Data Protection Commissioner
Commissaire à la protection des données

COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

Activity Report

July 2025 – October 2026

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Foreword

Through Convention 108 and its modernisation, the Council of Europe has decisively shaped the international standards for protection of personal data. This leadership carries a continuing ambition: to demonstrate how these standards can guide trusted institutional practice, protect individual rights and support responsible innovation. In that spirit, and with great pleasure, I present my first activity report, covering the period from July 2025 to October 2026. The report reflects my commitment to independent and effective supervision and considers how the experience gained can inform the next stage of the mandate.

In presenting this first report, I wish to express my sincere gratitude for the confidence placed in me by the Secretary General and the Consultative Committee of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (T-PD). I also pay tribute to my predecessor, Jean-Philippe Walter, whose wisdom and longstanding commitment have made a lasting contribution to data protection within the Council of Europe and beyond. He played a pivotal role in developing the Council of Europe Regulations on the Protection of Personal Data, adopted by Resolution CM/Res(2022)14 ("the Regulations"), and in guiding their initial implementation, laying the foundations on which this mandate continues to build.

The Regulations remain a relatively recent instrument. Their promise is realised only through the decisions, procedures and safeguards that give individuals effective protection. This requires sustained attention to how personal data are used, how responsibilities are exercised and how rights and remedies operate in practice.

My approach has combined independent scrutiny with constructive engagement. The examination of complaints clarified the corrective action required, while preventive reviews, consultations and guidance supported improvements in organisational practices. Together, these activities demonstrated how addressing individual concerns can inform broader safeguards and help prevent similar difficulties. Throughout, the emphasis has been on tangible results: meaningful responses, clearer responsibilities and effective protection of rights.

This work was supported by constructive cooperation with the Data Protection Officer (DPO), the Data Protection Unit and the responsible entities, as well as by assistance from the Directorate General of Administration. Direct engagement with individuals and staff representatives informed supervisory priorities, while international exchanges connected the mandate with wider expertise and opportunities for practical cooperation.

This report records the progress achieved and identifies where further action is required. The next phase will focus on implementation: carrying remedies and recommendations through, supporting the application of practical safeguards and anticipating risks as technologies and organisational practices evolve. Sustainable supervisory capacity will be essential if these responsibilities are to be pursued consistently.

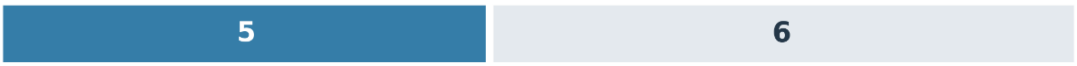
The Council of Europe is particularly well placed to demonstrate that robust data protection and institutional effectiveness are mutually reinforcing. I look forward to contributing to that ambition through independent supervision, constructive dialogue and sustained attention to results, helping to ensure that the standards the Organisation promotes are reflected in protection people can rely on.

Tamar Kaldani
Data Protection Commissioner

The Reporting Period in Figures

July 2025–October 2026

11 Formal Complaints Received



5 Determinations Completed

6 Complaints Under Examination

Supervisory and Advisory Work

3 Principal Reviews

8 Institutional Consultations

3 Working Visits

Practical Safeguards

Data Breach Guidance

3 Tools: Notification Form,
Register and Decision Tree

Developed; Dissemination and Use to Follow

2 Sets of Transfer Clauses

Controller-to-Controller
Controller-to-Processor

Under Adaptation

Cooperation and Institutional Engagement

1 Sponsored Resolution Adopted

Spring Conference
Cooperation Sub-Group

2 T-PD Plenary Meetings

Contributions to Discussions
and Draft Guidelines

The Collective Complaint Submitted by 18 Individuals Is Counted as One Complaint.

1. Protecting individuals' rights

The effectiveness of the Regulations is ultimately tested when individuals seek access to their personal data, question how information has been handled or ask for a remedy. During this first reporting period, the Commissioner examined those concerns through an independent complaints mechanism, clarifying obligations and requiring corrective action where infringements were established. Individual cases also brought to light practices warranting attention beyond the immediate complaint.

The Commissioner received 11 formal complaints and issued five determinations; six complaints remained under examination at the end of the reporting period. Six complaints concerned the personal data breach of June 2026, including one collective complaint submitted by 18 individuals. Other complaints concerned access to personal data, implementation of remedial action and alleged unauthorised access to and handling of personal and professional material.

Formal complaint activity increased compared with previous reports. This increase may partly reflect greater awareness of the Regulations and the remedies they provide, although complaints related to the data breach also accounted for a substantial share of the caseload. The determinations clarified the scope of supervision, secured further examination and disclosure of personal data, and required improvements in retention arrangements and information provided to individuals.

Enquiries and requests for assistance complemented complaint handling. They helped individuals identify the applicable framework and available procedures, while bringing recurring concerns to supervisory attention. Together, these activities provided an evidence-based foundation for preventive guidance and for the setting of further supervisory priorities.

1.1 Determinations and remedial action

The Commissioner made five determinations during the reporting period. They addressed three principal areas, clarifying the application of the Regulations and requiring corrective action where infringements were established:

- **Scope of supervision.** The first determination clarified the application of the Regulations to processing by the European Court of Human Rights and its Registry, particularly the exclusion of processing in the exercise of judicial activities. It highlighted the importance of examining the nature and context of the processing concerned when determining supervisory competence. The determination thus provided a reference point for subsequent requests and enquiries and enabled clearer explanations of the avenues available to individuals.
- **Access to personal data.** In a complaint concerning access to recruitment-related personal data, the Commissioner found that some relevant records had not been adequately identified and examined. The determination clarified that effective access requires sufficiently complete searches and accurate, intelligible communication of the personal data covered by the request. The Commissioner ordered a renewed examination and communication of any data to which the applicant was entitled. The Secretary General took a decision in accordance with the determination, which resulted in a further review of records and the communication of additional information. A subsequent complaint concerning its implementation remained under examination at the end of the reporting period.

- **Personal data breach of June 2026.** Three determinations concerned complaints arising from the personal data breach affecting the Council of Europe. The examinations assessed the obligations relevant to each complaint separately, distinguishing security, retention, information and measures to mitigate possible adverse effects. The casework reinforced the requirement to justify continued retention and explain applicable storage periods or criteria and clarified that notification does not end the Organisation's responsibilities concerning continuing risks. Findings remained confined to the evidence examined, with corrective action required where infringements were established.

Follow-up will focus on verifying implementation of remedial requirements and their effectiveness in addressing the shortcomings identified.

1.2 Enquiries and requests for assistance

Accessibility and responsiveness were guiding priorities in the Commissioner's engagement with individuals. During each working visit, the Commissioner held separate, private meetings with staff members wishing to raise concerns. Online meetings were also offered on request, providing opportunities for direct engagement between visits and for individuals unable to meet in person.

Enquiries concerned access to personal data, confidentiality, publication of information and the procedures available for seeking assistance or redress. Responses explained the applicable framework, directed requests to the competent service and clarified the possibility of lodging a formal complaint. These exchanges helped individuals understand their options and identified practical difficulties that might otherwise remain outside formal casework.

Several enquiries concerned Court-related proceedings, records or publications, including anonymisation and access to case-related information. Another sought the review of a decision taken by a national data protection authority. Explaining the boundaries of the Commissioner's mandate helped individuals identify the appropriate channel and highlighted the importance of clear information about the distinct protection arrangements that apply.

Correspondence following the personal data breach raised questions about available information, protective advice and access to updates, including the needs of former staff members and pensioners. The Commissioner referred individual questions to the DPO and responsible services and addressed broader communication concerns without prejudging pending complaints. These exchanges underscored the need for clear, actionable information and for channels accessible to people who no longer use the Organisation's internal systems.

Together, written responses and direct meetings provided an accessible point of contact and a valuable source of insight into how individuals experience data protection in practice. Recurring concerns informed dialogue with relevant services and helped identify priorities for clearer guidance and preventive work.

1.3 Lessons and priorities

The casework demonstrated that effective protection depends on the Organisation's ability to translate the Regulations into reliable everyday practice. Access rights require complete searches and meaningful responses; retention requires justified limits that are applied and explained; and accountability requires evidence that safeguards operate effectively. These

requirements provide a practical basis for improving both individual protection and organisational decision-making.

The next phase of supervision will place particular emphasis on implementation and prevention. Follow-up will examine whether remedial action has addressed the shortcomings identified. Lessons from individual cases will inform guidance and targeted reviews, helping services recognise and resolve similar issues before they give rise to further complaints.

As data processing operations become more interconnected and increasingly reliant on artificial intelligence, the ability to identify where personal data are held, explain their use, control access and apply retention limits becomes all the more important. These foundations must evolve in step with technological capability. Early assessment of risks, clear responsibilities and accessible means of exercising rights will be essential to responsible innovation within the Organisation.

The priorities are therefore to strengthen retention and access practices, verify the effectiveness of corrective action and make rights and remedies easier to navigate. Continued engagement with individuals, the DPO and responsible services will help direct supervisory attention towards demonstrated risks. Progress will ultimately be measured by the protection achieved: whether individuals receive meaningful answers, safeguards work in practice and identified shortcomings lead to lasting improvements.

2. Strengthening compliance and safeguards

Preventive supervision provides an opportunity to address risks before they materialise as harm or give rise to complaints. During the reporting period, the Commissioner examined how data protection requirements were reflected in organisational systems and procedures, seeking practical improvements in the collection, use, disclosure and retention of personal data.

Eight institutional consultations complemented reviews of video surveillance, procurement-system access and declarations of interests, alongside the development of breach guidance and international transfer safeguards. The work combined scrutiny of existing arrangements with advice on proposed changes, focusing on necessity, proportionality, transparency and demonstrable accountability.

2.1 Supervisory inquiries and reviews

Information received from staff members prompted examination of three processing activities. The Commissioner sought explanations and supporting documentation from the responsible services, assessed the safeguards described and provided recommendations or requested further clarification. These reviews illustrate how concerns raised by individuals can inform preventive supervision with wider organisational relevance.

Video surveillance

The Commissioner examined the purpose, proportionality and transparency of CCTV installations, reviewing the data protection impact assessment and arrangements governing recording, storage, access and the exercise of rights. Recommendations addressed the applicable safeguards, and the information provided to those affected. The review connected

the justification for surveillance with its practical operation: what is recorded, who can access it, how long it is retained, and how individuals can exercise their rights.

Procurement records

The Commissioner sought clarification regarding access to records of closed procurement procedures, including default permissions, possible restrictions, risk assessment and privacy information. The inquiry focused on whether access to personal data corresponded to a defined professional need and whether the system's permissions reflected that requirement. It drew attention to the continuing protection of records after a procedure has closed and the need to review access as responsibilities change.

Declarations of interests

Information concerning the new system prompted dialogue with the Ethics Office and review of the questionnaire, privacy notice and data protection impact assessment. Recommendations addressed data minimisation, guidance for free-text fields, information about third parties, cross-checking, retention and individual rights. The review sought to support the integrity objectives of the process while limiting unnecessary collection and making the use of information clearer. Particular attention was given to information about people who do not themselves complete a declaration, whose privacy may nevertheless be affected by the process.

2.2 Advice on organisational processing practices

Consultation with the DPO and other services enabled the Commissioner to address practical questions as procedures, guidance and responses were being developed. The advice helped services assess what information was necessary, how it should be made available and how the rights of different individuals should be protected. Its value lay in translating the Regulations into clearer, reasoned decisions that could be applied consistently.

Recruitment

Consultations concerned access to candidate information, confidentiality arrangements for selection panels, interview feedback and references supplied by third parties. The Commissioner supported clearer instructions on handling candidate data and recognised the benefits for transparency of communicating general interview comments. Advice on access to job references recommended explicitly explaining the balancing assessment undertaken; the DPO confirmed that this suggestion had been incorporated into the standard response. These exchanges supported more transparent explanations while recognising that different recruitment records may require different assessments.

Publication of staff information

The Commissioner reviewed draft guidelines on publishing staff information on Council of Europe websites and proposed adjustments to strengthen their alignment with the Regulations. The DPO confirmed that the suggestions would be incorporated. Separate advice concerned publication of staff movements and appointments. The common objective was to support legitimate organisational transparency through proportionate choices about the information published, its audience and the means of publication.

Financial delegations

Advice concerning the financial-delegation tool emphasised the requirement to maintain records of processing activities, including purposes, categories of personal data and

individuals concerned, and recipients. This linked the operation of the tool to the documentation needed to explain responsibilities and information flows, assess access arrangements and demonstrate compliance.

Breach notifications to affected individuals

The Commissioner advised on notification arrangements involving large numbers of recipients, clarifying the distinction between the DPO's responsibility for assessing and approving notification and the operational task of delivering it. Options included a DPO-approved communication issued through the team coordinating the response or a joint communication. The advice sought to ensure the timely and consistent provision of information to affected individuals while maintaining a clear allocation of responsibility under the Regulations.

2.3 Guidance and practical tools

The Commissioner developed practical instruments in two areas where clear procedures and responsibilities are essential: personal data breach response and international transfers. The objective was to make the Regulations easier to apply consistently and to support documented, accountable decisions.

Personal data breach guidance

The Commissioner developed guidance supported by a notification form, a breach register and a decision tree. Together, these instruments establish a common approach to recognising incidents, assessing their implications for personal data, documenting decisions and determining notification requirements.

The guidance clarifies the responsibilities of staff members, controllers, the Directorate of Information Technology and the DPO. It explains the progression from reporting an incident to assessing whether a personal data breach has occurred and whether it may seriously interfere with individuals' rights and fundamental freedoms, requiring notification under Article 6.5.

Particular attention was given to the need for timely action in conditions of uncertainty. Required notification should not be delayed because information is incomplete; available information should be communicated promptly and supplemented as the assessment develops. Consultation with the DPO and relevant colleagues helped refine the process and address practical arrangements, including notifications affecting large numbers of individuals.

The supporting tools translate these requirements into everyday practice. The form structures the information needed for assessment, the register records the breach and action taken, and the decision tree makes the sequence of responsibilities and decisions accessible. Their practical value will depend on dissemination, staff awareness and consistent application. Supporting their implementation will therefore be a priority in the next reporting period.

International transfer safeguards

The Commissioner undertook work to adapt the T-PD model contractual clauses to the Council of Europe's internal legal framework, covering controller-to-controller and controller-to-processor transfers, with an accompanying explanatory note. The work supports the development of safeguards for transfers outside the Organisation under Article 12.2.2 of the Regulations.

The adaptation connects standards developed through the Convention 108 framework with the Organisation's own obligations and supervisory arrangements. It seeks to give services a consistent contractual basis for defining the parties' responsibilities and documenting the protection required when personal data are transferred.

The draft clauses were under consultation with the relevant services at the end of the reporting period. Their finalisation will take account of the feedback received and the practical requirements identified through that process. Once finalised, they are intended to support consistent, reasoned transfer decisions, with safeguards suited to the circumstances of each transfer and capable of effective implementation.

2.4 Progress and follow-up

Preventive supervision contributed to concrete changes in operational communications and established a basis for further improvements. Advice was incorporated into the standard response concerning job references, proposed changes to staff-publication guidelines were accepted, and practical breach guidance and supporting tools were developed. Reviews also identified questions requiring clarification or action, while international transfer safeguards progressed to consultation with relevant services.

The next phase will focus on implementation and effectiveness. Follow-up will establish how recommendations are reflected in final procedures, whether guidance is accessible and used, and whether revised arrangements address the risks identified. Consultation on the transfer clauses will help to ensure that the safeguards are both legally sound and workable for the services applying them.

As systems and processing practices evolve, safeguards must remain responsive to changes in purpose, access, retention and risk. The reviews undertaken during this period provide a foundation for more systematic attention to those changes, with data protection considered early and responsibilities clearly documented.

Progress will be measured by demonstrable improvements: access aligned with professional need, collection and retention limited to what is justified, clearer information for individuals and decisions supported by evidence of compliance. The objective is to make effective safeguards a consistent part of organisational practice, supported by guidance, review and accountable follow-through.

3. Institutional cooperation and awareness

Constructive dialogue enables independent supervision to identify risks, establish facts and support improvements in practice. During the reporting period, cooperation with the DPO, responsible services and staff representatives connected supervisory work with operational experience and individuals' concerns. Communication also supported a shared understanding of the Regulations, the responsibilities they establish and the protection they afford.

3.1 Cooperation with the Data Protection Officer

Regular and constructive cooperation with the DPO was an important foundation for the Commissioner's work. The DPO's knowledge of organisational practices, coordination with responsible services and provision of explanations and supporting records greatly assisted both complaint examination and preventive reviews. Her engagement with emerging

questions and willingness to share draft documents enabled issues to be considered while procedures and responses were still being developed.

The cooperation brought complementary perspectives to the application of the Regulations. The DPO's operational experience informed the Commissioner's understanding of practical circumstances, while independent supervisory advice supported clearer procedures, guidance and communications. Cooperation also supported further enquiries and follow-up, helping clarify the evidence available and the action taken in response to findings. The distinction between the respective responsibilities of the Commissioner and the DPO nonetheless remained essential: constructive exchange supported informed assessment without displacing independent judgement.

Continued cooperation will be particularly valuable in completing instruments under consultation, supporting the use of practical guidance and following up on the implementation of recommendations. It provides a basis for identifying difficulties early and connecting supervisory findings with improvements that the Organisation can apply in practice.

3.2 Dialogue with Council of Europe services and staff representatives

Dialogue with services and staff representatives helped the Commissioner understand how processing arrangements operate in practice and how they affect individuals. These exchanges supported factual enquiries, informed preventive advice and brought to attention concerns that might otherwise have remained outside formal complaint procedures.

- **Directorates and other organisational entities.** Engagement included the Directorate General of Administration, the Directorate of Human Resources, the Directorate of Information Technology, The Directorate of Legal Advice and Public International Law, the Ethics Officer and the entities responsible for security and internal oversight. Exchanges supported examination of processing practices and clarification of their purposes, operational requirements and safeguards.
- **Staff Committee.** Regular meetings addressed human resources practices and concerns arising from the personal data breach, including confidentiality, transparency and information available to affected individuals. They provided a channel for collective concerns to inform supervisory attention and helped identify matters requiring clarification or further engagement with responsible services.
- **Trade union.** A consultation meeting enabled discussion of staff-related data protection concerns, the Commissioner's mandate and available avenues for raising issues. It broadened engagement with staff representatives and provided a further perspective on the practical protection of staff data.
- **Individual staff members.** Private meetings during working visits, complemented by online engagement on request, offered a direct avenue for discussing concerns and clarifying rights and procedures. Information received from staff prompted the supervisory reviews described in Section 2.1, demonstrating how accessible engagement can lead to examination of practices with wider organisational relevance.

Continued dialogue will support the early identification of emerging concerns and follow-up on recommendations, while preserving the confidentiality of individual exchanges and the Commissioner's independent assessment.

3.3 Awareness and communication

Effective data protection requires both an understanding of responsibilities and the ability to exercise rights. Those handling personal data need practical guidance, while individuals whose information is processed need clear explanations of its use, the safeguards applicable and the avenues available for assistance or redress.

The Commissioner's Data Protection Day statement highlighted the importance of protecting personal data within the Organisation. Responses to enquiries, meetings and practical advice reinforced that message by explaining the Regulations in concrete situations and directing individuals to the appropriate channels.

Recurring enquiries identified where communication could be clearer, particularly concerning the scope of supervision and procedures for obtaining information or seeking a remedy. They also highlighted the need to reach different audiences, including applicants, former staff members, pensioners and others who may not have access to internal communication channels.

The breach guidance and supporting tools provide a further basis for targeted communication. Their dissemination should help those responsible recognise incidents, understand reporting obligations and provide affected individuals with timely, useful information. Making guidance accessible and supporting its application will be important next steps.

Effective communication should enable responsible action and meaningful access to protection. Future efforts will therefore focus on practical explanations, appropriate channels and information tailored to the needs of its intended audiences, helping make the guarantees of the Regulations accessible in everyday interactions with the Organisation.

4. International cooperation and engagement with the T-PD

International cooperation connected the Commissioner's supervision within the Council of Europe with wider experience in protecting personal data. Engagement with the T-PD, national authorities and international organisations provided opportunities to contribute to standards, exchange practical approaches and support their implementation.

The period combined longstanding institutional relationships with new initiatives. Contributions included sponsorship of an adopted resolution on European supervisory cooperation, participation in standard-setting discussions and joint preparation of a workshop addressing the particular challenges facing international organisations.

4.1 Cooperation with the T-PD and Parties to Convention 108

The Consultative Committee of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (T-PD) holds particular significance for the Commissioner's mandate. It elects the Commissioner and receives her activity report as part of the accountability arrangements established by the Regulations.

Participation in the November and June plenary meetings enabled continued contributions to discussions on draft guidelines and exchanges with representatives of Parties to Convention 108. These contributions brought a supervisory perspective to the Committee's work, with

attention to how standards can be applied effectively in practice. Presentation of this first report will further inform that dialogue through an account of the Organisation's implementation of the Regulations, the results of supervision and priorities for continued action.

The adaptation of the T-PD model contractual clauses, described in Section 2, provided a practical connection between the Committee's standard-setting work and internal safeguards. Exchanges with national counterparts similarly focused on the conditions needed to translate legal commitments into effective protection:

- **Moldova.** The Commissioner delivered a keynote marking the national authority's anniversary, strengthened data protection legislation and ratification of the modernising Protocol to Convention 108. Her contribution highlighted how these developments provide a stronger foundation for protecting rights, including through a supervisory authority equipped with enhanced powers. The emphasis was placed on translating legal reform and international commitments into effective protection through independent oversight, institutional capacity and a sustained culture of compliance, supporting public trust and responsible innovation.
- **Armenia.** The Commissioner contributed to discussions in Yerevan on reform of the data protection framework and strengthening the supervisory authority. Her contribution addressed alignment with Council of Europe and European Union standards, emphasising that effective independence requires appropriate powers, sufficient resources and the capacity to enforce the law. Subsequent exchanges with the Ministry of Justice maintained that dialogue. The Commissioner facilitated contact with the T-PD Secretariat concerning the process for obtaining the Council of Europe's opinion on draft legislation, connecting the reform discussions with further institutional support.

These activities reinforced the relationship between common standards, independent oversight and practical implementation. Continued engagement will provide opportunities to share experience arising from supervision within the Organisation and draw on the expertise represented in the Committee.

4.2 Cooperation with supervisory authorities and the wider professional community

- Spring Conference of European Data Protection Authorities. The Commissioner participated in the 34th European Conference of Data Protection Authorities, hosted by the Turkish Personal Data Protection Authority in Antalya in May 2026. Discussions addressed artificial intelligence, children's data protection, international transfers and the evolving role of supervisory authorities. Exchanges on preventive and corrective approaches were relevant to the Council of Europe's own processing activities, particularly the assessment of new technologies and development of practical safeguards.
  A principal contribution was the Commissioner's sponsorship of the Resolution on the Establishment of a Cooperation Sub-Group, adopted on 7 May 2026, with co-sponsorship from the Croatian Personal Data Protection Agency, the Italian Data Protection Authority, the EDPS and the Swiss Federal Data Protection and Information Commissioner. The resolution established a framework for practical cooperation among European supervisory authorities, including those within and outside the European Economic Area. Its objectives include knowledge sharing, joint initiatives and guidance, drawing on existing work and avoiding duplication. The initiative connected the challenges discussed at the Conference with a mechanism for

sustained collaboration. Its adoption provided a concrete basis for cooperation; its practical contribution will depend on translating the Sub-Group's mandate into a work programme and useful outputs.

- **Protecting children's data in conflict settings.** The Commissioner contributed to an expert exchange of the Consultation Group on the Children of Ukraine on technology-facilitated and AI-enabled violence. Her intervention highlighted data protection as an essential safeguard within child protection systems, supporting trusted information sharing, coordinated responses and responsible use of technology.

4.3 Cooperation with the EDPS and preparation of the IOW

Cooperation with the European Data Protection Supervisor (EDPS) centred on joint preparations for the International Organisations Workshop (IOW) on 1–2 December 2026. The Commissioner worked closely with the DPO and the Data Protection Unit, combining complementary expertise in a coordinated team effort. This collaboration supported programme development, engagement with contributors and organisational preparations. The Secretary General confirmed his participation in the opening alongside the EDPS.

The workshop addresses a shared challenge: how international organisations can fulfil their mandates while ensuring effective protection within their distinct legal and institutional frameworks. Its programme connects responsible use of artificial intelligence, risk and impact assessment, accessible remedies and preparedness for personal data breaches. Practical exchanges are intended to help participants apply safeguards to the decisions they face within their organisations.

Preparation also provided an opportunity to bring Council of Europe expertise into the wider professional dialogue. The programme envisages practical work using the HUDERIA human rights impact assessment methodology, a contribution from the DPO on complaint handling and engagement with the Court concerning relevant case law.

The workshop's delivery and outcomes fall within the next reporting period. Follow-up will focus on the practical lessons and opportunities for continued cooperation arising from the event.

5. Conclusions and priorities

The central conclusion of this first reporting period is that independent supervision has begun to translate the Regulations into concrete improvements in the protection of individuals. Determinations clarified the scope of supervision, secured further examination and disclosure of personal data, and required corrective action on retention and transparency. Preventive reviews and consultations addressed risks in organisational practices, while guidance and work on transfer safeguards provided practical means of strengthening compliance.

These results establish a sound basis for further progress, but their lasting value will depend on implementation. Remedial requirements must be carried through, guidance must be accessible and applied, and transfer safeguards must be finalised through consultation with the relevant services. The next reporting period should therefore focus on verifying that these contributions produce effective, sustained changes in practice. The measure of progress will be whether individuals can exercise their rights effectively and the Organisation can demonstrate that its safeguards work.

Resources and capacity

The Commissioner benefited from logistical and secretariat support provided by the Directorate General of Administration, which facilitated the practical organisation of her work. The DPO's constructive cooperation and the Data Protection Unit's assistance also made valuable contributions to the exercise of the mandate.

The substantive supervisory work was nevertheless undertaken without dedicated staff support. Complaint examination, factual enquiries, legal assessment, drafting, preventive advice and follow-up depended on the Commissioner’s own capacity. While the support received is gratefully acknowledged, a clear need remains for dedicated capacity in independent analysis, case management and implementation monitoring. The growing use of the complaints mechanism makes the sustainability of these arrangements an increasingly pressing concern. Resources should therefore be assessed in light of the protection and supervisory assurance the Organisation needs.

Priorities for the next reporting period

The ambition for the next period is to make data protection a more consistent part of how the Organisation takes decisions, manages information and earns trust. Independent supervision will combine individual redress with preventive engagement, using experience from casework to strengthen practice across the Organisation.

- **Turn findings into lasting improvements.** Ensure that determinations and recommendations lead to effective remedies and changes that reduce the likelihood of similar shortcomings recurring.
- **Embed accountability throughout the information lifecycle**. Promote justified decisions about the collection, use, sharing and retention of personal data, supported by clear responsibilities and evidence of effective safeguards.
- **Enable responsible innovation.** Encourage early consideration of rights and risks as technologies and organisational practices evolve, so that digital transformation advances the Organisation’s mission while protecting those affected.
- **Make rights meaningful and accessible.** Support clear information, responsive procedures and effective avenues for assistance and redress, recognising the different circumstances of people whose data the Organisation processes.
- **Strengthen collective capacity for protection**. Build on cooperation with the DPO, responsible entities, the T-PD and supervisory counterparts to share experience and support implementation. Sustainable supervisory capacity will be essential to maintaining this effort.

As the home of Convention 108 and its modernised framework, Convention 108+, the Council of Europe is uniquely placed to lead by example in protecting personal data. Translating these standards into trusted institutional practice strengthens its contribution to human rights and responsible innovation. Building on the progress achieved, continued commitment and cooperation can establish the Organisation as a benchmark for effective data protection within the international community, reinforcing the confidence of those who entrust it with their personal data.