

Summary report

The European Data Protection Supervisor (EDPS) hosted the fifth meeting of the VIS Supervision Coordination Group (VIS SCG) on 29 October 2014.

The Group, which comprises national data protection authorities (DPAs) and the EDPS, each acting within their own competences, is tasked with ensuring coordinated data protection supervision of the Visa Information System (VIS). The Secretariat of the Group is provided by the EDPS.

The VIS SCG met with representatives of the European Commission and eu-LISA. Topics discussed included the state of play of the VIS roll-out and the planned further roll-out¹, recent developments related to the quality of data in the system and the mechanism to keep track of such quality as well as how the envisaged Visas Code provisions on the External Service Providers (ESP) could impact on the collection of fingerprints.

The representative of the Spanish DPA gave a presentation on different aspects of data quality which focused on items such as the current status of the BMS quality assurance system, the facial / free text, logs or external providers where in the view of ES DPA further action is needed. One of the action points decided by the meeting was to send a letter to the Commission and eu-LISA in order to ask for more clarifications on how fingerprints and facial images are collected and processed within the VIS system.

A subgroup composed of representatives of the German (federal), Italian, Maltese, Swiss (federal) and Swedish DPAs presented a Note on the analysis of technical and legal issues related to the use of subcontractors for the processing of visa applications, including questions of jurisdiction. The Group decided to continue the work on this subject by contacting the Commission in order to check how the Member States are concluding the contracts with the subcontractors. In parallel, the DPAs will start looking at national level on how such contracts are being used.

The group took note of the first results presented by the Secretariat on the three questionnaires circulated this summer aimed at checking at national level the list of authorities having access to the VIS, access to VIS for purposes of law-enforcement, and the exercise of data subjects' rights. The preliminary findings showed no major problems at national level but all contributions will be needed in order to have a comprehensive view on these issues.

Further to a presentation by the Fundamental Rights Agency on a biometric project to be developed in the near future the Group accepted to share the questionnaires mentioned above in order to contribute to the project.

Last but not least, the members of the Group shared relevant information about developments at national level, including inspections.

The next meeting of the VIS SCG will be held in spring 2015.

¹ <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32013D0493&qid=1400058351146&from=EN>