

Sample ccTLD Human Rights Impact Assessment Tool

Introduction to the Tool

THE DANISH
INSTITUTE FOR
HUMAN RIGHTS

ARTICLE 19

This Human Rights Assessment Tool contains a range of scenarios and questions related to Human Rights relevant to a Registry's operations (specifically, a Country Code Top-level Domain, or ccTLD, registry). The tool covers the following issue areas:

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How to Use This Tool

This tool is a working model for assessing the human rights impacts of Internet infrastructure providers, starting with country-code top level domain (ccTLD) registries.

If you would like to offer feedback on the model or are interested in partnering to carry out a human rights impact assessment for your business, please contact:

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Step 1: Complete the human rights impact scenario.

For each scenario please:

1. Rate the probability of the scenario taking place during one year from now across the operations of your company:

- Does not occur
- Isolated incidents may occur
- Occurs systematically

2. Describe the key potential impacts and who is impacted.

3. Rate the number of individuals potentially impacted in any one year:

- 0 - 500 persons
- 500 - 5.000 persons
- 5.000 persons and above

4. Rate the severity of the human rights consequences for the affected individuals:

- Low
- Medium
- High

Step 2: Complete of the human rights compliance assessment indicators

For each question and indicator the respondent is presented with the following answer options:

o Yes/No. The more indicators and questions the respondent is able to answer in this way, the more reliable the assessment will be.

o F/A (Further attention required): This option is intended as a last resort if the respondent is uncertain about what the correct answer is, and should therefore be used infrequently, if at all.

o N/A (Not applicable): use this option if a particular question or indicator isn't relevant for the company. Please provide an explanation in the "Comments" section where relevant.

The indicators show you the kind of policies, procedures, and practices you should ideally have in place in order to answer "yes" to the main Human Rights Compliance question.

When you answer "no" to a given question or indicator it may imply that you have identified a gap in your policies, procedures, or practices. Make a note of the indicator(s) that resulted in this gap, and add them to a prioritised list of improvement actions. If you answered "Further attention" to a given question or indicator, make a note of what action you need to take before the question or indicator can be answered with a "yes."

Step 3: Answer the Human Rights Compliance question

It's important that all the indicators are completed before attempting to answer the main Human Rights Compliance question.

Once all of the indicators have been completed, use the answers to assess the Human Rights Compliance question.

If the answer is determined to be "yes" to the Compliance question but one or more indicators have been answered with "No" or "Further Attention," a note should be included explaining why the indicators were not considered necessary for the Company.

A. Registries as Employers

Applies to all employees including field workers and maintenance personnel and to third-party in-premise staff

A.1 Working Hours

Right to work and to just and favourable conditions at work, Right to rest and leisure

Human rights impact scenario

Employees are exposed to excessive working hours, excessive overtime or lack of rest periods. (Exceeding 48 hours in a normal workweek. For shift work, exceeding 56 hours in any one week, or 48 hours' average in a three-week period).

Probability (click below to choose option)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry ensure that the workweek is limited to 48 hours; that overtime is infrequent and limited; and that employees are given reasonable breaks and rest periods?						

A.2 Wages

Right to work and to just and favourable conditions at work, Right to adequate standard of living

Human rights impact scenario

Employees are unable to make, at minimum, a living wage sufficient to meet the basic needs of the employee and the employee's legitimate dependents.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)				Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	It is company policy to provide employees with a living wage sufficient to meet basic food, clothing and housing needs and provide some discretionary income for themselves and their dependents.						
b	The registry is aware of whether the legal minimum wage in the country of operation meets the requirement for a living wage in practice.						
c	If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation.						
d	Part-time workers receive wages and benefits that are proportionate to those of full-time workers, and receive overtime compensation at a minimum of 1.25 times their hourly salary.						
e	The registry pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law.						
f	Bonus and piece-rate payment systems are monitored to ensure that the total salary paid meets living wage requirements without resorting to overtime.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry provide a living wage that enables workers to meet the basic needs of themselves and their dependents?						
A.3 Leave							
Right to work and to just and favourable conditions at work, Right to family life, Right to health							
Human rights impact scenario							
Employees are not provided with leave , including annual paid leave (minimum 3 weeks), paid sick leave and paid maternity leave (minimum 14 weeks).							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)				Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	Company employees are granted at least three weeks of paid holiday leave per year or more if required by national law or collective agreements. Part-time and short-term employees are provided with paid holiday leave proportionate to the number of hours worked, at a rate equal to that of permanent full time employees.						

b Employees are entitled to paid sick leave in accordance with the applicable national law. If sick leave is not provided for in national law, the registry consults with union or worker representatives to establish alternative means of protection in case of illness or injury.

c Sick leave is not deducted from employees' vacation time.

d Female employees are entitled to no less than fourteen weeks of paid maternity leave per child.

e The registry grants compassionate or parental leave to employees who have recently adopted a child or children, or have taken on the responsibility to care for foster children or other dependent children. Such leave should be granted on equal basis i.e. regardless of the employee's gender.

Human rights compliance question				YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry grant employees paid holiday leave, sick leave, and parental leave in accordance with international minimum standards?									

A.4 Harassment

The right to freedom from discrimination and harassment

Human rights impact scenario			
Incidents of sexual or other types of physical or psychological harassment occur in the workplace.			
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators				YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a The registry has a commitment to prevent workplace harassment, and actively informs employees of their obligations to refrain from violent, threatening or abusive conduct.

b The registry has a code of conduct to outline guidelines for appropriate behaviour at the workplace and manage offensive or abusive behaviour.

c All employees are informed about applicable internal procedures and complaint mechanisms in relation to offensive behaviour or abusive behaviour.

d Managers receive training on how to identify and deal with instances of harassment in the workplace.

e The registry investigates all complaints of workplace harassment and takes appropriate preventative and disciplinary action including reporting of criminal actions to the appropriate authorities.

f The registry has an internal system for handling cases of offensive or abuse behaviour. (Such a system could include a designated committee.)

Human rights compliance question				YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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	Does the registry protect workers from workplace harassment, including physical, verbal, non-verbal, sexual or psychological harassment, intimidation, abuse, or threats?						
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A.5 Employee Privacy

Right to privacy

A.5.1 Personal data and monitoring

Human rights impact scenario

Workplace monitoring or collection of employee personal data occurs without the knowledge of employees, without a justifiable purpose or in a disproportionate manner.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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<p>a The registry has a procedure stating what kinds of workplace monitoring are allowed; what kind of personal employee information is retained; where it is stored; who has access; and why the information is necessary.</p> <p>b Employees are made aware of all workplace monitoring, including cameras and Internet or e-mail monitoring, and the specific purpose of the monitoring.</p> <p>c The registry does not attempt to gain information from an individual with whom the employee has a privileged relationship, including a former employer, doctor or lawyer, without the employee's prior written consent.</p> <p>d Employees have access to all personal data collected about them, including data concerning disciplinary decisions and data obtained through monitoring, but excluding confidential management specific information related to performance evaluations, salary negotiations, promotions, rotation and similar employment decisions.</p>						
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Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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A.5.2 Sensitive personal data

Human rights impact scenario

The registry handles sensitive personal data about employees without careful consultation of national and international laws on data protection.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
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Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has a commitment to protect sensitive personal data of its employees.						
b	The registry only gathers personal data that is lawful, proportionate and for a justifiable purpose.						
c	Employees are made aware of requests to access their sensitive personal data.						
d	The registry has in place an employee whistle-blower program through which employees can report concerns on the management of their personal data.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry comply with national and international laws on data protection in relation to gathering and handling sensitive personal data?						
A.6 Grievance Mechanism							
Right to a fair hearing							
Human rights impact scenario							
Employees are unable to file and resolve workplace grievances in a safe, transparent and fair manner.							
Probability (choose)	Describe key impacts and who is impacted (write text)					Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has a written procedure, agreed upon with employee representatives, for how employee grievances are received, processed and settled.						
b	The procedure is open to grievances concerning all employment- and workplace-related issues.						
c	All employees, including temporary or third-party employees, are able to use the procedure.						
d	Employees are clearly informed, in a language understandable to them, on how to use the procedure; what grievances can be reported; and how grievances are processed and resolved.						
e	Employees are able to lodge grievances confidentially and without fear of retribution by management or other employees.						
f	The grievance procedure is able to respond to cases of harassment by managers, including gender specific issues, such as sexual harassment.						

g There is committee responsible for hearing, processing, and settling grievances, and the committee has representation by employee representatives.

h An employee lodging a grievance is allowed to participate in hearings held with respect to that grievance and is informed of the outcome of the grievance resolution process.

Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry have a mechanism for hearing, processing, and settling grievances of employees?						

A.7 Forced Labour

Right to freedom from forced labour and servitude

Human rights impact scenario

Work from employees is obtained involuntarily and under real or perceived threat (e.g. Forced overtime, Recruitment fees, Money deposits and Retention of personal documents).

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry ensures that all employees receive employment contracts prior to starting work for the registry, and that contracts are understood by the employees.						
b	Notice periods are of reasonable length and clearly communicated to workers prior to starting employment.						
c	If letters of release or other documents are needed for the employee to leave employment, the registry issues such letters without delay.						
d	Within normal working hours employees are able to earn a living wage sufficient to meet the basic needs of themselves and their closest dependents.						
e	Overtime work is paid, voluntary and not compelled through threat of pay deductions, termination or other sanctions.						
f	All workers are allowed to leave registry premises during breaks and at the end of their shifts, and workers in registry housing may freely enter and exit their accommodation at any time.						
g	The registry (or its recruiting agencies) does not require workers to pay recruitment fees or lodge money deposits, and do not retain identity cards, passports, travel documents or other personal items without which employees cannot leave employment.						

h	Loans or salary advancements to employees are based on fair terms that are clearly explained to the employee, are not granted to cover basic living expenses, are limited in size, and do not require the employee to remain with the registry until repayment is completed.						
i	If the registry uses prison labour it ensures that all prison workers have been convicted by a court of law, and that the work is voluntary and supervised by a public authority.						
j	The registry ensures that it does not use labour from agencies or firms involved in human trafficking or other forms of bonded labour.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that it does not participate in any form of forced or bonded labour?						
A.8 Child Labour							
Rights of the child							
Human rights impact scenario							
Employment of children or minors (below the age of 15 years for full-time work and below the age of 18 years for hazardous work) occurs in the workplace.							
Probability (choose)	Describe key impacts and who is impacted (write text)					Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry does not employ workers under 15 years of age for full-time work, 13 years of age for light work and 18 years of age for hazardous work.						
b	If the registry employs minors below the age of 18, the registry has a list of job functions that can safely be performed by minors.						
c	The registry is aware of local age-levels for completion of compulsory education and does not employ workers under that age for work that may interfere with such education.						
d	The registry has a reliable procedure to check the age of young job candidates by birth certificate, other official forms of identification, or by alternative means such as physical appearance or knowledge of historic events.						
e	registry apprenticeship programmes do not constitute the main portion of the workforce, are limited in duration, are performed in conjunction with a school programme (or supervised by Labour Ministers or Labour Organisations), and do not interfere with the child's compulsory education.						

f If the registry becomes aware that it is employing young workers below minimum age, it ensures that they are enrolled in education programme, and that their dependents are compensated for the resulting loss of income.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry comply with minimum age standards?						

A.9 Promoting Diversity

The right to freedom from discrimination and harassment

Human rights impact scenario
People from certain societal groups do not have equal opportunities to gain employment or promotion in the registry or in certain positions in the registry.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
g						

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry recognize, value and promote the differences that individuals bring to its workforce?						

A.10 Non-Discrimination

The right to freedom from discrimination and harassment

Human rights impact scenario

Employment-related decisions are made on discriminatory grounds, and not on the basis of qualifications, skills and relevant experience. (Can be seen in practices related to: recruitment, compensation, access to training, employee benefits and services, promotion, termination or retirement. Grounds for discrimination can be: sex, race, colour, disability, religion or belief, sexual orientation, age, language, national or social origin, political or other opinion, trade union membership, marital, caste, health or any other status recognized by international law.)							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	It is company policy to ensure that decisions concerning hiring, wages, promotion, training, discipline, retirement and termination are based only on unbiased criteria.						
b	Each job category in the registry has a written description stating the salary level and the qualifications required for that job category.						
c	Employment advertisements do not reference discriminatory criteria, such as race, gender or age (unless listed as part of a legal equal opportunities promotion).						
d	Job applicants are not asked to give information about their marital status, pregnancy, intent to have children, number of dependents, or similar information that may lead to discriminatory hiring decisions.						
e	All hiring managers receive training regarding the company's non-discrimination policies.						
f	The registry has established a grievance mechanism, accessible and known to all employees, where employees can safely report incidents of workplace discrimination.						
g	The registry takes reasonable steps to enable qualified persons with disabilities or health conditions to gain employment opportunities with the registry, for example allowing wheel chair access, flexible working hours, longer breaks etc.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry ensure that employment-related decisions are based on relevant and objective criteria?						
A.11 Freedom of Association							
Right to freedom of association							
Human rights impact scenario							
The registry does not allow or facilitate the right of employees to organize and to bargain collectively, and employees are exposed to harassment or retaliation based on their organisational / trade union affiliation or non-affiliation (including in countries of operation where trade-unions are un-common and suppressed).							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
g						
h						
i						
j						
Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry recognise the rights of its workers to freedom of association and to bargain collectively?						
A.12 Workplace Health and Safety						
Right to work and to just and favourable conditions at work, Right to adequate health, Right to life.						
Human rights impact scenario						
Employees are exposed to unsafe or unhealthy working environments, resulting in accidents or personal injury.						
Probability (choose)	Describe key impacts and who is impacted (write text)			Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)	

Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has effective health and safety procedures in place, which comply with industry, national and international standards.						
b	Health and safety information and procedures are available to employees in a language they understand.						
c	Responsibilities for health and safety tasks are clearly defined.						
d	Health and safety incidents are reported and investigated, and a confidential procedure is in place for receiving and handling health and safety complaints from employees.						
e	The registry routinely monitors its production processes, machinery and equipment to ensure that they are safe and in good working order.						
f	Workers and managers are trained to respond to workplace emergencies; first aid kits and fire extinguishers are readily available; and escape exits are clearly marked and free from obstruction.						
g	The workplace is maintained to ensure clean and comfortable conditions including a suitable temperature, ventilation and lighting; suitable washing and sanitation areas appropriate for both genders.						
h	Residential or overnight facilities are safe and sanitary and meet the basic needs of workers including with regard to safety, space, temperature, lighting, ventilation, food, water, sanitary facilities, privacy, and affordability.						
i	The registry provides safe drinking water for all employees and facilities for clean and sanitary food storage and eating.						
j	Where relevant the registry has put in place special health and safety precautions for pregnant women, employees with disabilities, night workers, young workers and other vulnerable groups.						
k	The registry has a procedure to ensure that all employees are provided, free of charge or deposits, with the protective equipment and training necessary to safely perform their job functions.						
l	Employees are kept fully informed, in a language and form understandable to them, of any health and safety risks associated with their job functions, including requirements for protective equipment.						
m	At a minimum of every two years, and when assigned to new tasks, employees receive training by a knowledgeable expert in the safe use of equipment and processes, and an accurate record is kept of who has been trained and for what tasks.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry ensure that its workers are afforded safe, suitable and sanitary work facilities?						
A.13 Intellectual Property Rights							
Right to intellectual property							

Human rights impact scenario							
Employees are not compensated for inventions or other works generated in whole or in part by them.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry policy on ownership of the intellectual property rights for inventions or other works is agreed upon by employees and their representatives.						
b	The registry has an agreement with its employees about how intellectual property rights for products created or invented in whole or in part by employees are to be shared.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry obtain employees' informed consent and provide them with compensation for inventions or other works generated by them entirely or in part?						
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	As part of its due diligence processes, the company contacts the patent offices to obtain information about inventions it may wish to use.						
b	The company obtains authorization from patent holders before commercially exploiting any locally patented ideas or products.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the company obtain authorization from existing patent holder(s) before commercially exploiting any locally patented invention?						

B. Registries as Procurers of Goods and Services

Applies to Tier 1 suppliers, and to lower-tier suppliers where a significant part of their production goes to the registry.

B.1 Human Rights in Supply Chain Management

Human rights impact scenario

Human rights standards (e.g. on employee treatment, community impact and consumer rights) are not adequately promoted in interactions with suppliers and business partners

Probability (click below to choose option)

Describe key impacts and who is impacted (write text)

Assess numbers impacted (click to choose option)

Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
g						
Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry promote international human rights standards (e.g. employee, community and consumer rights) in its interactions with suppliers and business partners?						

a The registry has a commitment to promote the continuous improvement of human rights standards of its suppliers.

b The commitment is supported by training on human rights standards for relevant management and procurement staff.

c The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of abusive human rights conduct.

d The registry has defined minimum requirements for the human rights standards of suppliers and communicates these in writing to new and existing suppliers and business partners.

e Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of human rights standards.

f The registry's procurement practices, such as prices, delivery times and internal incentive structures, encourage improved human rights in suppliers and business partners.

g The registry collaborates with other companies to promote improved human rights standards in suppliers.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry promote international human rights standards (e.g. employee, community and consumer rights) in its interactions with suppliers and business partners?						

B.2 Hours, Wages, and Leave

Right to work and to just and favourable conditions at work, Right to rest and leisure, Right to adequate standard of living, Right to family life, Right to health

Human rights impact scenario

Supplier employees are exposed to:

- excessive working hours, excessive overtime and lack of rest periods;
- salaries that do not constitute a living wage sufficient to meet the basic needs of the employee and the employee's legitimate dependents; or
- lack of paid annual leave, paid sick leave and paid maternity leave.

Probability (choose)	Describe key impacts and who is impacted (write text)					Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning working hours, overtime, rest periods, wages and leave and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A		
	Does the registry promote labour standards on working hours, overtime, rest periods, wages and leave in its interactions with suppliers and business partners?						
B.3 Workplace Health and Safety							
Right to work and to just and favourable conditions at work, Right to health							
Human rights impact scenario							
Supplier employees are exposed to unsafe or unhealthy working environments, resulting in accidents or personal injury.							
Probability (choose)	Describe key impacts and who is impacted (write text)					Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning workplace health and safety and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take steps to ensure that employees of its suppliers are afforded safe, suitable and sanitary work facilities?						
B.4 Forced Labour							
Right to freedom from forced labour and servitude							
Human rights impact scenario							

Work from supplier employees is obtained involuntarily and under real or perceived threat (e.g. Forced overtime, Recruitment fees, Money deposits and Retention of personal documents).							
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning forced and bonded labour and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour?						
B.5 Child Labour							
Rights of the Child							
Human rights impact scenario							
Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 years for hazardous work).							
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning minimum age and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that its suppliers comply with minimum age standards?						
B.6 Non-Discrimination							
The right to freedom from discrimination and harassment							
Human rights impact scenario							

Supplier employees are exposed to harassment or employment related decisions made on discriminatory grounds, and not on the basis of qualifications, skills and relevant experience. (Can be seen in the registry related to employment, recruitment, access to training, employee benefits and equipment. Also training, recruitment, grounds for discrimination and employee development)							
Probability (choose)	Describe key impacts and who is impacted (write text)			Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)		
High							
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning non-discrimination and non-harassment and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that its suppliers prohibit harassment and base employment-related decisions on relevant and objective criteria?						
B.7 Privacy							
Right to privacy							
Human rights impact scenario							
Supplier workplace monitoring or collection of employee personal data occurs without the knowledge of supplier employees, without a justifiable purpose or in a disproportionate manner.							
Probability (choose)	Describe key impacts and who is impacted (write text)			Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning privacy and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of not meeting the privacy standards						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that its suppliers comply privacy standards?						
B.8 Intellectual Property Rights							
Right to intellectual property, right to security,							

Human rights impact scenario							
Employees of suppliers are not compensated for inventions or other works generated by them, entirely or in part.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning intellectual property and communicates these in writing to new and existing suppliers and business partners.						
b	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
c	The registry has considered a preference for free and open-source software and hardware to enhance security and reduce potential unforeseen intellectual property claims.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take all necessary measures to ensure that its suppliers comply with intellectual property rights standards?						
B.9 Community Impact							
Right to adequate health, Right to adequate standard of living							
Human rights impact scenario							
Environmental impacts of suppliers leading to health problems, reduced livelihoods and access to safe water for local communities occur.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning environmental impacts and hazards and communicates these in writing to new and existing suppliers and business partners.						
b	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of non-conformance with these requirements.						
c	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of these standards.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION

	Does the registry take all necessary measures to ensure that its suppliers have a procedure to assess and address the environmental impacts of its operations on the human rights of local communities?						
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C. Registries, the Environment, and Local Communities

C.1 Environmental Impacts

Right to adequate health, Right to adequate standard of living

Human rights impact scenario

Environmental impacts leading to health problems, reduced livelihoods or reduced access to safe water for local communities occur.

Probability (click below to choose option)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a	The registry follows international environmental standards or local law, whatever is the highest.					
b	Before starting new operations or developments, the registry conducts an impact study to assess the potential environmental and social impacts of the planned activities, including an assessment of their potential human rights consequences for local inhabitants or other affected communities.					
c	The registry has a method for identifying the individuals who are likely to be affected by such impacts and engages in consultation with those individuals, prior to, during and after carrying out the operations.					
d	The registry shares the findings of its social and environmental impact assessment studies with the affected individuals in a form and language accessible to them.					
e	In consultation with the affected individuals, the registry develops appropriate management plans to prevent, reduce and mitigate adverse social and environmental impacts.					
f	The registry continuously monitors its social and environmental impacts and provides affected individuals with regular access to updated information about the social and environmental impacts of registry operations.					
g	The registry has clear procedures in place for waste management, including e-waste management.					
h	The registry provides or collaborates in an accessible, effective, fair and transparent mechanism to receive and resolve grievances from potentially affected individuals.					

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry have a procedure to assess and address the impact of its operations on the human rights of local communities?						
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C.2 Security

Right to freedom from torture, or degrading treatment or punishment, Right to life, liberty and security of person

Human rights impact scenario

Local communities are exposed to harassment, intimidation, use of force or other improper treatment by private security guards, police or military providing security for company personnel or for assets that are owned, operated or used by the registry.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry regularly conducts security risk assessments, and ensures that company security arrangements, including the deployment of private guards or public security personnel, are proportionate to the security risk.						
b	Company security risk assessments include an assessment of the risk of human rights abuses by private and public security personnel in the country or areas of operation.						
c	The registry selects private security firms based on information about professional ability, level of staff training, quality of equipment, past involvement in human rights abuses, links with political factions or organisations and other relevant criteria.						
d	Contracts with private security firms include requirements related to international human rights standards for law enforcement and use of force; require the investigation and discipline of any unlawful or abusive conduct by security guards; and allow for termination of the contract in case of such conduct.						
e	There is a manual defining the duties of security personnel, and all security personnel receive training on rules of conduct based on international human rights standards for law enforcement and the use of force.						
f	Where public security personnel are assigned to company facilities, the registry seeks to ensure transparency concerning its interactions with public security agencies, and the registry communicates to the relevant public security agencies its desire that security functions be conducted in accordance with international human rights standards for law enforcement and the use of force.						
g	The registry has a procedure for recording security-related incidents, including a mechanism for handling complaints from staff or local communities related to the conduct of security personnel, and forwards credible allegations of human rights abuses to the relevant authorities.						
h	The registry has a procedure for monitoring and evaluating its security arrangements, including the proportionality of the security arrangement; impact on local communities; impact on existing local tensions or conflicts; security incidents recorded; and credible allegations of human rights abuses by registry security personnel. Representatives from the local community are consulted as part of the monitoring.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry take steps to ensure that company security arrangements are in accordance with international human rights principles for law enforcement and the use of force?						
C.3 Land Management							
Right to own property, Right to adequate housing, Right to adequate standard of living							

Human rights impact scenario																																														
Acquisition, leasing, or renting of land or property leads to improper displacement of owners, residents or users without adequate prior informed consultation or without adequate compensation.																																														
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)																																									
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C.4 Corruption and Bribery																																														
Right to access to information, Right to take part in in government																																														
Human rights impact scenario																																														
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)																																									
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e The registry has and promotes a function by which employees can safely report suspicion of corruption related cases (e.g. hotline or mailbox) and allocates resources to systematically address the issues that are identified.

f The registry evaluates the potential areas of corruption including factors such as type of transaction, countries of operation, industries, and customers or business partners involved.

g The registry evaluates the risk of corruption when employees, agents, intermediaries or consultants deal with public officials including employees of state owned companies.

h The registry evaluates the risk of internal and external conflicts of interest in relation to business partners and government officials including employees of state owned companies.

i The registry has developed an action plan to address the risk of corruption, and has defined responsibilities for each task including detailed policies for high-risk areas.

j The registry has identified the weakest spots of corruption within the registry and seeks to address these weaknesses in the prevention of corruption internal functions with the highest risk of corruption, and addresses weaknesses in the prevention of corruption.

k The registry shares experience, procedures and challenges of corruption with other organizations i.e. the local business community, sector initiatives, networks etc.

l The registry has initiated or joined initiatives with other companies in the same sector for the purpose of promoting a fair business environment.

m The registry stimulates multi-stakeholder dialogue on challenges of corruption.

n The registry encourages the local business community and business partners to initiate cooperation to fight corruption.

Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry evaluate and assess the risk of corruption when doing business?						

D. Registries as Providers of TLD and Other Domain Services (in-house or outsourced)

D.1 Acquiring TLDs

Right to freedom of expression, right to privacy, freedom of association, freedom from discrimination

D.1.1 Agreements with ICANN

Human rights impact scenario

The agreement between the registry and ICANN does not cover how the registry should align itself with human rights, including on issues such as freedom of expression and right to privacy, and in relation to the registry's terms and conditions.

Probability (click below to choose option)

Describe key impacts and who is impacted (write text)

Assess numbers impacted (click to choose option)

Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
------------	-----	----	-----	-----	----------------------------	------------------

a						
b						
c						
d						
e						
f						
g						

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Are relevant human rights issues a part of the agreement between the registry and ICANN?

D.1.2 Agreements with government

Human rights impact scenario

In the case of a ccTLD, the agreement between the registry and the corresponding government does not cover how the registry should align itself with human rights, including on issues such as freedom of expression and right to privacy, in its terms and conditions.

Probability (choose)

Describe key impacts and who is impacted (write text)

Assess numbers impacted (click to choose option)

Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
------------	-----	----	-----	-----	----------------------------	------------------

a						
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b	The agreement with the corresponding government includes a commitment to comply with the right to privacy of registrars and registrants.						
c	The agreement with the corresponding government includes a commitment to comply the right to freedom of expression of registrars and registrants.						
d	The agreement with the corresponding government includes a commitment to ensure the right to freedom of association of registrars and registrants.						
e	The agreement with the corresponding government includes a commitment to ensure the right to freedom from discrimination of registrars and registrants.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Are human rights integrated into the agreement between the registry and the corresponding government?						
D.2 Human Rights in Registrar Engagement							
Right to freedom of expression, right to privacy, freedom of association, freedom from discrimination							
D.2.1 Human rights in interactions with registrars							
Human rights impact scenario							
Human rights standards are not adequately promoted in interactions with registrars.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)				Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has a commitment to promote the continuous improvement of human rights standards of its registrars.						
b	The commitment is supported by training on human rights standards for relevant staff.						
c	The registry has defined minimum requirements for the human rights standards of registrars and communicates these in writing to new and existing registrars.						
d	The contract between registry and registrar commits registrars to avoid contributing to actions that may interfere with the right to privacy of registrants or other users, except where such actions are lawful, proportionate and for a justifiable purpose.						
e	The contract between registry and registrar includes a commitment to respect international human rights, such as the right to privacy, freedom of expression, freedom from discrimination and freedom of association.						
f	In relation to take downs and blocking of specific domains, the contract between registry and registrar commits registrars to respect the right to freedom of expression of registrants and other users, and to avoid contributing to actions that may interfere with this right, except where such actions are lawful, proportionate and for a justifiable purpose.						
g	The contract between registry and registrar commits registrars to maintain openness and the free flow of information over the internet except in few, exceptional, and limited circumstances prescribed by international human rights law, such as in the case of abusive or discriminatory content.						
h	The registry has in place procedures for ongoing monitoring of registrars' compliance with the requirements set out in the contract.						

i The contract between the registry and registrar contains provisions for the registrar to inform the registry in the case that the registrar is not willing to delegate specific domains on the basis of legitimate and reasonable grounds.

j The registry maintains an inventory of specific domains with limited availability to ensure wide availability of registration, and informs registrants of the availability of alternative options to register domains.

k If the registry chooses to limit the registration of domains, the delegation is in line with human rights and clearly communicated with appropriate due process.

Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry promote international human rights standards in its interactions with registrars?						

D.2.2 Human rights in contract terms with registrars

Human rights impact scenario

The registry does not require registrars to respect human rights in their engagement with registrants.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a The contract between registry and registrar includes a commitment to respect international human rights, such as the right to privacy, freedom of expression, freedom from discrimination and freedom of association.

b The contract between registry and registrar commits registrars to avoid contributing to actions that may interfere with the right to privacy of registrants or other users, except where such actions are lawful, proportionate and for a justifiable purpose.

c In relation to take downs and blocking of specific domains, the contract between registry and registrar commits registrars to respect the right to freedom of expression of registrants and other users, and to avoid contributing to actions that may interfere with this right, except where such actions are lawful, proportionate and for a justifiable purpose.

d The contract between registry and registrar commits registrars to maintain openness and the free flow of information over the internet except in few, exceptional, and limited circumstances prescribed by international human rights law, such as in the case of abusive or discriminatory content.

e The registry has in place procedures for ongoing monitoring of registrars' compliance with the requirements set out in the contract.

f In the case that there is a direct contractual relation between the registry and the registrant the contract is alignment with the registry commitment to human rights.

Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry set requirements on registrars to respect human rights in their engagement with registrants and other users?						

D.3 Providing Domain Names

Freedom of expression, right to privacy, freedom of association, freedom from discrimination, right to material gains from inventions and moral rights of authors

D.3.1 Contracts between registrar and registrant

Human rights impact scenario

Registrants are not clearly and openly informed about their contractual commitments to the registry or the registry's terms of service.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
		5.000 persons and above			Low		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry ensures that their terms of service are clearly and openly communicated in the contracts between registrars and registrants.						
b	The registry ensures that registrars communicate clearly and openly about contractual commitments between registry and registrants in their contracts with registrants.						
c	The contract between the registry and registrar includes provisions to ensure that the human rights commitments are conveyed to the registrant in a way that is easily accessible.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry ensure that registrars inform registrants about their contractual commitments to the registry, and about the registry's terms of service?						
D.3.2 Access to domains							
Human rights impact scenario							
Certain groups are fully or partly excluded from acquiring available TLDs, due to pricing or other obstacles.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry ensures that its own price setting of domains allows for equal access to its services.						
b	The registry engages with registrars to ensure that their prices are at a level that allows for equal access to acquiring domains.						
c	The registry engages with the registrar to ensure access to the domain for people with disabilities or language constraints impairing their use of the registrar platform.						
d	The registry ensures that the domains are widely available, accessible and affordable to all.						
e	The registry ensures that no registrant is excluded from access to a domain by the registrar, unless such exclusion is based on national law of the country of the registry.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry ensure fair and equal access to acquiring domains?						
D.3.3 Managing personal data							
Human rights impact scenario							
Personal data is collected, stored or used without a clearly defined purpose, in an unlawful or unsafe manner, or without the informed and continued consent of registrants.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)			Severity of consequences for impacted people (click to choose option)		

Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Personal data is collected for a specific and clearly defined purpose. The registry has mechanisms to ensure that data is accurate, complete and kept up-to-date.						
b	The registry has processes to ensure that personal data is deleted when it is no longer necessary to fulfil the purposes for which it was collected, except if the data is strictly necessary for operational purposes.						
c	The registry has measures to prevent that personal data is disclosed, made available or otherwise used for purposes other than those for which it is collected; except with the consent of the registrant or user, or by the authority of law.						
d	Data is only used to identify user patterns in an anonymized form.						
e	Employees have a duty of confidentiality by law and written agreements regarding non-disclosure.						
f	Personal data is protected by reasonable security safeguards against such risks as loss or unauthorised access, fraud, destruction, use, modification or disclosure of data. Any breach in security or in the confidentiality of personal data are remediated within 24 hours, if at all possible.						
g	Security audits are continuously conducted to ensure implementation of corrective actions (e.g. in case of security incidents) and to maximize compliance with privacy and data protection policies and guidelines.						
h	Registrants and users may obtain information about data relating to him/her; have those data communicated within a reasonable time in an inexpensive and reasonable manner; be able to challenge data relating to him/her and, if the challenge is successful, have the data erased or rectified.						
i	There is a general policy of openness about practices and policies with respect to personal data. Means are readily available of establishing the nature of personal data collected, the main purposes of their use, and the identity of the data controller.						
j	Registry services that include privacy settings are by default set to maximize the privacy protection of the registrant and/or user. The registry provides clear information and warnings to registrants and users, including minors, of the potential consequences of changes they make in their default privacy settings.						
k	The registry is aware of and complies with relevant national laws, international guidelines, and industry standards regarding the transfer of personal data.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Does the registry respect the privacy of registrants and other users, and protect their personal data?						
D.3.4 Security in services and operations							
Human rights impact scenario							
Services provided by the registry are not secure due to lack of precautionary measures.							
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)				Severity of consequences for impacted people (click to choose option)	

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
g						
h						
i						

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry apply sufficient and appropriate measures, including newest standards and technologies, to ensure the security of its services and operations?						

D.4 Maintaining Domain Names

Right to freedom of expression, right to privacy, freedom of association, right to security

Human rights impact scenario

Personal data is compromised due to system malfunction or security breach.

Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
g						

h	The registry has a system in place to mitigate attacks against the TLD (e.g. amplification attacks).						
i	The registry has systems in place to mitigate infrastructure abuses (e.g. malware, botnets etc.).						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry a system in place to ensure the ongoing maintenance and function of the TLD?						
D.5 Amending / Transferring Domain Names							
Right to freedom of expression, right to privacy, freedom of association, right to security							
Human rights impact scenario							
Registrants are unable to amend or transfer their domains.							
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has in place a system to easily amend and transfer domains.						
b	Any transfers or amendments are done with permission by the registrant and in line with human rights standards and applicable national laws that govern the Registry.						
c	Registrars are required to file amendments to the system of the registry.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry have a system in place to transfer domains in a way which aligns to national regulation and in accordance with human rights standards?						
D.6 Engaging with Third Parties							
Right to freedom of expression, right to privacy, freedom of association, right to security							
D.6.1 Interference with the right to privacy							
Human rights impact scenario							
Personal data is accessed, disclosed or monitored in a manner which is unlawful, disproportionate or in breach of international human rights principles.							
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)	
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The registry has a policy commitment to comply with relevant international and regional standards on privacy and data protection.						
b	Registrants are informed about circumstances in which the registry is under a legal obligation to reveal their identification, connection or traffic data by request from government agencies.						

c	The registry has a commitment to evaluate any internal or external request - including government requests - that may interfere with the registrants' or users' right to privacy according to international privacy standards, e.g. to monitor or access personal data.								
d	The registry requires details regarding the necessity and justification for any restrictive request. Requests are required in written form, if at all possible.								
e	Procedures to be followed in case of a request that interfere with registrants' or users' right to privacy are clearly described and included in relevant company guidelines / instructions.								
f	Any legitimate request that interfere with the right to privacy is narrowly interpreted and enforced in the shortest time period possible.								
g	When requests appear to be in conflict with international standards on privacy the registry has processes to seek judicial review in accordance with established international treaties, guidelines, or other resources.								
	Registrants, government authorities, and other relevant stakeholders are notified in the event of data breach or unauthorized processing of personal data.								
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS		FOLLOW-UP ACTION	
	Does the registry avoid contributing to actions that may interfere with the privacy of registrants and users, except where such actions are lawful, proportionate and for a justifiable purpose?								
D.6.2 Interference with the right to freedom of expression									
Human rights impact scenario									
Registrants or users are barred from communicating, seeking or imparting information in a manner, which is unlawful or disproportionate or in breach of international human rights principles.									
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)			
Indicators		YES	NO	F/A	N/A	COMMENTS		FOLLOW-UP ACTION	
a	The registry has a commitment to international and regional standards on freedom of expression.								
b	The registry will as the general rule maintain openness and the free flow of information over the internet except in few, exceptional, and limited circumstances prescribed by international human rights law, such as abusive or discriminatory content.								
c	The registry has a commitment to evaluate any internal or external request to conduct an intentional take down a specific domain according to international standards on freedom of expression. The registry requires details regarding the necessity and justification for any restrictive request. Requests are required in written form, if at all possible.								
d	In case of taking down or blocking of specific domain, this is based on a decision by a competent judicial authority or a body that is independent of any political, commercial or other unwarranted influence. The decision can be reviewed by an independent and impartial tribunal or regulatory body in accordance with the requirements of Article 6 of the European Convention on Human Rights.								
e	Procedures to be followed in case of a request to restrict a domain service are clearly described and included in relevant company guidelines / instructions.								
f	Any legitimate request that interfere with the right to freedom of expression is narrowly interpreted and enforced in the shortest time period possible.								

g
h
i

When requests appear to be in conflict with the international standards on freedom of expression, the registry has processes to seek judicial review, appeal to relevant branches of the administration, and engage with relevant bodies or other stakeholders, including from civil society, for advice and support.

The registry considers, as the general rule, requests to completely disconnect registrants from access to their TLD to be disproportionate and in violation of human rights principles, regardless of the justification provided, including on the grounds of violating intellectual property rights law.

The registry has processes to ensure that it will not interfere with the registrants' and other users' freedom to access content and use applications of their choice, unless such interference is strictly necessary and proportionate to safeguard the integrity and safety of the domain or service, execute a court order, or comply with a written request from the registrant or user.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry have a commitment to respect the right to freedom of expression of registrants and users, and to avoid contributing to actions that may interfere with this right, except where such actions are lawful, proportionate and for a justifiable purpose?						

D.7 Terminating Domian Names

Right to freedom of expression, right to privacy, freedom of association, right to security

Human rights impact scenario			
Registrants are not given prior notice about the termination of their access to the TLD.			
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry ensure that registrants are informed about the procedure for termination?						

D.8 Grievance Mechanisms and Resolution

Right to remedy, freedom of expression, right to privacy, freedom of association, right to non-discrimination

Human rights impact scenario			
Registrants and domain users are not provided access to mechanisms to raise grievances and achieve remedy.			
Probability (choose)	Describe key impacts and who is impacted (write text)	Assess numbers impacted (click to choose option)	Severity of consequences for impacted people (click to choose option)

Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	Registrants and users, including minors, are provided with effective, safe, confidential and transparent mechanisms for voicing and resolving concerns relating to human rights issues.						
b	Subject to legal restrictions, registrants and users, including minors, who have been subject to interference with their rights is provided with advice on how and where they may respond.						
c	The registry provides for (or collaborates in) the swift, fair and comprehensive investigation and remediation of registrant or user complaints.						
d	The registry provides independent mediation or complaint body in the case that a registrar or registrant does not agree with a decision made by said registry.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry have a mechanism (or mechanisms) in place to receive, process and address grievances of registrants and other domain users?						
D. 9 Transparency							
Right to freedom of information							
Human rights impact scenario							
	Registrants and domain users are unable to access information on the human rights related commitments, policies, procedures and performance of the registry.						
Probability (choose)	Describe key impacts and who is impacted (write text)				Assess numbers impacted (click to choose option)		Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry's policies on human rights are explained to registrars, registrants, and users in clear language and an accessible form, taking into account for example people, with disabilities, children, elderly and ethnic minorities.						
b	Requests that interfere with registrants' or users' right to privacy or freedom of expression are documented and communicated to customers and other relevant stakeholders to the fullest extent possible. Subject to legal restrictions, affected registrants and users are informed about the procedure for the request, as well as the action taken.						
c	Subject to legal restrictions, the registry publicly reports data by country on the number and character of requests received, e.g. to monitor or access registrants' or users' data or restrict domain services, and how it has responded to these requests.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry allow registrants, domain users and other interested stakeholders to access information on registry commitments, policies, procedures and performance on human rights?						

E. Due Diligence Questions

F.1 Assessing Impacts

Indicators	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a						
b						
c						
Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry identify and assess the risk of contributing to adverse impacts on the international human rights?						

F.2 Addressing Impacts

Indicators	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a						
b						
c						
d						
e						
f						
Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry have systems and organisational capacity in place to address potential adverse impacts on international human rights?						

F.3 Government Requests

Indicators	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a						

b	In complex cases, the assessment includes engagement with independent experts, human rights groups, and others with specific knowledge on national laws and regulation.						
c	Governments are requested to provide details regarding the necessity and justification for any restrictive request. Requests are required in written form, if possible.						
d	When government requests appear to be in conflict with human rights standards on freedom of expression or the right to privacy, the registry has processes to seek judicial review, appeal to relevant branches of the administration, engage with relevant UN bodies or other stakeholders, including from civil society, for advice and support.						
e	Any measure that interferes with the right to freedom of expression is taken on the basis of a specific decision by a state authority expressly empowered by law to do so.						
f	Government requests that appear inconsistent with human rights law are addressed by senior level management to decide on the risks of responding vis-a-vis rejecting the request. National and international resources, including industry peers, are engaged to the extent possible.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Does the registry have procedures in place to handle government requests to prevent interference with the rights to privacy and freedom of expression?						
F.4 Tracking Compliance							
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Periodic audits are conducted to assess compliance with the registry's principles on human rights. These audits include feedback from registrants and other potentially affected stakeholders.						
b	Suppliers and business partners are held contractually accountable for compliance with the registry's principles on human rights. An effective programme is in place to monitor compliance and ensure corrective action.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Does the registry have systems in place to track compliance with its principles on human rights?						
F.5 Communication and Reporting							
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The registry's policies on human rights are explained to registrars, registrants and users in a clear and accessible form and language, taking into account for example people with disabilities, children, elderly and ethnic minorities.						
b	Requests that interfere with registrants' or users' right to privacy or their right to freedom of expression are documented and communicated to customers and other relevant stakeholders to the fullest extent possible. Subject to legal restrictions, affected registrants and users are informed about the procedure for the request, and the action taken.						

c	Subject to legal restrictions, the registry publicly reports data by country on the number and character of requests received, e.g. to monitor or access registrants' or users' data or restrict domain services, and how it has responded to these requests.						
d	In case a registrant or user tries to access specific content which has been blocked, they are provided with an explanation of why the content is blocked including contact details.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Does the registry communicate and report on its efforts to uphold international principles on human rights?						
F.6 Access to Remedy							
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Registrants and users, including minors, are provided with effective, safe, confidential and transparent mechanisms for voicing and resolving concerns relating to human rights issues.						
b	Subject to legal restrictions, registrants and users, including minors, who have been subject to interference with their rights are provided with advice on how and where they may respond.						
c	The registry provides for or collaborates in the swift, fair and comprehensive investigation and remediation of registrant or user complaints.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Do registrants and users whose rights may be affected by the registry's systems, products or services have access to safe, effective and fair remedies through which potential impacts can be reported, investigated and remediated?						