

ISO/IEC JTC 1 "Information technology"

Secretariat: ANSI

Committee manager: Rajchel Lisa Mrs.



SC 44 Business Plan 2025

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Description

This document is circulated for review and consideration at the November 2025 JTC 1 Plenary.

ISO/IEC JTC 1/SC 44 – Consumer protection in the field of privacy by design

Strategic business plan

2nd draft version integrating NB comments on the 1st version

reflecting the discussions of the SC 44 CAG

Kunming, CN, 2025-09-09

1.0 Executive Summary

ISO/IEC JTC 1/SC 44 was established in January 2025 with the title *"Information technology — Consumer protection in the field of privacy by design"* and the scope of *"Standardization of consumer protection in the field of privacy by design for products, goods and services, including their data lifecycles"*. This subcommittee is the successor to ISO Project Committee PC 317, which previously had produced ISO 31700-1:2023 *"Consumer protection — Privacy by design for consumer goods and services - Part 1: High-level requirements"*, complemented by part 2 in ISO/TR 31700-2:2023, providing illustrative use cases.

During the development of these deliverables, it became clear that the high-level requirements would benefit from being supplemented by more detailed requirements tailored to specific consumer use cases, technologies, and processes — such as smart home appliances, AI-enabled products, mobile financial transactions, or customer service chat bots.

The task of SC 44 is therefore to develop standards for privacy by design with an emphasis on the consumer lens. This work takes place in a highly fragmented product environment, where consumer products increasingly have significant privacy implications, while at the same time evolving at a rapid pace. Additionally, there is a multitude of regulatory developments and actors active in this field.

Relevant standardisation activities on privacy are to be seen in many committees within ISO, IEC and beyond (cf. section 2.0), which organize important expertise. However, it is often difficult to engage consumer expertise into the - often lengthy - standardisation process. The same applies for small and medium businesses (SMBs), who often face difficulties in engaging, but also implementing the standards (cf. section 6 for some thoughts on how to address this through depicting different maturity levels).

SC 44 recognizes these challenges and aims to address them to enable effective collaboration. The subcommittee is pursuing an inclusive approach (see section 4), with a particular focus on ensuring representation of consumers and their interests, while also finding ways to address consumer needs in a timely manner, thereby reducing the frustration sometimes encountered when engaging with standardization activities.

The overall strategy of SC 44 is to tackle these issues through a modular approach. This involves supplementing the high-level requirements with smaller, technology-, process-, or sector-specific projects that address individual requirements for clearly defined contexts. Such a targeted approach allows interested parties and volunteers to focus on specific gaps they have identified.

In cases where identified gaps are better addressed within another subcommittee, SC 44 will seek to contribute through established liaisons or, where absolutely necessary, by forming joint working groups. In some instances, companion documents tailored for different audiences may also be developed.

Beyond starting the mapping of the landscape and of identifying relevant gaps, SC 44 has begun discussions on assurance mechanisms necessary to sustain consumer trust. These efforts build on the modular approach and may include exploring the development of different profiles that could serve as a basis for audits in various contexts. Section 5 provides a more in-depth description of this envisioned approach.

Section 3.0 offers an overview of the initial steps taken to establish the subcommittee, while section 7.0 provides information on its current structure.

2.0 Environment

There are several environmental factors, including market dynamics, regulatory trends, technology developments, and evolving consumer and stakeholder needs, that relate directly to the scope of SC 44. They are as follows:

1. **Dynamic market context:**

- Today's ever-connected environment has created a highly dynamic market for consumer products and services. This environment requires the processing of large amounts of data, which contributes to a gap in consumer confidence — particularly given the rapid evolution of technologies such as AI.
- Different national bodies have varying structures and mechanisms to integrate consumer interests into regulatory or standards processes.
- The online world continues to accelerate, with an ever-increasing volume of consumer data being processed, fueling additional trust concerns.
- Regulatory updates frequently lag behind technological and market developments, struggling to keep pace with innovation. This can result in:
 - Low adoption rates due to the high level of effort required for compliance.
 - A need for extensive consensus before changes are widely adopted.
 - Challenges posed by fast-moving technologies, including open-source ecosystems.
- ISO processes themselves are often perceived as too slow to react to these rapid shifts, underlining the relevance of SC 44's strategy to pursue smaller, concise standards that can be developed and deployed more quickly.
- There is also inconsistent understanding of what constitutes personal data across jurisdictions, alongside a lack of standardized language (though ISO/IEC 29100 provides a foundational definition).

2. **Technology trends and the complex standards landscape:**

- A multitude of activities in the standardization world exist, which can be overwhelming for actors from the consumer space.

- For example, in AI alone: IEEE WG PDAI, maintains standards such as:
 - P7000 — Model Process for Addressing Ethical Concerns during System Design.
 - P7001 — Transparency of Autonomous Systems.
 - P7002 — Data Privacy Process.
 - P7003 — Algorithmic Bias Considerations.
 - P7006 — Standard for Personal Data AI Agents.
- In the field of AI, OECD published on June 17th, 2025 a report entitled: **Sharing trustworthy AI models with privacy-enhancing technologies** (https://www.oecd.org/en/publications/sharing-trustworthy-ai-models-with-privacy-enhancing-technologies_a266160b-en.html). The report calls for the development of a global repository of cross-country comparable, standardised use cases on PETs.
- The field of research is expanding, with examples like Carnegie Mellon’s privacy engineering program and ETSI EN 303 645 on consumer IoT security. An annex listing academic programs worldwide could be developed.
- Related professional activities and industry initiatives continue to multiply.

3. Consumer and stakeholder needs:

- **Consumers:**
 - Trust issues are emerging, with consumers sometimes avoiding beneficial products due to privacy concerns.
 - There is a risk of consumers being misled by sponsored advertising, manipulative practices (so-called “dark patterns”), complex user interfaces, or unauthorized data collection for advertisers and data brokers — which may also heighten risks like identity theft.
 - Consumers are often overwhelmed with the complexity of systems, such as those, which are operated by multiple organisations, or even the managing of different passwords.
 - In the nascent field of AI technology a number of new concerns arise, such as privacy leakage, as well as LLM hallucinations, false inferences causing consumer misinformation interacting with consumers.
- **Entities developing or licensing consumer products:**

- As noted, unclear or fragmented regulatory requirements present challenges.
- Developers also struggle with complexities arising from diverse products interacting within the same ecosystem.

4. Competition and market fairness:

- Unclear requirements can disadvantage market actors striving to provide a high level of privacy protection.
- There is a need to lower barriers of entry for companies aiming to comply with privacy by design requirements.
- Better standards could enhance consumer choice, for example by supporting data portability as envisaged by the GDPR, thereby reducing vendor lock-in.

5. Existing and evolving policies and regulations:

- Market practices and regulatory mechanisms are increasingly incorporating privacy by design, not limited to the EU GDPR, but also in many other areas of the world such as: Brazil, Australia, Québec, Kenya, Japan (recent amendments), Vietnam and South Korea as well as through frameworks such as the US FTC report (2012) and NIST Privacy Framework (2018).
- The costs of breaches, regulatory enforcement, and implementing compliance are substantial.
- Consumer attitudes, as captured by PEW Research, ANEC, CI, and others, further underscore the importance of clear, actionable standards.

This environment illustrates the broad and complex context in which SC 44's work takes place. It highlights the need for standards that not only protect consumers and foster trust but also enable manageable pathways for industry compliance, particularly through SC 44's intended modular approach.

3.0 Achievements and Benefits

Achievements

SC 44 maintained critical stakeholder momentum during the period leading up to its official establishment by maintaining continuous exchanges through the transition team. This allowed for a rapid start in establishing the subcommittee and led to an early set of concrete achievements, specifically:

- Held its first plenary meeting (June 2025), with a second plenary already scheduled (September 2025).
- Established the initial structure of SC 44 (see section 7.0).
- Launched communications activities:
 - Created a public-facing website.
 - Conducted outreach to COPOLCO and other audiences (e.g. cpdp.ai) as well as to the OECD.
- Established groups to address:
 - Revision of ISO/TR 31700-2.
 - Initiation of a Preliminary Work Item (PWI) on assessment.
 - Commencement of work on the Strategic Business Plan.
 - Preparing a report on the scope of SC 44 and potential transferal of projects, as well as preparing work on developing a landscape understanding of the environment in which SC 44 operates.

Benefits

While the work of SC 44 is only just beginning, and its tangible impact will naturally take time to develop, the success of its predecessor, PC 317, provides a strong foundation. Notably, a growing number of standards already reference ISO 31700-1, which bodes well for SC 44 and its scope. That said, several potential benefits of SC 44's establishment are already clear:

- It underscores ISO/IEC's commitment to addressing consumer interests.
- It may serve as a location within ISO/IEC for integrating consumer privacy activities and stakeholders.
- It also provides a point of engagement for external consumer privacy stakeholders to participate in ISO/IEC standardization activities.

Impact on ISO Sustainable Development Goals (SDGs) and ISO/IEC Strategy

SC 44 is closely aligned with ISO/IEC's broader strategic objectives. This includes supporting the goal of ensuring that *"all voices are heard"* through the inclusion of consumer interests, as highlighted in the ISO Strategy 2030.

Given the ever-increasing amount of personal information and digital footprints required to function in everyday life, SC 44's work is particularly relevant to supporting the objectives of the following SDGs:

- **SDG 8:** Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- **SDG 9:** Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.
- **SDG 16:** Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

Potential future relevance is also being evaluated for:

- **SDG 12:** Ensure sustainable consumption and production patterns.
- **SDG 3:** Ensure healthy lives and promote well-being for all at all ages.

4.0 Participation and cooperation/collaboration.

ISO/IEC JTC 1/SC 44 was formally approved by ISO/TMB and IEC/SMB in January 2025, and therefore we recognise that National Bodies are still consulting within their countries to identify experts and establish mirror groups to participate in SC 44.

The **membership** of SC 44 (2025-06-17) is as follows:

- 31 P members
- 5 O members
- 8 liaisons
 - ISO/COPOLCO
 - IEC/ASCEC
 - ISO/IEC JTC 1/SC 17 Cards and security devices for personal identification
 - ISO/IEC JTC 1/SC 27 Information security, cybersecurity and privacy protection
 - ISO/IEC JTC 1/SC 32 Data management and interchange
 - ISO/IEC JTC 1/SC 42 Artificial intelligence

- ISO/IEC JTC 1/SC 43 Brain-computer interfaces
- ISO/TC 232 Education and learning services

The inaugural Plenary meeting was held on 24th April 2025 and was attended by 56 delegates representing 13 NSBs as well as a number of liaison officers.

SC 44 recognizes that engagement with communities is essential to raise awareness amongst stakeholders. It has therefore established a Communication Group, AG 2, which is developing an outreach plan.

5.0 Objectives and strategies to achieve them

To advance its mandate, ISO/IEC JTC 1/SC 44 is defining a set of strategic objectives, each paired with corresponding strategies that outline how the subcommittee will approach its goals. The following objectives and strategies are framed with a forward-looking approach, acknowledging this initial plan will evolve as SC 44 matures. All strategies are designed to be inclusive and adaptable, with more detailed mechanisms (e.g. conformity assessment or profiles) identified as future topics of exploration rather than immediate commitments.

- **Ensuring inclusive participation**
 - Objective: Ensure broad and inclusive participation in SC 44's work by engaging all relevant stakeholders, including diverse national bodies, consumer representatives, regulators, industry experts, ~~SMEs~~ SMBs, and academia.
 - Strategy: The subcommittee will foster proactive outreach and liaison efforts to invite wide stakeholder contribution.
 - A dedicated communications program is being established to raise awareness of SC 44's activities and to encourage involvement.
- **Aligning with ISO's consumer protection goals**
 - Objective: Align SC 44's work with broader IEC, ISO and JTC 1 strategies on consumer protection and trust.
 - Strategy: SC 44 will ensure its work program directly contributes to these high-level goals by focusing on **consumer-centric privacy standards** developed in a timely manner.

- The subcommittee will coordinate with ISO/COPOLCO as well as;
 - coordinate with other ISO/IEC committees to ensure that its standards reinforce consumer rights and safety, complementing global consumer protection initiatives.
- By doing so, SC 44's outputs will embody ISO/IEC's commitment to enhancing consumer trust in digital products and services.
- **Identifying and filling standardization gaps**
 - Objective: Continuously identify gaps where new standards or guidance are needed to address emerging technologies, sectors, or practices not yet covered by existing privacy by design standards.
 - Strategy: SC 44 explores the adoption of a **modular standards development approach** that builds on the high-level, horizontal requirements of ISO 31700-1, ideally leveraging a smart standards approach where possible.
 - In practice, this means initiating new standardization projects that focus on specific context requirements – for example, privacy by design for IoT-enabled toys or health devices – thereby creating **vertical or technology-specific complements** to ISO 31700-1's general requirements.
 - Each new project should be scoped to address a clear gap and/or market need (such as a particular industry or vulnerability scenario).
 - SC 44 will also engage in liaison and monitoring activities to avoid duplicating work and to develop synergies to capture gaps that other committees or external bodies have not addressed, thus efficiently extending the **privacy by design framework** into new domains.
- **Supporting SMEs in implementation.**
 - Objective: Support small and medium-sized businesses (SMBs) in adopting privacy by design, recognizing the resource constraints and varying maturity levels of smaller organizations.
 - Strategy: SC 44 will strive to make its standards and guidance **accessible and scalable** for organizations of different sizes. This includes using clear, outcome-oriented language and providing illustrative use cases (as seen in ISO 31700-2) to help SMEs interpret high-level requirements in their context.
 - The subcommittee envisions frameworks for **phased or tiered implementation** of privacy controls – for example, a maturity model that defines incremental levels of privacy by design capability. Such a model would allow an SME to begin with

fundamental practices and progress toward full compliance over time, rather than face a binary all-or-nothing compliance hurdle. By enabling a stepwise approach, SC 44's work will lower barriers to entry for innovative smaller players while still guiding them toward the robust protection of consumer data. *(Any formal maturity model or profile standard would be considered in future work, ensuring that initial standards remain broadly applicable.)*

6.0 Factors affecting completion and adoption of the work program

As the work program of SC 44 is developed and solidified, more factors presenting challenges will emerge no doubt; however, even at this early/nascent stage, a few are already evident:

1. consumer and technology committees of ISO have functioned in different spaces and getting consumers involved in more technical standards is not easy
2. This structural issue extends to national bodies and their mirror committees
3. Alignment with other SCs addressing privacy aspects, which may be addressed by a clear methodological approach based on ISO 31700 within SC 44.
4. Considering the multitude of regulations or legally proscribed requirements, which is a challenge since most nations have privacy and consumer protection regulations.
5. Using unambiguous, plain language, understandable for experts, who not necessarily may be subject matter experts.
6. Ensuring the work product of SC 44 provides value to entities at various levels of maturity and size.

7.0 Structure, current projects, and publications

Organizational structure

SC 44 currently consists of:

- The main SC, managed by a Chair and a Secretariat provided by BSI (United Kingdom).
- A WG 1, being tasked with the revision of ISO/TR 31700-2 and a PWI on Audits of privacy by design for consumer products and services
- A Chair's Advisory Group (CAG) to assist with planning, strategic decisions, and oversight of the SBP and other management matters.
- A Communications Group to coordinate outreach, liaison promotion, and informational content about SC 44's work.
- An advisory group 1 (AHG1) was established to address the JTC 1 recommendations.
- Further ad hoc or advisory groups are expected to form as specific new work items or technical questions arise.

Current projects and publications

SC 44's work program is anchored by:

- **ISO 31700-1:2023**, setting high-level privacy by design requirements.
- **ISO/TR 31700-2:2023**, providing implementation examples through use cases.

Current work has started on two (preliminary) projects:

- Revision of ISO/TR 31700-2
- Preliminary Work Item on Audits of privacy by design for consumer products and services

Future work is anticipated to focus on modular extensions of ISO 31700-1 and complementing documents, potentially addressing for example, but not limited to:

- Specific consumer product categories (e.g. smart home devices, connected toys).
- Particular technological domains (e.g. AI-enabled services, health-related wearables and telehealth services).
- Frameworks such as privacy by design maturity models or sector-specific profiles.

A more detailed architecture diagram and updated list of projects will be included in future editions of this SBP as the subcommittee's portfolio develops.