Observatoire ARGA

INTERNATIONAL ANALYTICAL REPORT

D-01. Reform of the CCF Statute

Reasoned Decisions and Confidentiality

Author:

Sergey Khrabrykh - President of ARGA, PhD

Organization: Observatoire ARGA

Correspondence: 21 rue de l'Aviation, 64600 Anglet, France

Contact: info@argaobservatory.org, +33 7 58 49 62 27

Website: www.argaobservatory.org

23 September 2026

Contents

Source cut-off: 23 September 2026. Keywords: INTERPOL; CCF; reasons; confidentiality; personal data; revision; procedural safeguards.

Executive summary

The duty to give reasons and the duty to preserve confidentiality already coexist in the Statute of the Commission for the Control of INTERPOL's Files (CCF). Reform concerns how to fulfil both duties simultaneously. Article 38 requires a reasoned decision, while Article 35 permits restrictions on the communication of information on specified grounds. Neither provision, taken alone, satisfactorily answers how intelligible the version received by a party must remain. [1, Articles 35, 38]

The official Fourth Call for Contributions of 20 July 2026 also presents the problem from the perspective of states: data sources do not always receive a full explanation of the grounds, making it difficult to assess the possibility of revision. Reform therefore cannot be confined to expanding the applicant's access. It must protect each party's separate interest in understanding the decision while recognising that disclosure risks are unequal. [5]

This report proposes one complete decision with versions adapted for the applicant and the data source. The internal text preserves the entire reasoning; communicated versions restrict information whose disclosure creates a specific risk. Different versions must not entail different grounds or operative outcomes. For significant withheld material, the feasibility of a safe account of its substance and role in the reasoning must be assessed.

This proposal has a limit. Even a general account may sometimes identify a witness, a person's whereabouts or the direction of an investigation. Disclosure must not then occur automatically. A separate explanation of why safe communication is impossible, independent scrutiny of the withheld material and an assessment of whether the remaining grounds justify continued processing are required. Information security and evidential sufficiency are separate questions.

The report examines six published CCF decision excerpts and two judgments of the European Court of Human Rights. This material supports analysis of how conclusions are explained, but cannot measure the prevalence of inadequate reasoning. Comparative case law is used as an analytical reference, not presented as procedural law directly binding on INTERPOL.

The principal conclusion is that necessity, proportionality and counterbalancing measures already appear in published CCF practice. The proposed reform concerns their consistent expression in the structure and communication of decisions to both parties, including checks for consistency between versions. [12, paras. 47-51; 13, paras. 24-31] Practical guidance can clarify the application of existing rules. New mandatory safeguards and consequences for their breach require action at the appropriate normative level.

1. Research question and scope

1.1. What requires reform

The problem of reasoning arises when the full information available to the decision-maker is converted into a communication to its recipient. The body may possess sufficient material and conduct a thorough internal assessment, yet the party receives only the outcome. The reverse is also possible: a detailed letter creates an impression of justification without explaining why one of two mutually exclusive factual accounts was accepted. Neither page count nor the completeness of the internal file reliably measures the quality of the communicated decision.

The research question is functional: what information and explanations enable a party to understand the basis of a CCF decision and use the procedures established by the Statute where disclosure of some material creates a risk protected by Article 35? A separate question concerns the body itself: what internal steps should compensate for the inability to test a withheld assertion externally?

The report is confined to CCF proceedings and their normative framework. Domestic criminal proceedings, extradition, migration decisions and commercial screening databases are considered only insofar as they explain a decision's practical significance. Deletion of INTERPOL data is not equated with cancellation of a domestic warrant, termination of criminal proceedings or mandatory correction of every external database.

1.2. Evidence base and cut-off date

The normative basis comprises the official CCF Statute in its 2025 version, the published CCF Operating Rules as amended on 26 March 2026, INTERPOL's Rules on the Processing of Data and the Organization's Constitution. The consultation context is established through the Committee on the Processing of Data's official Fourth Call. Research was completed on 23 September 2026. The verified normative material contains the 2025 Statute. No official outcome of the September CPD discussion amending Articles 35 and 38 was established within the material examined. The report therefore asserts neither that amendments have been adopted nor that non-public discussions have not occurred. [1-5]

The practice analysis uses a purposive selection of six official anonymised excerpts: Nos. 7 and 12 of 2018, Nos. 9 and 11 of 2023, and Nos. 2 and 4 of 2025. Two directly concern restrictions on communicating information; one explains revision; the others show how conclusions about the validity of the underlying basis, the description of activities and identification are reasoned. This is neither a random nor a representative sample. It cannot establish success rates, the frequency of withheld evidence or compliance with Article 38 across all proceedings. [6-9, 12-14]

Confidential materials and the full decisions communicated to parties are unavailable to the researcher. A published excerpt is a separate product of selection and anonymisation. The absence of an argument from it does not prove that the argument was absent from the full file or ignored. The analysis therefore concerns the connection between issue, material and outcome demonstrated by the published text.

1.3. Method and status of conclusions

The text distinguishes five categories: existing rules; officially reported consultation circumstances; assertions by parties to proceedings; findings of the CCF and courts; and the author's proposals. Expressions such as 'it is advisable', 'it is proposed' and 'should be incorporated' identify recommendations. Illustrative scenarios do not describe actual clients, states or confidential cases.

The report develops ARGA's internal Russian-language position of August 2026. That material supplies the initial concept, not external verification of legal facts. This report does not assert that the position was submitted within the consultation deadline, accepted by the Committee or influenced the reform. Each such event requires separate documentary confirmation.

The comparative analysis uses Ruiz Torija and Regner. They were selected to examine two different questions: the response to a potentially decisive argument and the permissibility of non-disclosure with counterbalancing safeguards. The comparison does not establish ECtHR jurisdiction over INTERPOL or replace analysis of the Organization's own rules.

2. Institutional and normative framework

2.1. The CCF's mandate and its limits

The CCF is an independent body within INTERPOL. Its Statute separates supervisory and advisory functions from the examination of requests for access, correction and deletion. The Requests Chamber examines whether processing complies with the Organization's applicable rules. This is specialised oversight of information processing, not a retrial of a domestic criminal charge. [1, Articles 3-6]

INTERPOL's Constitution links international police cooperation to respect for the Universal Declaration of Human Rights and prohibits intervention or activities of a political, military, religious or racial character. These provisions matter for data oversight but do not justify automatically treating every economic or cross-border prosecution as political. A conclusion requires examination of the circumstances of the individual request. [4, Articles 2-3]

The limited mandate calls for precise reasoning. Deletion because activities are insufficiently particularised is not an acquittal. A finding that processing complies with the rules is not a judicial determination of guilt. The decision should describe the actual question examined without suggesting that a broader dispute has been resolved.

These limits also matter when designing counterbalancing measures. Article 37 permits provisional measures concerning data processing. It does not make the CCF a body that automatically stays any arrest or domestic proceedings. Possible corrective measures under Article 39 must likewise be read within the Organization's competence. [1, Articles 37, 39]

2.2. Four distinct information regimes

The first regime concerns access to data within INTERPOL's information system: police recipients, source control and information classification. The second concerns parties' access to information connected with a CCF request. The third covers the confidentiality of the Commission's internal files, work and deliberations. The fourth concerns publication of anonymised decisions for an unrestricted readership. [1-3]

These regimes interact but are not identical. A police authority's access to a record does not answer what explanation the applicant should receive. Confidentiality of an internal file does not displace the duty to provide a reasoned decision to the extent required by the Statute. The ability to communicate information to a party subject to particular obligations or situated within the case's factual context does not make publication on the open internet safe.

Reform will remain incomplete if all four regimes are subsumed under 'transparency'. Each instance requires identification of the recipient, the purpose of communication, the risk created by that communication and the governing provision. Otherwise restrictions on police exchanges quietly become a complete bar to procedural reasoning, or procedural access is mistakenly transformed into a duty of public disclosure.

2.3. The 2026 consultation

The Fourth Call to civil society was published on 20 July 2026 with a deadline of 16 August. Its official description links it to the review of the Statute begun in 2024 and consideration at the Committee's September meeting. The substantive focus is the nature and content of decisions under Article 38 in relation to Article 35 restrictions. [5]

Particularly significant is the reference to states' concerns that data sources do not receive full reasons and therefore struggle to assess revision under Article 42. This prevents a one-sided reading of reform as solely a dispute between state secrecy and individual access. A source may also need to understand which non-compliance was identified and what circumstance might alter the conclusion.

Institutional symmetry does not, however, imply factual symmetry of risks. The source and applicant may possess different information; it cannot be assumed that the applicant knows the contents of the submitted record. The applicant may in turn provide information whose disclosure to the source would endanger the applicant or third parties. A common standard of explanatory quality must accommodate these differences.

3. Existing law: Articles 35, 38 and 42

3.1. Access and restrictions under Article 35

Article 35(1) provides access for the applicant and data source to information connected with the request, subject to the applicable conditions. Before communicating information, the Commission consults its owner. Under paragraph 3, the Chamber may restrict communication on its own initiative or at the request of the source, General Secretariat or applicant. The Statute identifies four groups of protected interests. [1, Article 35]

They cannot be reduced to state secrets. They encompass public or national security and crime prevention; the confidentiality of an investigation or prosecution; the rights and freedoms of the applicant and third parties; and the proper discharge of the duties of the Commission or Organization. The provision's structure itself therefore requires attention to the safety of non-state participants.

Paragraph 4 is particularly important: a restriction must be justified and accompanied by an indication of whether some information may be communicated, for example through a summary. A lack of justification does not, by itself, lead to disclosure; it may be taken into account in examining and deciding the request. The current text does not support a rule that an unexplained secrecy claim automatically opens the document.

Article 35 already provides a starting point for less restrictive forms of communication. It does not, however, prescribe an exhaustive sequence of steps or the minimum substantive content of every summary. This leaves room for guidance and, where necessary, clarification of the Statute. The author's model develops that basis rather than presenting all its elements as existing duties.

3.2. Required contents of a decision

Article 38(2) requires a written, reasoned decision containing a brief account of the proceedings and parties' submissions, the facts, the application of INTERPOL's rules, analysis of legal arguments and the operative part. Paragraph 3 provides for communication to the applicant and source subject to confidentiality and Article 41. The reasoning requirement thus concerns the decision as a legal act, while confidentiality affects its communication. [1, Articles 38, 41]

In practice, the presence of a component must be distinguished from its usefulness. An 'analysis' heading does not guarantee analysis. Listing provisions does not explain why a particular fact satisfies their conditions. Proper reasoning should show the transition from the established circumstance to the applicable criterion and then to the outcome. That transition is particularly vulnerable to excessive redaction.

Article 38(1) makes decisions final and binding upon the Organization and applicant. This must not be transformed into a claim that a CCF decision automatically binds a domestic court on every issue in criminal proceedings. Binding force within the system and effects in other legal orders require separate analysis.

3.3. Revision, time limits and communication

Article 42 links revision to discovery of a fact that could have led the Chamber to a different conclusion had it been known during examination. An application must be made within six months of discovering that fact. The period should not automatically be calculated from the original decision. Revision is not an ordinary appeal allowing repetition of earlier objections without a new factual basis. [1, Article 42; 2, Rule 30]

This creates a practical connection with reasoning: explaining a new circumstance's significance requires understanding which conclusion rested on the previous factual basis. The CCF is not, however, required to devise a party's revision strategy. It is sufficient to identify clearly the issues determining the result, the accepted facts and their relationship to the applicable rules.

Article 40 establishes examination periods of four months for access and nine months for correction or deletion after a request is declared admissible, with extensions possible under the prescribed conditions. Under Article 41, the decision is transmitted to the General Secretariat within one month; implementation also has a one-month period, subject to necessary clarification. An access decision is communicated to the party within one month of adoption; a correction or deletion decision is communicated without delay and no later than one month after the Commission receives notice of implementation. These stages cannot be converted into an unconditional guarantee running from the first approach. [1, Articles 40-41]

Reform of reasoning must account for the implementation sequence. A detailed explanation arriving after substantial delay may be less useful. Reducing delays does not justify providing a formal outcome without reasons. Organisational evaluation should cover the full path from the completed decision to the safe version and its communication, not merely drafting time.

4. Existing CCF standards and the remaining gap

4.1. The established standard for restrictions

Necessity and proportionality should not be presented as principles first proposed by ARGA. Published CCF practice from 2018 describes access restrictions as exceptions requiring strict interpretation. The Commission also links them to counterbalancing measures and its own access to the material. This is the CCF's interpretation of its statutory framework, not the importation of a judicial standard from outside. [12, paras. 48-49; 13, paras. 24-25]

The distinction between the normative text and practice matters for reform. Article 35(4) expressly requires justification and consideration of partial communication; published decisions explain scrutiny of those requirements. A justified recommendation must therefore begin with consolidating and operationalising an existing approach. The examined sources do not support a claim that oversight is absent.

A different question remains: how is this approach reflected in the final version received by a particular party? Published excerpts reveal reasoning in selected cases but do not provide the full body of communicated texts. Neither consistent implementation nor systemic failure can be inferred. The research conclusion is limited to the need to make the approach's application verifiable.

4.2. Four grounds and four different tasks

Public or national security and crime prevention may require protection of methods, plans and sources. Investigative confidentiality may concern an outstanding procedural step or an untested hypothesis. The rights of applicants and third parties may require withholding addresses, protection-related contacts and identifiers. Proper discharge of the Commission's or Organization's duties may entail protection of internal procedures. These are analytical examples, not established facts of particular cases. [1, Article 35(3)]

The practical difference concerns the harm to be prevented and those at risk. One ground cannot substitute for analysis of another: the existence of an investigation does not automatically explain a risk to a witness, and witness protection does not necessarily justify concealing the legal criterion applied. Grouping similar information into one category depends on the risk being of the same nature.

4.3. Three independent assessments

The proposed procedure records separately whether confidentiality is justified, whether the material is reliable and whether the basis for processing is sufficient. Secrecy does not establish reliability; reliability does not require disclosure; a lawful access restriction does not resolve whether a party can challenge an assertion. This distinction explains why an access defect may affect the decision on data without compelled disclosure of the document itself.

Scrutiny cannot be delegated entirely to the owner's classification. Article 35(3) permits the Chamber to act on its own initiative, while paragraph 2 requires consultation. These powers do not imply an unlimited right to disclose any source information despite the applicable regime. A source's refusal to agree to safe communication requires consideration of consequences for examination of the request; the approach is visible in the 2018 No. 12 case. [1, Article 35; 12, para. 51 and operative part]

5. A verifiable structure of reasoning

5.1. From a party's assertion to the Commission's finding

Substantive scrutiny should distinguish five links: the disputed issue; the parties' positions; the relevant material; assessment under a specific rule; and the consequence for processing. This develops Article 38(2)'s components without claiming to be a currently binding template. Its purpose is to identify transitions lost through inadequate shortening. [1, Article 38(2)]

In particular, a source's statement of involvement is not the same as the Chamber's finding that information is sufficient. The decision should reveal what was actually checked: the existence of a current procedural basis, the individual's connection to the description or compliance with the notice's purpose. Otherwise repetition of an accusation acquires the appearance of an independent finding of guilt beyond the scope of review.

5.2. Decisive and supporting grounds

Material is decisive if the relevant conclusion cannot stand without it. Supporting material reinforces an already sufficient basis. This is a proposed analytical test, not a new formal standard of proof. It identifies where restrictions on communication require the most detailed internal scrutiny.

The test also applies to arguments. An objection concerning another person, a cancelled warrant or a changed judicial ruling may affect the basis of processing itself. Repetition of a previously considered general position may not require a separate paragraph. Quality depends on whether the response to a potentially outcome-changing issue is visible, within the bounds of safe communication.

5.3. Limits of findings and unresolved questions

If one sufficient ground disposes of the request, other issues left undecided should be identified. Inability to confirm compliance because data are insufficient does not establish that the domestic accusation is false. An unsubstantiated objection does not establish the opposite fact. These distinctions are especially important when a decision is used outside CCF proceedings.

For editorial review, the communicated text should be read without the confidential file and its logical chain recorded. It should then be compared with the full version. If removing a qualification makes a conclusion more categorical, the problem is altered meaning, not length. That semantic gap must be repaired while preserving justified restrictions.

6. CCF practice: access, reasoning and consequences

6.1. The 2018 No. 12 excerpt: access restrictions as a distinct issue

The source justified withholding access by reference to the RPD regime. The CCF distinguished police information exchange from proceedings on an individual request: an Article 35(3) ground, a case-specific explanation and consideration of minimum communication were required. The Commission addressed necessity and proportionality, its own access to the information and counterbalancing measures. An unjustified refusal did not result in disclosure without the source's consent. [12, paras. 44-51]

The operative part provided for deletion if the source failed, within one month of notification, to supply appropriate reasons and justification for refusing access. This was a conditional outcome; the published excerpt does not establish whether the condition was fulfilled or actual deletion occurred. A statement that the CCF 'deleted data for confidentiality' would therefore be incorrect. [12, operative part]

The case's relevance to reform lies in two different consequences. An access refusal may remain effective in practice without remaining neutral for assessment of processing compliance. The author's inference is that a source's right to protect information cannot be described as a consequence-free power to deprive a party of all information. The case nevertheless does not establish one automatic rule for every future request.

A more precise normative task is to make the choice of consequence visible. The Chamber should show which access defect impedes scrutiny, why alternatives failed and what condition must be met for data to remain. The decision must be linked to the CCF's own mandate rather than punishment for non-cooperation.

The source has limitations: the excerpt does not reproduce the full file and some particulars and passages are removed. It cannot be used to reconstruct an identity or domestic case. The procedural structure is sufficient for this study: specific justification, rejection of automatic disclosure and a conditional consequence for data.

6.2. The 2018 No. 7 excerpt: confidentiality in both directions

The applicant complained of being unable to challenge unknown information while also requesting that the applicant's own arguments be withheld from the source because of feared retaliation and the sensitivity of an earlier protection status. The CCF found the applicant's restrictions justified and was able to question the source using information already available. The source's blanket restrictions were found unjustified; its refusal to agree to counterbalancing measures was considered in the examination. [13, paras. 17-31]

Ultimate deletion followed a cumulative analysis culminating in a conclusion under Article 3 of the Constitution. It cannot be attributed solely to the access defect. Paragraph 46 nevertheless expressly returns to the applicant's inability to make specific objections. [13, paras. 46, 58 and operative part]

This example reframes equality between the parties. An identical number of disclosed attachments does not necessarily mean a fair procedure. What matters is whether each party has a safe opportunity to answer a relevant assertion. The proposed model therefore assesses recipients separately while applying one standard of intelligibility to the outcome.

Protecting the applicant must not exempt the applicant's position from scrutiny. One possible technique is to ask a substantive question based on information already available to the source without disclosing dangerous identifiers. This is not a universal solution: sometimes the question itself reveals the information source. Its safety requires assessment in the context of the individual proceedings.

6.3. The 2023 No. 11 excerpt: a verified response rather than a general denial

The applicant submitted a judgment said to constitute a final acquittal. The source disputed that conclusion and promised judicial assessment of the document but, despite reminders, did not provide the relevant response. The CCF linked inadequate cooperation to its inability to establish that continued retention complied with RPD Article 83(2)(b)(v). Deletion was ordered; the remaining arguments were not examined. [6, paras. 10-17]

The dispute concerned whether the basis for processing remained current, not merely the quality of the source's letter. The reasoning is useful because it identifies the verified response that was missing. Without that specificity, two opposite mistakes would arise: the applicant might read deletion as an international acquittal, and the source as a sanction for any delay in responding.

The lesson for reform is confined to verification. A specific contradiction requires an answer; repeating a general position may not resolve it. This does not transfer the criminal burden of proof to the CCF. The issue remains whether the basis for processing is sufficient under the Organization's rules.

6.4. The 2025 No. 2 excerpt: individualisation and the boundary with administrative matters

In a case involving tax and permit-related accusations, the CCF examined the individual's connection to the alleged acts. One document named the company but not the applicant; the source's general responses did not resolve objections concerning the individual's role, knowledge, benefit and the existence of a permit. The Commission found the information insufficient and ordered deletion. [7, paras. 30-35]

The analytical value lies in distinguishing an organisation's activities from the individual's connection to them. If withheld information supplies precisely that connection, the communicated version should, where possible, explain its function. Simply increasing the quantity of information about the company does not answer an individual objection.

It would, however, be wrong to turn the elements discussed in this case into universal elements of every offence. The CCF's reasoning concerned the specific accusations and Red Notice requirements. The report does not conclude that absence of personal benefit excludes international cooperation in every economic case.

6.5. The 2025 No. 4 excerpt: the limits of an adverse outcome

The CCF considered a Blue Notice and an objection concerning identical names. The source checked identifiers and corrected the date of birth. The Commission considered the information sufficient for obtaining information and establishing whereabouts; general allegations of rights violations did not establish non-compliance in that case. The data were retained. [8, paras. 18-26, 30-35]

This example should not be combined with the preceding one into a single sufficiency threshold. The notice type and purpose of cooperation differ. Reasoning must therefore connect the assessed data to the stated purpose rather than use an abstract assertion that 'the evidence is sufficient'.

A decision adverse to the applicant can be substantive if it explains the corrected inaccuracy, the remaining identification basis and the limits of review. Conversely, a favourable result may remain unintelligible. The direction of the outcome cannot measure reasoning quality.

6.6. Common lessons and limits of comparison

The first two examples directly concern Article 35; the next three concern the structure of explanations. The revision case is examined separately in section 11. Together they form a purposive analytical set, not a time series or assessment of all practice. The years in their titles follow the official index; undisclosed dates of individual decisions are not reconstructed. [6-9, 12-14]

Comparison identifies three verifiable requirements for a draft: distinguish a party's position from the body's finding; preserve the link between a specific defect and its consequence; and identify unresolved questions. How often these requirements are met in versions actually communicated to parties remains unknown.

Finally, publishing an excerpt and communicating a decision to a party are different acts. An anonymised public text may contain less than the served decision. Absence of a detail from publication does not prove an access violation; a detailed publication does not prove that both parties received equally substantive explanations.

7. ECtHR case law: two distinct bases for comparison

7.1. Ruiz Torija: relevance and the duty to respond

Ruiz Torija v. Spain (No. 18390/91, 9 December 1994) concerned judicial resolution of a lease dispute. The ECtHR distinguished the absence of a duty to answer every argument in detail from the need to address a clearly raised, potentially decisive objection. The limitation defence required a separate answer; silence made it impossible to know whether it had been considered and why it had been rejected. The Court found a violation of Article 6 without deciding whether that defence was substantively valid. [10, paras. 29-30]

For CCF analysis, the limited question is whether a rejected argument can be distinguished from an overlooked one. The comparison is particularly useful where a party alleges that the procedural basis has ceased to exist or identity is mistaken. Without an answer, the recipient cannot identify the circumstance accepted by the Chamber or the point against which a new fact must be assessed.

Ruiz Torija is not, however, a judgment about confidential police material. It establishes neither a minimum disclosure requirement in CCF proceedings nor a resolution of the competing interests under Article 35. This report uses it solely to examine reasoning structure, not as independent proof of a duty to release a withheld document.

7.2. Regner: concrete safeguards beyond institutional independence

In Regner v. the Czech Republic (Grand Chamber, No. 35289/11, 19 September 2017), the applicant and counsel lacked access to confidential material and the related grounds for withdrawal of security clearance. The ECtHR assessed the proceedings as a whole. Important factors included the domestic courts' full access, scrutiny of secrecy grounds, powers to order disclosure and quash the decision, and review extending beyond the applicant's arguments. No violation of Article 6 was found. [11, paras. 150-162]

The Court nevertheless observed that safe communication of at least the substance of the allegations would have assisted a focused defence. That observation must not become an unconditional requirement whose breach would automatically have changed the outcome of the case. [11, paras. 153, 160]

For the CCF, the analytical lesson is to compare the functions of safeguards. A body's access answers whether it can examine the material. A party's opportunity to challenge an assertion answers a different question: can the body learn of an error not apparent from the confidential file? One mechanism does not necessarily replace the other completely.

The proposition that the Commission's independence alone compensates for non-disclosure is therefore insufficient as a research conclusion. Actual steps must be mapped: who checked the risk, who assessed the material, which contradiction was examined and what follows from unresolved doubt? These are the author's questions; they do not attribute all the Czech courts' powers to the CCF.

7.3. Two limits of the comparative method

The first limit is institutional. The ECtHR examined states' Convention responsibility; this report does not establish that the Convention directly binds INTERPOL. The CCF's own normative basis and published interpretations must precede comparison. Necessity and proportionality have, in particular, already been formulated by the Commission itself. [12-13]

The second limit concerns subject matter. Ruiz Torija explains why silence on a decisive argument matters; Regner examines access restrictions and counterbalancing safeguards. They cannot be combined into a universal rule requiring disclosure of the substance or deletion in every case. Neither their differences nor the CCF's own Statute supports that result.

Comparison is practically useful along two axes: intelligibility of the answer to the disputed issue and adequacy of protection where information is restricted. Separate versions improve the first axis only if their content is not distorted; internal scrutiny strengthens the second only if its outcome affects the decision on data.

8. Preparing and communicating the decision

8.1. What the model adds

ARGA's model develops Article 35 and the CCF's published interpretation. Its additional element is a common sequence for preparing the complete decision, recording significant restrictions and checking recipient-specific versions. It proposes organisational arrangements and, for new mandatory safeguards, normative clarification. It does not describe an established Commission workflow.

First, potentially outcome-changing issues are identified. Confidentiality and sufficiency of relevant material are assessed separately. The assessment then determines what each recipient can receive: the original passage, a redacted document, an anonymised account or only a limited explanation of the material's role. Rejection of a safe alternative requires its own justification.

8.2. Minimum meaning and indirect disclosure

A communicated summary should ideally distinguish the information type, the proposition it supports and its significance for the outcome. A document may establish identity without establishing a warrant's continuing validity; a judgment may alter the procedural basis without resolving the political context. These distinctions can sometimes be explained without transmitting details.

Where dates, position and circumstances identify a witness, removing the name is insufficient. Review must consider the text as a whole together with what the recipient already knows. This is the author's risk model, not an assertion of an established incident. No predetermined word count or uniform level of generality is safe for every case.

8.3. Where safe communication is impossible

The existing Article 35(4) does not provide for automatic disclosure where justification is defective. The 2018 practice shows another route: preserve protection of source information and take procedural imbalance into account in assessing processing. Even complete non-disclosure therefore requires an answer concerning its consequences for determination of the request. [1, Article 35(4); 12-13]

Under the proposed model, the Chamber records why alternatives are impossible and what role the withheld material retains. Where necessary, clarification is sought under Article 34, provisional measures considered under Article 37 and corrective measures under Article 39. These provisions do not generally authorise new sanctions or cancellation of a domestic criminal act. [1, Articles 34, 37, 39]

If the source can remedy the defect, a specific condition and deadline with a foreseeable consequence may be considered. The 2018 No. 12 case demonstrates such an approach in particular circumstances but does not establish that it is mandatory in all cases. If the defect cannot be remedied, the outcome must follow from compliance with the processing rules, not a presumption that secret material is reliable.

8.4. Scrutiny before the decision and explanation afterwards

Reasons cannot retrospectively replace an opportunity to respond where that opportunity is necessary to test a significant contradiction. Communication of material during proceedings must be distinguished from communication of the reasons for an adopted outcome. Article 35 concerns information connected with the request, while Articles 38 and 41 govern the decision and its transmission. [1]

The proposed sequence therefore includes two checkpoints: before analysis is completed, assess whether a safe question or account can be put to the party for a response; after the conclusion is formed, assess whether the final version is intelligible. This avoids a polished text merely describing a closed procedure while leaving a fact-finding gap unresolved.

9. One decision and versions for different recipients

9.1. Consistency of content

In the proposed architecture, the complete internal version contains all analysis and grounds. The applicant's and source's versions are derived from it. Both must reflect one operative part and one line of reasoning within the bounds of safe communication. This does not entail two separate decisions on one request.

Party versions may be accompanied by a short disclosure restriction register. It may identify the material category, disclosure status, applicable Article 35(3) ground, a brief explanation and the alternative used: redaction, anonymisation or summary. The register must not describe withheld material so precisely that it indirectly reveals protected information.

This promotes consistent application of Article 35, helps the General Secretariat and parties understand the decision's structure and creates an internal record enabling the CCF to verify that less restrictive measures were actually considered.

Each version should undergo separate review before communication. The first check concerns completeness of logic: is the link between the issue, established facts, applicable rules and outcome still intelligible? The second concerns protection: could the remaining details collectively identify a source or person? The third concerns consistency of outcome: do different texts give incompatible explanations of one decision? The fourth concerns Article 42: can the recipient identify which facts were assessed and what new fact could potentially matter?

A rule for checking discrepancies should be established in advance. Removing a confidential passage is permissible if the remaining text preserves meaning. If it contained a qualification, mechanical deletion may create a more categorical assertion. A safe replacement preserving the assessment's limits is then needed. Review concerns compatibility of communicated conclusions, not identical paragraph counts.

9.2. Disclosure restriction register

The proposed register is a short internal document connecting material category, restriction ground, recipient, alternative communication method and review outcome. Its function is to make the restriction decision traceable within the procedure. It should not automatically be sent in full: even a list of sources or document types may disclose protected context.

The communicated part may be reduced to a safe explanation of categories withheld. It supplements reasons without replacing them. A table of restriction codes does not help if the decision itself fails to explain the subject and outcome of assessment. Register quality and explanatory quality should therefore be reviewed separately.

9.3. Public version

Publication creates an additional risk layer. Article 44 provides that the Commission shall endeavour to publish decisions subject to confidentiality; Article 43 provides for public annual reports. These mechanisms help explain approaches but do not require disclosure to the public of the same information available to a particular party. [1, Articles 43-44]

Public practice requires more than removal of names: analytical structure must survive. Publication should ideally preserve enough information about the issue, applicable rule, argument and limits of the finding. Rare combinations of profession, country, amount and date may nevertheless identify someone without a name. Anonymisation must be assessed against the final text and available external context.

10. Safety of applicants and third parties

10.1. Protected details and necessary content

Article 35(3)(c) expressly protects the rights and freedoms of applicants and third parties. The 2018 No. 7 excerpt shows that protecting an applicant's information can coexist with continued examination and questions to the source. This supports recipient-specific assessment, not automatic secrecy for every attachment. [1; 13, para. 26]

The practical model must distinguish legally relevant content from protective details. A document may establish a status or event while containing a family's address, medical information or a third party's contact details. The need to examine the first element does not make transmission of the second necessary.

10.2. Consultation and the limits of consent

Applicants should identify sensitive passages, the recipients to whom transmission would be dangerous and why. Absence of a marking does not remove the Chamber's ability to act under Article 35(3). Prior consultation with the information owner under paragraph 2 must also be distinguished from an assumption that submitting a document consents to any later transmission. [1, Article 35(2)-(3)]

The proposed organisational measure is to record the agreed scope of use and reassess it if the recipient or purpose changes materially. This is a recommendation; it does not attribute a comprehensive consent model to existing provisions that do not contain one.

10.3. Risk assessment without unproven accusations

A protection request should explain the link between information and possible harm, without having to await actual harm. An abstract fear does not, however, establish unlawful conduct by a particular state or person. Individual reasoning must distinguish the applicant's risk claim from the Chamber's finding that a restriction is justified.

This discipline allows protection to be assessed without unnecessarily deciding the domestic persecution dispute. This public report uses only officially anonymised materials; withheld names, states and dates are not reconstructed. The scenarios in section 17 are hypothetical and contain no client data.

11. Revision: a new fact and a new outcome

11.1. Two separate questions

Disagreement with the original text is insufficient under Article 42: a discovered fact capable of changing the conclusion and compliance with the six-month period from discovery are required. The Operating Rules require explanation of that potential significance. Reasons help compare the new fact with the original basis but do not themselves expand revision criteria. [1, Article 42; 2, Rule 30(7)]

This establishes an important limit to reform. An inadequate explanation and a new fact are different defects and grounds. A party cannot be promised that a complaint about poor reasoning will automatically be admitted for revision. A separate procedure to scrutinise the quality of the communicated decision would require its own normative basis.

11.2. The 2023 No. 9 excerpt

The CCF accepted previously unknown judgments as a fact satisfying revision conditions: they were submitted in time and potentially capable of affecting the conclusion. It then separately examined the merits, including repeated-prosecution arguments, absence of a transfer of proceedings and information about extradition steps. The operative part distinguishes admission of revision from the continued compliance of the data. [14, paras. 15-34 and operative part]

The author's conclusion is that reopening and changing the previous outcome are not synonymous. Reasons should explain separately what passed the entry threshold and why it was insufficient on the merits. This distinction prevents false expectations and identifies the circumstance that remained decisive.

The case does not provide a universal account of international ne bis in idem. This report focuses on the procedural structure of reasoning, not evaluation of all treaties and domestic legal orders. The CCF's position concerns the particular circumstances and materials before it.

11.3. The source's interest without an advisory function

The official 2026 Call identifies sources' difficulties in assessing revision. A communicated decision should, where possible, identify the nature of the non-compliance: currency of the underlying basis, the individual's connection, processing purpose or another criterion. [5]

The Commission explains its own conclusion rather than instructing a party how to obtain a desired outcome. This matters particularly for factual defects: changing words in a notice does not necessarily cure an insufficient basis. ARGA's recommendation concerns explanatory quality, not a guarantee of data re-registration.

11.4. Limits of external use

A change in INTERPOL processing does not automatically resolve a domestic warrant, migration status or commercial screening issue. This follows from the scope of review and limits of statutory measures. Decisions should therefore be worded so they can be accurately presented to other recipients without expanding their legal effect. [1, Articles 33(4), 39(3)]

Intelligible reasons help distinguish these consequences but do not impose new duties on outside bodies. Their conduct must be assessed under the law applicable to them. Those mechanisms fall outside D-01.

12. RPD, Operating Rules and digital communication

12.1. Internal confidentiality and the limits of guidance

Rules 13 and 29 protect the Commission's work and files; Rule 29(2) permits special procedures for sensitive material. Rules 31-33 provide for explanations of particular procedural outcomes and reasoned conclusions, subject to the relevant qualifications. They should be read with Article 38 of the Statute. [2]

This permits organisational arrangements for drafting but not removal of higher-level restrictions. Rule 34 prohibits derogation from the Statute. A new mandatory minimum of communication, independent challenge procedure or new sanction must have an appropriate normative basis. [2, Rule 34]

12.2. Classification does not replace procedural justification

The RPD preserve source control over processing and govern restrictions on access by other information-system participants. Confidentiality is determined by reference to risks; Article 112 establishes three levels. These rules protect exchange but do not replace the specific Article 35 assessment in individual proceedings. [3, Articles 7, 14, 58, 112]

This distinction is not merely the author's construction. In the 2018 No. 12 case, the CCF expressly required the source to supplement RPD references with a specific statutory ground, an explanation of its applicability and consideration of minimum communication. The outcome nevertheless did not entail unrestricted disclosure of source data. [12, paras. 46-51]

Two conclusions can therefore coexist: the document retains its information-system regime, and the proceedings require an explanation of why particular content is withheld from this recipient. Reconciling them requires consultation and assessment of alternatives and, if a defect remains, a decision on its significance for processing.

12.3. Portal and version control

The Operating Rules provide for requests and attachments to be submitted through the portal; other means are possible exceptionally with the Commission's permission. An electronic channel does not confer automatic access to the whole confidential file or change Article 35's substantive grounds. [2, Rule 25]

The proposed model benefits from organisational checks of recipient, version and communication date. The complete internal version, applicant version, source version and public excerpt should have distinct purposes. Attaching the wrong version is a typical risk of this architecture; this report does not assert that such an incident has occurred at the CCF.

Version control must not produce unrecorded changes to grounds after adoption. If an editorial error is found, correction of communication must be distinguished from changing the legal conclusion itself. Authority for the latter cannot be inferred from the technical ability to replace a file.

13. Objections and testing the model

13.1. Disclosure can cause irreversible harm

The strongest objection is that an intelligible decision cannot compensate for exposing a source or operation. Even a careful summary may enable identification. This valid objection rules out an absolute requirement to communicate the substance of every item in all circumstances.

The model responds with a separate indirect-identification assessment and the possibility of complete non-disclosure if no safe alternative exists. That exception must remain internally reviewable. It neither removes scrutiny of reliability nor automatically makes the factual basis sufficient.

13.2. Additional requirements increase workload

Preparing several versions, a register and risk checks takes time. With limited resources this may prolong proceedings, itself impairing protection of interests. The most detailed possible analysis of every line cannot therefore be recommended irrespective of its significance.

Proportionate implementation entails grouping similar information, standard explanations for recurring situations and intensive scrutiny of significant restrictions. Templates must help record the particular risk rather than replace it with general language. Effects on timeframes should be evaluated in a pilot, not assumed to be positive.

13.3. Parties may contest every redaction

A more explicit structure of restrictions may encourage further applications. Lack of explanation can also generate repeated requests based on misunderstanding. Without data, it is unknown which effect predominates. Reduced application numbers are therefore not promised as a reform outcome.

The proposed model does not automatically create a separate appeal against every editorial operation. It improves decision content within the existing system and identifies questions requiring statutory action if a new challenge procedure is intended. Substituting internal regulations for that action would be legally vulnerable.

13.4. Police trust may weaken

A source may fear disclosure contrary to the conditions under which information was supplied. This matters for international cooperation. The answer is not to deny source control: consultation and risk assessment remain. Any mandatory requirement for a safe account must be normatively clear and predictable.

The model also protects the source as a recipient of reasons. It receives an explanation of identified defects and the decision's limits without mandatory transmission of sensitive applicant details.

Reform thereby addresses both sides without eliminating the need to reconcile processing and communication conditions.

13.5. Clear writing can conceal weak evidence

Persuasive reasoning does not guarantee a correct outcome. Registers and multiple versions may also become formalities. Final review must therefore ask substantive questions: does the material establish this particular fact, has the contradiction been resolved, is the individual connection sufficient, and has a participant's assertion been presented as the body's finding?

If unanswered, these questions are not remedied by a longer text. Reform makes sense only alongside disciplined fact-finding. Accessible explanation helps expose logical gaps but cannot replace verification itself.

14. Proposed normative wording

The following provisions are English translations of the author's Russian-language drafts for discussion. They are not adopted amendments or official INTERPOL wording. Final legal drafting must consider all authentic language versions and consistency with related provisions.

14.1. Clarification of Article 35(3)

'A restriction on the communication of information shall be linked to a specific and reasonably foreseeable risk to one or more interests listed in this paragraph and shall not exceed what is necessary to protect those interests. Assessment shall take account of the recipient and the possible consequences of disclosure.'

The wording explicitly reflects individualised assessment and proportionality already recognised in practice without requiring proof of harm already suffered. [12, paras. 47-49] It preserves the four existing grounds and the Chamber's initiative. Its intended consequence is a duty to explain the link between material and risk rather than merely name the protected sphere.

14.2. Development of Article 35(4)

'Before withholding information in full, the Chamber shall consider whether the relevant interest can be protected through partial communication, redaction of sensitive passages, anonymisation or a substantive summary. Rejection of those methods shall be recorded with reasons to an extent compatible with protection of the information.'

This develops the existing reference to summaries and the CCF's published approach to counterbalancing measures. [1, Article 35(4); 12-13] It does not remove the rule that lack of justification alone does not lead to disclosure. Preservation of that qualification must be expressly checked when preparing consolidated amendment wording.

14.3. Significant withheld material

'Where undisclosed information materially affects the outcome, its substance and role in the reasoning shall be communicated to the affected party to the greatest extent safely possible. Where safe communication is impossible, the Chamber shall separately record the reasons, examine the material's reliability and significance, and assess the sufficiency of the basis for its decision.'

The proposal does not automatically render every withheld document inadmissible. A stricter consequence would require a separate choice by the competent rule-making body. It does, however, exclude treating secrecy as a substitute for evidential assessment.

14.4. Clarification of Article 38(2)

'The reasons shall make it possible to identify the issues determining the outcome, the material facts accepted, the INTERPOL rules applied, the assessment of the principal arguments and the connection between the analysis and operative part. The extent of explanation shall be proportionate to the disputed issues and take account of permissible restrictions on communicating information.'

The existing list of decision components is retained. A functional connection between them is added. The wording does not require an answer to every repeated assertion or equate the CCF with a domestic criminal court.

14.5. Clarification of Article 38(3)

'Adapted versions of one reasoned decision may be communicated to the parties. Restrictions shall be assessed separately for each recipient. The versions shall preserve a common operative part and shall not distort the factual and legal reasoning of the complete decision.'

Further work must identify which elements can already operate as editorial practice and which require express incorporation. Article 49 provides for amendment of the Statute by the General Assembly; guidance must not circumvent that procedure. [1, Article 49]

15. Implementation and evaluation

15.1. Phased introduction

The CCF has already announced a 2026 organisational pilot involving remote examination, expanded delegation for suitable uncomplicated cases and changes to its session schedule. This is the Commission's own initiative, not implementation of ARGA's proposals. It matters when assessing additional workload. [9]

The first stage of the model proposed here is to assess existing practice using authorised internal access. This study lacks data permitting the frequency of problems to be stated in advance. The initial task is therefore to establish a baseline: which restriction categories occur, where explanation is lost and how long preparation of a safe version takes.

The second stage is a pilot of a common decision structure and register of significant restrictions. It should cover different outcomes and sensitive information types rather than test only easy cases. It cannot remove existing rights or create new grounds for non-disclosure.

The third stage assesses legal gaps. If safe accounts cannot be ensured without clarification of powers, mandatory safeguards or consequences of breach, statutory work is necessary. Organisational improvement and normative reform must be connected but distinguished.

15.2. What to measure

Useful indicators should describe the process rather than confirm success in advance. Possibilities include the proportion of decisions clearly identifying decisive issues, significant restrictions with a recorded alternatives assessment, time spent preparing communicated versions and inconsistencies detected during review. Every indicator requires a defined unit of observation and coding rules.

Disclosure incidents and near misses should be recorded separately. Greater substance cannot count as success if dangerous identifiers are transmitted. Conversely, absence of recorded incidents does not prove full protection: detection and recording methods require scrutiny.

External intelligibility testing can use anonymised or constructed material without access to real confidential data. Readers can be asked to identify the issue, accepted factual basis and reason for the outcome. This tests explanatory quality, not substantive correctness or the actual risk in an individual case.

15.3. Limits of indicators

Page counts, percentages of redacted text and successful-request numbers are not independent measures of fairness. A short decision may suffice and a long one remain opaque. Success rates depend on the composition of requests and should not be a target for reasoning quality.

Nor should a specified reduction in misuse of international wanted-person mechanisms be promised. The study contains no causal model or statistics permitting that estimate. A supportable reform outcome is more modest: more consistent recording of restriction grounds and a clearer connection between material, rules and outcome, subject to subsequent evaluation.

16. Conclusions and recommendations

The existing Statute requires reasoned decisions while permitting information protection. The central uncertainty lies in the transition from full internal analysis to the communicated text. A standard is needed that preserves explanatory meaning while restricting details and does not treat confidentiality as evidence of sufficiency.

First, systematise the necessity and proportionality assessment already recognised by the CCF, recording the interest, recipient and risk for every significant restriction. [12-13] Similar material may be grouped if no distinct decisive issue is concealed. An unjustified confidentiality request must not automatically lead to dangerous disclosure.

Second, establish consistent consideration of safe alternatives: partial communication, redaction, anonymisation and an account of the substance. Where all alternatives are impossible, separate internal reasons and heightened scrutiny of the withheld material's reliability and significance are necessary.

Third, use one complete decision and consistent applicant and source versions. The source's interest in understanding the result is directly relevant to the 2026 consultation. Equal explanatory quality does not mean identical information: risks to participants and third parties may differ substantially.

Fourth, preserve in the communicated decision the outcome-determining issues, limits of established facts and nature of the applied criterion. This supports meaningful use of Article 42 without turning the Commission into the parties' adviser or presenting revision as an ordinary appeal.

Fifth, distinguish improvements available within existing rules from new mandatory safeguards requiring statutory amendment. Operating Rules, classification and source control must be reconciled with reform openly rather than changed indirectly through editorial practice.

Sixth, evaluate implementation through explanatory quality, disclosure safety and workload. Neither published excerpts nor decision length alone provides reliable statistics about the system's overall quality. Stronger conclusions require access to appropriately protected internal data.

Confidentiality may leave a party with less information than the CCF possesses. Without separate justification, it should not leave the party unable to understand which question was decided and why. Preserving that connection is the most concrete and realistic objective of reform.

17. Evidential limitations and decision review

Limitations affecting conclusions

The following have not been established: the proportion of inadequately reasoned decisions; all versions served on parties; implementation of the conditional 2018 No. 12 outcome; adoption of new Articles 35 and 38 following the September discussion; and the model's measurable effects. Corresponding assertions are therefore not used as facts.

Removing these limitations would require, respectively, protected access to a defined set of files, implementation information for the particular decision, a published normative act and a predefined evaluation method. Their absence does not prevent normative analysis but limits claims about prevalence and effectiveness.

The following framework is intended for discussion and is not an existing CCF instruction. It applies to the complete draft decision and separately to each communicated version.

A. Subject and limits

The reviewer establishes whether the request type and particular processing issue are defined, domestic accusations are separated from Commission findings, and it is clear which arguments were examined and which were left unresolved because another ground sufficed. If the outcome is described beyond competence, its wording is corrected before confidentiality review.

B. Material and risk

For every significant withheld element, record the information category, applicable Article 35(3) ground, recipient and risk. Record alternatives considered and the reason for rejecting each suitable alternative. Document classification does not replace this assessment but is considered alongside source control and supply conditions.

C. Intelligibility and consistency

The reviewer reads only the communicated version and reconstructs the transition from issue to fact, fact to rule and rule to outcome. Comparison with the full text then checks for lost qualifications, probabilistic conclusions made categorical or altered meaning of a decision not to examine another argument. A detected gap is repaired through safe editing where possible.

D. Safety of the final text

The remaining details are assessed collectively against what the recipient may already know. Particular attention is paid to combinations of dates, places, family links and procedural events. A public version requires fresh assessment because an unrestricted readership possesses a different external context.

E. Illustrative scenarios

Scenario 1: a document contains a witness's address and an account of a significant event. Proposed action: consider removing the address and identifiers while retaining the event's substance. If the remaining details still identify the witness, increase generality; anonymisation is not assumed automatically safe.

Scenario 2: the source states that all information concerns an ongoing investigation. Proposed action: request or independently assess the link between particular categories and a specific risk, preserving the Chamber's own-initiative power. Inadequate justification does not trigger automatic transmission of the entire file.

Scenario 3: the applicant submits a protection document containing the family's residence. Proposed action: separate legally relevant content from protective details and consider a neutral question to the source. The document's status does not exclude scrutiny of authenticity and relevance.

Scenario 4: the sole significant corroborating material cannot safely be described even generally. Proposed action: separately justify non-disclosure, assess reliability and sufficiency, and identify permissible measures within competence. Neither automatic disclosure nor automatic confirmation of lawful processing is the prescribed outcome.

F. Minimum register entry

An internal entry should connect the material to the decision issue, restriction ground, recipient, assessed alternative and outcome. Any part communicated to a party requires separate safety review. The register retains a supporting function and does not replace reasoned text.

18. Sources and reference apparatus

[1] INTERPOL. Statute of the Commission for the Control of INTERPOL's Files. II.E/RCIA/GA/2004 (2025). Amendments of 27 November 2025. Principal provisions: Articles 3-6, 35-44 and 49.
https://www.interpol.int/en/content/download/5695/file/Statute%20of%20the%20CCF%20(E).pdf?inLanguage=eng-GB&version=17

[2] CCF. Operating Rules. CCF/107/d488. Originally adopted on 28 March 2017; current version: 26 March 2026. Rules 13, 25 and 29-34.
https://www.interpol.int/content/download/24270/file/OperatingRulesCCF%202026%20E.pdf

[3] INTERPOL. Rules on the Processing of Data. III/IRPD/GA/2011 (2025). Articles 7, 14, 58, 83 and 112. Version year follows the text's title page, not the filename.
https://www.interpol.int/en/content/download/5694/file/26%20E%20RulesProcessingData_RPD.pdf?inLanguage=eng-GB&version=36

[4] INTERPOL. Constitution of the ICPO-INTERPOL. I/CONS/GA/1956 (2024). Articles 2-3.
https://www.interpol.int/en/content/download/590/file/01%20E%20Constitution_2024.pdf?inLanguage=eng-GB&version=18

[5] INTERPOL. Fourth Call for Contributions from Civil Society to the Committee on the Processing of Data. 20 July 2026; submission deadline: 16 August 2026.
https://www.interpol.int/Who-we-are/Legal-framework/Call-for-contributions-from-Civil-Society-to-the-Committee-on-the-Processing-of-Data

[6] CCF. 2023 - Decision Excerpt No. 11: Validity of proceedings, Cooperation of NCBs. Paragraphs 10-17. Anonymised excerpt; the publication does not disclose the individual decision date.
https://www.interpol.int/en/content/download/20523/file/2023%20-%20Decision%20Excerpt%20N%C2%B011%20-%20Validity%20of%20proceedings,%20Cooperation%20of%20NCBs.pdf?inLanguage=eng-GB&version=2

[7] CCF. 2025 - Decision Excerpt No. 2: Due Process, Lawfulness or Validity of the proceedings, Description of criminal activities. Paragraphs 30-35. Anonymised excerpt.
https://www.interpol.int/en/content/download/22554/file/2025%20%E2%80%93%20Decision%20Excerpt%20N%C2%B02%20%E2%80%93%20Due%20Process,%20Lawfulness%20or%20Validity%20of%20the%20proceedings,%20Description%20of%20criminal%20activities.pdf?inLanguage=eng-GB&version=2

[8] CCF. 2025 - Decision Excerpt No. 4: Article 2, Quality of the data. Paragraphs 18-26 and 30-35. Anonymised excerpt.
https://www.interpol.int/en/content/download/22578/file/2025%20%E2%80%93%20Decision%20Excerpt%20N%C2%B04%20%E2%80%93%20Article%202,%20Quality%20of%20the%20data.pdf?inLanguage=eng-GB&version=1

[9] INTERPOL. CCF sessions and decisions. Official index of published decisions and excerpts.
https://www.interpol.int/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/CCF-sessions-and-decisions

[10] ECtHR. Ruiz Torija v. Spain. Application No. 18390/91. Judgment of 9 December 1994. Paragraphs 29-30.
https://hudoc.echr.coe.int/eng?i=001-57909

[11] ECtHR, Grand Chamber. Regner v. the Czech Republic. Application No. 35289/11. Judgment of 19 September 2017. Paragraphs 146-162.
https://hudoc.echr.coe.int/eng?i=001-177299

[12] CCF. 2018 - Decision Excerpt No. 12: Access to files, Political character. Paragraphs 44-51; operative part, p. 7. Conditional consequence; implementation information is not published in the excerpt.
https://www.interpol.int/content/download/14114/file/2018%20-%20Decision%20Excerpt%20N%C2%B012%20-%20Access%20to%20files,%20Political%20character.pdf

[13] CCF. 2018 - Decision Excerpt No. 7: Asylum-Refugee, Access to files, Political character. Paragraphs 17-31, 46 and 58; operative part.
https://www.interpol.int/content/download/14109/file/2018%20-%20Decision%20Excerpt%20N%C2%B007%20-%20Asylum-Refugee,%20Access%20to%20files,%20Political%20character.pdf

[14] CCF. 2023 - Decision Excerpt No. 9: Application for revision, Ne bis in idem. Paragraphs 15-34; operative part. Admission of revision is distinguished from the merits outcome.
https://www.interpol.int/content/download/20518/file/2023%20-%20Decision%20Excerpt%20N%C2%B09%20-%20Application%20for%20revision,%20Ne%20bis%20in%20idem.pdf