



EDPS
EUROPEAN DATA PROTECTION SUPERVISOR

Case Reference
2022-0382

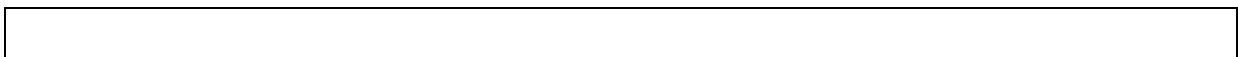
REPORT ON INSPECTION AT EUROPOL

pursuant to Articles
43(1) and (4) and 44(2) of Regulation (EU) 2016/794

6 September 2023

EDPS
Supervision & Enforcement Unit

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INSPECTION TEAM

[REDACTED]	Inspector (IT)
[REDACTED]	Inspector (legal)

HEAD OF ACTIVITY / SECTOR

[REDACTED]	Head of Activity Audit
[REDACTED]	Head of Sector Consultations and Audits
[REDACTED]	Head of Sector Area of Freedom, Security and Justice

HEADS OF UNITS

ZERDICK Thomas	Head of Unit Supervision & Enforcement
----------------	--

SUPERVISOR

WIEWIÓROWSKI Wojciech Rafał	Supervisor
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1. Executive summary

The European Data Protection Supervisor (EDPS) is the independent supervisory authority established by Article 52 of Regulation (EU) 2018/1725 and responsible under Article 43 of Regulation (EU) 2016/794 (hereinafter referred to as ‘the Europol Regulation’ or ‘ER’ abbreviated) for:

- monitoring and ensuring the application of the provisions of the Europol Regulation and of Regulation (EU) 2018/1725 relating to the protection of fundamental rights and freedoms of natural persons with regard to the processing of personal data by Europol, and for advising Europol and data subjects on all matters concerning the processing of personal data.

To these ends, the EDPS fulfils the duties provided for in Article 43(2) and exercises the powers granted in Article 43(4) of the Europol Regulation. Among his powers to investigate, the EDPS can carry out investigations in the form of data protection inspections. The power to inspect is one of the tools established to monitor and ensure compliance with Europol’s legal framework.

The inspection at Europol was part of the EDPS annual audit plan for 2022. The formal Decision was communicated to Europol by means of an Announcement Letter dated 17 November 2022. The fieldwork was carried out on 16 December 2022 at Europol’s premises, Eisenhowerlaan 73 2517 KK in The Hague, The Netherlands.

Scope of the inspection

The EDPS carried out an inspection of Europol’s processing of personal data of minors under 15 years old, provided to the Agency by third countries and international organisations, and marked as suspects.

According to Article 30(1) of the Europol Regulation, the processing of individuals under the age of 18 is allowed if it is strictly necessary and proportionate for the purposes of preventing or combating crime within the scope of Europol’s objectives. This requirement reflects the additional vulnerability of minors and the sensitivity associated with processing their data, as well as the potential harms they may face if involved in the criminal justice system at an early stage of their development.

More specifically, the EDPS limited the scope of this inspection to the processing of minors under 15 years old. This decision was based on the findings of the Joint 2018 Annual Inspection with regard to the compliance with Article 30(1) ER, where the average Minimum Age of Criminal Responsibility (MACR) used at Member State level was found to be 15 years old. This in turn means that personal data on minors processed by Europol before the minor reaches 15 years of age should be carefully checked to ensure lawfulness of the processing. The 2018 Annual Inspection also showed the need for coordinated supervision of the processing of personal data of minors, in particular of minors under 15 marked as suspects in Europol systems.

Under Article 38 ER, the responsibility for the legality of a transfer and of the quality of the personal data processed by Europol, and thus of the lawful marking of a minor as suspect

(during the ‘Data Subject Categorisation’, or ‘DSC’ process)¹ and of the accuracy of the personal data processed about that minor, lies with Europol when the data is provided by third countries or international organisations (Article 38(2)(b) Europol Regulation).

Such responsibility lies with Member States when they provide personal data to Europol. A finding of the 2018 Annual Inspection was that, given the complexity of the different national legal frameworks as regards the definition of the minimum age of criminal responsibility, it is difficult for Europol to give assurance that data provided by national authorities complies with this requirement.

A coordinated supervisory action was thus launched in 2020 in the context of the Europol Cooperation Board², now taken over by the Coordinated Supervision Committee (CSC)³ of the European Data Protection Board (EDPB). Within the CSC, the supervisory authorities of Member States, along with the EDPS, have undertaken to verify the lawfulness and accuracy of the processing of personal data of minors under 15 sent to Europol as suspects, on a yearly basis. This subcategory of minors was chosen based on the same combination of the stigmatising effect of being labelled specifically as a suspect, as well as the common MACR of 15 years old across EU Member States. It must be borne in mind that Article 30(1) of the Europol Regulation requires that all personal data about minors is processed only where ‘strictly necessary’, and not only this subcategory of minors under 15. However, even among this already specially protected category of data, processing data on minors under 15 as suspects can be seen as the ‘most sensitive of sensitive’ processing.

For these reasons, national data protection authorities have undertaken, on a yearly basis, to verify the lawfulness of the transmission of data about these minors by EU Member State competent enforcement authorities to Europol.

As an integral part of this joint exercise, the EDPS, as the supervisory authority of Europol, should also conduct checks of the processing of personal data of minors under 15, transferred to Europol by third countries and international organisations, thus ensuring that all contributions are covered.

This inspection was carried out in that context.

Key findings of the inspection

The audit identified seven formal findings. The main findings are summarised below:

- The EDPS found that the general process for the assessment of information provided by partners on minors (including minors under 15 years old) is clear and well developed. Furthermore, this general process has been well documented in the appropriate process descriptions and guidelines. However, when examining whether Europol applies any

¹ In the context of Europol, DSC stands for Data Subject Categorisation. It is the act of identifying in datasets suspects, potential future criminals, contacts and associates, victims, witnesses and informants linked to criminal activities.

² The Europol Cooperation Board (ECB) was an advisory body composed of representatives of the national supervisory authorities of the European Union Member States and of the EDPS, cooperating on specific issues requiring national involvement and to ensure the consistent application of the Europol Regulation.

³ On 28 June 2022, the ECB ceased to exist with the entry into force of Regulation (EU) 2022/991 of the European Parliament and of the Council of 8 June 2022, which transferred its tasks to the Coordinated Supervision Committee of the EDPB.

specific (or additional) safeguards for personal data transferred by third countries and international organisations, the EDPS found that Europol does not apply different measures to those data.

The EDPS considers that the assessment Europol needs to perform where it receives personal data of minors under 15 years old marked as ‘suspects’ by third countries and international organisations differs from the assessment it needs to perform where it receives this data from Member States. Whereby for the latter Europol can rely (if available) on the sender’s own assessment that the transfer is lawful under their legal system, for third country partners Europol must instead perform its own assessment whether the data is lawful under the EU’s legal system (which may have a higher threshold).

- Upon conducting specific checks of third country datasets, the EDPS found multiple cases where minors (under 15 years old) apparently have only been involved in relatively minor infractions, such as pickpocketing (at least two cases) or shoplifting, within the broader framework of an organised crime group.

The EDPS considers it crucial to distinguish between the varying levels of involvement within an organised crime group. While the organised crime group itself may be engaged in more serious or organised criminal activities, minors affiliated with the group may have limited roles or may have been coerced or influenced by family ties or older family members. Thus, attributing the same level of suspicion (in terms of classification) to minors as to the main organisers of the criminal activities could fail to acknowledge the nuances of their participation and may not meet the threshold of ‘strict proportionality’ established in Article 30(1) of the Europol Regulation.

- On the technical side, the EDPS found that Europol has recently upgraded its architecture for the processing of personal data for operational analysis purposes (Article 18(2)(c) of the Europol Regulation). The EDPS found that as part of this, several improvements have been made to the technical enforcement of data protection safeguards, including data retention and tracking of the reasons for the processing of minors. However, the justification fields (providing the reasoning for the processing) inspected by the EDPS did not yet meet the standard set out by Europol itself, which in turn implement Article 30(1) of the Europol Regulation.

Recommendations and follow-up of the audit

As a result of the audit activities and his findings, the EDPS has issued a set of 10 recommendations addressed to Europol. The main findings and recommendations are included at the end of each section of the report (with a full compiled list of recommendations inserted in Section 5). The recommendations contained in the report are issued in order to ensure compliance with the Europol Regulation, as well as Chapter IX of Regulation 2018/1725.

In the case of 6 out of 10 recommendations, implementation is designated as imperative to ensure compliance with the legal framework, with the requirement that Europol provides documentary evidence to the EDPS of implementation within the specified timeframe.

2. Scope

2.1 Criteria used to determine the scope of the inspection

Vulnerability of underage data subjects, in particular below the age of 15

As part of its strategy for 2020-2024, the EDPS has emphasised the role of data protection, and data protection supervision, for those in a position of particular vulnerability.⁴ It has therefore prioritised the supervision of data processing practices that specifically impact those groups and individuals.⁵

While all data subjects are vulnerable when their personal data are processed in a law enforcement context, as such processing could lead to a restriction of their rights and freedoms, certain individuals have an increased level of vulnerability.⁶ Some authors have therefore argued that the intensity of the legal protection for vulnerable individuals should be proportional to the quantity and quality of those layers of vulnerability⁷.

In the field of law enforcement, minors have long been recognised as carrying a larger weight of vulnerability, due to potential harms that can arise for those who become involved in the criminal justice system at an early stage of their development.

Indeed, according to Article 30(1) of Regulation (EU) 2016/794 (the ‘Europol Regulation’, or ‘ER’), the processing of individuals under the age of 18 shall be allowed if it is strictly necessary and proportionate for the purposes of preventing or combating crime within the scope of Europol’s objectives.

The strict necessity and proportionality requirement is a direct reflection of the vulnerability of minors and the sensitivity associated with this type of processing. In its 2018 Annual Inspection report⁸, the EDPS already set out the high risks regarding the processing of minors, as well as the applicable legal instruments that must be taken into account. The EDPS recalled in particular **Article 40 of the United Nations Convention on the Rights of the Child (UNCRC)**, which specifies **that children who are alleged as, accused of, or recognised as having infringed the penal law** should be treated in a “manner consistent with the promotion of the child’s sense of dignity and worth, which reinforces the child’s respect for the human rights and fundamental freedoms of others and which takes into account the child’s age and the desirability of promoting the child’s reintegration and the child’s assuming a constructive role in society.”

The EDPS also recalls that the “**Beijing Rules**” (UN Standard minimum rules for the administration of Juvenile Justice, adopted by General Assembly resolution 40/33 of 29 November 1985) apply to **juvenile offenders**, i.e. “a child or young person who is alleged to have committed or who has been found to have committed an offence”⁹. They aim at

⁴ The EDPS strategy 2020-2024: shaping a safer digital future, page 4.

⁵ Ibid, page 13.

⁶ See also G. Malgieri & J. Niklas, Vulnerable data subjects, Computer Law & Security Review Volume 37, July 2020, 105415.

⁷ Ibid.

⁸ Cf. section of the EDPS inspection report of 19 December 2018 dedicated to the processing of data on persons under 18, in particular pp. 46-48 (EDPS case file 2018-0067).

⁹ Principle 2.2(c).

promoting juvenile welfare to the greatest possible extent, which will minimise the necessity of intervention by the juvenile justice system, and in turn, will reduce the harm that may be caused by such intervention”¹⁰. Principle 4 provides guidelines for contracting parties to define an appropriate **minimum age of criminal responsibility** (MACR). If fixed too low or if there is no lower age limit at all, the notion of responsibility would become meaningless. According to the commentary a “modern approach would be to consider whether a child can live up to the moral and psychological components of criminal responsibility; that is, whether a child, by virtue of her or his individual discernment and understanding, can be held responsible for essentially antisocial behaviour”. They recall that while such age differs owing to history and culture, in general there is a close relationship between the notion of responsibility for delinquent or criminal behaviour and other social rights and responsibilities (such as marital status, civil majority, etc.)¹¹.

Within the European Union, a range of minimum ages of criminal responsibility exists across Member States. However, a 2014 study conducted by the European Commission shows that in the majority of EU countries, the MACR is set at either 14 or 15 years old, meaning that the processing of personal data on minors as suspects under the threshold of 15 years old should be examined with particular scrutiny.¹²

Joint supervisory context: annual exercise on the lawfulness of processing of minors under 15 as suspects by Europol

This inspection also takes place against the backdrop of the coordinated supervisory action undertaken by the Coordinated Supervision Committee (CSC) of the European Data Protection Board (EDPB). Within the CSC, the supervisory authorities of Member States, along with the EDPS, have undertaken to verify the lawfulness of transfers of personal data of minors under 15 to Europol as suspects, on a yearly basis. This subcategory of minors was decided because of the stigmatising effect of being labelled specifically as a suspect, as well as the common MACR of 14 to 15 years old across EU Member States.

Under Article 38 (2)(a) ER, Member States are responsible for the quality of the personal data processed by Europol, and thus of the accuracy of the indication of age and DSC, where they provided this personal data to Europol. However, Europol itself is responsible for personal data provided by third countries or international organisations.

On a yearly basis, the EDPS obtains and transmits statistics on all data about minors under 15 marked as suspects and shared by national competent authorities to the relevant supervisory authorities. These can in turn perform checks on the lawfulness of transmission.

As an integral part of this joint exercise, the EDPS, as the supervisory authority of Europol, should also conduct checks of the data about minors under 15 shared by third countries and international organisations for which Europol is responsible under Article 38 ER, thus ensuring that all processing of data about minors under 15 are covered.

2.2 Scope and purpose of the inspection

¹⁰ Commentary on Principle 1.

¹¹ Commentary on Principle 4

¹² For a link to the study as well as the dataset, see European Commission, Directorate-General for Justice and Consumers, ‘Children in criminal judicial proceedings - comparative information on sanctions’, 2016 (updated 2017-01-04), <http://data.europa.eu/88u/dataset/criminal-justice-sanctions>.

In light of the above, the scope of the inspection was determined as **‘the processing by Europol of personal data of minors under 15 years old as suspects stemming from third countries or international organisations.’**

The scope was set up to examine the default processes and procedures applied by Europol when receiving data about minors under 15 from these authorities. **Two types of processing activities were excluded from the scope**, since they form *sui generis* processes requiring a separate auditing methodology.

First, the EDPS excluded processing subject to specific and dedicated workflows. This led to the exclusion of the processing of **minor’s data obtained in the context of the work of AP TWINS (child sexual exploitation)**, as such processing is subject to a specific and dedicated workflow. However, considering that this still represents a large volume of suspects submitted to Europol, in particular because of the data obtained from the U.S. National Center for Missing and Exploited Children (NCMEC), the EDPS will continue to examine the processing of NCMEC data through specific supervisory actions, such as the follow-up of prior consultation opinions, thus ensuring that this processing activity complies with Europol’s data protection framework as well.

Second, the EDPS limited the scope of the inspection to personal data shared via the Europol’s Secure Information Exchange Network Application (SIENA), in order to align the scope of the inspection to the checks conducted by national supervisory authorities. Thus, the EDPS excluded **Open Source Intelligence (OSINT) gathering activities** as an information source, as in that context, Europol is directly collecting personal data.

The purpose of this inspection is to examine Europol’s framework for assessing and documenting the lawfulness and accuracy of the data shared by third countries and international organisations, in particular to ensure that Europol exercises its responsibility under Article 38 ER to ensure that these contributions comply with Article 30(1) of the Europol Regulation.

3. Methodology

The inspection was performed in accordance with the procedures established in the **EDPS Inspection Guidelines** and by relying on the cooperation of staff members and managers of Europol to provide requested information, data, documents and access to premises.

In particular, a **meeting with interviews** was set up and held with Europol staff to gather information and prior to checks of relevant electronic databases, files and premises. These interviews were coupled with physical examinations carried out by the EDPS team and **demonstrations** by Europol staff, which together constitute the basis for the observations and recommendations in this report.

Minutes of the meetings were drafted in order to document the inspection procedures applied and provide for a transcript of the conversations with Europol staff. Two original copies of the minutes have been prepared, submitted for comments and signed by the Executive Director of Europol¹³.

This **report** takes into account the documents provided by Europol before and during the on-site inspection (documents collected before and during the inspection are listed in **Annex 2 and 3** respectively), as well as documents requested during the on-site inspection and provided afterwards (the latter being listed in **Annex 4**).

An overview of the reference numbers of the SIENA messages that were checked and the respective samples taken are provided in **Annex 5** to this inspection report.

A list of **abbreviations** used in this report is included in **Annex 6**.

¹³ For acknowledgement of receipt.

4. Analysis and recommendations - Compliance with Regulation 2016/794

4.1 Criteria

Applicable provisions of the Europol Regulation

- Article 30 (1) allows the processing of personal data in respect of persons under 18 where this is strictly necessary and proportionate for preventing and combating crime that falls within Europol's objectives;
- Article 30 (5) restricts the further sharing of personal data in respect of persons under 18 with MS, Union bodies, third countries or international organisations to cases where such transfer is strictly necessary and proportionate in individual cases;
- Article 38 defines the responsibility in data protection matters of Europol and Member States as follows:
 1. Europol shall process personal data in a manner that ensures that their source, in accordance with Article 17, can be established.
 2. The responsibility for the accuracy of personal data as referred to in Article 71(1), point (d), of Regulation (EU) 2018/1725 shall lie with:
 - (a) the Member State or the Union body which provided the personal data to Europol;
 - (b) Europol in respect of personal data provided by third countries or international organisations or directly provided by private parties; of personal data retrieved by Europol from publicly available sources or resulting from Europol's own analyses; and of personal data stored by Europol in accordance with Article 31(5).
 - (...)
 4. Europol shall be responsible for compliance with Regulation (EU) 2018/1725 in relation to administrative personal data and for compliance with this Regulation and with Article 3 and Chapter IX of Regulation (EU) 2018/1725 in relation to personal data.

Applicable provisions of Regulation 2018/1725

- Article 71 defines the principles relating to the processing of personal data, and in particular that:

1. Operational personal data shall be:

- (a) processed lawfully and fairly (lawfulness and fairness);
- (b) collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes (purpose limitation);
- (c) adequate, relevant, and not excessive in relation to the purposes for which they are processed (data minimisation);
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that operational personal data that are inaccurate, having

regard to the purposes for which they are processed, are erased or rectified without delay (accuracy):

Europol's internal documents

- Process description on the processing of minors¹⁴;
- User Guidelines on the processing of special categories of data and data subjects, Article 30 Europol Regulation¹⁵;
- List of 40 SIENA messages sent to the EDPS in preparation of the EDPS inspection¹⁶;
- Operational data access policy¹⁷;
- Extract of the OD Analysis Training Portfolio¹⁸.

Other relevant documents

- Articles 16 and 40 of the UN Convention of the Rights of the Child (UNCRC)¹⁹;
- Rule 21, UN (1985), Standard minimum rules for the administration of juvenile justice (The Beijing Rules), General Assembly resolution 40/33 of 29 November 1985²⁰;
- Article 3(3) Treaty on European Union (TEU);
- Article 24 of the Charter of Fundamental Rights of the EU (EU Charter);
- Council of Europe Guidelines on child-friendly justice²¹.
- Children's rights and justice: minimum age requirements in the EU (Fundamental Rights Agency)
- European Commission, Directorate-General for Justice, *Summary of contextual overviews on children's involvement in criminal judicial proceedings in the 28 Member States of the European Union-*, Publications Office, 2014 DOI 10.2838/71517.

Related EDPS cases

Furthermore, the EDPS took into consideration the following **EDPS cases**:

1. 2021-1155 Europol: Statistics on the processing of minors
2. 2020-0224 EUROPOL – Centralised follow up to inspections
 - a. Specifically following up on the 2018 Annual Inspection, recommendations 15, 16, 19, 20, 21 (part B.1).

¹⁴ EDOC#1271496v7.

¹⁵ EDOC#1270422v2.

¹⁶ EDOC#1271341v1 (source : Europol data environment, 24 November 2022).

¹⁷ EDOC#1216352v3A.

¹⁸ EDOC#1277426v2 (labelled v1 in the document itself).

¹⁹ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

UN Resolution 44/25 of 20 November 1989. Article 1 defines “children” as “every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier The UNCRC is a legally-binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities. In 2000, two additional protocols were added. One asks government to ensure children under the age of 18 are not forcibly recruited into their armed forces. The second calls on states to prohibit child prostitution, child pornography and the sale of children into slavery. A third armed protocol was added in 2001. This enables children whose rights have been violated to complain directly to the UN Committee on the Rights of the Child.

²⁰ <http://www.ohchr.org/Documents/ProfessionalInterest/beijingrules.pdf>

²¹ Guidelines of the Committee of Ministers of the Council of Europe on child-friendly justice, 17 November 2010.

4.2 Actions taken

During the on-site activities, the inspection team met with Europol's Data Protection Function, the Data Quality Control Coordinator and several staff Members of the Europol O1 Operational and Analysis Centre (OAC). The interviews were followed by checks of all SIENA messages from third countries and international organisations transferring personal data to Europol about suspects under 15 years old. Where a SIENA message included multiple suspects under 15 years old, a sample was taken.

The EDPS was able to check a minor in each SIENA message that fell within the scope of the inspection, owing to the **limited amount of personal data about minors under 15 years old as suspects from third countries or international organisations**, at least with the exclusions to the scope that were taken for this inspection.²²

All inspection activities are described in detail in the inspection minutes.²³ This section focuses on the most relevant inspection activities and in particular on activities which triggered findings and recommendations.

An overview of the reference numbers of the SIENA messages that were checked and the respective samples taken are provided in **Annex 5** to this inspection report.

4.3. Findings and recommendations

4.3.1. Europol's process for assessing of minors' data sent by third countries and international organisations

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²² In particular the exclusion of AP Twins from the scope, which removes the information flows coming from *i.a.* NCMEC.

²³ See inspection minutes, incl. Annex I.

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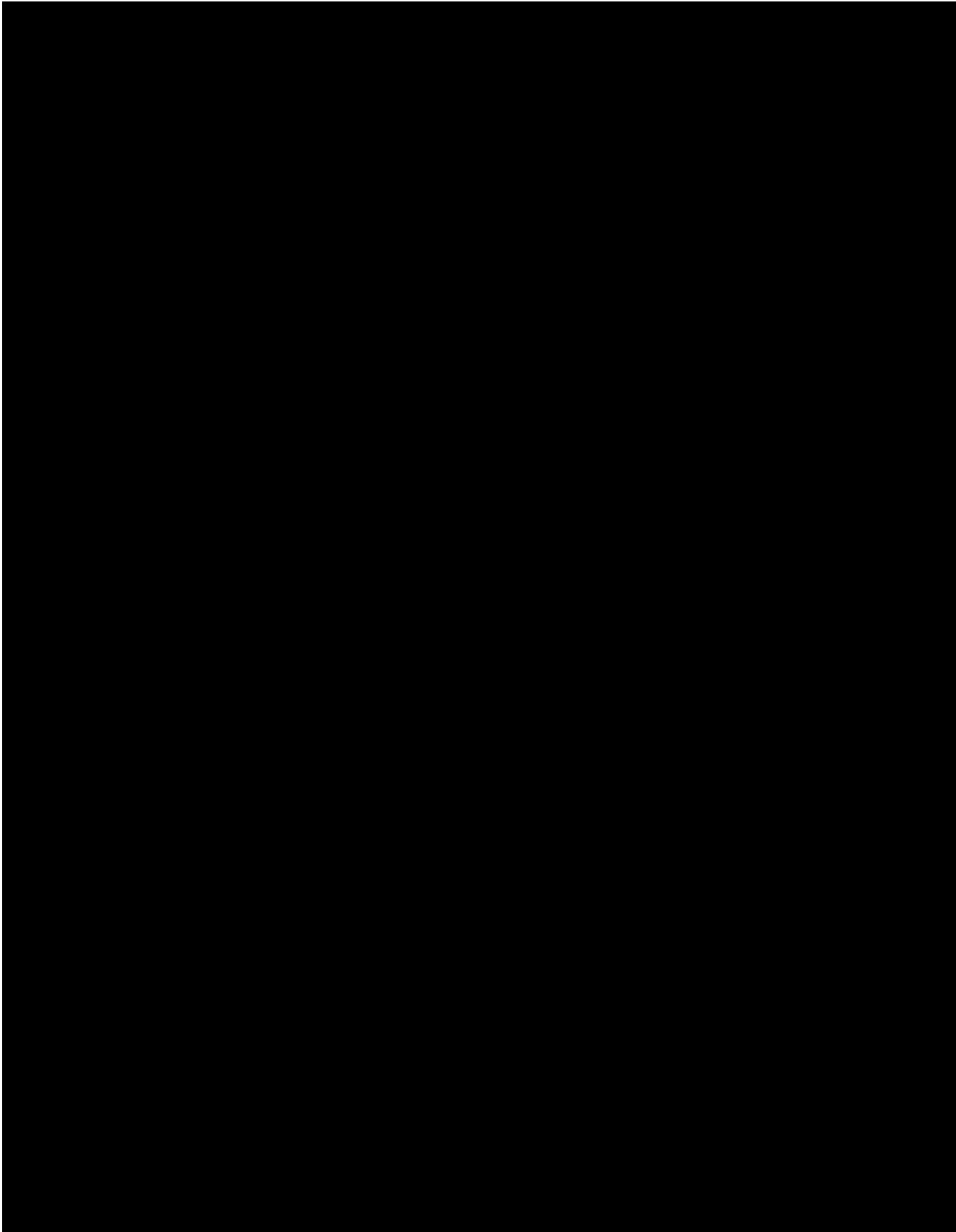
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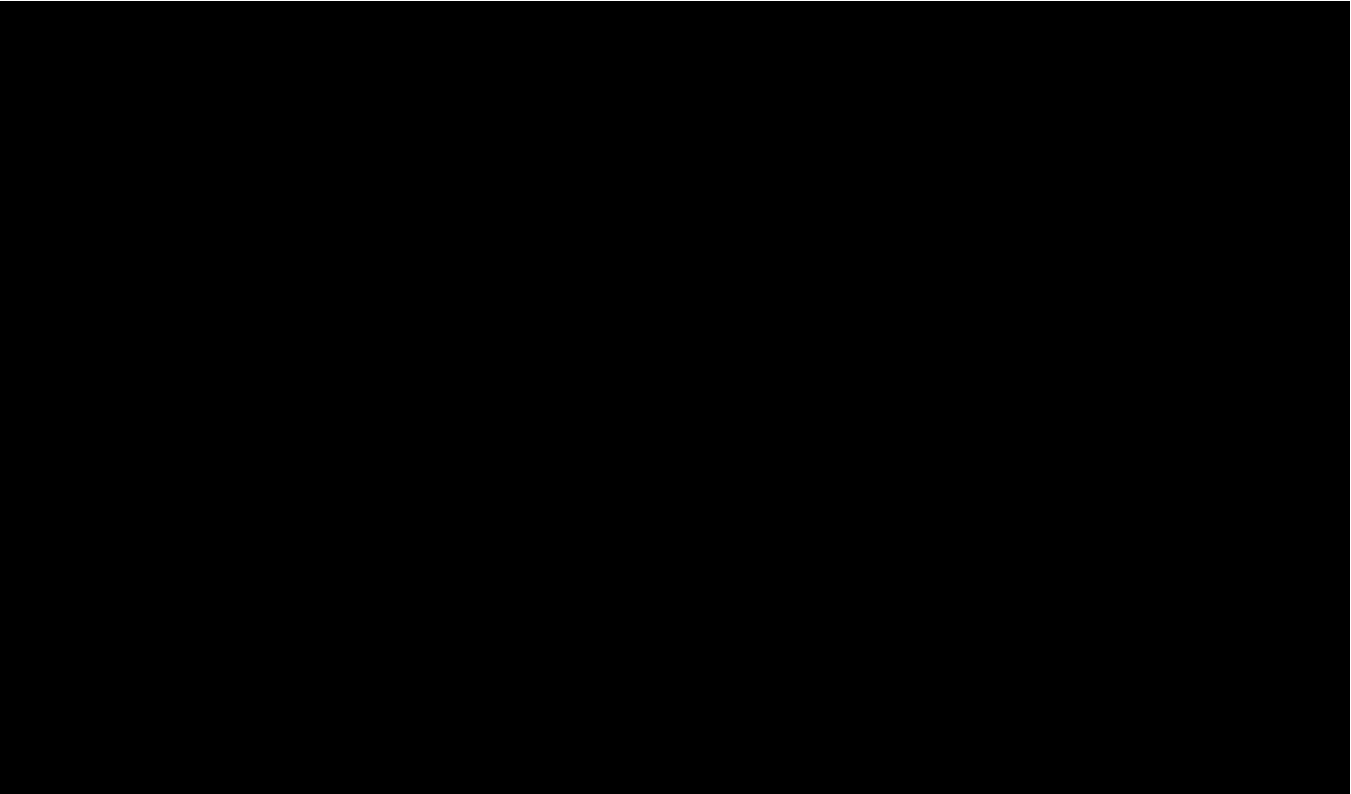
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5. Compiled list of recommendations and deadline for implementation





6. Annexes

Annex 1 Powers of the EDPS

Article 43 of Regulation (EU) 2016/794 sets forth the powers of the EDPS as follows:

‘ ...

3. The EDPS may pursuant to this Regulation:

The EDPS may pursuant to this Regulation:

- (a) *give advice to data subjects on the exercise of their rights;*
- (b) *refer a matter to Europol in the event of an alleged breach of the provisions governing the processing of personal data, and, where appropriate, make proposals for remedying that breach and for improving the protection of the data subjects;*
- (c) *order that requests to exercise certain rights in relation to data be complied with where such requests have been refused in breach of Articles 36 and 37;*
- (d) *warn or admonish Europol;*
- (e) *order Europol to carry out the rectification, restriction, erasure or destruction of personal data which have been processed in breach of the provisions governing the processing of personal data and to notify such actions to third parties to whom such data have been disclosed;*
- (f) *impose a temporary or definitive ban on processing operations by Europol which are in breach of the provisions governing the processing of personal data;*
- (g) *refer a matter to Europol and, if necessary, to the European Parliament, the Council and the Commission;*
- (h) *refer a matter to the Court of Justice of the European Union under the conditions provided for in the TFEU;*
- (i) *intervene in actions brought before the Court of Justice of the European Union;*
- (j) *order the controller or processor to bring processing operations into compliance with this Regulation, where appropriate, in a specified manner and within a specified period;*
- (k) *order the suspension of data flows to a recipient in a Member State, a third country or to an international organisation;*
- (l) *impose an administrative fine in the case of non-compliance by Europol with one of the measures referred to in points (c), (e), (f), (j) and (k) of this paragraph, depending on the circumstances of each individual case.*

4. The EDPS shall have the power to:

- (a) *obtain from Europol access to all personal data and to all information necessary for his or her enquiries;*
- (b) *obtain access to any premises in which Europol carries on its activities when there are reasonable grounds for presuming that an activity covered by this Regulation is being carried out there.*

...’

Annex 2 Documents collected prior to the audit

NO	DOCUMENT NAME
1.	EDOC#1271496v1 (labelled v7 in the file name) Process flowchart: processing of minors, incl. <15y.
2.	EDOC#1270422v2 Processing of Special Categories of Data and Data Subjects - Guideline.
3.	EDOC#1271341v1 Contribution to EDPS, minors (15), input for EDPS inspection 202212.

Annex 3 Documents collected during the audit

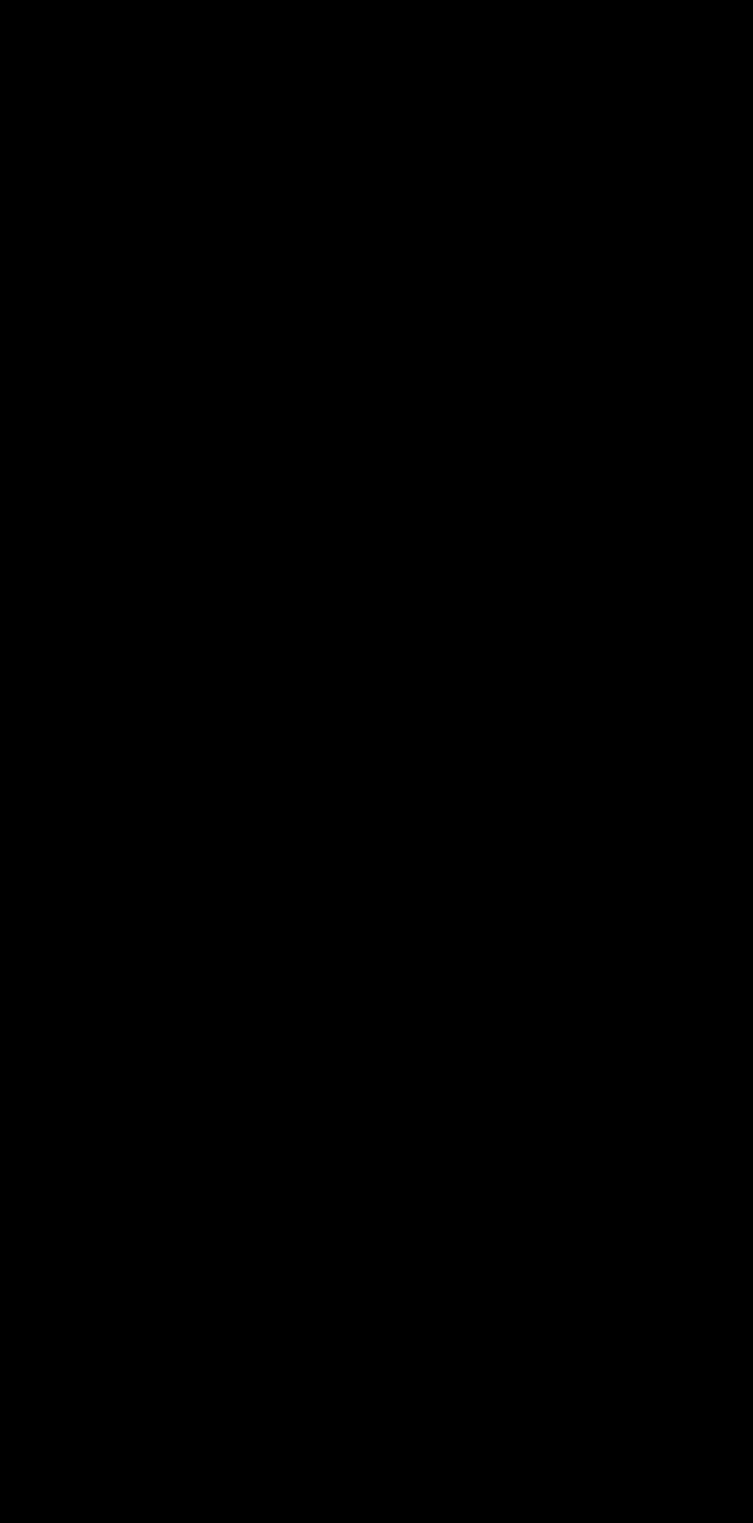
No additional documents were collected during the audit.

Annex 4 Documents requested during the on-site audit and provided afterwards

NO	DOCUMENT NAME
4.	EDOC#1216352v3A Operational Data Access Policy
5.	EDOC#1277426v1 (labelled v2 in the file name) Extract of the OD Analysis Training Portfolio, Document prepared at the request of the European Data Protection Supervisor.

Annex 5 Overview of SIENA message numbers checked and samples taken

The EDPS checked the following SIENA messages contributing minors under 15 years old to Europol. Where one message contributed multiple minors, the DAP ID of the minor checked is mentioned below (otherwise the field is marked with *).

SIENA number checked	Ending digits of Data Analysis Portal (DAP) ID checked
	

Annex 6 List of abbreviations

AP	Analysis Project
CSC	Coordinated Supervision Committee
CT	Counter terrorism
DPF	Data Protection Function unit
DPO	Data Protection Officer
DSC	Data Subject Categorisation
EAS	Europol Analysis System
EDOC	Europol Document
EDPB	European Data Protection Board
EDPS	European Data Protection Supervisor
EIS	Europol Information System
EMS	Entity Management Solution
ER	Regulation 2016/794 (Europol Regulation)
FMMS	File Metadata Management Solution
IAM	Identity Access Management interface
LEAs	Law Enforcement Authorities
LED	Law Enforcement Directive
MACR	Minimum Age of Criminal Responsibility
MS	Member State
NCMEC	National Center for Missing and Exploited Children
O1	Europol Front Office
OAC	Operational and Analysis Centre
OD	Opening Decision
OO	Opening Order
OSINT	Open Source Intelligence
SIENA	Secure Information Exchange Network Application
SOC	Serious and Organised Crime
TP	Third Party
UAS	Unified Audit Solution
USE	Unified Search System
UNCRC	UN Convention of the Rights of the Child