



## GPA Global Privacy and Data Protection Awards 2025

### 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 16 June 2025**.

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:	UK Information Commissioner's Office	
Person completing this form:	Helena	Quinn
	<i>First name</i>	<i>Last name</i>
Job title:	Principal Policy Adviser, AI Policy	
Email address:	<a href="mailto:helena.quinn@ico.org.uk">helena.quinn@ico.org.uk</a> / <a href="mailto:gpa@ico.org.uk">gpa@ico.org.uk</a> (please use both addresses for any correspondence with the ICO 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 before 16 June 2025.
- ☒ 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)

The ICO was the first data protection authority to issue guidance on the application of data protection law to generative AI. It did this in an innovative, collaborative way, by publishing five chapters for consultation with the public and industry, covering areas where greater regulatory clarity and certainty were required to enable innovation.

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

Generative AI poses novel challenges to people's information rights and to the application of data protection law. These challenges include:

- the vast scale of web-scraping that occurs to build some of the most widely used datasets for training generative AI models – often without people knowing their data has been used in this way;
- the purpose(s) that people's data is used for and how these are determined and justified;
- the accuracy of the data used to train these models, and the accuracy of outputs produced by them;
- how people can exercise their information rights, particularly if they don't know their data has been processed in the first place; and
- who is responsible for complying with data protection law when models are accessed by deployers in different ways (such as through an application programming interface or by downloading an openly available model).

To understand these challenges better and test our thinking on how data protection law applies in these circumstances, we wanted to engage widely and put our initial approaches to each challenge into the public domain. In 2024 we ran a consultation series, gathering views from the public, tech companies, legal firms, the creative industries and trade bodies. We sought input on the following:

- (1) the lawful basis for web-scraping to train a generative AI model
- (2) purpose limitation in the generative AI lifecycle
- (3) accuracy of training data and model outputs
- (4) engineering individual rights in generative AI models, and
- (5) allocating controllership across the generative AI supply chain.

We published the results of the consultation in December 2024. We retained our positions on (2), (3) and (5), and refined our positions on (1) and (4). A key finding of the consultation was a serious lack of transparency, especially in relation to training data within the industry, which the consultation responses show is negatively impacting the public's trust in AI. Without transparency, it is hard for people to exercise their information rights and hard for developers to use legitimate interests as their lawful basis to use web-scraped data to train their models.

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

This consultation and final report represented the first detailed guidance from any data protection authority on generative AI. Our open, engaging consultation process meant that this was well-received by stakeholders including AI developers, the creative industries and civil society. Our positions have been mirrored in subsequent EDPB guidance, and the Spanish data protection authority has translated the section on 'Tackling Misconceptions' into Spanish (see [here](#)).

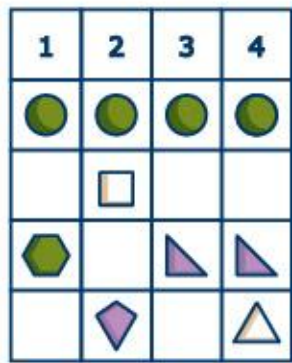
The iterative nature of the consultation provided a wide range of stakeholders with space to consider each issue in depth. It also allowed the ICO to understand each issue from a variety of viewpoints, and enabled us to consider the impact of generative AI and data protection law on different sectors.

As generative AI scales across the economy, our final report enables actors across the generative AI chain to understand how data protection law applies to this novel technology, allowing them to innovate in a compliant way.

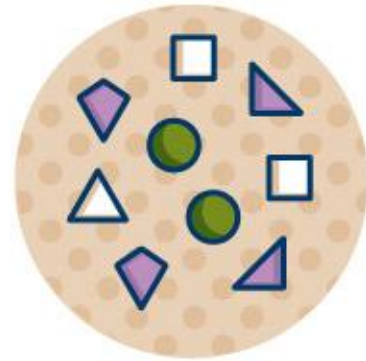
**d. Please include a photograph or image, if you wish** *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*

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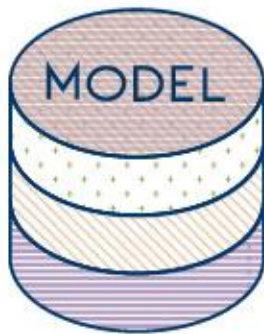
Figure 1: An indicative model development lifecycle. Some of the later steps may be interchangeable and iterative depending on the context.



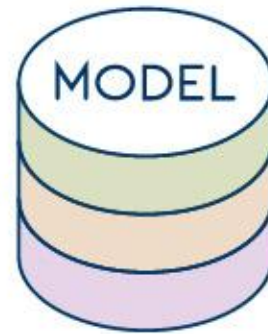
**Data collection**



**Data pre-processing**



**Training and model improvement**



**Fine tuning**



**Deployment**

- 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)*

[Information Commissioner's Office response to the consultation series on generative AI | 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):*

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