevant members of the Reference Panel to seek their input/perspectives on pursue opportunities in their spheres of influence. The DCCWG will also approach "sister" networks and explore the possibility of presenting to their members or hosting joint events.</p>
3.	Identify collaboration strategies and tools where they exist, and advocate for and recommend them where they do not.	<p>The DCCWG will continue to identify strategies and tools used for regulatory collaboration through surveying the GPA membership to understand their experience with successful regulatory collaboration. The DCCWG will use the results of the survey to produce successful case studies, identify regulatory strategies and tools that work, and advocate for new tools, strategies, and reforms to facilitate more cross-regulatory collaborations.</p>

4.	<p>Facilitating collaboration across all three regulatory spheres</p>	<p>The DCCWG will continue to develop strong relationships with other regulatory networks including holding an event or activity with counterpart networks such as ICN or ICPEN. This could take form of a cross-network joint even and/or workshop.</p> <p>The DCCWG will also summarise the key takeaways from communications with other regulatory networks, and the survey under Workstream 3 above, and add them to the GPA Enforcement Cooperation Handbook and/or Enforcement Cooperation Repository.</p>
5.	<p>Environmental scan of other regulatory areas of intersection with privacy</p> <p>As highlighted in the GPA's Strategic Plan, the DCCWG notes the importance of future cooperation with regulators from other sectors, especially where there may be overlapping or intersecting regulatory regimes. An environmental scan of any regulatory spheres (i.e. e-safety and telecom) intersecting with privacy and data laws would identify, and ordinarily assess other regulatory spheres according to risks, opportunities and potential impact on the digital society and economy.</p>	<p>The DCCWG will identify and assess other areas of regulatory intersection with privacy in the digital society and economy, beyond competition/ anti-trust and consumer protection. The DCCWG will explore how cross-regulatory collaboration can address the synergies and tensions between privacy and other regimes. For example, the working group is aware of the growing recognition of the interaction between online safety and children's privacy and will look to exploring the risks and opportunities posed by this intersection. The DCCWG will also conduct a survey of the GPA membership to understand members' experiences on emerging instances of intersections with privacy. The DCCWG will reach out to the Reference Panel to discuss their perspectives on novel intersections with privacy.</p> <p>A Report will be produced summarising the results of the above Environmental Scan.</p>

# Data Sharing Working Group (DSWG)

## Executive Summary

I am very pleased to present my first annual report on the activities of the GPA Data Sharing Working Group.

Following the adoption of the GPA Resolution on Data Sharing for the Public Good in Mexico, in October 2021, the GPA Secretariat has changed, as has the leadership of the former Covid-19 Working Group. I accepted the position of Chair in May 2022, with the first meeting of the new Data Sharing Working Group taking place in June 2022.

Much of the work of the Working Group thus far has been centred around building the group and ensuring a good global representation of Data Protection Authorities. Given the late constitution of the Working Group, progress on the objectives adopted in the Resolution has been limited. The subject of data sharing is vast, and as such it has been the priority of the Working Group to identify the main data sharing issues affecting each of the membership jurisdictions.

The Working Group resolved to meet every two weeks initially to ensure momentum is maintained and with the objective of focusing members' minds on the key issues. We also welcomed visiting speakers, Christian Reimsbach-Kanoutze from the OECD to lead the group through the OECD's recommendations arising from the OECD Council Report on Enhancing Access to and Sharing of Data, as well as Lori Baker from the Dubai International Finance Centre who spoke about her organisation's work in data sharing for the finance sector in Dubai.

At the time of writing, work is underway to create a survey for Working Group members, with the aim of identifying the key issues affecting Data Protection Authorities. Once the results of this survey have been assessed, the Working Group will undertake a workshop in September 2022 to set a programme of work for 2023.

In terms of the actions of the Working Group, the adopted resolution on the Assembly's Strategic Direction (2021-23) provides that the objective of the Data Sharing Working Group is to:

- *Deliver and promote a compendium of best practices on data sharing for the public good, for data protection and privacy authorities to use in conversations with governments and other stakeholders to demonstrate what good data sharing practice looks like, and to highlight key principles.*

This objective links to 3 strategic priorities of the GPA:

1. SP1 – Advancing global privacy in an age of accelerated digitalisation.
2. SP2 – Maximise the GPA's voice and influence.
3. SP3 – Capacity building for members.

## Forward looking plan 2021-2022: DSWG

The work of the DSWG will focus on the advancement of privacy protection worldwide, the promotion of high data protection standards as stated in the GPA [Resolution on the Assembly's Strategic Direction \(2021-23\)](#). It will also work towards maximising the GPA's voice and influence by strengthening relations with other international bodies and networks.

To this end, the DSWG intends to focus essentially on:

- Health data sharing for the public good;
- Identifying practical and pragmatic approaches and developing proactive responses on any emerging data protection and privacy concerns relative to the sharing of personal data;
- Developing a compendium of best practices on data sharing for the public good and updating the Covid-19 compendium of best practices, if members identify such a need;
- Capacity building of Data Protection Authorities in reference to data sharing approaches and practices.
- Maintaining and exploring possible synergies with other GPA Working Groups and external stakeholders;
- Continue to promote the work of the GPA and the DSWG by actively participating in various meetings, conferences, training sessions related to the objectives of the DSWG with external stakeholders in order to maintain and continue to explore possible synergies;

The action plan 2022-2023 will be discussed and adopted at the first DSWG meeting following the conference in November 2022.

# The Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management Working Group

## Executive Summary

In its second year of existence, the Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis management (WG AID) has focused its energy on adapting its action plan 2021-2022 in line with GPA's strategic priorities - specifically those relating to the advancement of privacy protection worldwide-, disseminating the questionnaire, updating the mapping and the strengthening of relations with other international bodies and networks that advance data protection and privacy issues.

In conformity with the objectives of the Resolution on the Role of Personal Data Protection in International Development Assistance, International Humanitarian Assistance and Crisis Management, the members of the WG AID have pursued the following general goals:

- to respond to the request for cooperation from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action;
- to develop an advocacy and engagement strategy with relevant stakeholders.

In order to achieve these two goals, the WG AID has pursued the following activities:

- Establish sustained contacts with the relevant actors, both at bilateral and multilateral levels and thus maximise the reach of the GPA's voice by strengthening the relations with the actors of international development aid;
- In collaboration with other relevant Working Groups of the GPA, produce documents and advocacy tools for better consideration of data protection and privacy in relevant activities;
- Promote and facilitate, for the recipient countries benefiting from these activities that do not have legislation on data protection and privacy, their integration into the global data protection and privacy community.

This has included various activities such as the updating of the mapping of international development assistance and international humanitarian assistance as well as the identification of the recipient countries benefiting from these activities that do not have legislation on data protection and privacy.

The WG AID focused its efforts on the questionnaire:

- First, the collection of email contacts from the various actors identified in the mapping, allowed the questionnaire and its cover letter to be sent to 72 relevant actors out of more than 100 identified;
- Secondly, several consultation phases took place: the first consultation phase took place from February to April 2022. A second phase was launched from April 21 to May 31 2022;
- Third, in a face-to-face meeting of a small number of the WG AID members in Paris in June 2022, the initial results were analysed. Several preliminary findings could be made:
  - A low response rate (16 responses, 8 of which were usable);
  - A flagrant lack of geographical homogeneity;
  - Only European and North American organizations responded.

As a result, the members of the WG AID decided to continue disseminating the questionnaire and to promote it during different meetings of the various personal data protection networks ([AFAPDP](#), [RIPD](#) and [CTN](#)) that are to be held in person this fall. These networks include representatives from continents that are under-represented among the respondents.

The WG AID has furthermore strengthened its presence with relevant actors at both the bilateral and multilateral levels and has thus maximized the reach of the GPA's voice by strengthening the relations with the actors of international development aid and humanitarian aid.

All these actions have been undertaken to contribute to building a global privacy community committed to high standards of protection for individuals, particularly for those who are beneficiaries of international development or humanitarian aid programmes and who are particularly vulnerable.

### Forward looking plan 2021-2022: AIDWG

The work of the WG AID will focus on the advancement of privacy protection worldwide, the promotion of high data protection standards as stated in the GPA strategic priorities 2019-2021 which have been reaffirmed in the [Resolution on the Assembly's Strategic Direction \(2021-23\)](#).

It will also works towards maximising the GPA's voice and influence by strengthening relations with other international bodies and networks.

To this end, the WG AID intends to focus essentially on:

- Collecting relevant contacts, in particular to gather responses from actors in the Africa, Asia and South America regions to continue the dissemination of the questionnaire (based on the mapping);
- Continue and refine the analysis of the responses to the questionnaire and the identification of pressing issues and promote the work of the GPA (e.g. promotion of the [Declaration on Ethics and Data Protection in AI](#));
- After a first contact with Dr. Ana Brian Nougères (UN Special Rapporteur on the right to privacy) in the margins of the Venice Symposium, try to organize a first meeting in Geneva;
- Based on the analysis of the responses to the questionnaire, the WG AID will refine its action plan and work program;
- Maintaining and exploring possible synergies with other WGs and external stakeholders;
- Continue to promote the work of the GPA and the WG AID by actively participating in various meetings, conferences, trainings related to the objectives of the WG AID with external stakeholders in order to maintain and continue to explore possible synergies;

Participation in various events is already planned for Fall 2022. E.g. panel at the AFAPDP annual conference; Symposium on Cybersecurity and Data Protection in Humanitarian Action in Luxembourg on October 12 2022; panel at the GPA open session; Protection Officer in Humanitarian Action certification course in Geneva in December 2022.

The action plan 2022-2023 will be discussed and adopted at the first WG AID meeting probably in January 2023.

## Conclusion

The WG AID is pleased with the growing interest in the WG AID activity. This is reflected in the number of invitations to participate in various events (conferences, workshops, etc.) at both national and international levels. He is confident that this will enable him to enrich his contacts and help to further disseminate the questionnaire in order to develop an awareness and engagement strategy with relevant stakeholders from 2023 onwards.

By continuing to pave the way to respond to the request for cooperation from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action, the WG AID is contributing to the implementation of the GPA's strategic priorities and policy.