GPA
Global Privacy Assembly

43rd Closed Session of the Global Privacy Assembly

October 2021

Adopted resolution on the Assembly's Strategic Direction (2021-23)

SPONSORS:

- Information Commissioner's Office, United Kingdom (Chair GPA)

CO-SPONSORS:

- Information and Data Protection Commissioner, Albania

- Agencia de Acceso a la Information Publica, Argentina

- Office of the Australian Information Commissioner, Australia

- National Commission for Informatics and Liberties, Burkina Faso

- Federal Commissioner for Data Protection and Freedom of Information, Germany

- National Institute for Transparency, Access to Information and Personal Data Protection, Mexico

- Office of the Privacy Commissioner (Te Mana Mātāpono Matatapu), New Zealand

- Office of the Privacy Commissioner of Canada

- National Privacy Commission, Philippines

- European Data Protection Supervisor, European Union

- Privacy Commissioner for Personal Data, Hong Kong, China

- National Commission for the Control and the Protection of Personal Data, Morocco

- Commission nationale de l'informatique et des libertés, France

- Office of the Privacy Commissioner, Bermuda

The 43rd Global Privacy Assembly 2021:

Recalling that:

a. The 33rd International Conference of Data Protection and Privacy Commissioners, now the Global Privacy Assembly (GPA) adopted rules and procedures that anticipated the closed session defining the Assembly's 'strategic direction'[1];

b. The closed session forms a core element of the Assembly and provides all members with the opportunity to participate in setting the Assembly's strategic priorities;

c. The 40th GPA adopted a Resolution on a Roadmap on the Future of the International Conference[2], which recognised the importance of increasing the Assembly's ambition in co-ordinating common positions and key messages towards governments and decision-makers on key policy issues identified in the field of privacy and data protection;

d. The 41st GPA adopted a Resolution on the Conference's Strategic Direction 2019-21[3], setting out a new strategic plan and the GPA's first policy strategy. This was a crucial moment in the evolution of the GPA, furthering its ambition to become the global forum for privacy and data protection authorities, advancing effective regulatory cooperation for data protection and privacy at the international level.

Recognising that:

e. The 2019-21 strategy provided for real modernisation and progress to take place, creating a year round platform for practical regulatory cooperation. The foundations built in terms of the development of the GPA's structure and governance, and the work delivered by the GPA and its working groups, provide a strong basis for the new strategic plan;

f. The environment within which the GPA and its members regulate has changed since the last plan was adopted, as the global pandemic has significantly accelerated digitalisation and data-driven innovation. The GPA more than ever needs an influential and collective voice, and a constructive global policy and regulatory approach to enable those innovations that improve the lives of our citizens, while also effectively protecting their rights.

---

[1] See the GPA Rules and Procedures , clause 2.2 (i)
[2] FOTC - Roadmap to Implement Recommendations (globalprivacyassembly.org)
[3] Resolution on the Conference Strategic Direction 2019 - 2021 FINAL (globalprivacyassembly.org)

The 43rd Global Privacy Assembly therefore resolves to:

1. Adopt the Strategic Plan 2021 - 2023 set out in the Annex, to commence immediately.

2. Direct the Executive Committee at the appropriate time to review the Assembly's strategic priorities and prepare, for consideration at the 45th Global Privacy Assembly Closed Session, a revised set of strategic priorities and implementation plan to commence in 2023.

3. Authorise the Executive Committee to convene committees or working groups to assist with implementation of the Strategic Plan or review.

Annex to the Resolution on the Assembly's Strategic Direction (2021-23) - SEE OVERLEAF

Strategic Plan 2021 - 2023

Global Privacy Assembly

GPA

Global Privacy Assembly

Contents

GPA Strategic Plan 2021 – 2023

The Vision

An environment in which privacy and data protection authorities worldwide can practically fulfil their mandates, both individually and in concert, to ensure high standards of data protection globally and promote and facilitate effective regulatory cooperation.

The Mission

The Global Privacy Assembly (GPA) seeks:

- To be a highly effective global forum for privacy and data protection authorities.
- To provide regulatory and policy leadership at the international level in data protection and privacy.
- To connect and support efforts at domestic and regional level, and in other international forums, to enable authorities to better protect and promote privacy and data protection.
- To disseminate knowledge, provide practical assistance, and help authorities to more effectively perform their mandates.
- To facilitate cooperation on cross border data flows.

Strategic Priorities 2021 – 2023

1. Advancing Global Privacy in an Age of Accelerated Digitalisation

- Work towards a global regulatory environment with clear and consistently high standards of data protection, as digitalisation continues at pace.

2. Maximising the GPA's voice and influence

- Enhance the GPA's role and voice in broader digital policy.
- Strengthen relationships with other international bodies and networks advancing data protection and privacy issues, including through observer arrangements.

3. Capacity Building for the GPA and its Members

- Support Members' shared learning from experiences, strategies and best practices, including cooperation and capacity building tools.
- Recognise and strengthen the importance of working together to ensure a coordinated response to data protection and privacy issues.

Introduction

The 2021-23 Strategic Plan will build on the successful foundations provided by the 2019-21 Plan – an evolution. The GPA's focus remains on enhancing regulatory cooperation, to ensure its members deliver optimal regulatory and policy outcomes, via collaboration, both within GPA and with global stakeholders, as they face new digital challenges and common global societal risks.

The GPA will achieve this by putting an Implementation Plan in place. This Plan replaces the Policy Strategy of the 2019-21 Strategic Plan and sets out how all three strategic priorities will be delivered, while still retaining the focus on key policy themes. The Implementation Plan highlights the key policy themes the GPA will focus on in 2021-23, and sets out actions to deliver outputs on those key themes. It also sets out how those actions will deliver our strategic priorities.

Background to the 2021-23 Strategic Plan

The GPA 2019-21 Strategic Plan included a Policy Strategy. The Policy Strategy set out how the GPA was to implement the first strategic priority of that Plan and to strengthen the GPA's core policy role and influence in advancing privacy and data protection at the international level. This was a crucial development in the evolution of the GPA, furthering its ambition to become the global forum for privacy and data protection authorities, a more dynamic platform for international cooperation and policy influence, and a year-round permanent network advancing data protection and privacy at the international level.

The GPA has made strong progress against the 2019-21 Strategic Plan and associated Policy Strategy; key achievements include:

- A foundational piece of work that analysed commonalities of multilateral data protection and privacy frameworks. This work is already informing GPA discussions with multilateral bodies and international organisations.
- A new resolution on accountability when implementing AI, delivering the intent of the 2018 AI Declaration.
- GPA engagement with and/or submissions to the UN, OECD and others on children's privacy issues.
- An enhanced focus on facilitating practical enforcement cooperation. This has led to interested members issuing statements on cryptocurrencies and videoconferencing, and creating 'safe space' discussions to share regulatory enforcement approaches to key data protection and privacy issues of a global nature.
- Targeted engagement on digital economy issues based on an agreed GPA narrative, bring a combined global data protection voice to ongoing debates.
- Influential Executive Committee statements on contact tracing and the use of health data for domestic and international travel purposes in response to the Covid-19 pandemic.

As well as these successes, the GPA also responded to the Covid-19 pandemic with the creation of a new Task Force in May 2020 (now established as a temporary Working Group) which delivered a series of webinars and created a repository of resources to build capacity as member authorities advised on their Governments' pandemic responses.
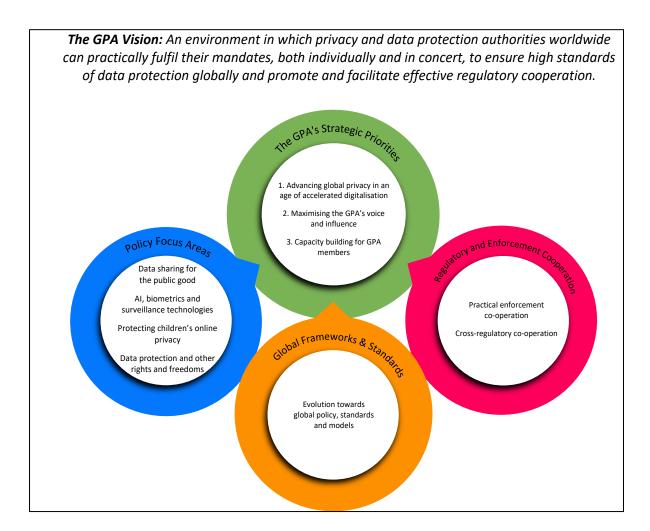
However it is vital to recognise that the environment within which GPA members regulate has changed since the last Strategic Plan was adopted in 2019. The global pandemic has significantly accelerated digitalisation in both the public and private sectors, making significant changes to the way people live, work, travel, learn and socialise, and how services are delivered. The world increasingly operates online, and this has clear implications for data protection and privacy. The GPA must continue to strive to be an active platform which is able to influence and engage on issues to ensure the DPA voice remains relevant on evolving issues. To assist this, the refreshed Strategic Plan will adopt an Implementation Plan (in lieu of the Policy Strategy). The Implementation Plan will have clear, practical actions that implement each of the three GPA Strategic Priorities, rather than a focus solely on policy development. It is more important than ever that the GPA and its members collaborate to enable innovative changes to take place in a way that benefits society and protects our citizens from data protection and privacy risks.

Implementation of the Strategic Plan 2021-23

Three pillars of collaborative work

The 2021-23 Strategic Plan continues to focus on the three pillars of collaborative work highlighted in the previous Plan, which represent foundational concerns common to all GPA members. We seek to achieve our strategic objectives through focusing on these foundational issues which complement and strengthen the regulatory co-operation between members of the GPA. The three pillars are:

- **Pillar #1** Global Frameworks and Standards
- **Pillar #2** Enforcement Co-operation
- **Pillar #3** Policy Focus Areas

The GPA Vision: An environment in which privacy and data protection authorities worldwide can practically fulfil their mandates, both individually and in concert, to ensure high standards of data protection globally and promote and facilitate effective regulatory cooperation.

The GPA's Strategic Priorities

1. Advancing global privacy in an age of accelerated digitalisation
2. Maximising the GPA's voice and influence
3. Capacity building for GPA members

Policy Focus Areas

Data sharing for the public good

AI, biometrics and surveillance technologies

Protecting children's online privacy

Data protection and other rights and freedoms

Regulatory and Enforcement Cooperation

Practical enforcement co-operation

Cross-regulatory co-operation

Global Frameworks & Standards

Evolution towards global policy, standards and models

The actions under these pillars are designed to support the delivery of all three Strategic Priorities, though some activities will be of more relevance to some of the priorities than others.

Delivering the Strategic Priorities

Strategic Priority 1: Advancing global privacy in an age of accelerated digitalisation

Accelerating digitalisation is now a constant feature across the globe. In both the public and private sectors, it is making significant changes to the way people live, work, travel, learn and socialise, and how services are delivered. The world increasingly operates online, and this has clear implications for data protection and privacy, and also more broadly for ethical and societal considerations.

The GPA will continue to work towards a global regulatory environment with clear and consistently high standards of data protection. Specific actions to deliver Strategic Priority 1 can be found in the Actions tables under Pillars 1, 2 and 3.

Strategic Priority 2: Maximising the GPA voice and influence

This touches upon every aspect of our work and provides mechanisms by which the GPA can engage and influence on priority policy topics. One way we can do this is by engaging and influencing other international fora. This work will enhance the GPA's role and voice in wider digital policy, and strengthen its relationships with other international organisations, bodies and networks advancing data protection and privacy issues.

A key achievement of the GPA last year was the membership's adoption of the Joint Statement mechanism. This was an important milestone in the evolution of the GPA and enables GPA members to maximise their voice and influence, throughout the year, by developing and publishing joint statements on emerging and novel issues as they arise. This mechanism provides the membership with continued real and valuable opportunities to make the GPA's voice and position on issues known, particularly in a post-COVID-19 reality where privacy is high on the public agendas.

There are two key areas where the GPA will continue to develop its approach under the 2021-23 Strategic Plan:

Engagement with other multilateral fora: Increasingly, the work of international organisations such as the OECD, G20, WHO, WTO, ISO, Council of Europe and WEF touches on data protection and privacy issues, particularly around ensuring trust in the digital economy and facilitation of data flows around the globe. GPA has well developed relationships with some of these organisations (as shown in the case study below) whilst others are nascent. In 2021-23 the GPA will focus on opportunities for deeper, active stakeholder engagement to further the GPA agenda.

Case Study

The GPA's work with OECD in 2020 had real impact. Collaborating with the OECD in delivering two workshops on COVID-19 brought together governments, data protection authorities, international organisations, technology companies, academics and other stakeholders to share learning and ensure that innovative responses to the pandemic adopted good data protection practice – amplifying the GPA's key messages and making a real difference to global and national discussions about technology-based solutions and privacy safeguards.

Strengthening Engagement by Working Groups and Observers: In 2019-21, there has been increased activity in external engagement by the GPA working groups and through observer arrangements. The GPA ExCo Strategic Direction Sub-Committee (SDSC) is starting to take a coordination role. In 2019-21 this has involved hosting 'deep dive' meetings for working group chairs, where engagement and other working group activities are discussed, and the provision of resources for GPA observers to other fora to use to engage effectively and to amplify the GPA's key messages. The SDSC also analysed the first use of the new Joint Statement mechanism and suggested guidance for future Statements in the GPA, including the involvement of GPA Working Groups in their development.

The GPA will build on this positive starting point. Shared priorities and objectives will be identified where they have not already, and the communication channels between the GPA and international organisations will be reviewed to optimise delivery of key learnings to the GPA membership, and maximise opportunities for the GPA voice to be heard. More opportunities for new Joint Statements will also be actively explored. The GPA will also continue to challenge itself – not just influencing and engaging in fora traditionally focused on data protection and privacy, but also fora engaged in the broader digital landscape.

Maximising the GPA voice and influence: actions

Actions to deliver Strategic Priority 2 can be found in the Actions tables under Pillars 1, 2 and 3. We will also work on two additional actions to engage and influence other international fora:

Action	Link to strategic priority	Owner
Continue to consider the GPA's international stakeholder map, such as exploring opportunities with existing stakeholders.	SP2 – maximise the GPA's voice and influence.	Strategic Direction Sub-Committee

Deepen engagement with existing stakeholders by actively seeking new activities for more significant impact, voice and influence.	SP2 – maximise the GPA's voice and influence.	All GPA Working Groups to include in their work plans and in their interim and annual reports how they will deliver on this action. The Strategic Direction Sub-Committee will have a coordination and review role.

Strategic Priority 3: Capacity building

The GPA has more than 130 members of varying size and enforcement powers. We all use the GPA as a forum to share our expertise and learn from others. It's a community where no GPA member faces their regulatory challenges alone. GPA recognises the importance of working together to ensure there are coordinated approaches to address data protection and privacy issues. The GPA provides resources and best practices on many of the common issues we face. We have also held capacity building workshops.

The GPA will continue to work to build capacity for our members, to share the policy, regulatory and technical knowledge and expertise we all need to protect our citizens. Specific actions to deliver Strategic Priority 3 can be found in the Actions tables under Pillars 1, 2 and 3.

Pillar #1: Global frameworks and standards

The reality and challenges of the global digital economy continue to highlight the need for mechanisms to ensure that personal data is protected wherever it is processed and flows.

Global frameworks and standards can promote high standards of data protection and privacy, thus supporting convergence and interoperability. This is essential for regulatory co-operation, supporting the secure and smooth flow of data across borders. The voice of the GPA can be of an expert and independent adviser. The GPA can play a unique role, focused on the importance of promoting high standards for data protection and privacy - advising on the practical principles and steps that enable data flows at international level, by reinforcing mutual trust. While not all members of the GPA have a function for advising on the development of laws, this pillar also considers the GPA's influence of development of international instruments and standards, with the GPA's work on analysing global frameworks and cross border transfer mechanisms contributing to the promotion of shared understanding of high standards.

Case study

The GPA completed an analysis of ten global data protection frameworks in 2020. This work highlighted convergence and commonalities, particularly in relation to core principles, between the frameworks. A more detailed analysis of cross border transfer mechanisms will be delivered in 2021, which is likely to include some recommendations for further follow-up in 2021-23. Work on developing common meanings of core data protection terms has commenced on a rolling programme, with additional core terms anticipated to be added in the coming years.

With the OECD's work to supplement the Privacy Guidelines, and the G7, G20 and WTO taking a closer interest in issues related to data flows with trust, there will be an opportunity to further engage and influence through a clearer articulation of the GPA's view of high standards for data protection and privacy and the vital role that independent data protection authorities play, for example by promoting the ongoing work of the GPA on access by government to personal data held by the private sector for national and public security purposes. To achieve this, the work done in 2019-21 will be built upon, to start to develop a roadmap towards an overarching resolution or policy statement to articulate the GPA's view of high standards. The GPA will also work to develop more formalised relationships with other fora undertaking similar work.

Pillar #1 Global Frameworks and standards: actions

Action	Link to strategic priority	Owner
Building on work done in 2019-21, work towards a resolution or policy statement to articulate the GPA's view of high data protection and privacy standards.	SP1 – advancing global privacy in an age of accelerated digitalisation. SP3 – capacity building for members.	Global frameworks and standards Working Group[4]
Develop formalised relationships with other fora undertaking similar work, taking into account work done by SDSC on stakeholder engagement where appropriate.	SP2 – maximise the GPA's voice and influence.	Global frameworks and standards Working Group

---

[4] This is the renamed Policy Strategy Working Group, workstream 1

Pillar #2: Regulatory and enforcement cooperation

Practical enforcement cooperation

The International Enforcement Cooperation Working Group (IEWG) is a permanent Working Group of the GPA. The emphasis on creating an environment that supports practical enforcement cooperation on current and pressing issues has delivered some real success as the IEWG's 'Safe Space' sessions led to not only useful exchanges of knowledge and information on live issues, but also contributed to concrete initiatives such as the ICO-OAIC joint investigation into Clearview AI and an open letter to video conferencing companies which is leading to practical engagement with the sector.

Case Study

The IEWG Safe Space sessions provide members with a confidential environment to discuss live, developing and current privacy and enforcement matters of global priority and to explore collaborative opportunities where they exist.

The IEWG runs several sessions per year, focussing on topics of global relevance; these may centre on specific incidents or organisations, or take in broader issues and emerging trends.

Of particular note was a session focussing on video-teleconferencing (VTC) platforms and another on the issue of credential stuffing attacks. Both resulted in the formation of subgroups to progress joint actions. The VTC subgroup has issued a statement and undertaken coordinated engagement with several VTC companies to improve privacy practices in the industry.

The IEWG has developed a safe space framework (to be renamed 'closed enforcement session framework'), setting out the process and providing all IEWG members with the tools to host their own sessions. This general framework is to be made available on the GPA enforcement repository.

This area of focus clearly contributes to the GPA's vision and strategic priorities – fostering a global regulatory environment of high standards of data protection and privacy, and capacity building.

It will be essential that momentum is maintained, and these foundations are strengthened, broadened and used effectively over the next two years.

Cross regulatory cooperation

The growing digital economy is driving increasing volumes and scope of data collection. As society increasingly operates online, concerns have persisted about global online platforms, and their breadth of access to, and control of, personal data. These issues should remain high on the GPA's agenda, alongside the recognition that data protection and privacy authorities cannot regulate alone and, especially where there may be other overlapping or intersecting regulatory regimes, must cooperate with regulators from other sectors.

In recent years the GPA's Digital Citizen and Consumer Working Group (DCCWG) has worked on regulatory intersection issues between our work in data privacy, consumer protection and competition regulation. This work has attracted global and domestic attention by key stakeholders and is essential to many of our members, with digital regulatory cooperation increasingly on domestic agendas across the globe. Given the sustained relevance of the DCCWG's work and the important role cross-regulatory cooperation will take in the coming years, the DCCWG will become a permanent working group from October 2021.

Developing a GPA focus on cross-regulatory cooperation will benefit the wider membership as societies and economies increasingly adopt digital approaches that may trigger varied and multiple regulatory concerns. As citizens do more online, the reach of global online platforms is broadened. That sheer breadth of access to, and control of, the data of global citizens means that joined-up regulatory approaches are of clear interest and benefit. The GPA should give priority focus to this theme, and reinforce the overarching message that data protection and privacy authorities will most effectively regulate digital economy and online platforms as part of a joined-up approach with other regulators in the digital space, and to look to ways in which cross-regulatory cooperation can be facilitated. This could include an agreed articulation of the synergies and tensions between data protection and other regimes, and how regulators can work together to address them.

Pillar #2 Regulatory and enforcement cooperation: actions

Action	Link to strategic priority	Owner
Build skills and capacity among members, particularly in relation to enforcement strategies; investigation processes; cooperation in practice; and breach assessment. Broaden participation by increasing the linguistic, cultural and regional diversity of contributions to the work of the International Enforcement Working Group.	SP3 – capacity building for members.	International Enforcement Cooperation Working Group
Continue monitoring for opportunities for enforcement cooperation, noting the new and emerging digital risks posed to individuals' privacy.	SP1 – advancing global privacy in an age of accelerated digitalisation.	International Enforcement Cooperation Working Group

Continue to use 'closed enforcement' sessions to share concerns, policy positions and regulatory experiences on identified topics, following up with external stakeholders where appropriate.	SP3 – capacity building for members. SP2 – maximise the GPA's voice and influence.	International Enforcement Cooperation Working Group
Identify, explore and develop links between the areas of enforcement cooperation and cross regulatory cooperation. This should include engagement with networks of other regulatory bodies in sectors such as consumer protection, competition or anti-trust.	SP3 – capacity building for members. SP2 – maximise the GPA's voice and influence. SP1 – advancing global privacy in an age of accelerated digitalisation.	International Enforcement Cooperation Working Group Digital Citizen and Consumer Working Group
Enhance the focus on practical cooperation across different sectoral regulators, initially by the development of a compendium of best practice arrangements for cross-regulatory cooperation.	SP1 – advancing global privacy in an age of accelerated digitalisation. SP2 – maximise the GPA's voice and influence. SP3 – capacity building for members.	Digital Citizen and Consumer Working Group

Pillar #3: Policy focus areas

Authorities around the globe continue to develop policy positions on shared societal risks. This sphere of work aims to leverage individual policy efforts by creating opportunities to borrow and adapt each other's work to benefit citizens across the world. It will allow us to increase consistency across our policy positions, and develop clearer messages to multi-national actors while at the same time making the best use of all our limited resources.

The four areas of policy focus are:

- Data sharing for the public good
- AI, biometrics and surveillance technologies
- Children's online privacy
- Data protection and other rights and freedoms

Data sharing for the public good

As governments respond to the pandemic, there is increased interest in using personal data to develop those responses – in many cases to rapidly enable innovative digital solutions in the short term, and in the longer term to contribute to the rebuilding of the economy and public services, including health care reform. While acknowledging the increased risks posed by innovative solutions relying on personal data, a recognition that privacy can enable innovative uses of data by securing and maintaining citizen and consumer trust is essential if societies are to maximise the benefits of data. Data sharing will remain a key challenge, in terms of solutions that build in privacy while enabling use of data in the public interest. Government approaches will require data protection and privacy authorities to act as both enablers and protectors.

The COVID-19 global pandemic has accelerated the growth of digital and data-enabled services like never before. Health and location data has become increasingly important as nations strive to respond to the crisis. The use of passenger travel data, and citizen and consumer data in general, has expanded as attempts are being made to mitigate the health risks of travelling, shopping, working and other daily activities.

There is a renewed interest in when and how personal data can be used – in tracking health outcomes, in research, in developing innovative digital solutions and in rebuilding economies. In 2020 and 2021 the GPA has worked on the immediately pressing issues in this area, by our use of joint statements, and by the COVID-19 Working Group.

Case Study:

As governments continued to respond to the COVID-19 pandemic in 2020 and 2021, the importance of returning to full social and economic activity within and across borders led to a variety of proposals for the sharing of domestic and international passenger health data across a number of entities.

On 31 March 2021, the GPA Executive Committee issued a Joint Statement on the use of health data for domestic or international travel purposes, urging governments and both private and public sector organisations to pay due regard to common global data protection and privacy principles, such as privacy by design and default, when considering those proposals. The Statement was shared with the World Health Organisation and the Vaccine Credential Initiative, together with representatives of the global travel industry, and key GPA stakeholders.

The Joint Statement has been welcomed globally, complementing efforts being made at both national and regional levels, and contributing to a positive, co-ordinated privacy outcome internationally.

It's foreseen that there will be scope for further work beyond 2021 to address key messages and influence that the GPA can uniquely deliver related to governance for data sharing. The focus should be on how personal data can be shared and used to enable innovation and growth while protecting individual rights and public trust, as the pandemic response develops into rebuilding economies and societies. The COVID-19 Working Group will broaden its scope and evolve into a Data Sharing Working Group to implement this work.

Data sharing: actions

Action	Link to strategic priority	Owner
Deliver and promote a compendium of best practices on data sharing for the public good, for data protection and privacy authorities to use in conversations with governments and other stakeholders to demonstrate what good data sharing practice looks like, and to highlight key principles.	SP1 – advancing global privacy in an age of accelerated digitalisation. SP2 – maximise the GPA's voice and influence. SP3 - Capacity building for members.	Data Sharing Working Group

AI, biometrics and surveillance technologies

Emerging and developing innovative technologies undoubtedly provide opportunities and potential value to society. However, many such technologies have significant implications for privacy and the potential to harm and unfairly discriminate against our citizens - many involve the processing of large volumes of personal data, many process biometric data, and many use complex computer systems with algorithms that are not easily explained.

Surveillance technologies are not only used for security purposes, but increasingly for broader contexts at work, in education, and for commercial opportunities, in predicting consumer behaviour and assisting the targeting of advertisements.

A number of these areas are of current strategic interest to the GPA – work is ongoing to develop principles on facial recognition technology; repositories of guidelines and principles on AI, and real-life applications of AI have been created and contributions continue to be added. While the range of issues under this theme are broad, the GPA will, on an ongoing basis, identify those areas of current and emerging surveillance technology where the GPA's work should be prioritised. This will include utilising the expertise of the GPA Reference Panel as appropriate.

AI, biometrics and surveillance technologies: actions

Action	Link to strategic priority	Owner
Continue to implement the [Resolution on Facial Recognition Technology](#) – completing work on the development and promotion of principles on FRT.	SP1 – advancing global privacy in an age of accelerated digitalisation. SP2 – maximise the GPA's voice and influence. SP3 - Capacity building for members.	International Enforcement Working Group Ethics and Data Protection in AI Working Group
Identify and consider any other biometric technologies that the GPA should focus on.	SP1 – advancing global privacy in an age of accelerated digitalisation.	International Enforcement Working Group Ethics and Data Protection in AI Working Group
Consult GPA members on emerging technologies of most concern, and consider identifying further areas of work related to the findings.	SP3 - Capacity building for members.	Ethics and Data Protection in AI Working Group
Identify and consider topics of focus relating to surveillance of citizens and consumers in the digital economy, such as advertising technologies, web scraping, smart cities and connected vehicles, and monitoring of mobile workers.	SP1 – advancing global privacy in an age of accelerated digitalisation.	Digital Economy Working Group[5] International Enforcement Working Group
All GPA Working Groups to consider emerging technologies relating to their area of work and any potential privacy or data protection concerns, and include in their annual forward plans where appropriate.	SP1 – advancing global privacy in an age of accelerated digitalisation.	All GPA Working Groups

---

[5] This is the renamed Policy Strategy Working Group, workstream 2

Protecting children's online privacy

Children are particularly vulnerable to the risks associated with the digital environment, given their increasingly early and frequent use of a range of technologies. The global pandemic has accelerated these practices as never before, which are taking place not only in the home but in the increasingly connected school environment.

The protection of children's privacy online is more than ever at the heart of the public debate in many countries and on the agenda of international organisations. An increasing range of initiatives exist at the international level, as illustrated by the recent UN General Comment on the Rights of the Child in the Digital Environment and the actions of UNICEF, the OECD, the Council of Europe and the International Telecommunications Union (ITU).

The GPA will continue to support and provide input to such initiatives where appropriate.

All working groups should consider in their work plans how their mandate and work intersects with children's privacy.

Protecting Children's Online Privacy: actions

Action	Link to strategic priority	Owner
Undertake to provide GPA support and input to other international and multilateral initiatives to facilitate the effective exercise of children's rights appropriate to their level of maturity in the digital environment.	SP1 - advancing global privacy in an age of accelerated digitalisation SP2 – maximise the GPA's voice and influence.	Digital Education Working Group (DEWG)
All GPA working groups should consider the whether and how the issue of children's privacy and the exercise of their digital rights intersects with their work, and where appropriate include in their annual forward plan. This should take place in coordination with the DEWG.	SP1 - advancing global privacy in an age of accelerated digitalisation SP2 – maximise the GPA's voice and influence. SP3 – capacity building for members	All GPA working groups

Data protection and other rights and freedoms

At a global level, data protection and privacy rights are enshrined in important global instruments such as the Universal Declaration of Human Rights and the International Covenant of Civil and Political Rights. The GPA has taken a keen interest in data protection and privacy and how they relate to rights and social protection, and this has been a key policy theme in the 2019-21 policy strategy. A narrative on this topic will be submitted for adoption at the 43rd GPA in 2021, to highlight and clarify links between privacy and data protection, freedom of expression, political rights and freedoms, non discrimination, liberty and security. This work will be a helpful way of highlighting potential issues, and there will likely be more targeted work to do, informed by the narrative, once adopted. Important developments in 2020-21 have seen the global pandemic response re-igniting concerns about employee rights in the light of remote working, and health surveillance, as well as individual rights and the freedom to travel.

Other Rights and freedoms: actions

Action	Link to strategic priority	Owner
Consider and take forward recommendations from the adopted narrative on the integral relationship of data protection to other rights and freedoms.	SP1 – advancing global privacy in an age of accelerated digitalisation. SP2 – maximise the GPA's voice and influence. SP3 - Capacity building for members.	Data protection and other rights and freedoms Working Group[6]
Promote the narrative with relevant stakeholders.	SP2 – maximise the GPA's voice and influence.	Data protection and other rights and freedoms Working Group

---

[6] This is the renamed Policy Strategy Working Group, workstream 3

While most Strategic Plan actions are allocated to one or two specified working groups, some actions are to be delivered by all working groups. Actions should be periodically reviewed to ensure the owners remain the appropriate working group. A list of the GPA's current working groups for 2021-23 can be found in the table below.

Working Group	Formerly known as
Global Frameworks and Standards Working Group	Policy Strategy Working Group, workstream 1
International Enforcement Cooperation Working Group	
Digital Citizen and Consumer Working Group	
Data Sharing Working Group	COVID-19 Working Group
Ethics and Data Protection in AI Working Group	
Digital Economy Working Group	Policy Strategy Working Group, workstream 2
Data Protection and other Rights and Freedoms Working Group	Policy Strategy Working Group, workstream 3
Digital Education Working Group	
Personal Data Protection in International Development Assistance, International Humanitarian Aid and Crisis Management Working Group	
Data Protection Metrics Working Group	
Future of the Conference Working Group	