



International Oil Pollution
Compensation Funds

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GDPR IMPLEMENTATION AND AI INTEGRATION

DEVELOPMENTS WITHIN THE SECRETARIAT

Note by the Secretariat

Summary:	This document provides recent developments on the application of the General Data Protection Regulation (GDPR) of the European Union (EU) and Directive 2016/680 to the IOPC Funds, and the Secretariat's work towards the implementation of the IOPC Funds' data protection system. It further outlines the integration of artificial intelligence (AI) technologies to support GDPR oversight and to enhance wider Secretariat operations, including claims handling, business intelligence and communication.
Action to be taken:	<u>1992 Fund Assembly and Supplementary Fund Assembly</u> Information to be noted.

1 Background information

- 1.1 The General Data Protection Regulation (GDPR, Regulation (EU) 2016/679) and Directive (EU) 2016/680 took effect in the European Union on 25 May 2018. Both aim to safeguard individuals' rights regarding personal data while ensuring its free movement within the EU.
- 1.2 Given the nature of the IOPC Funds' work, compensating victims of oil pollution and receiving oil reports from Member States, the collection of personal data is unavoidable. As international organisations, the IOPC Funds sought clarification from the European Commission, which confirmed that applicability of the GDPR depends on the privileges and immunities set out in the 1992 Fund and Supplementary Fund Headquarters Agreements.
- 1.3 The UK Government later indicated that while the GDPR applies to the IOPC Funds, the Funds may determine their own position. A data protection lawyer was therefore retained to advise on GDPR implications and to guide the development of internal policies.
- 1.4 On this advice, and noting the inviolability of archives under the Headquarters Agreements, the Secretariat considers that the GDPR does not strictly apply. However, it is regarded as best practice to adopt its principles and establish equivalent internal measures.
- 1.5 Since 2019, the IOPC Funds have worked with external experts to design a data protection system aligned with GDPR standards. Following the UK's departure from the EU, UK legislation has maintained GDPR-level protections, with EU adequacy decisions confirming the free flow of personal data between the UK and EU until at least December 2025.

2 Recent developments

- 2.1 The Secretariat has identified personal data held by the IOPC Funds and drafted a data protection policy, data privacy notices for claimants, a general data privacy notice, and a data classification and retention policy. These policies cover both existing and future data and were reviewed by the data protection lawyer.
- 2.2 Provisions for data protection have also been incorporated into various contracts, including those with experts in claims handling.
- 2.3 The IOPC Funds engaged an IT support team to assist with implementing the Microsoft Purview Information Protection (MPIP) suite. This enables a phased approach to identifying sensitive information and applying appropriate security measures.
- 2.4 With expert support, Secretariat staff received preliminary training on data protection concepts, their obligations under the GDPR and practical exercises based on realistic scenarios. Department-specific training will follow once MPIP is fully deployed, ensuring all staff understand their responsibilities.
- 2.5 Progress has continued with IT training platforms designed and implemented for staff. Training sessions have been delivered throughout the year in preparation for full system implementation and the adoption of data protection and retention policies.
- 2.6 In line with the retention policy, the Secretariat has launched a data clean-up exercise to systematically review and remove unnecessary data. This ongoing process is closely aligned with policy guidelines and reinforces transparency, accountability and sound data management practices.
- 2.7 Planned next steps include publishing the suite of data protection and retention policies on the IOPC Funds' website to address public queries, conducting further staff training on document retention and destruction, and categorising all documents held by the IOPC Funds.
- 2.8 The Secretariat has also identified and trained an internal Data Protection Officer and developed policies to address data breaches and requests for data destruction, ensuring best practices.
- 2.9 AI technology
- 2.9.1 In 2025, the Secretariat began expanding its use of AI with a particular focus on reducing and automating routine administrative tasks. Tools such as Microsoft Copilot are being introduced to streamline functions including scheduling and documenting meetings, managing correspondence and automating repetitive workflows. At the same time, AI is assisting staff in drafting, reviewing and editing documents across all three official languages, ensuring accuracy, consistency and efficiency. These applications are designed to relieve staff of time-consuming tasks, allowing them to focus on more complex responsibilities without compromising the quality of the work of the Secretariat.
- 2.9.2 The Secretariat is in the process of integrating AI technologies to further strengthen oversight of and ensure adherence to GDPR principles. These systems will improve the identification and classification of personal data, support the monitoring of access to sensitive information and automate retention reviews in line with policy requirements. AI will also enable the generation of audit trails, compliance dashboards and tailored training modules. Through this phased integration, the Secretariat is reinforcing data governance, improving transparency and embedding GDPR compliance into its operational practices.

- 2.9.3 Beyond GDPR, the Secretariat is progressively integrating AI into the claims-handling process to support its work in an international and multilingual environment. AI tools will help streamline submissions, reduce repetitive data entry and accelerate assessments, while ensuring claimants receive clear and consistent guidance in their own language. These capabilities create greater opportunities for direct engagement with claimants, improving accessibility and communication across jurisdictions. At the same time, AI-powered analytics will assist staff in managing and securing data, strengthening data governance and identifying risks such as fraudulent activity or duplicate claims. Together, these measures will significantly enhance the effectiveness of the claims-handling process while also deepening engagement with claimants.
- 2.9.4 The Secretariat is also working to apply AI to the production and management of information. Integration into online services will enable the creation of multilingual content, including publications, reports, explanatory videos, interactive learning modules and outreach materials, adapted in real time to the needs of different audiences. AI-powered tools are expected to improve media output and digital engagement, ensuring communication that is timely, consistent and transparent.
- 2.9.5 Efforts are underway to incorporate AI into the design and delivery of presentations, workshops and training sessions. By automating aspects of content development and using advanced visualisation tools, AI will support the creation of more dynamic, interactive and engaging learning environments. This will strengthen the Secretariat's ability to deliver impactful workshops for Member States and external partners, ensuring complex issues are communicated effectively and memorably across both in-person and online.
- 2.9.6 Throughout this process, the Secretariat remains committed to ensuring that AI complements, rather than replaces, existing safeguards and human expertise. The principles of fairness, accountability, and integrity continue to underpin both GDPR compliance and the wider application of AI across the work of the Secretariat.
- 2.9.7 The Secretariat will report further developments at future sessions of the governing bodies.

3 Action to be taken

1992 Fund Assembly and Supplementary Fund Assembly

The 1992 Fund Assembly and Supplementary Fund Assembly are invited to take note of the information contained in this document.
