



GPA Global Privacy and Data Protection Awards 2023

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org **no later than 9 June 2023**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Information Commissioner's Office
Person completing this form:	John Best
	<i>First name</i> <i>Last name</i>
Job title:	Senior Policy officer, Emerging Technology
Email address:	John.best@ico.org.uk

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2022.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

As an example of its commitment to proactive data protection output, the ICO's Biometrics Technologies twin Insight and Foresight reports support businesses and organisations at the development stage of novel biometrics products and services. They provide an understanding of what processing biometric data might encompass in the future, as well as insight for organisations to assess the public risks of using these technologies before implementation.

Please provide a full description of the initiative (no more than 350 words)

We see a growing set of technologies which collect information in ways that can lack transparency, and over which people often do not have meaningful control. The complexity of data ecosystems can similarly make it difficult for people to understand how their personal information is being processed. The ICO's newly created Foresight function is undertaking deep dive analysis into key technologies that may have significant impacts for privacy regulation, to ready the ICO to respond to these new challenges as they emerge. Our reports on biometrics were the first examples of this type of deep dive foresight research, and have generated significant attention in both the media and in the policy community.

The ICO's Biometric Technologies Insight Report explores potential definitions of biometrics both under the UK GDPR and data that are considered to be 'biometrics' by researchers and specialists (which may fall outside the scope of current UK data protection legislation) to better understand how we can critically consider applications of these emerging technologies. It looks at the wider global landscape of biometric processing and regulation, as well as its growth as a subject of study in academia.

The Biometric Technologies Foresight Report highlights sectors where biometric technology are likely to have a significant anticipated impact in the next five years, exploring those sectors through possible scenarios. These scenarios were developed through a process including a call for views, with the responses being analysed and refined through foresight techniques including red teaming, as well as review by experts. Crucially, it also addresses the issue of biometric processing for classificatory purposes, where data might not be initially used for identification, but instead to infer qualities about data subjects. Whilst this data is not necessarily recognised as 'biometric data' under the UK GDPR, it is still identified as 'biometric' by third parties.

b. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

The ICO's foresight programme is designed to enable the ICO to be a more effective and proactive regulator, supporting innovation. This initiative is one of the first outputs from that process, and demonstrates the ICO's commitment to empowering organisations and the public through information.

Looking beyond current legislation and technology deployments, this initiative marks an important inflection point in the processing of biometric data. The ICO's biometrics technology reports seek to arm organisations with the tools they need to begin future biometric processing in a manner compliant with current UK GDPR and best practice. Additionally, where novel technologies are unproven, but carry potentially high risk of harm, the report raises concerns around how those data should be used, particularly in processing which is automated.

The insight report details types, modalities and contexts of data which might and might not be considered biometric data under UK GDPR.

Considering possible futures, the foresight report projects the potential rewards and challenges of biometric processing through scenario-based foresight.

Approaching biometric data processing ahead of that processing taking place not only enables organisations to understand their obligations before implementation but gives other DPAs foundations for their own work in this area.

- c. Please include a photograph or image, if you wish** (*This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided*)

- d. Please provide the most relevant link on the authority's website to the initiative, if applicable** (*The website content does not need to be in English*)

[Biometrics technologies | ICO](#)

- e. Please provide any other relevant links that help explain the initiative or its impact or success** (*e.g. links to news reports or articles*):

Media coverage based on promotion and reception of the report:

[UK: Biometric technologies - An early warning and picture of the way forwards from the ICO | Insights | DataGuidance](#)
[Immature biometric technologies could be discriminating against people | DWF Group](#)
<https://www.theguardian.com/technology/2022/oct/25/information-commissioner-warns-firms-over-emotional-analysis-technologies>
[ICO Warns Against Biometric Emotion Analysis Tech | Silicon UK](#)

[UK watchdog warns against AI for emotional analysis, dubs 'immature' biometrics a bias risk | TechCrunchU.K. Watchdog Issues Warning Against Emotional Analysis Tech \(gizmodo.com\)](#)
[UK watchdog warns of emotion-analysis tech risks - BBC News](#)