



GPA

Global Privacy Assembly

Strategic Direction Sub Committee (SDSC) Report – October 2024

AAIP Argentina Chair



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1. Introduction

During the 44th [Global Privacy Assembly \(GPA\)](#), which bring together more than 130 privacy authorities and experts from around the world, the Argentina [Public Information Access Agency \(AAIP\)](#) was honored to be elected to chair the Strategic Direction Sub Committee (SDSC).

With this mission, we held a [bilateral meeting](#) with the Australian Information Commissioner's Office (OAIC), Angelene Falk, whose term in charge of the Subcommittee ended in 2022, to achieve the handover of the presidency.

The purpose of this report is to give an account of the work carried out during these two years of Argentina's management at the head of SDSC, in which we had the opportunity to accompany the groups and design together the best strategy to address challenges and objectives.

We look forward to sharing the final report of the two years of mandate, thoughts on what it meant to lead the construction of the [GPA's 2023-2025 Strategic Plan](#) and its implementation during this last year.

2. Executive Summary

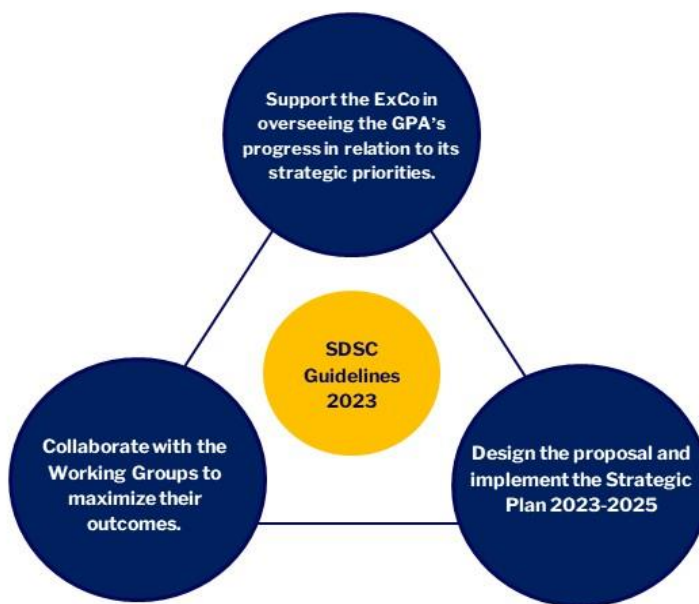
At the beginning of the management, **three guidelines** were set by SDSC for **2023**:

- a) Support the ExCo in overseeing the GPA's progress in relation to its strategic priorities.
- b) Collaborate with the Working Groups to maximize their outcomes.
- c) Design the proposal and implement the Strategic Plan 2023-2025.

The development of our strategy involved supporting and following up each of the Working Groups in implementing their plans. At first, our main goal was to have a more detailed knowledge of the groups' work agenda and identify future challenges and strategies. We therefore held a round of kick off meetings and analysis of all the reports that we requested from the Working Group on the status of compliance with the [Strategic Plan 2021-2023](#).

During 2023, we conducted rounds of working meetings under the Deep Dive methodology, bilateral meetings and a meeting during the Assembly in Bermuda with the chairs of the working groups.

This way of planning allowed us to have an orderly working methodology, in which we were able to identify certain points to correct, reinforce or reform. Through reports and meetings, we learned how the [2021-2023 Strategic Plan](#) was being implemented which gave this SDSC a new perspective to include some changes in the [2023-2025 Strategic Plan](#).



As regards the **guidelines** set by SDSC for **2024**:

- a) Support the Executive Committee in overseeing the GPA's progress in relation to its strategic priorities.
- b) Collaborate with the Working Groups to maximize their outcomes.
- c) Encourage activities for the implementation of the GPA resolutions.

During the last year of our tenure as SDSC president, we went from “designing the proposal for the 2023-2025 Strategic Plan” approved at the 45th GPA, to “promoting activities for the implementation of the GPA resolutions.”.

This change was introduced at the 45th GPA Assembly by Commissioner Beatriz Anchorena, Director of the AAIP, National Data Protection Authority of Argentina, when she highlighted the importance of produce activities for the implementation of GPA resolutions.

In 2024, the work strategy was the same as the previous year by holding meetings in a deep dive format, bilateral meetings and promoting a fluid communication with the WG chair and the Executive Committee.



3. SDSC in numbers - First year term (2022-2023)

During the first half of 2023, SDSC focused its efforts on understanding the status of each of the Working Groups. For that reason, the year began with the Annual Kick off meetings, the Progress Reports and the Deep Dives meetings were held in March. Finally, the Quarterly Stocktake Reports from January to March were sent by the Groups.

On the second semester of 2023, a consultation survey on the [2021-2023 Strategic Plan](#) were sent to the Working Groups. During July and August, we held new meetings and requested the Working Groups to produce the "annual reports". In September, and not mandatorily, we requested the Group to provide an "update report" before the 45th Global Privacy Assembly in Bermuda in October. Finally, the presentation of the reports for the period August-November was scheduled in November. In parallel, 5 other bilateral meetings were held for consultations and definitions of some issues that certain groups pointed out. During the 45th Assembly held in Bermuda, Beatriz de Anchorena as chair of SDSC, convened a working meeting with all chairs from the WGs where the working plan was discussed and the importance of having a fluid dialogue and promoting participation of GPA members in working groups was highlighted.

| Group Work Plan Reports | Kick off meetings | Quarterly Stocktake | Deep Dives | Bilateral Meetings | Annual Reports | Resolutions adopted |
|-------------------------|-------------------|---------------------|------------|--------------------|----------------|---------------------|
| 10 | 10 | 7 | 10 | 5 | 10 | 8 |

As SDSC presidents, we have always set ourselves the internal goal of maximizing the number of resolutions and reports to be submitted to synthesise the working done throughout the year. To this end, we endeavour to accompany the different Working Groups in the preparation of their reports, especially those that were unable to present them during the 44° Assembly. This allowed all groups to [present their annual reports at the 45° Bermuda Assembly](#).

Regarding the 2023 outcomes on the 45th Global Privacy Assembly, 8 (eight) resolutions were adopted, representing the highest number of the last 10 (ten) years of the Assembly. From the SDSC,

we appreciate having been able to conclude 2023 with such a significant production of resolutions, a fact that has not been repeated since 2013 in Poland with 7 (seven) resolutions adopted.

The resolutions adopted on the 45th Global Privacy Assembly were:

1. [Resolution Strategic Plan 2023-2025](#)
2. [Resolution on Artificial Intelligence and Employment](#)
3. [Resolution on health data and scientific research](#)
4. [Resolution on achieving global data protection standards: Principles to ensure high levels of data protection and privacy worldwide](#)
5. [Resolution on the Creation of a GPA Library](#)
6. [Resolution on Generative Artificial Intelligence Systems](#)
7. [Resolution establishing a working group on intersectional gender perspective in data protection](#)
8. [Resolution on Privacy and Human Rights Award](#)

4. SDSC in numbers - Second year term (2023-2024)

After the 45th GPA in Bermuda, the AAIP as chair of the SDSC analysed what the goals for the last year of the mandate were. To design those goals, we took into consideration the goals that had been defined for 2023, the completion of the [Strategic Plan 2021-2023](#), the needs of the WGs and the start of implementation of the [Strategic Plan 2023-2025](#). In this sense, the first two objectives of 2023 related to activities supporting the Executive Committee and coordination in the implementation of the strategic plan and collaboration with the WG to maximize results were maintained. Additionally, the new 2024 goal was defined as promoting activities for the implementation of GPA resolutions.

- a) Support the ExCo in overseeing the GPA's progress in relation to its strategic priorities.
- b) Collaborate with the Working Groups in order to maximize their outcomes.
- c) Encourage activities for the implementation of the GPA resolutions.

For the 2024 planning work, we took into account the contributions and comments received from the working groups. To achieve these goals, three guidelines were set to be considered.

- The generation of dialogue spaces for the implementation of GPA resolutions.
- Encourage members to participate in the WGs.
- Promote greater articulation between the WGs to avoid overlaps.



After the 45th Assembly, we asked the Working Groups to send us the Quarterly Stocktake of the period August-November 2023 to know the level of progress since the last report sent, their vision on the [Strategic Plan 2023-2025](#) and if there were outstanding actions or results of the previous Plan to be fulfilled. Regarding the 9 (nine) updates received, although most Groups agreed that most of the provisions in the [2021-2023 Strategic Plan](#) had been fulfilled, they stressed that certain actions should be further strengthened or completed in the coming months.

At the same time, Deep Dives meetings were held in 2024. We met with 11 (eleven) of the Working Groups, including the recently created Intersectional Gender Perspective in Data Protection, to learn their status regarding the completion of the previous and current Strategic Plan. Moreover, three (3) bilateral meetings were also held to discuss the status of activities undertaken in order to implement certain resolutions. At the end of this process, in accordance with the previous timetable, 11 (eleven) annual reports were received from the Working Groups on their activities during the past year.

| Quarterly Stocktake | Deep Dives | Bilateral Meetings | Annual Reports | Implementation Meetings | Draft Resolution for 46th GPA |
|---------------------|------------|--------------------|----------------|-------------------------|-------------------------------|
| 9 | 11 | 3 | 11 | 1 | 5 |

5. Strategic Plan 2023-2025

During the first year of her mandate, AAIP as president of the SDSC designed a proposal for the 2023-2025 Strategic Plan that was circulated to the GPA members and, taking into account their contributions, the resolution that was approved at the 45th GPA was presented.

In this process, as a first step, an opinion survey was sent to the Working Groups so that they could share their expectations and points of view, since we believe it is essential that the Strategic Plan reflects the needs and the Working Groups round map and outcomes.

The results highlight the consensus regarding the need to continue with the pillars contained in the [2021-2023 Strategic Plan](#), evolving and deepening efforts and approaches in relation to these key points. Likewise, the responses received point out the centrality of strengthening the implementation instances of the products of the working groups, as well as improving the capacities of articulation, cooperation and incidence of the GPA with other actors in the international agenda of Personal Data Protection.

The AAIP then formulated a first draft that was worked on with the remaining members of the SDSC and its result was presented to the Executive Committee. After that, the draft of the Strategic Plan resolution was circulated among all GPA members for their input and comments.



The [2023-2025 Strategic Plan](#) should give continuity to the 2021-2023 Plan; therefore, the strategic priorities of that Plan have been embodied into the Vision.

The overall strategy direction includes the “Vision”, which defines the strategic objectives of the plan and informs the results. This represents the strategy that guides the actions of the GPA and transcends biannual planning.

To operationalize the plan, the pillars from the 2021-2023 plan -Global Frameworks and Standards, Enforcement Cooperation, and Policy Focus Areas- are presented as objectives and the objectives as results. The trends in this Strategic Plan act as a bridge between the strategic direction and the operational plan, giving a contextual logic to the planning. Likewise, specific actions are proposed to facilitate their implementation.

The changes in the structure of the 2023-2025 plan promote a holistic view of the GPA, graphically reflecting the relationship between the strategic and operational levels and clarifying how trends act as a bridge between both.

In this way, the Plan seeks to facilitate and coordinate the work of the WGs in the direction of the strategic plan, while the specific actions allow for progress against the plan to be monitored.

Structure of Strategic Plan 2023-2025



The Vision seeks to consolidate the Global Privacy Assembly's leadership on personal data protection and privacy, **maximizing its voice and influence** across geographic and linguistic networks and **strengthening the enforcement capacities of authorities to move towards a higher level of global data protection and privacy** that ensures effective protection of data subjects.



The **strategic objectives** are goals framed for the period 2023-2025, together with the vision and results, that form part of the strategic orientation of the Plan. These objectives are:

1. High level of data protection in global frameworks

Promote influence and support the development of international frameworks and standards on data protection and privacy and their equitable application to ensure the protection of data subjects, especially those in vulnerable situations, such as children, women, migrants, and indigenous communities, among others.

2. Strategic Alliances and Impact

Consolidate the articulation and creation of strategic alliances between authorities and other networks and organizations to strengthen the impact and influence of the GPA in the field of Personal Data Protection and Privacy.

3. Capacity building for DPAs

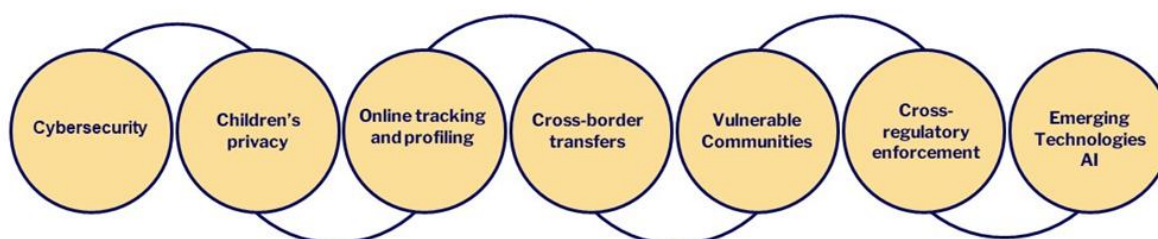
Promote actions for the exchange of experiences and good practices among data protection and privacy authorities that give rise to instruments and mechanisms that facilitate the enforcement of personal data protection and privacy policies.



The trends represent the most relevant topics for the members of the groups and the main challenges to be addressed. In this way, the trends are the bridge between the strategic orientation structured in the vision, objectives, and results and the operational part of the strategic plan composed of the WGs and their actions.

These issues are transversal to all working groups and are present in their actions, however the plan is focused on avoiding overlaps between the WGs.

Trends



The operational part of the plan defines the actions for each WG, taking into consideration their planning and results obtained in recent years.

Finally, the plan has provisions regarding its implementation. Developing a roadmap to follow up the implementation of the Strategic Plan allows the actions carried out by the different working groups to be evaluated in terms of the achievement of the objectives set out here.

To this end, the working groups, according to their respective scope of responsibilities (or terms of reference, where these have been developed) and expectations, will establish indicators that will allow them to monitor their actions to self-evaluate the progress of their work.

These indicators will be shared through reports, according to the schedule established by the Strategic Direction Sub-Committee (SDSC), which will have the task of systematizing this information.

The indicators are defined according to the following criteria:

- The level of coordination and engagement achieved with other international spaces or fora.
- The tools or instruments created for the implementation of public policies on privacy and data protection.
- The influence and impact of the GPA on the decisions of policymakers and lawmakers.
- GPA's participation in the creation and adoption of high standards and regulatory frameworks at the global level.
- GPA's contribution to the empowerment of data subjects in relation to the fundamental right to the protection of their personal data and privacy.

6. Implementation of the resolutions

The [Strategic Plan 2023-2025](#) is the instrument to achieve the vision & objectives. It guides the way between the concrete actions and the strategic direction, to consolidate the GPA's leadership, moving towards a higher level of global data protection and privacy that ensures effective protection of data subjects.

The GPA has an effective leadership on personal data protection and privacy, maximizing its voice and influence across geographic and linguistic networks and strengthening the enforcement capacities of authorities to move towards a higher level of global data protection and privacy that ensures effective protection of data subjects.

As SDSC Chair during the first year term, our main challenge was to encourage and accompany the Working Groups in the construction and development of products. We also had the aim of deeping the strategic politic direction of the GPA to generate new tools based on a clear vision and objectives. As a result of this year's work, we adopted 8 resolutions and in the second year of our mandate, we reviewed the public value generated by these 8 resolutions, promoting the generation of activities and products that implement these resolutions. As we anticipated, our methodology followed a similar structure to that of the first year, however what we observed implied changes in our action strategy.

To this end, we invite the main sponsors of the resolutions adopted at the 45th Global Privacy Assembly to a meeting on May 8, 2024, with the support of the National Institute for Transparency, Access to Information and Protection of Personal Data (INAI) of Mexico, the Presidency of the GPA and the Executive Committee, proposing the idea to the sponsoring authorities and learning about their implementation projections.

We believe these actions are key to be able to complement resolutions with actions transforming all these outputs into knowledge production, promote capacity building and maximize the voice of the GPA.



We share a summary of some of the actions that are already being implemented and those planned that were discussed at the meeting.

Resolution on Generative Artificial Intelligence Systems: Main Sponsor: *European Data Protection Supervisor (EDPS)*

○ **Actions:**

- Interim report to presenting the work conducted by the GPA AIWG members on generative AI systems.
- Survey to the members of the GPA for to know about the work they are conducting on generative AI systems, and notably how they implement the GPA resolution adopted in 2023

- **Resolution Establishing a working group on intersectional gender perspective in data protection:** Main Sponsor: *National Institute for Transparency, Access to Information, and Personal Data Protection (INAI), Mexico*
 - **Actions:**
 - The WG created by the Resolution has already been formed.
 - They have worked on a plan focused on 10 strategic points.
 - The chair is the National Institute for Transparency, Access to Information, and Personal Data Protection of Mexico, its Co-chair is the Data Protection Authority of Georgia and 11 other members, which totals 13 DPAs participating.

- **Resolution to Advance the GPA / Access Now Privacy and Human Rights Award Proposal** Main Sponsor: *Office of the Privacy Commissioner of Canada*
 - **Actions:**
 - Preparation of materials related to the award and the creation of a subcommittee that will be charged with evaluating nominations and determining the winner of the award.
 - The award will be presented at the RightsCon Summit in February 2025 taking place in South Korea.
 - The five-member subcommittee It has already been established, chaired by the OPC-Canada and include the South African Information Commissioner’s Office, the Georgia Data Protection Authority, a representative from Access Now, and Valeria Milanes – who sits on the GPA’s Reference Panel.

- **Resolution on the Creation of a GPA Library of Member Guidance and Interpretations of Key Principles of Data Protection and Privacy Law (“GPA Library”)** Main Sponsor: *Office of the Privacy Commissioner for Bermuda*
 - **The resolution involves**
 - Request that the GPA’s Executive Committee form a sub-committee or identify a willing GPA Working Group to deliver an exploratory document. That include an action plan and instructions for the appointed Secretariat or another body to develop and permanently maintain the GPA Library as a comparative reference tool and include a recommendation for steps take.

- Request that all GPA Working Groups consider in their work plans: how their mandate and work intersect with the goal of developing a shared GPA Library of guidance and interpretations.
- **Resolution on health data and scientific research** Main Sponsor: *Federal Commissioner for Data Protection and Freedom of Information (BfDI), Germany*
 - **The resolution involves**
 - Call upon all decision makers, stakeholders and parties, which are involved in collecting and processing health data of individuals for scientific purposes or in a research context, to embrace privacy by design as a key element within research project design and identify and implement appropriate requirements and safeguards and PETs continuously. Such implementation should be reassessed and adjusted accordingly, by regular audits and reviews about the suitability and effectivity.
 - Invite the GPA Data Sharing Working Group to further reflect on addressing the collection and processing of health data for scientific purposes or in a research context, while at the same time indicating the principles, rights and relevant safeguards to be applied in the context of sharing of data for the public good.
- **Resolution on Artificial Intelligence and Employment** Main Sponsors: *Information Commissioner's Office (ICO), Federal Commissioner for Data Protection and Freedom of Information (BfDI), Germany and Garante per la Protezione dei Dati Personali - GPDP, Italy*
 - **The resolution involves**
 - Diffusion of the resolution in various forums and institutions.
 - Elaboration of a survey for the members of the SFG.
 - Drafting of an article for the GPA newsletter.
 - Privacy Symposium speaking engagement (ICO AI Compliance team level) on AI, Gen AI developments across jurisdictions and regulatory actions to address this.
 - AI team deploys its knowledge gained from the AI and Employment resolution drafting process to their colleagues in innovation/ enterprise/ engagement functions at domestic level through ongoing existing contacts. Eg. Sharing knowledge about the resolution's commitments through engagement.

- **Achieving Global Data Protection Standards: Principles to ensure high levels of data protection and privacy worldwide** Main Sponsor: *Information Commissioner's Office (ICO), United Kingdom*
 - **Actions:**
 - Diffusion of the resolution in international forums, colloquiums and workshops.
 - Inclusion of the resolution in the AFAPDP Bureau meeting, as well as in the APF (association of French-speaking parliamentary representatives).
 - Drafting of articles for the GPA Newsletter.
 - Development of a webinar for GPA members.

- **Resolution on the GPA's Strategic Plan (2023-2025)** Main Sponsor: Public Information Access Agency (AAIP) Argentina – SDSC Chair
 - **Actions:**
 - Execution of the Strategic Plan 2023-2025
 - Maximising member participation
 - Greater articulation between groups to avoid overlapping of topics
 - Discussion spaces for the implementation of resolutions.

7. Highlights of the Working Groups

The 2024 annual reports and the meetings held with each of the chairs and co-chairs of the Working Groups have demonstrated their high level of commitment to the [2023-2025 Strategic Plan](#) and to the completion of the previous one.

1. **Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management Working Group:** They will seek to work on adapting their Work Plan based on the [resolution on the strategic direction of the GPA 2023-2025](#); continue to update the Mapping of International Development Aid and International Humanitarian Aid;

investigate possible new synergies with other Working Groups; and continue to participate in external networks.

2. **Global Frameworks and Standards Working Group:** They will continue to work on transfer mechanisms and on their comparative work on contractual clauses in different countries' frameworks, which is still being updated. They are interested in working on topics such as Data Free Flow with Trust (DFFT), which is considered a topic of great interest in various forums. They are carrying out a survey of GPA members on cross-border transfers. Furthermore, they have a plan to actively work on actions that promote the implementation of their resolutions.

3. **Digital Citizen and Consumer:** Their projects for 2023-2024 focused not only on this year's actions, but also on completing the pending points of the [2021-2023 Strategic Plan](#). They have a great interest in issues related to Artificial Intelligence and age assurance. They are aware of the importance of continuing to collaborate with various WG. They will continue to map cases of intersection between personal data protection, competition and antitrust, consumer protection and other areas of regulatory intersection, as well as identify obstacles to interregulatory cooperation, existing solutions and promote and facilitate greater transregulatory cooperation.

4. **Digital Education:** This group in particular has made good progress in highlighting the importance of progressively empowering children by producing and disseminating a wide range of advocacy and awareness-raising activities by age groups. Substantially, it has carried out sustainable follow-up activity on topics such as EdTech data governance, as well as AI in relation to child rights. They continue to support teachers and parents in teaching them how to address children's rights on the internet and social media to prevent cases of cyberbullying and online harm.

5. **Ethics and Data Protection in Artificial Intelligence:** The main focus is on the implementation of the ["Resolution on Artificial Intelligence and Employment"](#), adopted in Bermuda last year.

This demonstrates the Group's clear commitment to comply with the provisions of the adopted resolution.

6. **International Enforcement Cooperation:** There is a great deal of work on a Joint Statement on Data Scraping complementary to the [JS on Data Scraping released in 2023](#). As well as on Capacity Building Workshops; Transnational case map; Cybersecurity; Enforcement cooperation; and the development of a handbook.
7. **Data Protection and Other Rights and Freedoms:** They focused on the implementation of the [resolution adopted in Bermuda, on the Privacy and Human Rights Award](#). They started to implement the [Strategic Plan 2023-2025](#) with the drafting of their joint statement with the Preliminary Representative of the United Nations and the adoption of their Work Plan.
8. **Digital Economy and Society:** This year's work has focused on drafting resolutions on "Surveillance and the Protection of Individuals' Rights to Privacy" and "Neurotechnology, Human Rights, Data Protection and Privacy", which have been circulated to GPA members and will be voted on at the Assembly in Jersey.
9. **Intersectional Gender Perspective in Data Protection:** Took their first steps in constituting the WG and implementing its work plan, in line with the [Strategic Plan 2023-2025](#), by starting with an assessment of existing policies and activities related to gender equality and gender mainstreaming among GPA members. Their future work will focus on: 1) Review of existing policies and practices; 2) Training and capacity building; 3) Stakeholder consultation.
10. **Data Protection Metrics:** They were able to launch the mini-census aimed at assessing the performance and progress of each Working Group in relation to its objectives, monitoring key management indicators, ensuring member participation and verifying compliance with resolutions. This approach allowed the Group to systematically monitor performance and identify areas for improvement in the GPA.

11. **Data Sharing:** Its main priorities will be to focus on health data exchange, including international transfers and the sharing of sensitive data for the public good. The DSWG will then seek to produce a comparative study analysing international regulatory frameworks for health data exchange.

The Groups continue to strengthen their work in line with the strategic direction agreed in the Strategic Plan 2023-2025. This allows us to be certain that great results have been obtained from the Strategic Plan 2021-2023 and that many more await us on the path to implementing the Strategic Plan 2023-2025.

8. Final words.

Since we assumed the Presidency of the SDSC at the 44th Global Privacy Assembly (GPA) in Istanbul in 2022, our horizon has been to deepen the political-strategic direction of this network, based on the strengthening of regulatory capacities and the generation of concrete actions and instruments. This work is in line with the aim of achieving a higher level of protection of personal data and privacy at a global level.

One of the key achievements of the first year of work was the development of the [Strategic Plan 2023-2025](#). This plan was developed using the [Strategic Plan 2021-2023](#) as a starting point, and incorporated the contributions of the Working Groups, the members of the SDSC, the Executive Committee and the members of the GPA. From the beginning, we conceived of this plan as a roadmap to realize the strategic vision of the GPA. It is a shared agenda to integrate the diverse geographical, cultural and regulatory realities and to guide future actions. The plan is the result of a collaborative process involving the working groups and ongoing dialogue with the Ex-Co, the members of the SDSC and the GPA.

We also support all working groups with the aim of maximising the development of concrete actions and products. Based on their great commitment and vocation, a total of 8 resolutions were reached (being the highest number in the last 10 years), presented at the 45th Assembly held in Bermuda. These [documents](#) allow strengthening the protection of personal data in strategic areas such as Artificial Intelligence, employment, research and health data at a global level, among others.

The GPA is the ideal network to harmonize the different capacities, contexts and realities that exist among the Data Protection Authorities, through the exchange of good practices and the strengthening of regulatory and enforcement capacities to bridge these gaps and move towards a convergence of mechanisms that guarantee the protection of personal data. Projecting and encouraging this public value chain is essential to contribute to the progress of the GPA and consolidate its leadership at an international level.



These two years of AAIP, DPA of Argentina, as President of the SDSC were, without a doubt, a time of great growth and learning for us. At the end of our mandate, we hope to continue working, in another role, together with all the members of the GPA to promote high standards of personal data protection and protect the fundamental rights of citizens. We will actively support those who assume the Presidency of the SDSC, in order to continue contributing to the growth of the GPA.