

Comment

"While am in agreement that ICANN should be allowed to determine the appropriate measures and mechanism of implementing the diversity group recommendations. I am also in agreement that ICANN should have an office of diversity that would ensure ICANN comply and work inline with the recommendations except the roles would be designated to one of the offices within ICANN."

While I recognize that each SO/AC has their own challenges and should design their own diversity strategies and objectives, I'm concerned that the lack of external oversight will only lead to inertia and / or self-congratulation. If ICANN staff only is responsible for publishing an annual report on diversity, the report will probably not propose anything new or any ambitious objective to enhance diversity.

Is there any solution?

There are various available options to enhance external oversight for these diversity strategies and reports. One of them is to create a diversity office. Another option would be to have an advisory panel on diversity, with people coming from SO/ACs and in charge of coordinating the staff efforts to draft a global annual report on diversity. The panel could also propose objectives or best practices to SO/ACs, and analyze the gaps between AC/SOs strategies and results. By the way, the Ombudsman sub-group proposes in its recommendations to create an Ombudsman advisory panel with similar views. That could be of interest to the diversity subgroup.

The RySG agrees with the majority of the sub-group that the implementation of the recommendations within ICANN should be left to the ICANN organisation and that there is no need to recommend the establishment of an Office of Diversity.

ROUGH TRANSLATION -The French Government Fears that the lack of comprehensive oversight will hinder the development of a coherent and long-term diversity policy. In fact, to the extent that the report recommends that each SO/AC identify its own Objectives and develops its own strategy In terms of diversity, The risk of fragmentation and contradictory measures between the different so/AC may adversely affect the management of diversity policy as a whole if no supervisory authority at the ICANN level as a whole exists. Thus, the French Government, as well as many members of the community, remainsnt Convinceds The need to set up a Independent dedicated body to oversee global policy Of Diversity As is Mentioned In recommendation 8 of the report. Indeed, the Members of the sub-group proposed to create an office for diversity within ICANN to the image Many public organizations and private in the world Who have chosen this path. Some members of the sub-group opposed The creation of the Bureau of Diversity on the one hand, that such an instance would entail financial costs and, on the other hand, That this jurisdiction was the responsibility of ICANN staff. Yet the French government thinks that only An autonomous and dedicated entity, WhatThe That Its name (Office, Advisory Group... etc.), is able to drive efficiently and independently An ambitious diversity policy because the members of this entity will be The otherNot related to a group or To the staff of theIcann. Indeed, it is essential that the structure in charge of diversity policy is independent in order to protect itself from any conflict of interest. If a Dedicated office within ICANN is the best way for the French government and many members of the community, it is indispensable, in a constructive spirit, to advance on other possibilities on the form, not on the principle, that could take this structure like that Of Create a GROUP Advisory Committee on diversity within the OMbudsman ICANN, which is now And already a neutral and independent body.

We understand from the report that there are a small number of participants that are advocating for the establishment of an Office of Diversity, and that no recommendation has been issued from the CCWG on this topic. The report identifies that the role of this office would be to independently support, record and keep track of issues including complaints from the community on diversity issues within the organization, and could include the reporting responsibilities.

The idea of this office is not fully defined. It is not clear how this structure would be implemented, what resources would be required to establish and maintain this office, or how to address the overlapping responsibilities that are already handled within ICANN. Given the lack of clarity around this office, lack of consensus support within the subgroup (and presumably within the CCWG-Accountability and the broader community), and noting the previously-mentioned budget and funding constraints and considerations, the Board is not in a position to accept this item if it were to be presented as a formal consensus-based recommendation in the final WS2 report.

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There are various available options to enhance external oversight for these diversity strategies and reports. One of them is to create a diversity office. Another option would be to have an advisory panel on diversity, with people coming from SO/ACs and in charge of coordinating the staff efforts to draft a global annual report on diversity. The panel could also propose objectives or best practices to SO/ACs, and analyze the gaps between AC/SOs strategies and results. By the way, the Ombudsman sub-group proposes in its recommendations to create an Ombudsman advisory panel with similar views. That could be of interest to the diversity subgroup.

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The SSAC also notes the specific request to provide further input and comment on the concept of establishing an Office of Diversity to independently support, record and keep track of issues including complaints from the community on diversity issues, rather than have this function performed by existing ICANN staff. The SSAC is not convinced of the necessity for a dedicated and independent Office of Diversity and is concerned about the cost of resourcing such an office. A preferred approach is to review the support provided by ICANN staff after an initial 12 month period and assess whether issues have arisen that would justify the implementation of an Office of Diversity.

Across the recommendations, the implementation will require resources and support from across the ICANN Community, as every ICANN SO and AC must participate in this effort in order to achieve full implementation. While ICANN organization can produce reports and make items available on the websites, etc., the component SOs and ACs must modify their work practices in order to meet many of the recommendations. ICANN organization cannot impose this change

Because it is not possible to cater for the wide diversity of languages, at least people who are not fluent English speakers should understand the English used as the working language of ICANN. This is why efforts to improve the quality of ICANN documents and presentation in order to enable informed, inclusive and meaningful participation are important also from a diversity point of view.

In order to communicate with a diverse community, it is necessary to explore other ways and means to bridge cultural and language barriers (in addition to translations), e.g. infographics, animations, videos that are langue-neutral or which can be localized by communities in their own cultural contexts. Infographics and pictures need to be accurately described in the meta tags or text attached to the picture so screen readers that are used by the visually impaired can understand and describe the picture.

Captioning is a particularly useful tool to help people whose native language is not English and for those with disabilities. It would also help those whose remote participation at ICANN events is hampered by low bandwidth in areas where they live. The use of captioning should be extended to all groups and constituencies who want it, and efforts should be made to improve its accuracy.

With respect to language diversity, the BC offers a few comments:

- a) While supporting the objective of broader inclusiveness when it comes to language diversity as the BC as business users are very familiar with the challenges of language as a barrier to engagement, however, the BC notes that ICANN should adopt a reasonable and best efforts approach beyond the official languages of the United Nations. As pragmatic business leaders, the BC notes that not even the budgets of the UN organizations support every language in the world; and most working meetings are conducted in English, with translation and interpretation limited to the official UN languages.
- b) Still, ICANN has a unique accountability related to the IANA functions and also supporting IDN services. Thus, some unique support may be required in fulfilling such functional responsibilities, and may require focused translation of materials.
- c) The BC acknowledges that each community can do more to address the barrier of language, but only when financial resources or human resources are available. As an example, the BC does not have human or financial resources to translate all website/policy submissions or to conduct its meetings with interpretation, or translate all other materials into all of the six UN official languages. So the BC takes a targeted approach to support engagement, and translates its outreach materials into languages most relevant to the ICANN meeting, and when conducting outreach activities, into the most prevalent language relevant to said event, often using ICANN support, but also using volunteer resources from members. As appropriate, and as resources have allowed, the BC has also translated into the local language, while recognizing that the working language of ICANN, as with the UN organizations, is English. Having said that, the BC supports ICANN efforts to translate into the six UN languages, and where specific issues indicate a requirement, e.g. the IANA functions additional translations.
- d) Both translation and interpretation are needed, and present significant cost implications for ICANN. Thus the BC suggests that this recommendation be tempered with respect for what is practical, and what is essential for fulfilling ICANN's core mission and activities.

"I think the draft should emphasize the SO / AC membership process and a recommendation could be included and dedicated to accountability and diversity in the SO / AC membership process. Indeed some weakness could be easily noted when analyzing the membership process in some charters of some SO/AC or ICANN bylaws.

The membership process of the SSAC and RSSAC for example need to be more accountable , transparent and divers :

-It's not admissible in our days that the board appoint all the Member of SSAC based only on SSAC members recommandations without any transparent criteria , what I suggest that an independent committee could be elected , based on the 7 key elements of diversity defined by recommandation 1, and assigned the role of appointing the member of the SSAC.the member of the SSAC.

-The committee whose appointed RSSAC Caucus Members should be also Independente and elected based on stackholder and regional representativity. "

comment regarding diversity of business entities It is the belief of the BC that businesses of all sizes and specialties are affected by ICANN's policies and the consequences that those carry for their online presence. In this sense, we would like to reinforce the idea that not only is it important to have diversity of stakeholders, but also to find a broader diversity within those groups. As far as commercial users are concerned, the involvement of large corporations along with SMEs and class entities is vital to gather a variety of views that comes close to reflecting a shared set of values that can be called both global and beneficial to as many businesses as possible. It is our desire to continue increasing collaboration with the ICANN organization to reach a broad variety of actors, and to always become more representative of the many ventures we speak for.

To note, though, there may be competing privacy interests that may weigh against ICANN's (or the other SO/AC/group's) ability to collect diversity information. For example, in June 2017, ICANN organization expanded its diversity questionnaire as part of its meeting registration process, in part to try to start collecting information along the lines of the diversity elements noted in the Subgroup's work report. However, concerns were quickly raised on the propriety of collecting some of the information, and ICANN responded to community concerns and removed the new questions.

It would be helpful to understand how privacy interests were considered as part of the development of these recommendations. The availability of a "prefer not to respond" option in various collection vehicles may mitigate the impact, but could also have implications for the effectiveness of data collection efforts to achieve the goals set out in the subgroup's report. In addition, in light of GDPR and other similar laws and regulations, the concept of creating databases to store information on personal characteristics could become unworkable.

1. There may be need to indicate the timing during the year by which the diversity criteria should have been published and updated on the SO/AC websites. It will also be useful to note that at a minimum, annual updates will be made to the SO/AC websites, after the initial publication.
2. The fulfillment of 1 above may be tied to an important ICANN event for which SO/AC are active participants and/or beneficiaries, such as the AGM, which provides a date well known to the full ICANN community, well ahead of time.

While supporting the recommendations for enhancing diversity as a whole, we want to focus on Language, which is one of the seven elements of diversity identified by WS2.

The sub-group report recognizes the value of diversity and proposes a broad definition, including various criteria: Language; Gender; Age; Physical Disability; Diverse skills; Stakeholder group or constituency. The report proposes that SO/ACs assess themselves against diversity criteria and publish an annual report. ICANN staff would then publish a global annual report on diversity based on the AC/SOs' reports. AC/SOs are encouraged to take actions and design strategies to become more diverse.

The BC endorses all the recommendations of the sub-group on CCWG-Accountability -WS2. However, the BC provides the following comments:

The sub-group report recognizes the value of diversity and proposes a broad definition, including various criteria: Language; Gender; Age; Physical Disability; Diverse skills; Stakeholder group or constituency. The report proposes that SO/ACs assess themselves against diversity criteria and publish an annual report. ICANN staff would then publish a global annual report on diversity based on the AC/SOs' reports. AC/SOs are encouraged to take actions and design strategies to become more diverse.

The sub-group report recognizes the value of diversity and proposes a broad definition, including various criteria: Language; Gender; Age; Physical Disability; Diverse skills; Stakeholder group or constituency. The report proposes that SO/ACs assess themselves against diversity criteria and publish an annual report. ICANN staff would then publish a global annual report on diversity based on the AC/SOs' reports. AC/SOs are encouraged to take actions and design strategies to become more diverse.

While there are no associated security and stability aspects, the SSAC does wish to thank the Diversity Sub-Group for its effort and for this comprehensive report. The SSAC is generally supportive of the recommendations and notes the observation that the elements of diversity identified in the report may have varying importance in different contexts, situations or groups within ICANN.

The IPC notes its support for Recommendation 1. Enhancing diversity through each of the seven key elements discussed in the Draft is essential to the success of ICANN.

The NCSG affirms the seven key elements of diversity, as identified by the subgroup, as being the baseline for all diversity considerations within ICANN. However, we would like to be clear that this is the baseline and not an exhaustive list, and with the passage of time, there should be a clear mechanism in place to extend, modify, and update this set of criteria. Indeed, it is far from apparent that this list is even adequate today, with obvious elements of diversity absent (for instance, sexual orientation, ideology, or religion). To update the criteria, the self-identification of communities could be contemplated. Self-identification allows one to identify a need to diversify the community based on an element not listed in the baseline, and such aspects which could be temporary or strategic (for instance, refugees, indigenous people, among others). Further discussion is required on how we can ensure that the common framework for diversity is one which remains fit for purpose.

In order to ensure that the attribute of language, identified by the subgroup as a key element of diversity, is represented within ICANN, we encourage the use of translation and interpretation into the UN languages as much as possible. At present, this happens consistently for GAC and ALAC meetings, the Public Forum, and some Board meetings; however, there is a need for translation and interpretation in other meetings as well. That there is not currently a perceived need for these services is more a reflection on a lack of diversity than a sign that there is no need at all for language assistance.

The language of Recommendation #1 seems to imply or point at the formal acceptance of the key elements of diversity by the different SO/AC/Groups. The RySG suggests amending the language in line with the other recommendations to 'SO/AC/Groups should agree ...'

ROUGH TRANSLATION - First, a multidimensional definition of diversity could be established taking into account both the criteria for geographical and regional representation, language, gender, age but also elements related to the physical condition and components of the Community (recommendation 1 and 4). This Broad definition Of diversity will help to understand the complexity of this phenomenon and to include all situations.

Recommendation #1 & #2: Although it has been stated that SO/AC/groups agree that the 7 key elements of Diversity can be used as a common starting point for all Diversity considerations within ICANN, the following aspects/dimensions may also additionally be taken into account:

Race

Ethnicity

It is imperative to ensure diversity in SO/AC/Groups. While speaking of diversity, the importance of 'Geographic Diversity' cannot be overstated. Therefore, it is strongly recommended that geographies (countries) where the largest number of internet users come from should be provided with voting rights and membership proportionate to the legions of internet users they seek to represent. Furthermore, each SO/AC must ensure equitable representation from each geography in proportion to the number of internet users that they represent. (long response please see document for complete text)

As a global organization, diversity is extremely important to the ICANN Board and ICANN organization, and as such we support these recommendations as written. However, with regard to these recommendations, it is important to note the following elements specific to the Board and ICANN organization.

INTA supports the CCWG-Accountability WS2's recommendation that diversity should be defined using key elements employed as a common starting point for all diversity considerations within ICANN. (See Draft Diversity Report at page 4.) Currently, the 7 key elements as identified in the Draft Diversity Report are: 1) Geographic/regional representation, 2) language, 3) gender, 4) age, 5) Physical Disability, 6) Diverse Skills, and 7) Stakeholder group or constituency. While INTA supports with the concept of identifying key elements, the elements themselves appear to exclude certain factors that should be considered. Specifically, INTA notes the exclusion of ethnicity, race/national origin, minorities (as applied to a particular geographic area or region) and underrepresented groups. For example, there may be certain people in a country, e.g. New Zealand, who are considered underrepresented in that country based on their race or ethnicity. However, under the factors as set forth in the Draft Diversity Report, such person would not be considered as "diverse" under the definition of diversity as they would not fit within the 7 enumerated categories.

The IPC supports the Draft's recommendations for SOs/ACs (Recommendations 2-5), and notes that the support of ICANN staff will be important so that our volunteer membership and participation recruitment structures can successfully tackle each Recommendation.

Across the community, every SO/AC should be committed to upholding ICANN's diversity principles and associated policies and practices. Accordingly, it is our strongly held view that all SO/ACs must address all of the identified key elements of diversity. There is no justifiable reason for a charter to consider some criteria but not others.

With respect to Recommendations #2, #3, #4 and #5, it would be ideal to specify timelines or a process that defines timelines for SOs/ACs/Groups to complete initial assessments, create baselines and then publish the results on their official web sites before the data could be used further.

ROUGH TRANSLATION - the recommendation to measurer Diversity through updated, complete and published figures Is Also a positive step (recommendationS 2).

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(summary – please see the original comment for the complete text) The ICANN Board presents three main concerns with this recommendation:

- Although it fully supports diversity for the Board it is very limited as to what it can do to improve diversity beyond what is included in the Bylaws with respect to this
- Although it fully supports diversity for staff it is significantly constrained as to what it can do to improve diversity in this area by employment laws in the various countries where it operates
- As noted in the privacy concern ICANN may be significantly constrained as to what information it can collect and keep with respect to diversity by various privacy laws.

INTA generally agrees that each SO/AC/group should identify which elements of diversity are mandated in their Charters or ICANN Bylaws and any other elements that are relevant and applicable to each of its levels including leadership (“Diversity Criteria”) and publish the results of the exercise on the official websites. INTA believes this will lead to further transparency in diversity efforts and may alert the ICANN community to issues of diversity within the overall structure.

The IPC supports the Draft’s recommendations for SOs/ACs (Recommendations 2-5), and notes that the support of ICANN staff will be important so that our volunteer membership and participation recruitment structures can successfully tackle each Recommendation.

It is inefficient and possibly ineffective to permit each SO/AC to define its own metrics for assessing diversity. We believe a common, basic toolkit of criteria, metrics, and a score card would make it easier to fairly compare diversity levels within the ICANN community and how they change over time. Targets and goals for an appropriate baseline of diversity should also be set in order to know where to increase efforts for diversity promotion.

With respect to Recommendations #2, #3, #4 and #5, it would be ideal to specify timelines or a process that defines timelines for SOs/ACs/Groups to complete initial assessments, create baselines and then publish the results on their official web sites before the data could be used further.

In particular, recommendations 3 and 4 which propose that each SO/AC establish a clean evaluation compared to the criteria of various committees and publishes an annual report will help to better identify within the community components the priority actions.

Recommendation #3, #4 & #5: While appreciating the recommendation for each SO/AC/group, supported by ICANN staff for undertaking annual update of their diversity assessment against their Diversity Criteria and objectives at all levels including leadership, publishing these on their official websites and using this information to review and update their objectives, strategies and timelines, more information in the draft recommendations should have been provided regarding the criteria, structures and the processes for undertaking such update of objectives, strategies and timelines.

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- As noted in the privacy concern ICANN may be significantly constrained as to what information it can collect and keep with respect to diversity by various privacy laws.

INTA generally agrees that each SO/AC/group, supported by ICANN staff, should undertake an initial assessment of their diversity for all of their structures including leadership based on their Diversity Criteria and publish the results on their official website. However, if the SO/AC/group does not have their own Diversity Criteria, INTA would recommend that the SO/AC/group use the Diversity criteria as set forth in the Draft Diversity Report as an initial guideline for such inquiry.

The IPC supports the Draft’s recommendations for SOs/ACs (Recommendations 2-5), and notes that the support of ICANN staff will be important so that our volunteer membership and participation recruitment structures can successfully tackle each Recommendation.

We recommend that the diversity assessments be designed to be undertaken on a regular basis without placing undue burden on SO/AC/Groups. ICANN’s support is required to ensure that these assessments are conducted within a reasonable time frame (avoiding delays and postponement) and, recognising that most SO/AC/Groups are not experts in fostering diversity, that ICANN staff deliver expert assistance in devising relevant diversity strategies and contracting external experts when needed.

With respect to Recommendations #2, #3, #4 and #5, it would be ideal to specify timelines or a process that defines timelines for SOs/ACs/Groups to complete initial assessments, create baselines and then publish the results on their official web sites before the data could be used further.

ROUGH TRANSLATION - First, a multidimensional definition of diversity could be established taking into account both the criteria for geographical and regional representation, language, gender, age but also elements related to the physical condition and components of the Community (recommendation 1 and 4). This Broad definition Of diversity will help to understand the complexity of this phenomenon and to include all situations. In particular, recommendations 3 and 4 Which propose that each SO/AC establish a clean evaluation Compared to the criteria of various Ittee and publishes an annual report will help to better identify within the community components the priority actions.

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- Although it fully supports diversity for staff it is significantly constrained as to what it can do to improve diversity in this area by employment laws in the various countries where it operates
- As noted in the privacy concern ICANN may be significantly constrained as to what information it can collect and keep with respect to diversity by various privacy laws.

INTA generally agrees that each SO/AC/group should use the information from their initial assessment to define and publish on their official website their Diversity Criteria objectives and strategies for achieving these, as well as a timeline for doing so.

The IPC supports the Draft's recommendations for SOs/ACs (Recommendations 2-5), and notes that the support of ICANN staff will be important so that our volunteer membership and participation recruitment structures can successfully tackle each Recommendation.

We support the periodic reassessment and monitoring of diversity, provided it does not place an undue burden on the SO/AC/Group. We believe such assessments are best conducted by the ICANN organisation, who can procure expertise in this area, involving the SO/AC/Groups in the process.

With respect to Recommendation #5 (that each SO/AC/Group, supported by ICANN staff, undertake an annual update of their diversity assessment following their initial assessment), the RySG suggests that an annual update would be too frequent, especially given the demands on volunteer-time and effort. It bears noting that the RySG is composed of a finite number of companies contracted with ICANN, that each of those companies decides who it sends that represents them, and that the creation of new registries is stalled while policy development for a subsequent gTLD round is ongoing. These factors limit the ability for the stakeholder group to impact diversity, particularly on a condensed timeline as contemplated in the report.

While there are RySG actions that touch on diversity, it seems that discretion should be allowed among the groups with possibly an overall timeframe (biennial or longer) suggested as the outside target timeline.

ROUGH TRANSLATION -This approach encourages AC/SO To Take action and develop strategies to become more diversified (recommendation 5) will allow ICANN, as a whole, to develop a coherent diversity policy.

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INTA generally agrees that each SO/AC/group, supported by ICANN staff, should undertake an annual update of their diversity assessment against their Diversity Criteria and objectives at all levels including leadership. Such results should be published on the official website and should be used to review and update objectives, strategies and timelines.

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- As noted in the privacy concern ICANN may be significantly constrained as to what information it can collect and keep with respect to diversity by various privacy laws.

The IPC supports the proposed actions by ICANN staff in Recommendations 6-8 to support diversity in ICANN across each of the categories identified on page 11 of the Draft. Greater data collection (e.g., through Statements of Interest), and the development of an Annual Diversity Report will be important steps forward. Specifically, we encourage ICANN staff to help SOs and ACs better identify and categorize both in-person and remote participation in ICANN activities.

The NCSG considers it important to discuss the role of ICANN in supporting the SO/ACs in both defining and rolling out their applicable diversity strategy. Such resources may include, for example, capacity building programs to raise awareness and to train people on ICANN's diversity framework. It may also include bringing in external expertise to support SO/AC/Groups with regards to achieving their diversity activities and strategies.

INTA generally agrees that ICANN staff should provide support and tools for the SO/AC/groups to assist them in assessing their diversity in an appropriate manner. INTA also agrees that ICANN should identify staff or community resources that can assist the SO/ACs or other components of the community with diversity related activities and strategies

While the ICANN Board and organization are supportive of the recommendations in this section, it is important to note that these recommendations, as well as several previous recommendations in the report, will require ICANN staff support and could impose ongoing resource requirements.

ICANN operates within a specific budget based on limited funding. Recommendations that add costs to ICANN's operations result in the organization making trade-offs with other items, such as the implementation of new policies, or innovation of existing programs or services. They might also establish a situation where the organization is unable to effectively meet community expectations with either the new recommendations or existing obligations. The CCWG-Accountability should consider these factors when providing guidance on the extent these recommendations should be implemented.

The Board and organization appreciate the subgroup's majority opinion that implementation of the recommendations should be left to the ICANN organization to determine appropriate mechanisms and structures. However, guidance is needed regarding the extent of implementation of these recommendations, especially with regard to the privacy-related concerns and resource considerations previously noted.

The IPC supports the proposed actions by ICANN staff in Recommendations 6-8 to support diversity in ICANN across each of the categories identified on page 11 of the Draft. Greater data collection (e.g., through Statements of Interest), and the development of an Annual Diversity Report will be important steps forward. Specifically, we encourage ICANN staff to help SOs and ACs better identify and categorize both in-person and remote participation in ICANN activities.

The NCSG believes that any process designed to address complaints within the community should be built in collaboration with SO/ACs/Groups. External expertise can be brought in if deemed necessary by all involved parties.

With respect to Recommendation #7 (that ICANN staff develop a process for dealing with diversity-related complaints), all affected groups should have a hand in developing such processes that affect them. Therefore, the RySG proposes to amend Recommendation #7 as follows: 'ICANN staff should support the SO/AC/Groups in developing and publishing a process for dealing with diversity related complaints and issues.'

ROUGH TRANSLATION -Third, the Implementation In place OfA device Specific Requests from members of the community to Allow them to address any questions about ICANN's actions in the area of Diversity is a Progress.

Recommendation #6, #7 & #8:

We welcome the recommendations #6,#7 & #8 regarding Supporting Diversity which include providing support and tools for SO/AC/groups in assessing their diversity, develop and publish a process for dealing with Diversity related complaints and support to the capture, analysis and communication of diversity information by way of dedicating a Diversity section on the ICANN website which gathers and maintains all the diversity related information at one place etc. However, ICANN must also develop processes which capture and analyze information on the impact of cultural sensitivity and unconscious bias on ICANN processes and document the same and develop processes which limit the extent of/ try and overcome/ minimize the impacts of the above factors on ICANN processes, through appropriate training /support tools as well as measures aimed at substantive inclusion of users with differing sensitivities according to their respective cultures.

It is felt that language is a determining factor in supporting Diversity and hence it is felt that adequate measures need to be taken in the ICANN ecosystem to make available websites(information available on), resources(both for learning and participation), communication (like letters, newsletters, announcements, notifications etc.) and exchanges(mails in mailing lists) in languages which are best understood by the respective users and as such over reliance on the justification regarding the languages officially recognized by UN system does not seem to be in order. With the kind of resources that ICANN has at its disposal and the vision of ICANN to be seen as a truly globally-representative body, it is important that ICANN make available all the resources required for substantive participation at the disposal of all its stakeholders in order to support diversity and representation of the viewpoints of stakeholders from all linguistic and cultural backgrounds.

INTA generally agrees that ICANN staff should develop and publish a process for dealing with diversity related complaints and issues. However, given privacy issues and possible concerns for individuals in particular jurisdictions, INTA does not take a position regarding the specifics of this program.

While the ICANN Board and organization are supportive of the recommendations in this section, it is important to note that these recommendations, as well as several previous recommendations in the report, will require ICANN staff support and could impose ongoing resource requirements.

ICANN operates within a specific budget based on limited funding. Recommendations that add costs to ICANN's operations result in the organization making trade-offs with other items, such as the implementation of new policies, or innovation of existing programs or services. They might also establish a situation where the organization is unable to effectively meet community expectations with either the new recommendations or existing obligations. The CCWG-Accountability should consider these factors when providing guidance on the extent these recommendations should be implemented.

The Board and organization appreciate the subgroup's majority opinion that implementation of the recommendations should be left to the ICANN organization to determine appropriate mechanisms and structures. However, guidance is needed regarding the extent of implementation of these recommendations, especially with regard to the privacy-related concerns and resource considerations previously noted.

The IPC supports the proposed actions by ICANN staff in Recommendations 6-8 to support diversity in ICANN across each of the categories identified on page 11 of the Draft. Greater data collection (e.g., through Statements of Interest), and the development of an Annual Diversity Report will be important steps forward. Specifically, we encourage ICANN staff to help SOs and ACs better identify and categorize both in-person and remote participation in ICANN activities.

The NCSG supports the role of the ICANN organisation in capturing, analysing, and communicating diversity-related information. This should permit the capture and publication of diversity-related information in a timely manner, and in a consistent format and with consistent metrics. External assistance may be required in delivering this support if there is a need for more independence in assessing specific diversity elements, or if the ICANN organisation lacks the internal expertise to conduct this work. Such external expertise should be delivered by qualified professionals with extensive experience or ties to the relevant diversity element, be that through involvement in relevant organizations or work.

Recommendation #6, #7 & #8:

We welcome the recommendations #6,#7 & #8 regarding Supporting Diversity which include providing support and tools for SO/AC/groups in assessing their diversity, develop and publish a process for dealing with Diversity related complaints and support to the capture, analysis and communication of diversity information by way of dedicating a Diversity section on the ICANN website which gathers and maintains all the diversity related information at one place etc. However, ICANN must also develop processes which capture and analyze information on the impact of cultural sensitivity and unconscious bias on ICANN processes and document the same and develop processes which limit the extent of/ try and overcome/ minimize the impacts of the above factors on ICANN processes, through appropriate training /support tools as well as measures aimed at substantive inclusion of users with differing sensitivities according to their respective cultures. It is felt that language is a determining factor in supporting Diversity and hence it is felt that adequate measures need to be taken in the ICANN ecosystem to make available websites(information available on), resources(both for learning and participation), communication (like letters, newsletters, announcements, notifications etc.) and exchanges(mails in mailing lists) in languages which are best understood by the respective users and as such over reliance on the justification regarding the languages officially recognized by UN system does not seem to be in order. With the kind of resources that ICANN has at its disposal and the vision of ICANN to be seen as a truly globally-representative body, it is important that ICANN make available all the resources required for substantive participation at the disposal of all its stakeholders in order to support diversity and representation of the viewpoints of stakeholders from all linguistic and cultural backgrounds.

Although INTA believes that it is appropriate and indeed desirable for ICANN to capture, analyze and communicated diversity information to later be provided through ICANN's website, Annual Diversity Reports and in other manners, INTA does not take a position regarding the specifics of this program provided it is done at regular intervals and the results published periodically

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Comment about data gathering of participation and representation in ICANN meetings: The BC suggests that much more can be done to gather and publish information about participation and representation at ICANN meetings, but also in online participation.

a) the IGF, for instance, asks for affiliation by stakeholder group, and publishes such data. ICANN could establish a clearer definition of which stakeholder group an individual is most affiliated with for use in registration for ICANN meetings; statistics can also be inclusive of gender; language preference/language fluency; age, geo location, etc. ICANN could also update the Statement of Interest process to gather such statistics, which will provide an ongoing sample of participation in community work activities, above and beyond the membership data that can be gathered by the Constituency/SO/AC.

b) statistics could also be gathered from remote participants in the official ICANN meetings to identify the "footprint" of ICANN beyond those who are attending in person. This could be a part of registering for remote participation/carefully distinguishing between those who are using online resources while on site. Such statistics will be helpful to ICANN to also understand its engagement with remote participants, but if inclusive of stakeholder interest group, will help the relevant SG/Community group.

