



**Observatoire ARGA**

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## **INTERPOL POST-REFORM COMPLIANCE (2024–2026)**

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## **Purpose of the document:**

This report is prepared to provide a structured analysis of how legal and institutional compliance review within INTERPOL has actually operated in the period 2024–2026 following the accumulated reforms in review procedures, publication of practice, and updates affecting the CCF framework. Its practical purpose is not to restate formal declarations on neutrality, human rights and data quality, but to determine how the post-reform architecture affects defense strategy in matters involving Red Notices, diffusions, blue notices and other forms of international police cooperation. The report proceeds on the basis that, after 2024, the decisive issue is no longer merely the wording of the rules, but their operationalization: the updated Repository of Practice, the published decision excerpts, the CCF's 2024 activity statistics, the amendments to the CCF Statute, and the organizational measures adopted in 2025–2026 to address delays and workload distribution. It is at this level that the real value of post-reform compliance is determined for clients, lawyers and international human rights strategy. ([Interpol](#))

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1. Executive Summary

The 2024–2026 period shows that post-reform compliance within INTERPOL can be described neither as a merely cosmetic update nor as a completed triumph of legal safeguards. On the one hand, in 2024 INTERPOL publicly released an updated Repository of Practice on Articles 2 and 3, expressly presenting it as a tool for greater transparency in the application of constitutional limits, while the CCF continued to publish anonymized decision excerpts that reveal actual assessment criteria concerning due process, Article 3, quality of data, family matters, refugee policy and misuse of channels. On the other hand, the CCF itself officially acknowledged delays, increased workload and the need for a 2026 organizational pilot, which means that the post-reform system remains overloaded and that access to effective protection still depends heavily on the quality of the applicant's strategy and evidentiary discipline. ([Interpol](#))

The principal practical conclusion is that, in 2024–2026, INTERPOL defense must no longer be built around abstract references to neutrality or human rights, but around demonstrable non-compliance with specific criteria that are visible in the published practice: purpose of data, lawfulness and validity of proceedings, description of criminal activities, seriousness and international interest, due process, Article 2 and Article 3 concerns, refugee protection, family-matter boundaries, and the absence of a genuine international police cooperation purpose. The formal language of reform is no longer sufficient on its own; it is effective only when translated into procedurally precise argument.

Post-reform compliance should therefore be understood as a new arena of contestation. It is useful for defense because it offers more published guidance than before. But it also raises the bar for defense work: poorly assembled applications, underdeveloped politico-economic classifications, generic references to persecution without a structured link to INTERPOL rules, and underestimation of diffusions and hidden forms of data processing continue to produce refusals or protracted proceedings without immediate relief. In that sense, reform has strengthened not automatic protection, but the importance of professionally constructed access to safeguards.

## 2. Context & Problem Statement / Why this topic has legal and international significance

For international legal practice, post-reform compliance matters because INTERPOL has long ceased to be merely a technical channel for police information exchange. In transnational cases, a Red Notice, diffusion or other data category may trigger consequences well beyond the INTERPOL system itself: arrests, extradition proceedings, migration complications, termination of banking relationships, reputational damage, restrictions on movement, and intensified sanctions and compliance screening. For that reason, the extent to which such data are lawfully and adequately reviewed is not just an internal administrative issue but one of broader international legal significance. ([Interpol](#))

In 2024, INTERPOL explicitly presented the updated Repository of Practice as an element of ensuring neutrality and human rights in international police cooperation. This matters not merely as a statement of principle. For the first time in quite some time, the organization itself strengthened the visible link between operational review and constitutional commitments under Articles 2 and 3. Yet the same institutional picture reveals the limits of this progress: in 2024 the CCF closed a record 2,717 requests, the highest number in its history and 21 percent above 2023, while at the same time acknowledging serious delays and backlog. That combination usually means only one thing: the mechanism has become more developed and more visible, but not automatically fast or error-free. ([Interpol](#))

For ARGA, the topic has institutional significance because defense in the post-reform period requires not rhetorical but doctrinally precise understanding of where the line actually lies between the declared compliance architecture and its real operation. In circumstances where applicants and their representatives often rely either on outdated assumptions about the CCF or, conversely, overestimate the significance of new publications, the practical role of an expert report is to align expectations and translate reform into a working legal algorithm. ([Interpol](#))

## 3. Legal Framework / Normative and institutional framework

The basic normative framework of post-reform compliance remains the same at its core, but it has changed in the degree of concretization. It is built on the Constitution of INTERPOL, especially Articles 2 and 3, the Rules on the Processing of Data, the Statute of the Commission for the Control of INTERPOL's Files, the Operating Rules of the CCF, and the practice of the Notices and Diffusions Task Force and the Requests Chamber. INTERPOL itself states that the RPD govern all data processing in the INTERPOL Information System, including notices, diffusions and messages, and that those rules have continued to be updated since their entry into force in 2012. ([Interpol](#))

The key post-reform development of 2024 is the update of the Repository of Practice on Articles 2 and 3. INTERPOL expressly noted that the revised version now includes guidance on the interpretation and implementation of Article 2(1), and its news release of 4 November 2024 linked that publication to greater transparency in how the organization assesses requests for international police cooperation. This is not a source of binding rules in the strict sense, but it is an exceptionally important quasi-doctrinal tool because it systematizes the operational reading of constitutional limits and thereby influences the argumentation of both the General Secretariat and the CCF. ([Interpol](#))

A second significant shift occurred in 2025. The updated Statute of the CCF reflects amendments approved by the 93rd General Assembly in 2025. Among the material elements are not merely technical procedural adjustments but also a more explicit framework for addressing abusive, improper or bad-faith conduct, as well as powers of the Requests Chamber to take corresponding measures, including dismissal of a request where there has been a serious abuse of proceedings and the reporting of substantiated suspicions of serious abuse or misconduct. Formally, this is designed to protect the integrity of the procedure. Practically, it means that the post-reform period requires even greater evidentiary accuracy and procedural good faith from the defense.

A third element concerns not the substance of the rules but workload management. On the CCF sessions and decisions page, INTERPOL states that from the beginning of 2026 it is running a pilot aimed at managing decision-making more evenly throughout the year, including increased use of remote online case reviews, expanded delegation of power to the Rapporteur and Chairperson for appropriate non-complex cases, three longer sessions, and the possibility of a fourth session in December. At the same time, the organization expressly acknowledges delays due to increased workload and backlog. For legal strategy, this matters directly: timing, urgency, interim protection and evidence sequencing become part of the compliance analysis itself rather than an external organizational inconvenience. ([Interpol](#))

#### 4. Mechanisms of Practice / Abuse / Key mechanisms of practice, abuse or conflict

The first mechanism of post-reform practice lies in pre-publication filtering at the level of the General Secretariat through the Notices and Diffusions Task Force. INTERPOL states that the NDTF conducts a robust quality and legal compliance review of incoming Notice and Diffusion requests prior to their authorization, and that its practice in applying the constitutional rules is reflected in the Repository of Practice. This means that compliance control is no longer concentrated only in the CCF on an ex post basis; it is distributed between pre-publication review and later challenge procedures. Yet this two-tier structure does not itself eliminate problematic publications: the existence of subsequent not compliant decisions in the decision excerpts demonstrates that initial screening and subsequent review are not identical in depth or analytical standard. ([Interpol](#))

The second mechanism is the shift from obvious violations to more refined criteria of quality and purpose. In the published decision excerpts for 2024 and 2025, the recurring tags include due process, lawfulness/validity of the proceedings, description of criminal activities, quality/accuracy, seriousness, purpose, family matter, Article 2, Article 3 and refugee policy. This shows that post-reform compliance increasingly operates not only at the level of obviously political cases, but also at the level of structural adequacy: whether the acts are clearly described, whether there is a genuine international objective, whether the matter is private or family-related, and whether INTERPOL is being used as leverage in defective domestic proceedings.

The third mechanism concerns growing public visibility of CCF practice, though only in strictly measured form. INTERPOL emphasizes that all decisions are confidential and not meant for public dissemination, although certain anonymized decisions are published. As a result, the defense has more guidance than before, but it still does not have access to a fully developed body of precedent. This produces a typical post-reform paradox: transparency has improved, but it remains selective and curated. That is useful for argument construction, but it does not remove the asymmetry of information between the applicant and the institution. ([Interpol](#))

The fourth mechanism relates to the procedural discipline of the defense itself. Following the 2025 amendments, the CCF now has more explicit tools to respond to abusive or bad-faith conduct in its own proceedings. This changes representative strategy: exaggerated assertions, unsupported accusations against institutions, procedural manipulation, repetitive filings without evidentiary basis, and concealment of material circumstances are no longer merely weak tactics but distinct risk factors.

In a legal environment where everyone claims to be acting in the name of fairness, negligence is usually what produces procedural disaster.

#### 5. Case Patterns / Typical scenarios, development models and practice patterns

The first typical scenario concerns cases framed externally as ordinary crime but containing indicators of politico-economic instrumentalization. In the post-reform environment, such matters are no longer assessed solely through a narrow political-character lens. Also relevant are procedural deficits, disproportionality, lack of clear criminal description, the relationship between the underlying dispute and enforcement, misuse of criminal law for leverage, and lack of genuine international police interest. The 2024–2025 decision excerpts show that even where Article 3 is central, outcomes often turn on a broader matrix that includes human rights, due process and data quality.

The second scenario concerns weak evidentiary framing by the applicant. Even a substantively strong case is lost when the application is built as a political declaration without disciplined work through INTERPOL criteria. Post-reform practice requires showing not only why the prosecution is unjust, but why the data are incompatible with the architecture of INTERPOL processing. Those are different questions, and the CCF systematically responds to the latter even where the former may be morally obvious.

The third scenario involves refugees and persons benefiting from international protection. Earlier decision excerpts already reflected the relevance of refugee policy; in the 2023 excerpt dealing with extradition, refugee policy, description of criminal activities and due process, the outcome was not compliant. For post-reform practice, the implication is that refugee and asylum status remains a strong but not automatic argument: it must be integrated into proof of misuse, incompatibility with neutral police cooperation, and conflict with INTERPOL's own protective logic.

The fourth scenario concerns diffusions and other less visible forms of data processing. Although the present report is not limited to hidden tools, CCF materials and 2024 statistics confirm that a significant share of requests concerns diffusions, not only notices. Accordingly, post-reform compliance cannot be evaluated solely through public Red Notices. A defense strategy focused only on the red notice often arrives too late to the actual architecture of data processing. ([Interpol](#))

#### 6. Risk Assessment / Main risks, legal vulnerabilities and problem areas

The principal risk for the client is a false sense of security generated by the rhetoric of reform itself. Publication of guidance, decision excerpts and statistics creates the impression of a more predictable system. But the CCF's own acknowledgment of delays, backlog and a 2026 pilot arrangement shows that even a high-quality application may not produce immediate relief. Any compliance strategy must therefore be built in parallel with extradition, migration, banking and reputational protection, not in place of them. ([Interpol](#))

A second risk is procedural reductionism, where the defense assumes it is enough to cite Article 3, refugee status, or general unfairness of proceedings. The published practice shows a more complex picture. The CCF assesses a combination of factors, and even a strong human-rights core must be packaged through admissible, concrete, data-specific reasoning. Where a representative fails to connect the human-rights narrative to processing standards, a gap appears between factual unfairness and legal relevance within the INTERPOL framework.

A third risk lies in underestimating the confidentiality structure. Because CCF decisions are confidential and the published excerpts are limited, the defense operates in conditions of incomplete visibility. This encourages templates and overconfidence in supposedly typical arguments. In reality, post-reform compliance requires case architecture, not copy-paste advocacy. ([Interpol](#))

A fourth risk concerns the institutional evolution of the CCF itself. Broader delegation of authority to the Rapporteur and Chairperson in non-complex cases may accelerate review, but it also heightens the importance of how the matter is perceived at an early stage: as genuinely complex and deserving full analysis, or as standard and procedurally simple. For representatives, this means correctly calibrating the presentation of complexity, urgency and systemic implications. ([Interpol](#))

#### 7. Institutional Gaps / Institutional limits, deficits of guarantee and systemic weaknesses

The first systemic weakness of the post-reform system is that increased transparency has not eliminated selective opacity. The Repository of Practice and decision excerpts are useful, but they do not substitute for a fully public body of decisions. As a result, the system still lacks the kind of predictability through precedent characteristic of a mature legal environment. Applicants still do not see the full picture and cannot fully assess how consistently criteria are applied across comparable cases. ([Interpol](#))

The second weakness is temporal. Even the record number of closed requests in 2024 does not alter the fact that the CCF itself acknowledges delays and backlog. For persons already facing extradition proceedings or migration restrictions, delay itself becomes substantive harm. In other words, an institutional guarantee that operates too slowly partly loses its protective value. ([Interpol](#))

The third weakness lies in the continued tension between organizational neutrality and enforcement utility. INTERPOL must simultaneously facilitate effective international police cooperation and prevent misuse of its channels. The post-reform architecture makes that balancing exercise more explicit, but it does not eliminate the underlying systemic conflict: the more actively the organization serves operational exchange, the greater the risk that problematic data will enter the system faster than they can be corrected through later review. That is why legal defense cannot rely solely on institutional self-correction. ([Interpol](#))

#### 8. Practical Guidance / Practical recommendations and model of legal action

In the post-reform period, defense should begin with compliance mapping. It is necessary to determine which categories of data may have been processed, through which source, for what stated purpose, and which INTERPOL criteria may have been breached: Article 3, Article 2, due process, lawfulness, quality, seriousness, family matter, refugee protection, or lack of genuine international interest. Without such a map, even strong facts remain legally diffuse.

The next step is evidence sequencing. At the first level, official procedural materials must be collected: warrants, decisions, charging documents, extradition correspondence, asylum records, judicial findings, and proof of political or corporate-conflict background. At the second level, an analytical bridge must be built between domestic facts and INTERPOL criteria. At the third level, narrative discipline must be imposed: every substantial assertion should lead not to a general moral conclusion but to a specific conclusion about the non-compliance of the data processing. The post-reform system responds better to structured legal argument than to narratives that may be emotionally persuasive but normatively imprecise. ([Interpol](#))

The third step is parallel protection design. Since delays remain real, an application to the CCF must not be treated as the only or self-sufficient remedy. One must simultaneously assess the risks of arrest, extradition, banking de-risking, visa consequences, reputational disclosures and digital screening. The practical value of post-reform compliance is greatest when it is embedded in a multilevel defense architecture rather than isolated from it. ([Interpol](#))

The fourth step is process hygiene. After the 2025 changes, the defense must be especially careful to avoid abusive, improper or bad-faith conduct. This means: do not submit artificially inflated revision

requests, do not conceal adverse facts, do not use the CCF as a platform for political manifestos instead of a data challenge, and do not construct argumentation on unsupported insinuations. Legal precision here is not a stylistic ornament but a condition of procedural survival.

#### 9. Policy Recommendations / Recommendations on legal and institutional approach

First, post-reform compliance requires further expansion of the public reasoning base. INTERPOL and the CCF have already moved toward greater transparency through the Repository of Practice and anonymized decision excerpts, but that remains insufficient for genuine foreseeability. More consistent publication of reasoning patterns is needed in key categories: politico-economic persecution, weak due process, abuse of the extradition interface, misuse through diffusions, refugee-related conflicts and data quality failures. ([Interpol](#))

Second, institutions should focus on reducing time-to-protection. The additional funding approved by the 92nd General Assembly and the 2026 pilot are positive steps, but they should be evaluated against one criterion only: whether the period between filing and effective remedy is actually shortened in cases where ongoing enforcement creates irreparable harm. Until that interval becomes materially shorter, the system will continue to suffer from a structural deficit in practical protection. ([Interpol](#))

Third, the international advocacy and human-rights community should abandon the simplified narrative that “INTERPOL has reformed, therefore it is now safer.” A more accurate formulation is this: INTERPOL has become more reviewable, more documented and somewhat more procedurally disciplined, but not frictionless, not fully transparent and not self-sufficient as a remedy. That is the position that permits honest defense strategy and avoids dangerous optimism. ([Interpol](#))

#### 10. Conclusion / Conclusion

The 2024–2026 period confirms that post-reform compliance within INTERPOL is a real but limited achievement. It is real because guidance materials have been updated, the visibility of reasoning has increased, amendments have been made to the CCF Statute, backlog and delay problems have been openly recognized and partly addressed, and the review system has become more clearly articulated. It is limited because transparency remains partial, timing remains problematic, and effectiveness still depends on the applicant’s ability to translate the facts of the case into the language of INTERPOL compliance rather than general grievance. ([Interpol](#))

For ARGAs, the practical significance of that conclusion is clear. In the post-reform era, the successful actor is not the one who invokes human rights most loudly, but the one who shows most precisely why specific data, in a specific category, for a specific purpose, in a specific procedural context, should not remain within the INTERPOL system. Reform has not removed the need for sophisticated legal work. It has merely made that work more targeted, more evidentiary, and when properly performed, more effective.

#### 11. Appendix A. Terminology

**Post-reform compliance.** A working term for the combined procedural, normative and practical mechanisms through which, in the period following key INTERPOL updates, data are reviewed for compliance with the Constitution of INTERPOL, the RPD and related internal guarantees. ([Interpol](#))

**Repository of Practice.** A document published by INTERPOL reflecting the operational interpretation of Articles 2 and 3 and the practice of assessing requests for international police cooperation. It is not a formal code, but it has strong interpretive value. ([Interpol](#))

NDTF. The Notices and Diffusions Task Force conducting pre-publication legal and quality review of incoming notices and diffusions. ([Interpol](#))

CCF. The Commission for the Control of INTERPOL’s Files, an independent and impartial body responsible for ensuring that personal data processing complies with INTERPOL’s rules and for examining requests for access, correction and deletion. ([Interpol](#))

Decision excerpts. Anonymized extracts from CCF decisions published for informational purposes while preserving confidentiality of the full decision. ([Interpol](#))

Process hygiene. A practical standard of good-faith and accurate litigation before the CCF, excluding abusive, improper or bad-faith conduct.

## 12. Appendix B. Risk / powers / legal consequences matrix

Task	Legal risk	Legal limit	Possible consequence	Practical comment
File a request with the CCF	Generic or unsupported assertions	Facts must be linked to specific INTERPOL criteria	Inadmissibility, weak review, delay	The application must be data-specific, not slogan-specific
Rely only on Article 3	Over-reduction of the case	The CCF assesses a combination of factors	Incomplete risk review	Add due process, quality, purpose, seriousness and refugee issues where supported
Ignore diffusions	Incomplete picture of data processing	Compliance review extends beyond public Red Notices	Hidden arrest exposure remains	Always assess the possibility of diffusions and other data categories
Use emotional rhetoric instead of structure	Procedural weakness	The CCF works through legal categories	Reduced persuasiveness	Narrative must serve compliance logic
Fail to build parallel extradition/asylum strategy	Time gap between review and protection	The CCF does not replace other mechanisms	Arrest, extradition exposure, reputational harm	A multilevel defense architecture is required
Submit manipulative or bad-faith materials	Abusive or bad-faith conduct	2025 Statute amendments allow responsive measures	Dismissal or other adverse procedural action	Process hygiene is strategic, not optional
Overestimate the “reformed” nature of the system	False sense of security	Delays and backlog remain acknowledged	Insufficient urgency in protective action	Reform improves reviewability but does not remove risk

## 13. Official Sources

- INTERPOL Constitution and Rules on the Processing of Data. The core legal framework for data processing within INTERPOL; defines constitutional limits, processing principles and the architecture of notices and diffusions. ([Interpol](#))

- Repository of Practice on Articles 2 and 3, updated in November 2024. A key source for understanding how INTERPOL operationalizes neutrality, human rights and Article 2(1) concerns in the post-reform environment. ([Interpol](#))
- CCF Annual Activity Report for 2024. Shows actual workload, record closure volume and therefore the institutional context for evaluating effectiveness and delay. ([Interpol](#))
- Statute of the Commission for the Control of INTERPOL's Files, as amended in 2025. Essential for understanding CCF powers, proceedings and the newer mechanisms for responding to abusive conduct.
- CCF Sessions and Decisions webpage and published decision excerpts. A practically significant body of materials showing real reasoning patterns on due process, Article 2, Article 3, refugee policy, family matters, quality and purpose of data. ([Interpol](#))
- INTERPOL page "Compliance and review - Notices". Official description of the role of the NDTF in pre-publication legal and quality review of incoming notices and diffusions. ([Interpol](#))