



Observatoire ARGA

INTERNATIONAL ANALYTICAL REPORT

D-05. CCF Practice 2020-2026:

Limits of Public Disclosure

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Source cut-off: 28 September 2026. Keywords: CCF; transparency; confidentiality; anonymised decisions; statistics; implementation.

Executive summary

The public practice of the Commission for the Control of INTERPOL's Files (CCF) permits examination of the legal grounds of decisions, but does not constitute a complete register of individual proceedings. Annual reports, anonymised excerpts and procedural announcements answer different questions. Combining them is useful only if the distinctions between the activity period, decision date, publication date, statistical unit and confirmed implementation outcome are preserved.

This report examines the limits of public disclosure over 2020-2026 as at 28 September 2026. The earlier part of the period is represented primarily through activity reporting, including the combined 2019-2020 report. Eight decisions from 2023-2025 are used to analyse reasoning. Organisational changes announced for 2026 are examined as procedural measures, rather than as proven improvements in outcomes. The report does not assume that complete results exist for the unfinished year 2026.

The principal finding is that CCF transparency has several independent dimensions: availability of rules, disclosure to participants, publication of legal reasoning, explanation of statistics and visibility of implementation. Progress in one does not establish progress in all the others. For example, more publicly available excerpts may improve understanding of legal reasoning without permitting calculation of a deletion probability or the average duration of a particular category of requests.

The case analysis demonstrates the importance of distinguishing Red, Yellow, Green and Blue Notices, diffusions, and the SLTD and SMV databases. Their outcomes cannot all be described as cancellation of international wanted-person status. Conditional retention, correction of an identifier, deletion of several connected notices and retention of a vehicle record have different meanings. A public account should identify the object and legal condition examined.

Observatoire ARGAs proposes targeted transparency: preserving the legally material structure of a case during anonymisation; explaining publication selection criteria; distinguishing outcomes and stages; explaining changes to statistical definitions; and providing aggregate implementation information. This approach seeks verifiability without revealing applicants' identities, operational information or confidential national case materials.

1. Scope, source corpus and method

1.1. What public practice means

The expression "CCF practice" may refer to all requests examined by the Commission, the published texts of selected decisions, or professional understandings of how particular issues are resolved. These meanings must be distinguished. A researcher using public materials observes the product of selection and anonymisation, rather than the Commission's entire workload. Describing the corpus as public is a substantive statement about the evidence available.

The report uses three source groups. The first comprises the CCF Statute and INTERPOL's Rules on the Processing of Data (RPD). The second covers the official activity reports for 2019-2020, 2021, 2022, 2023 and 2024, together with current institutional webpages. The third consists of published

decision excerpts: 2023-01, 2023-10, 2024-03, 2024-04 and 2025-01-2025-04. Each group is used within its evidential function. [1-17]

The eight decisions were selected purposively to compare different information objects and outcome types. They are not a sample designed to estimate success rates. Full files, party documents, processing logs and confidential correspondence are unavailable to this study. Implementation is examined separately from the wording of the published operative part.

1.2. Chronological discipline

The period 2020-2026 in the title defines the scope of the transparency inquiry. It does not imply an evenly distributed sample of decisions for every year. The inspected catalogue includes series for 2023, 2024 and 2025; activity reports provide the principal evidence for the earlier portion of the period. Absence of a year from the observed decision series does not establish absence of cases decided in that year. [3-9]

At least four dates should be distinguished for each source: the activity period, adoption of the decision, publication and the researcher's consultation of the document. The year in an excerpt's title forms part of its official designation; it does not reconstruct a redacted calendar date. Search-engine indexing dates are not treated as proof of first publication.

The cut-off is 28 September 2026. The latest activity report listed in the inspected reports section covers 2024. This is an observation about the available corpus, not a claim about the existence or absence of other internal documents. Current webpages may change; historical comparison of publication practices would require archived versions that are not available here for the entire period. [3; 4]

1.3. Order of examination

Each excerpt is read in sequence: processing object, applicant's position, source response, CCF findings and operative part. The analysis then identifies what is available and what is redacted. Conclusions follow that examination and state their limits. This separates a party's allegation from a Commission finding and from the author's own proposal.

Particular attention is paid to adverse and conditional outcomes. They reveal the limits of arguments and prevent selection of successful deletions alone. A refusal to delete can be more informative than a short success announcement where it explains the legal importance of a particular evidential gap. Public practice is examined as material for testing reasoning, rather than as a collection of promotional endorsements.

2. Five dimensions of transparency

2.1. Rules, participation and published reasons

Access to legal rules establishes competence and procedure. Participants' access to materials enables a challenge in particular proceedings. Publication of anonymised decisions enables third parties to study reasoning. These functions are connected but not interchangeable: publishing general guidance does not answer whether an applicant received a material document.

Similarly, providing a reasoned decision to the parties does not make it public. The official CCF page states that decisions are confidential, while selected anonymised texts are published to explain its activities. A public excerpt and the text supplied to a participant may therefore differ in length. A confidentiality label retained in an officially published file does not itself make that file a leak. [3]

The fourth dimension is statistical transparency. It requires understanding which requests a measure includes or excludes and how combined requests are counted. The fifth is visibility of implementation: the ability to establish what happened after a decision. Neither a general rule, an anonymised explanation nor an overall number of closed proceedings is sufficient for that purpose.

2.2. Why a single transparency score is insufficient

An institution may publish detailed rules but disclose individual reasons infrequently. It may increase the number of excerpts while retaining difficult statistics. It may inform parties well while limiting external scrutiny of implementation. Reducing these properties to a single "open or closed" assessment conceals the particular improvement required.

The report instead proposes examining each dimension separately: whether information exists, how intelligible it is, whether it can be compared with other sources and which conclusions it supports. Legal research benefits more from identifying the missing element than from assigning a general reputational score. This approach recognises the value of published decisions while allowing criticism of an incomplete corpus.

Dimension	What can be examined	Question requiring separate examination
Availability of rules	Competence and procedural conditions	Application in a particular case
Participant access	Ability to understand and challenge material	Permission to disclose it to third parties
Published decisions	Legal reasoning in selected cases	Representativeness of selection
Statistics	Volume and composition of defined categories	Probability of an outcome in a new request
Implementation	A confirmed processing change	All subsequent national consequences

3. The legal framework of confidentiality

The Statute provides for a public annual report and separately addresses publication of decisions, recommendations and opinions subject to confidentiality and other conditions. The distinction between Articles 43 and 44 matters: annual reporting and disclosure of individual practice do not create an identical obligation to publish every item in full. [1, Arts 43-44]

Article 35 is relevant to participant access, providing for communication restrictions and consideration of partial disclosure. Analysis should identify both the restriction and its object: a source, passage, authority response or third-party information. Justification and proportionality concern the particular material. [1, Art. 35]

This framework supports an analytical distinction between confidentiality of identity and confidentiality of legal reasoning. Removing a name can often be compatible with preserving the issue, test and outcome. However, a combination of unusual circumstances may identify someone without naming them. Effective anonymisation therefore requires examining the information collectively rather than mechanically replacing a surname with a placeholder.

Publication also affects people other than applicants: children, witnesses, alleged victims and relatives. One participant's consent does not automatically authorise disclosure about everybody else. For this research, that means using the official publication without attempting to reconstruct redacted identifiers from related news coverage.

Restricted publication has a cost: readers have less visibility of context, applicable national law and the completeness of responses. Legitimate confidentiality protection does not eliminate this research loss. The analytical task is to identify which legally material relationships can safely be preserved. Whether a decision is final or both parties participated may matter more than an exact date or geographical name.

The proposed model does not assume unrestricted public access to case files. It concerns the minimum information needed to understand why an outcome followed. Defining that information precisely reduces the need to choose between completely inaccessible reasoning and excessive personal disclosure.

4. The period 2020-2026 through activity reporting

4.1. The earlier period and institutional context

The combined 2019-2020 report describes work during the pandemic and organisational responses intended to maintain continuity. Its two-year scope is essential when reading statistics: a combined total cannot be placed in a row labelled "2020" without a separate breakdown. The 2021 report also links work organisation to continuing pandemic constraints. [5, preliminary remarks; 6, paras 1-4]

Historical comparison should distinguish changes in external conditions from changes in legal reasoning. Remote examination can affect organisation without itself establishing a different standard of data sufficiency. More requests may reflect accessibility, applicant awareness or changes in international cooperation flows. The direction of a numerical change alone does not identify its cause.

The 2022 report covers supervision, advice and request processing. This illustrates the incompleteness of assessing the CCF solely through individual deletions: some work concerns rules and information systems before a particular dispute arises. Public reporting benefits from separating these functions because their outcomes are expressed in different units. [7, executive summary and report structure]

4.2. Reporting year and information about the following period

The 2023 report expressly explains that its statistics concern 2023 while the narrative includes selected information about activity in 2024. Such a combination is legitimate but requires care. The date of an event should not automatically be inferred from the report's title. Analysis of an organisational change should use the relevant paragraph rather than the cover alone. [8, para. 1]

The 2024 report separately explains its move to reporting new admissible requests and restating corresponding earlier figures for comparability. This changes the comparison basis. A series assembled from headline figures in different publications may mix all received requests with admissible requests and create a false impression of growth or decline. [9, para. 53]

The analytical implication is that statistical definitions need version control alongside numbers. Where a new report restates an earlier year, researchers should identify whether they use the original or restated value. Both may be correct under their respective definitions, while mechanically combining them produces an invalid series.

4.3. The unfinished year 2026

The current CCF page describes a 2026 pilot involving increased remote examination, delegation of appropriate non-complex cases and three longer sessions with an additional session possible. For this report, that establishes an announced organisational change. It is not evidence of an achieved reduction in processing times. [3]

Evaluation will require comparable indicators before and after implementation, information about case composition and the outstanding caseload. Faster disposal of straightforward cases may reduce the average duration of completed proceedings even while complex requests wait longer. An organisational reform should therefore be assessed across categories rather than through a single overall mean.

5. Statistics: the denominator determines the result

5.1. Different levels of the same flow

The 2024 report shows successive narrowing of the population: 2,717 closed requests; 1,077 closed deletion requests; 703 admissible deletion requests involving applicants subject to data; 164 deletions by sources or the General Secretariat before a CCF decision; and 539 CCF decisions. In the last group, 217 outcomes were compliant, 272 non-compliant and another 50 non-compliant because of complete source non-cooperation. [9, paras 59-62]

This sequence demonstrates why "complaint success rate" needs a definition. A measure might count non-compliance decisions, cessation of processing before a decision, any record amendment or only final deletions on a particular ground. Each answers a different question. A percentage without an identified numerator and denominator has no verifiable meaning.

A further difficulty is the difference between incoming and outgoing flows. Requests closed during a year may have arrived earlier; requests arriving that year may remain open. Dividing completed cases by new requests does not establish an individual success probability or the proportion granted in one cohort. That requires following the same group from receipt to outcome.

5.2. Non-cooperation and assessment of the allegation

An outcome caused by absence of a source response has different evidential significance from an outcome following substantive examination. In the former, the procedure lacked necessary material; in the latter, the explanation supplied was assessed. Both can matter for processing, but deletion alone does not establish that the Commission found political character or innocence.

The proposed research dataset should store the legal ground and procedural route separately. This captures non-cooperation without losing information about the legal issue involved. Where a public source reveals only the procedural ground, other fields remain unknown. Filling them with an assumed explanation creates the appearance of a more complete database than actually exists.

5.3. Calculation as illustration rather than prediction

A hypothetical example illustrates the problem. If 30 of 100 invented requests end before substantive determination and 70 receive a decision, the favourable-outcome proportion among the 70 differs from the proportion among all 100. Including corrections changes the numerator again. These numbers explain the method only and do not describe CCF activity.

Even a correctly calculated proportion characterises its reporting category. A new case may differ in data type, allegation, documentary completeness and source cooperation. Applying statistics to an individual forecast would require a model accounting for those differences and validated on independent data. No such model is available in this study's public corpus.

6. Selection, anonymisation and limits of comparison

A public excerpt is a selected representation of a case. Selection may aim to explain an interesting issue, illustrate varied outcomes or reveal a new problem. Without the full selection policy and underlying population, a researcher cannot assess how closely publications reflect the distribution of all cases.

This matters especially when comparing years. If one series includes more deletions and another more retentions, editorial choice is a possible explanation. A change in legal approach must be established through comparable circumstances and reasons, rather than by counting outcomes in a few published files.

Anonymisation creates a second boundary. Without a country name, the national rule may be difficult to examine; without dates, a procedural interval cannot be measured; without annexes, a pivotal item of evidence cannot be inspected. Nevertheless, the legal structure often remains visible: the argument, source response, test applied and decision. That level is the main object of the analysis below.

A third boundary concerns processing objects. A test for warning of a possible threat cannot automatically be transferred to a request for arrest; a vehicle dispute differs from assessment of personal criminal involvement. Comparison therefore starts with classifying the object before applying general provisions on quality and purpose.

Testing a conclusion requires considering alternative explanations. Where deletion followed, the researcher should identify whether content insufficiency, an excluded offence category, loss of purpose or a procedural problem was decisive. If the grounds are incompletely disclosed, the conclusion narrows accordingly. This discipline makes the corpus useful without attributing unavailable completeness to it.

7. Red and Yellow Notices: decision 2025-01

7.1. The published outcome

The case combined a Red Notice concerning a parent and Yellow Notices concerning children. The CCF examined competing custody decisions and parental participation in the proceedings. The Red Notice did not satisfy the requirements in the family-dispute context; a continuing search purpose was not established for the Yellow Notices given the children's known situation. The challenged data were to be deleted. [10, paras 23-34 and operative part]

7.2. What the example reveals about disclosure

One published excerpt can cover several people and different notice categories. PDF counts therefore do not equal counts of individuals, records or independent legal outcomes. Quantitative research must define its observation unit before counting. Where the objective is analysis of grounds, a useful unit is the combination of processing object and issue determined.

Qualitatively, the shared family circumstances have different implications depending on notice type. Assessment of the offence category and assessment of the need to locate someone are not a single test. The published result preserves that distinction despite redacted names, countries and dates. Anonymisation can therefore retain valuable legal structure without revealing children's identities.

However, the reader does not receive the complete material needed to resolve the custody dispute. An account of the CCF decision does not establish universal priority of one national court over another. Its research value concerns the limits of INTERPOL tools in a particular configuration. Turning the excerpt into general family-law advice would exceed the evidence available.

A useful publication improvement would separately identify the number of information objects and the outcome for each. This is a metadata proposal, not a demand to reveal children's names. It would support statistics and prevent inaccurate accounts presenting several different notices as one warrant.

7.3. Uneven cooperation and sufficient public explanation

The published text of 2025-01 records that one consulted NCB did not respond. The Commission nevertheless had information about judicial proceedings and interstate communication. [10, para. 22 and paras 23-34] Analysis must therefore distinguish a missing particular response from absence of all evidence concerning the issue.

In such circumstances, public reasons should show which available material supports the finding. Where another document confirms the matter covered by an unanswered inquiry, the gap has a different significance from a missing answer needed to verify the sole processing basis. Merely recording that a State did not respond does not explain this difference. Research should examine the function of the missing material, not cooperation alone.

This distinction avoids two opposite errors. Silence should not automatically be treated as acceptance of the applicant's arguments; nor should it be assumed that no decision is possible without every participant's response. The issue is whether the available material suffices for the particular conclusion. Publication is more useful when it preserves the connection between the evidential gap and the issue determined.

Cases involving several applicants raise a further difficulty: different disclosure needs. Information sufficient to explain an adult's outcome may expose a child unnecessarily. A single text need not disclose every factual strand in equal detail. The priority is intelligibility of the legal basis for each result, rather than symmetry in the amount of detail published.

8. Personal involvement: comparing 2023-01 and 2025-02

8.1. Two published assessments

In diffusion case 2023-01, the CCF distinguished a valid cooperation purpose from adequate description of personal involvement; deficiencies in the latter led to deletion. In Red Notice case 2025-02, involving tax and licensing issues, insufficient explanation of the applicant's role, knowledge and alleged benefit was material; deletion was also ordered. [16, paras 29-41; 11, paras 30-35]

8.2. Similar reasoning and different legal structures

The comparison supports a narrow analytical proposition: both published accounts attach importance to the link between a particular person and the conduct described. However, the conditions for publishing a Red Notice differ from those governing circulation of a diffusion. The special restrictions on one category cannot all be transferred to the other merely because the decisions use similar data-quality language.

This distinction matters when studying development of practice. Repetition of an argument in a later case may indicate continuity in a form of reasoning, but two texts cannot establish universal application. It remains unknown how many similar cases ended differently or which additional materials distinguished them. Publication identifies a comparative research question rather than automatically resolving it.

The most informative element is the connection between objection and response. If authority is disputed, the answer should explain the alleged involvement in the relevant operation. If knowledge is disputed, a job title alone may not supply the required connection. These observations support examination of reasons without substituting the CCF for the national criminal court.

External verification remains limited by unavailable annexes. Readers see the published evaluation of a response but generally cannot inspect every underlying document themselves. A sound research conclusion therefore concerns how the Commission explained its decision, rather than an independent finding of the applicant's factual non-involvement.

8.3. What anonymisation should preserve

The function of a position, period of authority, alleged act and character of the response matter in understanding such cases. The exact company name may be less important. Removing legally material connections while retaining formal statutory citations makes publication uninformative. Conversely, a coherent description of a role without identifiers can support comparison.

The report proposes retaining a minimum chain: disputed assertion, relevant objection, source response and reason for evaluating that response as the Commission did. Readers can then examine the logic without receiving every item of evidence. Where an element cannot safely be retained,

identifying its function would help prevent a redaction being mistaken for absence of material in the proceedings.

8.4. Alternative explanations for similar outcomes

Two deletions do not establish a trend towards stricter scrutiny of corporate allegations. Testing that hypothesis would require comparable retention cases, information about response completeness and the applicable legal conditions. Otherwise the result may reflect a specific documentary deficiency rather than an institutional change in standards.

A useful comparative question is counterfactual: which additional element might have mattered within the published reasoning? The purpose is not to predict a CCF outcome but to identify what the reasoning treated as material. Where the gap concerns description of conduct, more information about the general seriousness of the charge may not answer it. Where a special offence-category restriction applies, a detailed factual account may not resolve the legal issue.

This comparison separates two control mechanisms: factual particularisation and eligibility for a particular cooperation instrument. They may operate together. A public summary retaining only "insufficient evidence" loses the legal layer and may suggest that the CCF determined guilt anew.

Pairs of publications addressing similar issues with different outcomes would be particularly valuable. They could reveal legally material distinctions and explain the sufficiency boundary more clearly. This editorial proposal does not require identifying related people: comparison derives its value from similar questions, not reconstruction of real participants.

9. Green Notice: the conditional outcome in 2025-03

9.1. How the operative part changes classification

In 2025-03, the CCF rejected challenges to the Green Notice's purpose and proportionality. Retention nevertheless depended on confirmation of lawfulness under the source's national law. Without that confirmation within one month of notification of the decision, the data were to be deleted. The excerpt does not state whether the condition was subsequently met. [12, paras 15-20 and operative part]

This is particularly important for statistical transparency. Coding only the initial findings could produce "applicant unsuccessful", while reading only the consequence of non-fulfilment could produce "deletion". Both would be incomplete. A valid research category must capture conditionality and separately state whether implementation is known.

9.2. Condition, period and subsequent event

Analysis of a conditional decision must preserve the required action, responsible recipient, event triggering the period and consequence of non-performance. The exact date may be redacted while the logical sequence remains understandable. Otherwise readers cannot distinguish an immediate change from an outcome dependent on a further response.

Public follow-up does not necessarily require identifying an individual case. Aggregate reporting could indicate how many conditions were satisfied, how many resulted in deletion and how many remain unresolved. Small groups require protection against identification. The possibility of

aggregation nevertheless shows that confidentiality and implementation scrutiny do not invariably conflict.

The example also separates assessment of a present threat from verification of the national basis for retention. These are distinct processing conditions. A positive answer to one does not settle the other. Preserving this sequence matters because an unqualified statement that data comply would change the decision's meaning.

9.3. Historical convictions and the present basis of a warning

The public text of 2025-03 includes the applicant's argument about elapsed time and source information about earlier convictions and another arrest. The Commission assessed the explanation of a possible threat before separately requiring confirmation of national authority for retention. [12, paras 11-20] The inquiry therefore was not a simple calculation of years elapsed.

External analysis should distinguish a historical fact from a present evaluative conclusion. An account of an earlier event may be accurate while the continuing need for a warning requires separate justification. Quality review thus has a temporal dimension: what does the source regard as still relevant, and why? The public text is useful to the extent that it reveals that transition rather than merely listing old events.

Anonymisation and unavailable national material limit verification. Published retention therefore does not establish universal permission for indefinite warnings. Equally, elapsed time does not become an automatic deletion rule. The research question concerns the substance and currency of the justification and the separate legal basis for continued processing.

The conditional outcome demonstrates that examination can have several substantive components. Publication must retain every decisive element, including one arising after rejection of the principal arguments. If the final qualification disappears in an abbreviated account, readers receive a different legal result.

10. Blue Notice: correction and retention in 2025-04

The published case concerns a Blue Notice, a namesake objection and a corrected birth-date error. The CCF considered the information sufficient for the relevant information-gathering purpose and rejected the human-rights arguments; the challenged data were found compliant. [13, paras 18-35 and operative part]

For transparency research, an important element is a change occurring during examination. Final retention does not describe the entire history where identification information was corrected. Statistics recording only the ultimate outcome may miss changes achieved before that outcome was formulated. The report therefore proposes distinguishing the pre-request record, intermediate amendments and final decision.

Mistaken identity differs from denial of criminal involvement. The first concerns whose data are processed; the second concerns the allegation against an identified individual. These levels are particularly easy to confuse in an anonymised text because real identifiers are absent. A useful publication should preserve an explanation of the verification performed, insofar as confidentiality permits.

The excerpt does not, however, enable independent comparison of passport information, biometrics or the national file. Researchers can analyse the described verification and its reasons but cannot certify identity afresh. That determines the permissible level of conclusion: the subject is a data-quality decision, not independent identification of an undisclosed participant.

A comparative corpus should therefore include a separate "correction during proceedings" field. This should not automatically count as complete success, but neither should it disappear within retention. Such detail helps evaluate the procedure's functions beyond final deletion.

10.1. What correction establishes about the original error

The corrected birth date in 2025-04 establishes an amendment, but does not automatically reveal how long the original error existed or every consequence of its use. That would require the earlier record, update dates and documents concerning domestic action. The public reasons serve the narrower function of explaining assessment in the particular proceedings.

This exposes a boundary between current compliance and retrospective responsibility. A remedied deficiency may cease to obstruct future processing while remaining relevant to an earlier incident. These are different subjects of examination, not contradictory results. Statistics recording only final compliance do not answer how often earlier errors were corrected.

The proposed reporting model should describe amendments without assuming harm. "Identifier corrected" records an observable event; "correction prevented arrest" requires separate evidence of causation. This distinction expands useful information without attributing either unproven injury or unproven benefit to the procedure.

For legal communication, an outcome can therefore be partial yet significant. Identifying the information changed and the claims rejected is more accurate than an overall declaration of victory or defeat. Substantive transparency should support that precision.

11. SLTD and SMV: two decisions from 2024

11.1. 2024-03: country information and the individual connection

In the SLTD case, a passport was recorded as revoked. The applicant alleged politically motivated use of the system and relied on general country materials. The CCF found the individual substantiation insufficient and the source's information on the judicial basis for revocation sufficient; the record was retained. [14, paras 13-16 and operative part]

Publication of an adverse decision is useful because it exposes the evidential gap between general context and a particular action. Information about a systemic problem may explain background, but the connection to the person, document and procedure requires separate examination. Anonymised publication reveals the need for that connection even where it does not permit verification of every national circumstance.

The outcome does not establish that country information is irrelevant generally. A more precise question is what function it performs alongside individual documents. If general material is the sole explanation for every adverse act, it cannot distinguish potentially different causes. Published reasons help identify that weakness in an argument.

Publication standards also require precise description of document status. Lost, stolen and revoked should not replace one another in a summary. A category error may suggest that the CCF decided a different issue from the one actually before it. Anonymisation does not remove the need for terminological accuracy.

11.2. 2024-04: vehicle acquisition and the purpose of a record

In the SMV dispute, the applicant relied on lawful auction purchase before the vehicle was registered as stolen. The source confirmed continuing proceedings and the validity of the search. The CCF did not consider the acquisition account sufficient to establish non-compliance and retained the data. [15, paras 17-21 and operative part]

The example distinguishes a purchaser's rights from an object's information status. A purchase document may establish transaction circumstances without resolving every question about the property's earlier removal. A reader should not convert a processing decision into a final determination of title or purchaser bad faith.

Comparison with personal-involvement cases also requires care. A vehicle record can remain relevant to cooperation independently of a sufficient account of criminal conduct by its current owner. The general data-quality requirement therefore concerns a different object and purpose. Counting all deletion refusals without database distinctions mixes legally heterogeneous situations.

Both 2024 decisions enrich the corpus through diversity of subject matter. They demonstrate why CCF research should extend beyond arrest-related notices. Their publication does not, however, establish the distribution of workload between databases. That requires separate aggregate measures with defined counting units.

11.3. National authority and the boundary of external verification

The SLTD and SMV decisions raise a common question: how far does a published confirmation of a national basis enable readers to assess its applicability? Each outcome concerns a particular object, but the full national act is not part of this study's public corpus. An independent audit of national lawfulness is therefore not possible from these excerpts.

That limitation does not make the reasons useless. They show which information the Commission considered relevant and why the applicant's position did not alter the result. External verifiability is nevertheless lower than where the act, applicable rule and sufficient context are available. Research should reflect this distinction rather than replace it with an assumption that the national decision was correct or mistaken.

For passports, document validity must be distinguished from freedom of movement. For a vehicle, a police database entry differs from ownership and domestic registration procedures. These connections may generate several independent disputes. A public excerpt concerning one does not resolve all the others.

An account of practice should therefore identify issues left outside the examination. This can add value without disclosing further facts. It discourages use of a decision in an unrelated legal context and makes competence boundaries visible to non-specialists.

12. Retention with an annotation: 2023-10

In diffusion case 2023-10, the Commission did not consider parallel proceedings sufficient to remove the processing purpose in the circumstances examined. Retention was accompanied by an annotation recording extradition to another State for the same facts and subsequent discharge for lack of evidence. [17, paras 18-25 and operative part]

For public assessment, the result includes both retention and a change to the information available to users. An annotation may affect a subsequent domestic decision, but the excerpt itself does not establish that it did. Its purpose, entry and actual use in a later incident are distinct events.

The term discharge requires national context and should not automatically be rendered as a final acquittal. Where the underlying act is unavailable, researchers should retain a neutral description and state the limit. This matters especially in public communication: stronger wording may attribute a legal effect unsupported by the source.

The proposed classification separates retention with an annotation from unchanged retention. Research should also record the annotation's subject: a national decision, factual correction, use restriction or other material information. This describes the mechanism more accurately than a binary division into victories and defeats.

13. Comparative findings from eight decisions

Decision	Object and published outcome	Principal interpretation issue
2023-01	Diffusion; deletion	Purpose versus adequate description
2023-10	Diffusion; retention with annotation	Amendment within a retention outcome
2024-03	SLTD; retention	Connecting general context to a particular document
2024-04	SMV; retention	Purchaser rights versus processing purpose
2025-01	Red and Yellow Notices; deletion	Several people and objects in one decision
2025-02	Red Notice; deletion	Particularisation of role and applicable restrictions
2025-03	Green Notice; conditional outcome	Unknown subsequent implementation
2025-04	Blue Notice; retention	Correction during examination

The comparison identifies four variables that a public corpus should preserve: processing object, issue determined, outcome type and procedural stage. If any is missing, the risk of invalid

comparison increases. Legally different outcomes may look identical in a short announcement while requiring different action by a participant.

At the reasoning level, a concrete connection between the argument and processing object repeatedly matters. Its basis nevertheless differs: personal involvement, document status, search purpose or national authority for retention. This supports a functional reading of practice. A general quality rule does not remove the need to identify what must meet that rule and for which purpose.

At the disclosure level, the most evident gap lies between decision and subsequent status. Conditional outcomes, corrections and annotations depend on events during or after examination that are unevenly visible. Expanding the corpus should therefore be accompanied by better metadata on the stage of the outcome. Otherwise publication volume grows faster than comparability.

14. Timeframes and effectiveness beyond the session calendar

A session calendar describes work organisation, not the distribution of individual processing times. Receipt, admissibility, exchange of materials, determination and implementation are separated by distinct intervals. Effectiveness assessment requires identifying which interval is measured and which cases are included.

Public CCF communications acknowledge delays and describe efforts to reduce them. This is significant institutional information but insufficient to verify the effect of a particular measure. A causal conclusion would require considering changes in workload, case composition and resources alongside procedure. [3]

The proposed research model distinguishes duration of completed cases from age of outstanding cases. The former describes achieved outcomes; the latter captures accumulated waiting. Publishing only the former excludes the longest-running open cases from calculation altogether. That can suggest improvement without changing the position of those waiting longest.

Stage-specific information is also needed: waiting for admissibility, substantive examination and implementation. One stage may accelerate while another slows. For someone facing a restriction on liberty, interim protection matters separately. A single average does not reveal whether such protection was available during the wait.

The 2026 pilot should be evaluated once sufficient observations exist. Before then, analysis can address its intended function and criteria for future testing. Announcing reform and demonstrating effectiveness are different evidential propositions.

14.1. Testing acceleration without false causal attribution

Future evaluation of organisational changes should compare groups by data type, complexity and procedural stage at the start of observation. Comparing calendar years alone is insufficient where registration rules or incoming case composition also changed. In particular, a move to admissible-request statistics requires aligned definitions before calculating a trend.

Time spent within the institution should also be distinguished from waiting for other participants. This does not automatically exclude external waiting from assessment of effective access to protection: the whole period may matter to the applicant. Identifying the delay's location is

nevertheless essential to choosing an improvement. More sessions will not necessarily accelerate document receipt, and automation cannot replace a substantive source response.

A research evaluation can examine several outcomes together: age of outstanding requests, stage durations, interim protection and subsequent implementation. If one improves at the expense of another, the overall conclusion should reflect it. Transparency means being able to observe that distribution rather than publishing only the most favourable number.

15. Representative case publicity and institutional practice

An official anonymised excerpt, a representative's announcement and a client's interview perform different evidential functions. The first discloses reasoning selected by the Commission; the second describes the representative's involvement and reported result; the third communicates personal experience. A common subject does not make them interchangeable.

A public account should identify the verifiable result: the deciding body, the data concerned, the action ordered and what is known about implementation. "The case was closed" is too broad where only an international record changed. Similarly, procedural deletion should not be described as a finding that the entire allegation was false.

For ARGAs, agreeing publicity with the client remains an important communication condition. Legal analysis must also consider third-party information and restrictions attached to the document. A client's initiative to speak publicly does not make every procedural item public. Disclosure should match the particular communication purpose.

An analytical report can use official anonymised practice without connecting it to identifiable clients. If an organisation discusses its own case, it should distinguish that account from statistical claims about the CCF. Selecting successful cases for communication naturally creates a selected population; it does not establish the overall probability of an outcome for all applicants.

Accurate communication has practical value. It helps a prospective client understand the result that can be pursued and which national issues remain separate. For professional credibility, a verifiable account of a limited achievement is more durable than a promise to eliminate every consequence of international proceedings.

16. Observatoire ARGAs proposals

16.1. Metadata and selection criteria

Each excerpt should have a stable identifier, decision year, publication date, data category and outcome type. Where an exact decision date creates identification risk, a less granular temporal field can be used with an explanation. Changes to a public version should be recorded so researchers can understand differences between saved copies.

A publication policy should explain selection purposes: legal novelty, typicality, diversity of processing objects or another ground. A completely random sample may be incompatible with resources and confidentiality, but explaining the selection principle already improves interpretation. It identifies which research purposes the corpus can support.

16.2. Preserving legal structure

Anonymisation should preserve the dispute's subject, material arguments, character of the response and decisive ground. Geographical and personal identifiers should be replaced consistently so relationships remain comprehensible. Where a removed passage determines the limit of a conclusion, its function should be indicated without revealing its content where feasible.

Decisions covering multiple objects should specify the result for each data category. Conditional outcomes should state the condition and consequence separately. Retention with amendment should identify the change. These requirements support legal analysis without turning an excerpt into a complete national file.

16.3. Comparable statistics

A published indicator dictionary should identify the counting unit, incoming or completed cohort, admissibility, presence of data, decision procedure and outcome type. Changed definitions require comparable restated earlier values or an explicit break in the series. Machine-readable data are useful only with that dictionary.

Changes before final determination, including corrections and source deletions, should be recorded separately. They should not automatically be attributed to a substantive CCF decision, but excluding them also impoverishes the picture. Distinguishing these events matters more than a single overall success measure.

16.4. Implementation and timeframes

Conditional outcomes should be accompanied by aggregate information on fulfilment and subsequent status. Time reporting should distinguish stages, categories and age of the outstanding caseload. Small groups require aggregation or suppression where values would identify people. Public reporting should explain those restrictions too.

Monitoring national consequences requires careful allocation of responsibility. The CCF does not manage every domestic system, so implementation reporting should specify the act actually confirmed. A universal statement that every restriction has ceased cannot replace examination by the competent national authority.

16.5. Responsible bodies and implementation order

Publication and classification proposals are addressed to the CCF within its powers. Technical hosting and search require cooperation with the relevant INTERPOL services. Clarification of national implementation involves NCBs and other competent authorities. Representatives and researchers are responsible for accurate use of published material.

Implementation could begin with a limited series of new excerpts and a common outcome dictionary. Independent readers should then test whether they can consistently identify the object, ground and result. Divergent classifications call for clearer description rather than automatically adding mandatory fields. After this test, the model can be extended to a wider corpus.

17. Counterarguments and limits

Broader publication requires resources. Anonymisation, translation and identification-risk review can divert staff from processing requests. A transparency proposal should therefore specify priorities: first informative metadata and clear outcomes, then wider coverage. Published page counts are not themselves a quality criterion.

Another risk is identifying a person from combined characteristics. An unusual set of participants and sequence of events may reveal a case even without names. Review must consider the document as a whole and available external sources. Transparency does not justify details unnecessary to understanding the legal conclusion.

Standardisation may also oversimplify complex decisions. Several grounds can interact, with the result depending on their combination. Structured fields should supplement rather than replace reasons. An outcome category aids searching and counting; legal analysis still requires the relevant text.

Finally, a public corpus cannot eliminate all informational differences between a participant and an external researcher. The objective is greater verifiability at the accessible level, rather than a promise to reproduce confidential proceedings completely. Recognising this limit supports realistic proposals and assessment criteria.

18. Conclusions

Public CCF materials for the period support examination of several forms of legal reasoning and institutional change, but do not constitute a complete dataset of cases for 2020-2026. Reports and decisions should be used together while preserving their different functions. Chronological gaps and changing statistical definitions form part of the research findings.

The eight decisions show that the processing object and precise outcome determine the meaning of a public account. Deletion, conditional outcomes, correction and retention with annotation require different categories. Disclosure becomes substantively useful when readers can reconstruct the connection between the disputed issue, source response and action ordered.

The principal limitation for external evaluation is the restricted ability to connect reasons with subsequent implementation and comparable statistics. This does not establish non-implementation; it defines the limit of a verifiable conclusion. ARGAs proposals seek to reduce that information gap.

Priority should go to accurate public description: stable identifiers, clear selection criteria, preserved legal structure, defined denominators and separate accounting for procedural stages. This can strengthen trust through verifiability while protecting individuals' confidentiality and the legitimate interests of international police cooperation.

Annex A. Minimum public-decision record

Field	Content	Rule where information is absent
Identifier	Official excerpt reference	Do not invent an underlying case number
Time	Decision year and verified publication date	Do not substitute indexing for publication
Object	Notice type or database	Do not describe every entry as wanted-person data
Argument	Specific issue determined	Do not assume every argument succeeded
Ground	Reasons supporting the result	Mark undisclosed elements
Outcome	Deletion, retention, amendment or condition	Read the complete operative part
Implementation	Separate confirmation if available	Record as unestablished
Limitation	Anonymisation and missing annexes	Confine conclusions to available evidence

This record is an Observatoire ARGAs proposal for research coding. It does not replace CCF application forms or imply that every field is available in every case.

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