



**GPA**

Global Privacy Assembly

# Working Group on Ethics and Data Protection in Artificial Intelligence

Report – July 2025

Commission Nationale de l'Informatique et des Libertés (CNIL), France

European Data Protection Supervisor (EDPS), European Union

Office of the Privacy Commissioner for Personal Data (PCPD), Hong Kong,  
China

Personal Information Protection Commission (PIPC), Korea



## Table of Contents

### Contents

Table of Contents.....	1
Executive Summary.....	3
Introduction .....	4
Working Group Activities.....	5
Forward looking plan 2026-2027 .....	6
Conclusion.....	7



## Executive Summary

The Ethics and Data Protection in Artificial Intelligence workgroup (AIWG) established, during its first meeting of 2024, a new working plan for 2024-2025. This working plan is composed of five items. Volunteers have taken the lead for three of these items (with participation of other DPAs). These are:

1. Human review of AI systems under the GDPR/data protection legislation. This draft resolution which is proposed for the 47th Global Privacy Assembly, aims at promoting a common understanding of the notion of meaningful human oversight of decisions that involve AI systems.
2. Report on Generative AI related work: One of the follow-up actions foreseen by the GPA Resolution on generative AI is an interim report on the work conducted by the GPA AIWG members on generative AI systems to be presented at the 47th Global Privacy Assembly.
3. Implementation by GPA Members, led by the UK ICO and other resolution Main Sponsors (Italy (Garante) and Germany (BfDI)) of the AI and Employment resolution, adopted at the GPA Closed Session in 2023.

The two other items without an identified lead so far are:

1. AI auditing capabilities and experience: The goal is to explore the capabilities for auditing AI systems that exist in each working group member, the types of audits they have carried out, and any tools they have developed in the process.
2. Discrimination in insurance: This initial research would aim to understand members' positions on the use of special category data and any concerns regarding discrimination in insurance pricing and decisions.

Other items were discussed during the two meetings held in 2025, covering topics such as AI policies and guidelines on AI set in order to help organisations and natural persons deal with the advent of this technology.

Looking ahead, the AIWG will discuss its work plan for 2026-2027 at its next AIWG meeting. This work plan will include the two items without a lead yet: "AI auditing capabilities and experience" and "Discrimination in insurance", plus an additional item "Developing a checklist that helps guide organisations in formulating internal policies on the use of generative AI".

Furthermore, with the help of the GPA secretariat, the AIWG has reached out the other GPA WG in order to identify synergies in the work plans. Indeed, the development of AI in all sectors of our lives has the effect of leading other GPA working groups to also discuss subjects related to this area.



## Introduction

The 40th ICDPPC (now Global Privacy Assembly) adopted in October 2018 in Brussels a Declaration on Ethics and Data Protection in Artificial Intelligence<sup>1</sup> (the Declaration), which endorses six guiding principles as core values for the preservation of human rights in the development of Artificial Intelligence. The Declaration establishes the Permanent Working Group on Ethics and Data Protection in Artificial Intelligence and mandates it with promoting the principles of the resolution *“by all relevant parties involved in the development of artificial intelligence systems, including governments and public authorities, standardization bodies, artificial intelligence systems designers, providers and researchers, companies, citizens and end users of artificial intelligence systems”*<sup>2</sup>.

With the help of the Executive Committee of the GPA (the ExCo), the Group started in early 2019. CNIL (France), PIPC (Korea), PCPD (Hong Kong, China) and the EDPS (EU) currently co-chair the Group, with the EDPS providing the secretariat function for the Group.

To date, the Member authorities of the Group are:

- IDP (Albania);
- AAIP (Argentina);
- Defensoría CABA (Argentina);
- IPC New South Wales (Australia);
- OAIC (Australia);
- OIC Queensland (Australia);
- CNIL (Burkina Faso);
- OPC (Canada);
- OIPC British Columbia (Canada);
- IPC Canada Ontario (Canada);
- CAI Quebec (Canada);
- SDPD (Colombia);
- Datatilsynet (Denmark);
- DPC (Gabon);
- BfDI (Germany);
- Bavarian DPC (Germany);
- LfDI Rheinland-Pfalz (Germany);
- PDPS (Georgia);
- HDPA (Greece);
- ODPA (Guernsey);
- PCPD (Hong Kong, China);

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<sup>1</sup> Declaration on Ethics and Data Protection in Artificial Intelligence; 40th ICDPPC, 23rd October 2018, Brussels, [http://globalprivacyassembly.org/wp-content/uploads/2018/10/20180922\\_ICDPPC-40th\\_AI-Declaration\\_ADOPTED.pdf](http://globalprivacyassembly.org/wp-content/uploads/2018/10/20180922_ICDPPC-40th_AI-Declaration_ADOPTED.pdf).

<sup>2</sup> The Declaration, p. 6.



- GPDP (Italy);
- PPA (Israel);
- ARTCI (Ivory Coast);
- PPC (Japan);
- OIC (Jersey);
- ODPC (Kenya);
- PIPC (Korea);
- IMAIP (Mexico);
- INAI (Mexico);
- INFO Ciudad de Mexico (Mexico);
- INFOEM (Mexico);
- OPC (New Zealand);
- KVKK (Turkey);
- ICO (United Kingdom);
- AGESIC (Uruguay);
- FTC (USA);
- FDPIC (Switzerland).

The Observers part of the Group are:

- Council of Europe (COE);
- Fundamental Rights Agency (FRA- EU);
- International Committee of the Red Cross (ICRC);
- Office of Privacy and Civil Liberties (US Department of Justice);
- Office of Technology & Innovation NYC (US);
- Qatar Financial Centre (Qatar);
- Organisation for Economic Co-operation and Development (OECD).

Since the 2024 GPA Closed Session, the Group held two meetings: on 4 February 2025 and 4 June 2025.

## Working Group Activities

The Working Group has held two meetings in 2025. These meetings took place on the 4 February 2025 and 4 June 2025. The meetings allowed the group members to discuss the working plan, give presentations on activities occurring in members' countries related to the use of Artificial Intelligence and share material promoting the deployment of Artificial Intelligence in a manner compatible with applicable data protection legislation.

The Working Group discussed its working plan for 2024-2025 during these meetings. This working plan 2024-2025 includes the following items:



1. Human review of AI systems under the GDPR/data protection legislation. This draft resolution, proposed for the 47th Global Privacy Assembly, aims at promoting a common understanding of the notion of meaningful human oversight of decisions that involve AI systems. Furthermore, it urges organizations that use AI systems in decision-making processes to designate only overseers who possess the necessary competence, training, resources, and understanding of the specific AI system's capabilities, limitations, potential failure modes, and associated risks, including potential biases, and to adopt appropriate human-machine interfaces and interpretability tools to adopt technologies and processes that allow for meaningful human oversight, in particular where these decisions may have significant impacts on individuals' fundamental rights and freedoms.
2. Report on Generative AI related work: One of the follow-up actions foreseen by the GPA Resolution on generative AI is an interim report on the work conducted by the GPA AIWG members on generative AI systems to be presented at the 47th Global Privacy Assembly.
3. AI auditing capabilities and experience: The goal is to explore the capabilities for auditing AI systems that exist in each working group member, the types of audits they have carried out, and any tools they have developed in the process. The purpose would be to understand the maturity in the auditing capabilities of each member and share learning and best practice.
4. Discrimination in insurance: This initial research would aim to understand members' positions on the use of special category data and any concerns regarding discrimination in insurance pricing and decisions. This could then lead to a resolution outlining an agreed stance on the appropriate use of such data in insurance and strategies to address bias and discrimination.
5. Implementation by GPA Members, led by the UK ICO and other resolution Main Sponsors (Italy (Garante) and Germany (BfDI)) of the AI and Employment resolution, adopted at the GPA Closed Session in 2023.

The French DPA leads the work on item 2 ("Report on Generative AI related work") with the support of the Korean DPA.

Items 3 and 4 ("AI auditing capabilities and experience" and "Discrimination in insurance" respectively) still need a lead, but the UK DPA, the federal German DPA and the Kenyan DPA have already agreed to participate in item 3.

## Forward looking plan 2026-2027

As work items 3 (AI auditing capabilities and experience) and 4 (Discrimination in insurance) presented above will not be completed by the end of 2025, they will be pushed to the work plan of 2026-2028.



Additionally, the PCPD proposed to add a work item on “Developing a checklist that helps guide organisations in formulating internal policies on the use of generative AI”. This work item aims to create a practical and cross-jurisdictional checklist for organisations’ reference, on the use of generative AI by employees, covering essential common elements of privacy protection while allowing for local flexibility. This work item has been proposed at one of the AIWG meetings held in 2025 and is awaiting interested members to join as co-rapporteurs.

The working group will also compile a list of all AI-related guidelines issued by DPAs—including but not limited to generative AI—and will keep updating this list on a semi-annual basis.

Potential additional work items will be discussed during the next AIWG meeting.

Furthermore, with the help of the GPA secretariat, the AIWG has reached out the other GPA WG in order to identify synergies in the work plans.

## Conclusion

The rollout of systems using technologies from the domain of Artificial Intelligence has illustrated the need for a strategic approach to the challenges for data protection and privacy as human rights.

The common work on these matters demonstrates that the Global Privacy Assembly has the unique potential to contribute to the determination of global strategies to address global problems. The GPA AI WG will continue following these issues and contributing to the work of the GPA by addressing all relevant and topical AI related matters.

As AI continues to evolve, international cooperation and the sharing of policies from each DPA will be essential in shaping global governance and safeguarding privacy.