



GPA

Global Privacy Assembly

International Enforcement Cooperation Working Group

Report – July 2025

Chair authority:

- **Colombia** – Superintendence of Industry and Commerce (SIC)
- **Canada** – Office of the Privacy Commissioner of Canada (OPC)
- **Guernsey** – The Data Protection Authority (ODPA)
- **Hong Kong, China** – Office of the Privacy Commissioner for Personal Data (PCPD)
- **Norway** – Norwegian Data Protection Authority (Datatilsynet).



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Executive Summary

The International Enforcement Cooperation Working Group (IEWG) is pleased to present this report to the Global Privacy Assembly (GPA) on its activity, progress, and successes between July 2024 – July 2025.

Heading towards its sixth year in operation as a permanent Working Group of the GPA, the IEWG is co-chaired by the Office of the Privacy Commissioner of Canada, the Superintendence of Industry and Commerce of Colombia, the Norwegian Authority for Data Protection, the Office of the Privacy Commissioner of Hong Kong, China and the Data Protection Authority of Guernsey.

The IEWG's work continues to be integral to the GPA, particularly in advancing its objectives to promote and support enforcement cooperation in Pillar 2 of the Policy Strategy in the GPA Strategic Plan. To that end, the IEWG Co-Chairs are pleased to report that flowing from the commitment to diversify the contributions and members of the group, since the year 2021 the Co-Chairs are representatives from Europe, North America, Asia and Latin America.

The last twelve months have witnessed the following achievements by the IEWG:

- Concluding joint statement on data scraping;
- Two successful virtual capacity building sessions;
- One in-person capacity building session at GPA Jersey;
- One closed enforcement session;
- The updating of the transnational case map.
- The creation of the Cybersecurity Community of Practice in collaboration with GPEN

The work plan for the rest of this year is included as annex 1 and features further capacity building sessions, both in-person and virtually, another closed enforcement session and a further update to the transnational case map.

The work plan for the rest of this year is included as annex 1 and features further capacity building sessions, both in-person and virtually, another closed enforcement session and updates to the transnational case map and the enforcement collaboration handbook. It also features efforts to further explore cooperation opportunities within the GPA and other networks such as the Global Privacy Enforcement Network (GPEN), Asia Pacific Privacy Authorities (APPA), IberoAmerican Data Protection Networks (RIPD) and the Organization for Economic Cooperation and Development (OECD).

The IEWG extends an invite to any data protection or privacy authorities that would like to join its ranks. To discuss how the IEWG can support your own organization, contact either the IEWG secretariat or any of the Co-Chairs. To request membership, please email the GPA Secretariat in the first instance.



Introduction

Background & History

Building on the work of previous, temporary, enforcement cooperation working groups, the International Enforcement Cooperation Working Group (IEWG) was established as a permanent working group of the Global Privacy Assembly (GPA) following the 41st Conference in Tirana in 2019. The overarching mandate of the IEWG is derived from Pillar 2 of the Policy Strategy in the GPA's 2019-2021 Strategic Plan. This called for the IEWG to refresh its objective as:

“...an active group considering live issues and concerns related to enforcement, with a focus on sharing experience, tactics and approaches to tackling specific aspects, including common experience in investigating multinational companies.”

The table below outlines the key achievements of the IEWG since its establishment -

Year	Notable Achievements
First year (2019 – 2020)	<ul style="list-style-type: none"> • ‘Safe space’ sessions (now known as Closed Enforcement Sessions) to encourage enforcement cooperation • Regional champions to promote IEWG’s diversity of membership & participation in the group
Second year (2020 – 2021)	<ul style="list-style-type: none"> • Refreshing practical tools to support enforcement cooperation such as Enforcement Cooperation Handbook.
Third year (2021 – 2022)	<ul style="list-style-type: none"> • Thematic sub-working groups published guidance on credential stuffing & principles to govern facial recognition technology. • Launched the Transnational Case Map to highlight enforcement cooperation activities that have a cross-border impact.
Fourth year (2022 – 2023)	<ul style="list-style-type: none"> • Launched capacity building sessions with an in-person session in Istanbul to share strategies & experiences managing backlogs. • Closed enforcement sessions covering Tik-Tok & ChatGPT • Published its strategic forward plan on the 2022 GPA Cyber-Security Resolution.
Fifth year (2023 – 2024)	<ul style="list-style-type: none"> • Joint Statement on Data Scraping published. • The first virtual capacity building session held.

Co-Chairs & Secretariat

The following authorities are Co-Chairs of the IEWG -



- **Colombia** – Superintendence of Industry and Commerce (SIC)
- **Canada** – Office of the Privacy Commissioner of Canada (OPC)
- **Guernsey** – The Data Protection Authority (ODPA)
- **Hong Kong, China** – Office of the Privacy Commissioner for Personal Data (PCPD)
- **Norway** – Norwegian Data Protection Authority (Datatilsynet).

Following an extended and commendable period as secretariat, the SIC stood down from that role at the end of 2024. The Co-Chairs thank them for their leadership, support and coordination and are pleased to retain the SIC as a co-chair.

In January 2025, the ODPA Guernsey took on the role of secretariat.

IEWG Work Plan & Links to GPA Strategic Plan

The work of the IEWG is split across three priorities and a number of objectives.

Priority 1 – Foundations: Lay the foundations for the IEWG and GPA to facilitate practical enforcement cooperation, focusing on organisations and issues with significant global impact on people’s data protection and privacy rights.

- Objective 1 - Develop ‘safe space’ enforcement cooperation frameworks focused on multinationals.
- Objective 2 - Use of and evaluation of the framework in practice.
- Objective 3 – Develop an annual transnational case map for authorities to use in order to learn from other colleague’s work.

Priority 2 – Tools: Build on the previous work of the IEWG to further develop practical tools for enforcement cooperation.

- Objective 1 – Promote and teach our members how to use the Enforcement Cooperation Handbook.
- Objective 2 – Maintain and promote the enforcement cooperation repository.

Priority 3 - Awareness and communication: Ensure that the IEWG has a good awareness of the global Privacy Enforcement Authority (PEA) network landscape and maintains or establishes mutual lines of communication and observation to coordinate and leverage activities.

- Objective 1 – Analyse global PEA networks and make recommendations on coordination.
- Objective 2 – Promote and strengthen the communication channels between PEA of each region.
- Objective 3 – Develop existing and new mutual observation agreements.
- Objective 4 – Improve our communication outreach for more of our members to participate in the activities put in place.
- Objective 5 – Translate to the best of our abilities and capacities of the products, conferences and different activities the group may have.



These priorities feed into the following strategic objectives from the GPA's Strategic Plan 2023-2025.

Strategic Objective # 1 High level of data protection in global frameworks

- Contributing to influencing and supporting the development of global frameworks with a high and consistent level of data protection, creating standards and models.
- Maximize the enforcement cooperation of personal data protection standards and frameworks.

Strategic Objective # 2 Strategic alliance and impact

- Enhance the external involvement of the GPA through increased participation of the Working Groups in other international groups and fora.
- Strengthen communication channels between the GPA and international and regional organizations.
- Strengthen GPA engagement with external stakeholders, such as other sectoral regulators, and the scientific/academic sector.

Strategic Objective #3 Capacity building for DPAs

- Strengthen learning spaces by sharing experiences, strategies, and best practices among DPAs.
- Strengthen the data subject for the protection of his or her rights.



Working Group Activities

Governance Meeting

In March of this year, the Co-Chairs convened a governance meeting with all IEWG members. This meeting allowed the Co-Chairs to brief members on the work plan for 2025 and the ensuing activities. It also gave members early notice of future opportunities to partake in and guide the work of the IEWG.

Closed Enforcement Sessions

Closed enforcement sessions provide members the opportunity to discuss emerging privacy and enforcement matters that have cross-border or global impacts and explore opportunities for enforcement cooperation.

The first session of 2025 was hosted by the UK ICO and tackled two pressing children's privacy issues. These were age verification and recommender systems. The well-attended session gave the ICO the opportunity to share the work it had begun in these areas and the strategic value of focussing on those topics.

Capacity Building Sessions

On the margin of the 46th GPA meeting, held in Jersey, the IEWG hosted an in-person capacity building session entitled "Setting Priorities". This session saw Commissioners and senior leaders from varied global regions and stages of DPA development engage in an interactive discussion, sharing their strategies for setting priorities to serve their varied mandates. These priorities ranged from the operational (e.g. education balanced against enforcement) to the thematic (e.g. defending Children's rights, targeting AI, etc.). The Co-Chairs extend their thanks to colleagues from INAI, OPC Canada, IPC Ontario, ODPa Guernsey, ADGM Abu Dhabi and the Somali DPA for taking part in the session and to all those that attended in the audience. A particular thanks goes to the GPA Executive Committee and the Jersey Office of the Information Commissioner for providing the time and location for what was a successful start to a great week.

Following a successful first virtual capacity building session, held in June 2024, the IEWG hosted two further virtual capacity building sessions. These dealt with complaint investigation and the promotion of compliance. Both were well attended and saw a variety of DPAs sharing their experiences.

Given the success of the virtual capacity building sessions, the IEWG decided in early 2025 to continue the series. Members of the IEWG and the wider GPA were asked to complete a survey indicating their preference for future session topics and if they would like to present as part of any sessions. Thank you to all who responded.



Data Scraping

In August 2023, twelve IEWG members signed a joint statement on data scraping and the protection of privacy. This example of enforcement cooperation followed on from a closed enforcement session and saw data protection authorities call on industry to identify and implement controls to protect against, monitor for, and respond to, data scraping activities on their platforms.

The statement also outlined key privacy risks associated with data scraping - the automated extraction of data from the web including social media platforms and other websites that host publicly accessible personal information.

After the publication of the joint statement, the IEWG engaged with social media companies to discuss the expectations set out in the joint statement and to understand what such companies were doing to combat data scraping. As a result of that engagement, [the Concluding Statement on Data Scraping and the Protection of Privacy](#) was adopted in October 2024, with sixteen signatory authorities:

- AAPI (Agency for Access to Public Information), Argentina
- Office of the Privacy Commissioner, Canada
- Data Protection Authority, Guernsey
- Privacy Protection Authority, Israel
- INAI (National Institute for Transparency, Access to Information and Personal Data), Mexico
- CNDP (Commission Nationale de contrôle de la protection de Données à caractère Personnel), Morocco
- Datatilsynet, Norway
- AEPD (Agencia Española de Protección de Datos), Spain
- Office of the Australian Information Commissioner
- Superintendencia de Industria y Comercio, Colombia
- PCPD (Office of the Privacy Commissioner for Personal Data), Hong Kong, China
- Jersey Office of the Information Commissioner
- CCIN (Commission de Contrôle des Informations Nominatives), Monaco
- Office of the Privacy Commissioner, New Zealand
- Federal Data Protection and Information Commissioner, Switzerland
- Information Commissioner's Office, United Kingdom

The concluding statement contained additional guidance to help companies protect users' personal data from unlawful scraping. Organisations should:

- Comply with privacy and data protection laws when using personal information, including from their own platforms, to develop artificial intelligence (AI) large language models;
- Deploy a combination of safeguarding measures and regularly review and update them to keep pace with advances in scraping techniques and technologies; and



- Ensure that permissible data scraping for commercial or socially beneficial purposes is done lawfully and in accordance with strict contractual terms.

Transnational Case Map

The [Transnational Case Map](#) seeks to identify cases that IEWG members have had with transnational implications. Such cases can include administrative fines, enforcement orders or any other kind of enforcement tool that IEWG members have used with implications beyond its borders.

The following information can be consulted for each case:

- Jurisdiction
- Data Protection Authority
- Year in which the investigation was initiated
- Year in which the enforcement measure was imposed
- Case number / name
- Type of the institution of the data controller/processor
- Description of the case
- Enforcement tool used
- Transnational implication of the case
- Enforcement cooperation mechanisms used (if any)
- Technologies involved in the case (if any)
- Hyperlink to the case

The transnational case map currently hosts cases up to the middle of 2024. A survey has been sent out to IEWG members to collate cases since then and the case map will be updated in due course.

Cybersecurity Community of Practice

In October 2024, the IEWG in conjunction with GPEN, published the Terms of Reference for the new Cybersecurity Community of Practice. This group, formed following the adoption of a resolution on cybersecurity at the 44th GPA, seeks to connect staff with cybersecurity remits from authorities across the globe, in order to provide support and to share experience.

Coordinated by the UK ICO, there have been three virtual meetings of participants, most recently to hear the research carried out by the Dutch DPA into cyber attacks and malware.

Enforcement Cooperation Handbook

The GPA's Enforcement Cooperation Handbook was originally created in 2015 and last updated in 2021. Based on contributions and experiences of members from across the GPA, it provides guidance and a common foundation for authorities wishing to engage in enforcement cooperation. It sets out:

- the issues an authority may face in preparing for, and engaging in, enforcement cooperation;
- models, approaches, and solutions to address such issues; and
- how to choose appropriate strategies in different circumstances.



The handbook is a living document and will be updated as new developments arise - for example, case studies will be added as practical examples of the handbook in action.

Promotion of the IEWG

The IEWG now has a presence on LinkedIn. The intention is for this channel to:

- Spotlight the activities of the IEWG and its members, including joint investigations, joint statements and guidance; and
- Highlight data protection and privacy related content of international interest.

If members have any matter they want the IEWG to include on its feed, please contact either the IEWG secretariat or one of the Co-Chairs.



Forward looking plan 2025-2026

The comprehensive work plan outlining activities for the next year is included as annex 1 of this document. Key activities the IEWG has planned are outlined below:

- A closed enforcement session will be held in the second half of 2025 and details will be circulated to IEWG members in advance.
- Planning is underway for an in-person Capacity Building session at GPA Seoul titled “Mastering investigation strategies”.
- A virtual Capacity Building session will be held on 4 September covering the development of regulatory partnerships. The enforcement cooperation handbook will form part of that virtual session. This will be presented jointly by the OPC Canada and the UK ICO and invitations will be extended to all IEWG and GPA members as well as the OECD network.
- An updated version of the transnational case map will be published, with the addition of more recent enforcement cases with transnational implications.
- Links will be developed with other GPA working groups and other networks to enhance the reach and impact of the IEWG’s work.
- The IEWG will further expand its presence through LinkedIn to highlight IEWG outcomes and globally relevant privacy and data protection content.



Conclusion

Executed strategically, *'enforcement cooperation expands our collective capacity to take action and amplifies the impact of those actions'*.

The IEWG has evolved as an integral global enforcement forum for cooperation and impactful action. From its Closed Enforcement Sessions to its Capacity Building Workshops, to its high-impact enforcement initiatives (e.g. Data-Scraping), it has demonstrated its importance by bringing together authorities from around the world to address shared global privacy risks.

Thanks to the efforts of the Secretariat and the Co-Chairs, together with the commitment of all the members of the group, it has been possible to achieve many planned activities.

We commit to maintaining the momentum for this working group and continuing to deliver on concrete activities that expand the members' capacities. Looking ahead, and with a renewed leadership mandate for this crucial working group, the five elected Co-Chairs will maintain their position until December of 2026, as will the Secretariat.

Annexes

Annex A:

IEWG Workplan 2025

Completion date	Item	Action items and deliverables	Lead
<p>Priority 1 – Foundations: Lay the foundations for the IEWG and GPA to facilitate practical enforcement cooperation, focusing on organisations and issues with significant global impact on people’s data protection and privacy rights.</p> <p>Objective 1 - Develop ‘safe space’ enforcement cooperation frameworks focused on multinationals.</p> <p>Objective 2 - Use of and evaluation of the framework in practice.</p> <p>Objective 3 – Develop an annual “transnational case map” for authorities to use in order to learn from other colleague’s work.</p>			
Ongoing	Transnational case map	<ul style="list-style-type: none"> • SIC to republish case map once technical issues are resolved • HK and SIC to analyse input from other DPAs and then update the map for 2024 	SIC Colombia / PCPD Hong Kong, China
Ongoing	Closed Enforcement sessions	<ul style="list-style-type: none"> • Arrange 2 closed enforcement sessions to discuss possible areas of enforcement cooperation • Follow up sessions with appropriate ‘call to action’ for interested members 	All co-chairs
Ongoing	Cooperation with other networks	<ul style="list-style-type: none"> • Invitations to various relevant networks to participate in capacity building sessions • Become an observer in DESWG to enhance communication, deduplication and cooperation between the two working groups on issues of mutual interest and relevance (including potential work on AdTech) • Produce annual report & present it at GPA Closed Session in September 	All co-chairs
<p>Priority 2 – Tools: Build on the previous work of the IEWG to further develop practical tools for enforcement cooperation.</p>			



Objective 1 – Promote and teach our members how to use the Enforcement Cooperation Handbook.			
Objective 2 – Maintain and promote the enforcement cooperation repository.			
Ongoing	Enforcement collaboration handbook	<ul style="list-style-type: none"> • Co-chairs to continue seeking opportunities to promote and educate regarding the Handbook, and to seek opportunities to enhance the handbook through case studies 	OPC Canada
Ongoing	Repository	<ul style="list-style-type: none"> • Liaise with GPEN Executive Committee to explore the use of the GPEN website • Co-chairs to invite GPA members to submit relevant documents • Co-chairs to engage with GPA secretariat to promote this resource 	OPC Canada / ODPA Guernsey
<p>Priority 3 - Awareness and communication: Ensure that the IEWG has a good awareness of the global Privacy Enforcement Authority (PEA) network landscape and maintains or establishes mutual lines of communication and observation to coordinate and leverage activities.</p> <p>Objective 1 – Analyse global PEA networks and make recommendations on coordination.</p> <p>Objective 2 – Promote and strengthen the communication channels between PEA of each region.</p> <p>Objective 3 – Develop existing and new mutual observation agreements.</p> <p>Objective 4 – Improve our communication outreach for more of our members to participate in the activities put in place.</p> <p>Objective 5 – Translate to the best of our abilities and capacities of the products, conferences and different activities the group may have.</p>			
12/2025	Virtual capacity building sessions	<ul style="list-style-type: none"> • Seek ideas from IEWG members for topics for this year’s sessions • Organise sessions • Report back on sessions at the 2025 GPA 	Datatilsynet Norway/ODPA Guernsey



		<ul style="list-style-type: none"> Assess the feasibility of continuing these sessions in 2026 	
09/2025	Capacity building session at GPA Seoul 2025	<ul style="list-style-type: none"> Select topic for in-person session at GPA Seoul 2025 Prepare & deliver session 	ODPA Guernsey
Ongoing	Promotion of IEWG	<ul style="list-style-type: none"> Guernsey to create new LinkedIn page for the IEWG and promote and administer as Secretariat Co-chairs to consider topics for promotion on LinkedIn Engage with the GPA Secretariat to promote IEWG amongst members 	All co-chairs
Ongoing	Resolution on International Cooperation Capacity Building for Improving Cybersecurity Regulation & Understanding Cyber Incident Harms	<ul style="list-style-type: none"> Raise the profile of and engagement with the Cybersecurity Community of Practice amongst IEWG members 	All co-chairs