

Project Plan: Discussions between ICDPPC and other networks to coordinate enforcement efforts

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Full title: Project Plan to implement Executive Committee's mandate to initiate discussions with GPEN and other relevant networks with a view to exploring practical options and opportunities for better coordination of efforts to improve enforcement cooperation.

Project sponsor: ExCo Chair

Project manager: ExCo Secretariat

The mandate: The 36th Conference resolved in its [Resolution on Enforcement Cooperation](#):

To further mandate the Executive Committee to initiate discussions with GPEN and other relevant networks with a view to exploring practical options and opportunities for better coordinating their efforts to improve enforcement cooperation and to report on these options to the 37th Conference.

Project scope: To identify and initiate contact with GPEN and other relevant networks; to identify or create opportunities for holding discussions; to facilitate such discussions and to record ideas for improved cooperation. Adoption or implementation of options for improving cooperation or coordination are outside the scope of the project but some practical steps might nonetheless be taken where those fall within existing mandates of Executive Committee.

Key deliverables:

1. Written approach to identified networks initiating discussions (September 2015)
2. Informal meetings with selected networks to scope initial engagement (October 2015)
3. Formal meeting alongside another DPA meeting (possibly APPA, Singapore) (May 2016)
4. Report on outcomes of the meeting (June 2016)

Stakeholders:

- Governance body of ICDPPC - Executive Committee (Chair, Secretariat, existing Committee, new Committee)
- ICDPPC membership
- Governance bodies of other PEA network (where they exist) or identified representatives
- Other PEA networks' memberships
- Other relevant networks to be identified (see annex), relevant networks that are not wholly made up of enforcement authorities might be likely to include those involved in government standard setting on privacy enforcement; those involved in researching privacy enforcement; and those bringing together internal compliance officers.
- APPA Secretariat and Singapore DPA (if the 2016 meeting be held alongside APPA Forum meeting in Singapore).

Implementation plan

The plan is for the Secretariat to identify target networks; the Chair to write to networks inviting exploration of useful directions for discussions to follow after the Amsterdam Conference; the closed session to adopt new Strategic Plan to include this work as a priority; the Chair to meet informally with representatives of other networks in the margins of Amsterdam Conference (in some cases by addressing a scheduled side meeting of such networks where feasible); with the constructive engagement of other networks, the Secretariat will work towards scoping and then arranging an in-person meeting of all participating networks to be held by mid-2016 alongside another meeting (e.g. APPA Forum, Singapore, May 2016); a report on the meeting to be prepared.

Approximate timeline

Preliminary steps (completed)

October 2014	Adoption of resolution
October to June 2015	Low key preliminary work e.g.: <ul style="list-style-type: none"> • Secretariat building bridges with other networks by inviting and publishing profiles in ExCo newsletter (OECD, AFAPDP, OAS, APPA). • Chair informally meets with relevant stakeholders (EDPS, OECD Secretariat; A29WP Chair). • Secretariat begins to operationalise Cooperation Arrangement (work ongoing and not complete).
June 2015	Strategic Direction Working Group settles 2016-18 Strategic Plan to develop supportive connections between networks involved in cross-border enforcement.

This project plan

August	Chair approves draft plan (complete)
August	Secretariat identifies initial networks to approach (more can be added as project progresses)
September	ExCo approves plan
September	Chair sends letter to governance bodies of identified networks inviting participation in project and to contribute to scoping
September	Secretariat explores opportunities for informal meetings in the margins of Amsterdam Conference, and sets up meetings for Chair
September	Secretariat prepares report for Conference on progress and plan (as part of ExCo annual report)
October	Closed session, 37 th Conference, Amsterdam: Chair reports to the closed session; 2016-18 Strategic Plan adopted
October	In margins of Amsterdam Conference: Chair holds informal side meetings <i>Post Amsterdam Conference</i>
October – December 2015	Firm up on timing and location of proposed meeting for mid-2016
October 2015 – April/May 2016	Scope then organise meeting (which may be part of a larger enforcement oriented meeting or standalone)
April - June 2016	Hold meeting (1-2 days)
<i>Follow up (not part of the plan itself)</i>	
June to October 2016	Follow up culminating in and reports and proposals to place before 38 th Conference, Morocco



Annex: “Other relevant networks”

The resolution refers to discussions with GPEN “and other relevant networks”. That phrase clearly anticipates networks of privacy authorities with explicit enforcement cooperation mandates or existing cross-border enforcement cooperation experience. However, there are many other networks that might be “relevant” and for which it would be useful to initiate discussions.

The Secretariat proposes to take a reasonably expansive view of relevant networks. Accordingly, it does not plan to limit discussions either to networks of DPAs nor to networks with explicit enforcement cooperation mandates or existing cross-border enforcement cooperation experience. However, it might start the process with core networks and they will likely be the priority.

The Secretariat proposes to take this expansive approach for several reasons:

- It will be invidious for the Secretariat to try to make distinctions between networks that include ICCDPPC member authorities – refusals may offend.
- Casting a wide net may yield unexpected benefits and insights.
- The networks approached will operate a filtering process anyway – if the project offers little benefit to a particular network it will decline to participate.
- DPAs are not the only bodies with a legitimate interest in enforcement cooperation, governments and other stakeholders have an interest also.

Target network types

While no decisions have been taken on the networks to approach this table illustrates potential target network types all having an interest in cross-border cooperation in privacy enforcement (note that where an organisation exists we would seek the ‘network’ within it typically a committee comprising representatives of different countries or economies):

Type	Examples (illustrative only, lists are not comprehensive)
Specialised privacy enforcement bodies	APEC CPEA; APEC CBPRs JOP
Networks set up under treaty or supranational law	A29WP; COE T-PD
International Government Organisations having a demonstrated policy interest in privacy enforcement cooperation	OECD WPSPDE; APEC DPS; COE T-PD; A29WP; OAS; ECOWAS
Regional or linguistic forums of DPAs	APPA; Ibero-American network; Francophonie; OAS
Research networks examining enforcement cooperation	PHAEDRA
International networks of internal compliance bodies	IAPP; iappANZ; network of EU DPOs
International DPAs	Interpol supervisory board; various EU JSAs