



## GPA Global Privacy and Data Protection Awards 2024

### 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](mailto:secretariat@globalprivacyassembly.org) **no later than 17 June 2024**.

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 6.2<sup>1</sup> applies.

#### 1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Information Commissioner's Office (ICO)	
Person completing this form:	Sophia	Ignatidou
	<i>First name</i>	<i>Last name</i>
Job title:	Group Manager for AI Policy	
Email address:	sophia.ignatidou@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

<sup>1</sup> [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)

In January 2024, in response to rapid developments in generative AI, the UK ICO launched a unique consultation series on generative AI and how aspects of data protection law should apply to its developments and use.

This evidence-led initiative arose from the ICO's in-depth engagement with generative AI developers and users. The consultation series aims to promote high levels of accountability across the generative AI supply chain, address regulatory uncertainty and safeguard individuals' information rights and freedoms.

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

The ICO started engaging with key organisations developing and using generative AI in Spring 2023. This process, along with the exercise of our information gathering powers, led us to the conclusion that greater regulatory certainty was needed in how specific aspects of data protection law applied to generative AI development and use.

The following areas were identified as lacking regulatory certainty and became the focus of the consultation series:

- 1) The lawful basis for web scraping to train generative AI models
- 2) Purpose limitation in the generative AI lifecycle
- 3) Accuracy of training data and model outputs
- 4) Engineering individual rights into generative AI models
- 5) Allocation of accountability across the AI lifecycle and supply chain

Calls one to four have been published at the time of writing, while the fifth is due to be published in July 2024.

Additionally, we will convene three roundtables on issues raised by stakeholders through the calls for evidence with a) technology sector representatives b) creative industries representatives and c) civil society groups. These roundtables will ensure to ICO receives evidence and views from a diverse range of perspectives in shaping our policy positions on these critical issues. This engagement will also provide those stakeholders most affected by our regulatory approach with an opportunity to engage with us and challenge our thinking.

Following the conclusion of the consultation, the ICO is committed to publishing a summary report by the end of 2024 and incorporating final positions into the next iteration of our guidance on AI and data protection.

Our draft positions clearly signal to the market our regulatory expectations, and should help inform the thinking of our international counterparts in terms of generative AI regulation. More broadly, we hope this consultation series has moved the wider data protection and privacy community one step closer to regulatory certainty on the issue of generative AI compliance with data protection law.

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

This is an evidence-led initiative to promote accountability across the generative AI supply chain. It was born out of ICO's engagement with strategically important generative AI developers and users, which identified areas of regulatory uncertainty around how data protection law applies to this rapidly growing subset of AI.

Organisations cannot easily be held accountable when the regulatory expectations around how they should manage their data protection responsibilities are not clear enough. This is why we launched this series of consultations on our interim positions. By putting these generative AI positions in the public domain we signalled our expectations to the market but also demonstrated transparency around how and why we reached our policy positions.

This consultation ensured all relevant stakeholders have the opportunity to provide evidence and views, ensuring the ICO's policy positions are as robust as possible. The format of this consultation offers the opportunity to regulated entities to hold us accountable by challenging our thinking, and by providing regulatory certainty to the market, it will also enable us as regulators to hold generative AI developers and deployers to account.

- d. 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*)

- e. 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*)

[ICO consultation series on generative AI and data protection | ICO](#)

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

Press coverage:

- [ICO to examine legality of using personal data to train generative AI models | The Independent](#)
- [ICO to examine legality of using personal data to train generative AI models | Evening Standard](#)
- [ICO to examine legality of using personal data to train generative AI models | Hackney Gazette](#)
- [ICO to examine legality of using personal data to train generative AI models | Perspective Media](#)
- [ICO to examine legality of using personal data to train... | Daily Mail Online](#)
- [ICO Launches Consultation Series on Generative AI - Lexology](#)
- [ICO's Third Consultation on Generative AI: Accuracy of Training Data and Model Outputs - Bird & Bird \(twobirds.com\)](#)
- [ICO launches consultation series on generative AI and data protection | RPC](#)
- [ICO launches consultation on data protection law and generative AI - Tech Monitor](#)
- [ICO's generative AI guide underlines data-scraping compliance risks \(pinsentmasons.com\)](#)
- [ICO launches consultation series on generative AI | UKAuthority](#)
- [Stephen Almond \(ICO\) - Masters Of Privacy](#)

Number of submissions to call for evidence as of June 2024:

241 submissions to the series of the calls for evidence to date.