Executive Summary

ARGA Observatory Annual Report 2026

Indicators of misuse of INTERPOL channels and safeguards in practice · External edition · Evidence cutoff: 18 November 2026

Finding for decision-makers

On 7 May 2026, the Commission for the Control of INTERPOL's Files (CCF) confirmed that it had transmitted ARGA material to the INTERPOL General Secretariat "for information and action under its procedures" so that it could be considered in compliance checks. This confirms a referral. The correspondence does not establish whether the material was reviewed, whether data were corrected, or whether the applicant or representative was informed of what happened next.

The question and proposed pilot

Can an applicant or representative receive a short, non-confidential notice confirming whether CCF-referred material was considered and whether it led to a data correction, within applicable disclosure limits? ARGA proposes a pilot that records the dates of receipt, referral and review, the outcome category, and elapsed time. A status notice would tell the person whether the material reached the responsible unit and whether further information may be useful.

2026 record at a glance

Observed figure	What it counts — and does not count
162 messages	Unique message IDs from targeted mailbox searches; not cases or a prevalence denominator.
13 submissions	Entries visible in the CCF portal sentbox; not 13 people or incidents.
27 register rows	Indexed person/case rows; unique legal-matter total is not certified and includes one out-of-scope Europol matter and unresolved references.
3 CCF outcomes	Two decisions found challenged data compliant; one access reply reported no Russian-origin data currently recorded. The 7 May referral is separate.

The CCF's 2024 Activity Report says 30% of deletion requests completed in 2024 took more than nine months. This request-level figure provides context; ARGA's selected casework is not directly comparable.

Three practical questions for INTERPOL

General Secretariat: test referral tracking and a short status notice; clarify whether the responsible team can confirm receipt and implementation of national updates after an INTERPOL data correction.

Notices and Diffusions Task Force: assess whether documented indicators can trigger a request for clarification before a notice or diffusion is circulated, and record the result.

CCF / CPD: consider whether reasons can identify the decisive factual issue and type of new evidence relevant to revision, within the confidentiality limits of Articles 35, 38 and 42 of the CCF Statute.

The report distinguishes receipt, referral, consideration, data correction and public mention; it separates INTERPOL compliance findings from national court outcomes and applicant-reported events. The sample does not support global or country-level prevalence estimates. File references are retained in the case and source registers; applicant names are replaced by stable labels.