



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 **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 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Information Commissioner's Office, UK				
Person completing this form:	Rebecca Carleton-Bland				
Job title:	<table><tr><td>First name</td><td>Last name</td></tr><tr><td colspan="2">Principal Lawyer, Binding Corporate Rules and Transfers.</td></tr></table>	First name	Last name	Principal Lawyer, Binding Corporate Rules and Transfers.	
First name	Last name				
Principal Lawyer, Binding Corporate Rules and Transfers.					
Email address:	gpa@ico.org.uk / Rebecca.carletonbland@ico.org.uk (please use both email addresses for all correspondence with the ICO)				

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

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)

In December 2023, the ICO introduced the UK BCR Addendum (Addendum) to simplify and speed up the application and approval process for international transfers of personal data using Binding Corporate Rules (BCRs).

By introducing the Addendum, which is added on to approved EU BCRs to create standalone UK BCRs, the approval process has been reduced from years to months.

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

UK BCRs are an 'appropriate safeguard' under Article 47 UK GDPR. When approved by the ICO, they allow multinational organisations to freely transfer personal data internationally within their corporate group.

Post Brexit, many BCR holders who had BCRs approved in the EU could no longer use their BCRs for restricted transfers from the UK if the ICO was not involved in the original approval decision. They had to submit a new standalone UK BCR application even though this was duplicative and costly. At the time, the application and approval process was lengthy; it could take years to obtain an approval.

To solve this problem, the ICO drafted and introduced the Addendum and supporting guidance.

The Addendum is the legally binding instrument which underpins the UK BCRs. It simply adapts an approved EU BCR to form a new standalone UK BCR. The terms of the Addendum ensure that UK BCRs comply with all requirements of Article 47 UK GDPR. The Addendum can be used as a template, which applicants can adapt (in parts) to suit their business needs, or it can be used as a standard form. Using the Addendum as a standard form speeds up the approval process considerably.

The application process using the Addendum is simple. Applicants fill out the template Addendum (using the guidance for support) and produce a short UK BCR Summary (which explains to UK data subjects the impact of the UK BCRs on them). Applicants submit the Addendum to the ICO for approval. The approval process is significantly quicker than the traditional UK BCRs approval process and has reduced approval times considerably.

Many BCR holders are represented by legal teams. Feedback since introduction of the Addendum amongst the legal community has been extremely positive.

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

UK BCRs are regarded as the gold standard of international transfer mechanisms. They ensure that UK data subjects can easily seek redress (for breach by a third country group

member) within the UK courts, and the UK lead group member will take on full liability as if they committed the breach themselves. The ability to speed up and extend the use of UK BCRs is an extremely positive step.

There are many barriers to the free flow of data with trust, not least because of the diverse array of privacy systems and jurisdictions around the world. Simplifying the process for UK BCRs helps to bridge this gap in a small but meaningful way.

It is hopeful that the Addendum could be used as a model and example for other jurisdictions to follow to help facilitate international transfers.

Ultimately, the introduction of the Addendum promotes growth and innovation for businesses and supports the safe flow of personal data internationally whilst providing data subjects with considerable protection and redress.

- 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)*

[\(A\) UK BCR Addendum | 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):*

1. This webinar was produced in October 2023 before the UK BCR Addendum was launched – <https://vimeo.com/1090493572/96d64c04a1?share=copy>
2. This video explains how to speed up your UK BCR Addendum application and was produced for the DPPC conference in October 2024 - [The UK BCR Addendum how to speed up your application on Vimeo](#)
3. The Addendum is also praised by the Information Commissioner in his letter (see number 5) to the UK Government of 16 January 2025 - [ICO response to government on economic growth | ICO](#)