Harvard International Law Journal

Corrective Measures and the Problem of Transparency at INTERPOL

March 30, 2026

Charlie Magri*, Ted R. Bromund**, Sandra A. Grossman***

INTERPOL describes itself as a neutral platform for international police cooperation, grounded in Article 3 of its Constitution, which prohibits the Organization from undertaking any activity "of a political, military, religious or racial character." The promise of neutrality is central to INTERPOL's legitimacy: it allows states with divergent political systems and often-conflicting interests to share information on criminals and crime through a common channel. Yet the neutrality concept faces challenges in practice. Over the past decade, civil society organizations, the media, academics, practitioners, and individual victims of abuse have documented misuse of INTERPOL's channels and repeated violations of its neutrality mandate, particularly by authoritarian regimes that deploy Red Notices and Diffusions to pursue dissidents, exiles, entrepreneurs, and political opponents abroad.

The INTERPOL General Secretariat's response to such misuse relies on a set of compliance tools known as "corrective measures," codified in the Rules on the Processing of Data (RPD). These measures include enhanced supervision of a National Central Bureau (NCB), temporary suspension of processing rights, and, in serious cases, restrictions (including suspension of access or processing rights) that must be approved by the Executive Committee. In principle, they provide a graduated means of addressing repeated non-compliance with INTERPOL's Rules while maintaining operational cooperation. In practice, however, the use of corrective measures lacks transparency. INTERPOL rarely identifies which states are subject to them, the grounds for intervention, or the outcomes achieved.

This piece examines the dissonance between INTERPOL's commitment to neutrality and its secretive use of corrective measures. It argues that disclosure is indispensable to ensure accountability, deter abuse, and preserve the Organization's constitutional framework.

Corrective Measures: Legal Foundations and Practice

When a member country refuses to respect INTERPOL's rules, the answer lies in the RPD. In force since 2012, the RPD equips the General Secretariat with a graduated set of supervisory powers. Article 128 of the RPD authorizes re-examination and, where necessary, correction or deletion of non-compliant data. Article 130 permits suspension or withdrawal of individual user access rights. Article 131 escalates further, empowering the Secretariat to place an NCB under supervision, suspend its processing rights, or dispatch an assessment team. Long-term suspensions, those lasting more than three months, require Executive Committee approval.

The General Secretariat has consistently maintained that corrective measures are not punitive. In its March 2022 statement on the war in Ukraine, it stressed that "INTERPOL's mandate does not include issuing sanctions or taking punitive measures, nor is there any provision in the Constitution for the suspension or exclusion of a member country." A similar formulation appeared in written evidence submitted to the UK Parliament's Joint Committee on Human Rights during its 2025 inquiry into transnational repression, where INTERPOL emphasized that corrective measures are "not meant to be punitive but rather to guide a member country towards improving its performance."

This account, while formally accurate, reveals INTERPOL's careful diplomatic calculus. By framing corrective measures as remedial rather than punitive, and by ignoring the possibility of long-term suspension that exists in the RPD, the Secretariat seeks to demonstrate responsiveness to misuse while avoiding the political confrontation that would accompany explicit sanctioning of member states. In the same evidence to the UK Parliament, INTERPOL claimed that experience "demonstrates that corrective measures . . . contribute to improvements in the compliance rates of countries," pointing to at least one case where non-compliant requests fell "to practically zero" within a year.

INTERPOL's supervisory framework is logically coherent: the General Secretariat may intervene at the level of records (by re-examining and correcting data), users (by suspending access rights), and National Central Bureaus (by supervision or suspension). Yet a system so central to the Organization's credibility cannot achieve legitimacy if it remains hidden from public view.

Secrecy and the Public Interest in Disclosure

That corrective measures are used is not in doubt. INTERPOL itself acknowledges that "since the entry into force of the RPD in 2012, interim and corrective measures have been applied with regard to different NCBs on different occasions." What the Organization does not disclose is which member states are subject to these measures, what conduct triggered intervention, how long the measures lasted, and what assessment led to their end. Failing to publish this information means that member states are not fully aware of how and when they may be sanctioned for breaching the RPD. INTERPOL thereby misses an opportunity to establish deterrence.

The concept of corrective measures is not always sound, as it assumes that abuse is caused by ignorance rather than intent. Certainly, some misuse may stem from poor training or limited capacity at the national level, in which case supervision might be appropriate. But when abuse is repeated, persistent, and targeted at regime opponents—as in the well-known case of William Browder—the idea that supervision alone will produce compliance is implausible. INTERPOL operates, even when imposing corrective measures, on an assumption of national good faith. It accepts the existence of frequent errors but does not acknowledge systemic abuse, because doing so would mean recognizing politically motivated misuse.

The effect of INTERPOL's secrecy is that both the measures and their targets are shielded from view. The few occasions when INTERPOL has disclosed corrective measures demonstrate both their potential and the inadequacy of confidentiality. In October 2021, INTERPOL announced the lifting of measures on Syria, tacitly confirming that restrictions had been in place for years. In March 2022, following Russia's invasion of Ukraine, the General Secretariat revealed that Russia's diffusions would be subject to heightened supervision, routed through INTERPOL for compliance checks with Executive Committee endorsement. And in July 2025, an official from INTERPOL's Directorate for Legal Affairs described in a public webinar how one NCB had submitted notices with a 30-40 percent non-compliance rate over six months, many targeting activists and critics (American Bar Association (ABA) webinar, July 2025, 1:14:27 to 1:15:55).. Corrective measures and monitoring reportedly reduced non-compliance to zero within two years; the country was not named.

These examples demonstrate INTERPOL's inconsistency. While INTERPOL opted for transparency in the Syrian and Russian cases, cooperation with those states continued. But in the case described in the ABA webinar, where abuse was rampant, the offending state was anonymized. A country that channels nearly half its notices against dissidents has engaged in systemic abuse: concealing its identity is not neutrality. It is a shield for abuse.

Moreover, the decision to publicize corrective measures selectively, naming some states but not others, introduces political considerations into the very mechanism meant to safeguard impartiality. It effectively ties disclosure to the scale of external outrage or geopolitical

importance. This not only violates the spirit of the Constitution but makes acknowledgment of abuse within INTERPOL conditional on unrelated events, such as war crimes or international condemnation. The result: states that commit systemic abuses *outside* INTERPOL are named, while those that commit systemic abuses *through* INTERPOL's systems remain protected.

The use of corrective measures is far from exceptional. In December 2022, Secretary General Jürgen Stock told the European Parliament that five states were under such measures. By April 2025, six countries were reportedly subject to enhanced monitoring under INTERPOL "corrective measures," including Russia, Belarus, and Syria. This figure was reported by *Disclose*, based on a leak of internal INTERPOL documents and with reference to a memo prepared for INTERPOL's Executive Committee. But while corrective measures are not rare, their confidential application makes it impossible to assess consistency or effectiveness.

Neutrality Without Transparency

The opacity surrounding corrective measures has been sharply criticised. In its 2025 report on Transnational Repression, the UK Parliament's Joint Committee on Human Rights warned:

"We are deeply concerned by the misuse of INTERPOL Red Notices by certain member states. Refusal by the INTERPOL secretariat to acknowledge that there is a problem and to take remedial action poses a significant threat to the rights and freedoms of individuals targeted by authoritarian regimes and sends a message that this behaviour is acceptable."

The Committee urged governments to work with partners "to track and expose malicious, vexatious, and politically motivated use of Red Notices" and to "advocate for greater transparency and accountability within INTERPOL's procedures."

The Committee's warning underscores the central concern: neutrality without transparency risks becoming an empty promise.

Toward a Transparent Regime

Routine disclosure of corrective measures is both feasible and necessary. At a minimum, INTERPOL should publish annual statistics on the number and duration of such measures. More meaningfully, it should:

- Clarify the structure and relative severity of available measures;
- Explain the criteria the General Secretariat uses when deciding to impose or lift them;
- Describe the objectives and methodology of supervision or assessment missions; and
- Maintain a public register identifying states currently subject to measures and the restrictions applied.

Such disclosure would strengthen neutrality, not weaken it. Equal treatment across member states would replace political discretion with predictable, rules-based transparency. It would also send a clear message to would-be abusers that misuse carries reputational costs.

The General Secretariat insists that corrective measures are "non-punitive." In practice, however, suspending processing rights, placing an NCB under supervision, or disconnecting a bureau from INTERPOL's systems directly restricts a state's ability to use the Organization's channels. These are sanctions in all but name. Keeping them confidential reduces their deterrent effect, shields abusive states from reputational costs, and prevents courts, asylum authorities, and civil society from evaluating whether rules are applied consistently.

Conclusion

Corrective measures are INTERPOL's principal tool for addressing systemic misuse of its channels. The RPD framework is robust, and experience shows that intervention can restore compliance. Yet secrecy undermines legitimacy. As long as abusive states are protected by anonymity, neutrality remains a constitutional slogan rather than a lived practice.

Full disclosure of the mechanisms governing corrective measures, naming states subject to these measures and specifying their duration and outcome, would align INTERPOL's practice with its constitutional commitments. The only truly neutral approach, and the one most likely to deter future abuse, is to treat all states subject to corrective measures equally, by naming them all.

*Charlie Magri is a Lawyer at *Otherside*.

**Ted R. Bromund is the Founder of *Bromund Expert Witness Services, LLC*.

***Sandra A. Grossman is the Managing Partner at *Grossman Young & Hammond, LLC*.

← PREVIOUS
Small Nations and the Role of Int...

NEXT →
The Deportation of Undocument...

The Harvard International Law Journal is an officially recognized student-run journal of Harvard Law School. Membership in this journal is open to all HLS students.

The Harvard International Law Journal is the oldest and most-cited student-edited journal in international law. It is primarily edited by J.D. and LLM students at Harvard Law School. Learn more.

1585 Massachusetts Ave,
Cambridge, MA USA 02138

hlsilj@mail.law.harvard.edu