

Registry/ Registrar Human Rights Assessment Tool

THE DANISH
INSTITUTE FOR
HUMAN RIGHTS

ARTICLE 19

Introduction to the Tool

This Human Rights Assessment Tool contains a range of scenarios and questions related to Human Rights relevant to an Internet registry/ registrar's operations, including hosting services. The tool covers the following issue areas:

Issue Areas

A. Registry/ Registrars as Employers

- A.1 Working Hours
- A.2 Wages
- A.3 Leave
- A.4 Harassment
- A.5 Employee Privacy
- A.6 Grievance Mechanism
- A.7 Forced Labour
- A.8 Child Labour
- A.9 Promoting Diversity
- A.10 Non-Discrimination
- A.11 Freedom of Association
- A.12 Workplace Health and Safety
- A.13 Intellectual property rights

B. Registry/ Registrars as Procurers of Goods and Services

- B.1 Human Rights in Supply Chain Management
- B.2 Hours, Wages and Leave
- B.3 Workplace Health and Safety
- B.4 Forced Labour
- B.5 Child Labour
- B.6 Non-Discrimination
- B.7 Privacy
- B.8 Intellectual property rights
- B.9 Community Impact

C. Registry/ Registrars, the Environment, and Local Communities

- C.1 Environmental Impacts
- C.2 Security
- C.3 Land Management
- C.4 Corruption and Bribery

D. Registry/ Registrars as Providers of Domain and Web Hosting Services (in-house or outsourced)

- D.1 Acquiring Domains
- D.2 Human Rights in Registry Engagement
- D.3 Providing Domain Names
- D.4 Maintaining Domain Names
- D.5 Amending, Transferring, and Terminating Domain Names
- D.6 Engaging with Third Parties

E. Due Diligence

- E.1 Assessing Impacts
- E.2 Responding to Impacts
- E.3 Government Requests
- E.4 Third-party Requests
- E.5 Tracking Compliance
- E.6 Transparency, Communication, and Reporting
- E.7 Access to Remedy

How to Use This Tool

This tool is a working model for assessing the human rights impacts of Internet infrastructure providers, including ccTLD and gTLD registries, registrars, and hosting providers.

If you would like to offer feedback on the model or are interested in partnering to carry out an human rights impact scoping 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

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

The indicators show you the kind of policies, procedures, and practices you should ideally have in place in order to answer "yes" to the

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.

A. Registries as Employers

Applies to all employees, including field workers and maintenance personnel, as well as third-party on-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; or 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					Normal company working hours are limited to 48 hours per week by both company policy and practice (or fewer if provided by national law, collective agreement, or industry standards).	
b					Overtime is infrequent, remunerated at premium rate, and does not exceed 12 hours in any one week or 36 hours per month.	
c					The registry has a system to plan, record and monitor hours worked by each employee, and regularly evaluates whether the number of employees is sufficient to meet production targets without resorting to overtime.	
d					Where overtime per employee systematically exceeds 12 hours per week, the registry increases its workforce to correspond to production targets, or puts in place measures to increase worker productivity and reduce overtime.	
e					Registry employees are allowed at least 24 consecutive hours of rest (or more if provided by national law or industry standards) in every seven day period.	
f					The registry ensures that employees have no less than a 30-minute break for every 4 hours of work (or more if provided by national law or industry standards) and that employees are allowed to use toilet facilities whenever necessary and not just during designated breaks.	

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a					The registry is aware of whether the legal minimum wage in the country of operation meets the requirement for a living wage in practice.	

b It is company policy to provide employees with a wage sufficient to meet basic food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage).

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	FOLLOW-UP ACTION
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Does the registry provide a living wage that enables workers to meet the basic needs of themselves and their dependents?						
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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)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a Company employees are granted at least 3 weeks of paid holiday leave per year or more if required by national law or collective agreements.

b 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 full-time employees.

c 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.

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

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

f Parental leave is granted to all employees, i.e. regardless of the employee's gender.

g 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.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
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Does the registry grant employees paid holiday leave, sick leave, and parental leave in accordance with international minimum standards?						
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A.4 Harassment
 The right to freedom from discrimination and harassment

Does the registry respect the privacy of its employees whenever it gathers private information or monitors the workplace?						
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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
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a					The registry has a commitment to protect its employees' personal data.	
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					Potential employees are made aware of access their personal data, e.g. recruiting agencies during hiring processes.	
e					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	FOLLOW-UP ACTION
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Does the registry comply with national and international laws on data protection in relation to gathering and handling sensitive personal data?						
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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)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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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; which grievances can be reported; and how grievances are processed and resolved.	
e					Employees are able to log 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 For companies with 250 or more employees, there is committee responsible for hearing, processing, and settling grievances, and the committee has representation by employee representatives.

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

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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
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a The registry ensures that all employees receive employment contracts prior to starting work, 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 Overtime work is paid, voluntary and not compelled through threat of pay deductions, termination or other sanctions.

e All workers are allowed to leave premises during breaks and at the end of their shifts. In the case where workers are provided housing by the company, they may freely enter and exit their accommodation at any time.

f The registry (or its recruiting agencies) does not require workers to pay recruitment fees or money deposits, and do not retain identity cards, passports, travel documents, or other personal items required for free movement.

g 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.

h 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.

i 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	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)
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Has students under 18 occasionally for "Placements," which is essentially a work-study high school arrangement

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

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
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Does the registry comply with minimum age standards?						
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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)
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a						
b						
c						
d						
e						
f						

g For firms with more than 250 employees, the company has established a forum, accessible and known to all employees, whereby they can register suggestions and ideas for improvement in diversity management.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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
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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 has a written description stating the skills and qualifications required for that job category, as well as the projected paygrade.					
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 non-discrimination training regarding the company's policies.					
f	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	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 employees to organize and to bargain collectively, and employees are exposed to harassment or retaliation based on their union affiliation or non-affiliation (including in countries of operation where trade-unions are uncommon 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
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a	The registry has a commitment to recognise the rights of its workers to freedom of association and collective bargaining, including the right to freely form and/or join independent trade unions, and this commitment is clearly communicated to all employees.
b	The registry recognises workers' organisations for collective bargaining purposes and has procedures in place to ensure regular collective bargaining with authorised worker representatives concerning all workplace related issues.
c	The registry allows worker representatives access to collective bargaining agreements, registry premises, employees, and other relevant documentation needed to fulfil their duties.
d	The registry prohibits discrimination or adverse actions against worker representatives or employees for participating or refraining to participate in lawful trade union activities.
e	The registry has agreed with workers' representatives about fair hearing requirements in relation to all disciplinary cases and employee grievances.
f	The registry allows employees to engage in regular employee-only meetings within normal working hours, where employees can discuss concerns regarding working conditions.
g	Where independent trade unions are prohibited by law or otherwise absent, the company informs employees of their right to form independent collective representation at the workplace.
h	The company informs employees of their right to engage in regular collective bargaining concerning all workplace issues.
i	Company management meets regularly with employee representatives to discuss work-related problems and any grievances employees may wish to raise.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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						
b						
c						
d						
e						

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 are provided.
h	Where relevant, residential or overnight facilities are safe and sanitary and meet the basic needs of workers in 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 with the equipment and training necessary to safely perform their job (e.g. ergonomic seating and work stations, protective equipment, etc.)
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 a record is kept of who has been trained for which tasks.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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 has a policy on ownership of the intellectual property rights for inventions or other works, which has been agreed upon by employees and (where applicable) their representatives.	
b					The registry has an agreement with its employees about how intellectual property rights for products created or invented wholly or in part by employees are to be shared.	

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	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 appropriate patent offices to obtain information about inventions it may wish to use.	

b The company obtains authorization from patent holders before profiting from any locally patented ideas or products.

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the company obtain authorization from existing patent holder(s) before commercially exploiting any locally patented invention?						

Probability Does not occur Isolated incidents may occur Occurs systematically Scale of impact 0 - 500 persons 500 - 5,000 persons 5,000 persons and above Severity Low Medium High

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)
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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 suppliers.						
b	Training on human rights standards is provided 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.						
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.						

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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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.						
b	These minimum requirements are communicated in writing to new and existing suppliers and business partners.						
c	There is a process in place to follow up on these commitments.						

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

scenario

Supplier employees are exposed to unsafe or unhealthy working environments, resulting in accidents or personal injury.

Probability	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a The registry has defined minimum requirements concerning workplace health and safety in its selection of suppliers and business partners.

b These minimum requirements are communicated in writing to new and existing suppliers and business partners.

c There is a process in place to follow up on these commitments.

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

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a

b

c

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take 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

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a The registry has defined minimum requirements concerning minimum age in its selection of suppliers and business partners.

b These minimum requirements are communicated in writing to new and existing suppliers and business partners.

c There is a process in place to follow up on these commitments.

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take necessary measures to ensure that its suppliers comply with minimum age standards?

B.6 Non-Discrimination

The right to freedom from discrimination and harassment

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 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, and marital caste, health or any other status recognized by international law.)

Probability	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a					The registry has defined minimum requirements concerning non-discrimination and non-harassment in its selection of suppliers and business partners.	
b					These minimum requirements are communicated in writing to new and existing suppliers and business partners.	
c					There is a process in place to follow up on these commitments.	

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take necessary measures to ensure that its suppliers prohibit harassment and base employment-related decisions on relevant and objective criteria?						
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B.7 Privacy

Right to privacy

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a					The registry has defined minimum requirements concerning privacy in its selection of suppliers and business partners.	
b					These minimum requirements are communicated in writing to new and existing suppliers and business partners.	
c					There is a process in place to follow up on these commitments.	

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take necessary measures to ensure that its suppliers comply privacy standards?						
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B.8 Intellectual Property Rights

Right to intellectual property, right to security,

scenario

Employees of suppliers are not compensated for inventions or other works generated by them, entirely or in part.

Probability	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
-------------	--	-------------------------	------------------------------

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

a					The registry has considered a preference for free and open-source software and hardware to enhance security and reduce potential unforeseen intellectual property claims.	
b					The registry has defined minimum requirements concerning intellectual property in its selection of suppliers and business partners.	
c					These minimum requirements are communicated in writing to new and existing suppliers and business partners.	

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take 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

scenario

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

Probability	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
-------------	--	-------------------------	------------------------------

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 in its selection of suppliers and business partners.					
b	These minimum requirements are communicated in writing to new and existing suppliers and business partners.					
c	There is a process in place to follow up on these commitments.					

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Does the registry take 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?

Probability						
Does not occur						
Isolated incidents may occur						
Occurs systematically						
Scale of impact						
0 - 500 persons						
500 - 5,000 persons						
5,000 persons and above						
Severity						
Low						
Medium						
High						

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 as a result of the company's operations.

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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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?

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, whichever provides the highest standard.					
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	The registry provides or collaborates in an accessible, effective, fair, and transparent mechanism to receive and resolve grievances from potentially affected individuals.					
f	In consultation with the affected individuals, the registry develops appropriate management plans to prevent, reduce, and mitigate adverse social and environmental impacts.					
g	The registry continuously monitors its social and environmental impacts and provides updated information about the social and environmental impacts of its operations, such as through an annual report.					
h	The registry has clear procedures in place for waste management, including e-waste management.					

C.2 Security

Right to freedom from torture, 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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
-------------	--	-------------------------	------------------------------

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?

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Relevance question Does the registry employ security services to protect company personnel or assets?

a The company 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 company 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 company seeks to ensure transparency concerning its interactions with public security agencies, and the company 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 company 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 abuses to the relevant authorities.

h The company 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 abuses by registry security personnel.

i Representatives from the local community are consulted as part of the aforementioned monitoring.

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for
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compliance question

Before buying, renting, acquiring or otherwise accessing land or property, does the registry ensure that all affected owners and users of the land or property, have been adequately consulted and compensated?

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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a Prior to buying, renting, acquiring, or otherwise accessing land or property, whether directly or through a third party, the company identifies all existing owners and users of the land or property.

b The company investigates the past usage and ownership of the land or property to ensure that past users and owners have not been wrongfully removed, and that any expropriations by the authorities have been conducted in accordance with international law.

c The company consults with affected users and owners of the land or property (including women, tenants, settlers, minorities, and other vulnerable groups) and seeks their free and informed consent before continuing to acquire or access the land or property.

d The company ensures that affected owners and users of the land or property are adequately compensated, at or above market replacement rates, for the land or property. This includes compensation for damages to land, damages to assets, and loss of income.

C.4 Corruption and Bribery

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?						

Right to access to information; Right to take part in in government

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

Probability
Does not occur
Isolated incidents may occur
Occurs systematically

Scale of impact
0 - 500 persons
500 - 5.000 persons
5.000 persons and above

Severity
Low
Medium
High

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

D.1 Acquiring Domains

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 negatively impacts human rights, particularly right to privacy and freedom of expression.

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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- a Information added to the public WHOIS registry is in line with local and international law, as well as human rights.
- b Information added to the public WHOIS registry is minimized to safeguard registrants' privacy.
- c The agreement with ICANN includes a commitment to respect international human rights
- d The agreement with ICANN includes a commitment to respect the right to privacy of registrars and registrants.
- e The agreement with ICANN includes a commitment to respect the right to freedom of expression of registrars and registrants.
- f The agreement with ICANN includes a commitment to respect the right to freedom of association of registrars and registrants.
- g The agreement with ICANN 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
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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

Agreements between the registry and government(s) do 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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for impacted
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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Relevance question Does the registry have any agreements with the government?

- a Agreements with government(s) includes a commitment to respect international human rights.
- b Agreements with government(s) include a commitment to comply with the right to privacy of registrars and registrants.
- c Agreements with government(s) include a commitment to comply with the right to freedom of expression of registrars and registrants.
- d Agreements with government(s) include a commitment to ensure the right to freedom of association of registrars and registrants.
- e Agreements with government(s) include 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
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Are human rights integrated into the agreement between the registry and government(s)?

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for impacted
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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- a The registry has a commitment to promote the continuous improvement of human rights standards of its registrars.
- b If included, this 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(s) between registry and registrars commits registrars to avoid contributing to actions that may interfere with the right to privacy of registrars or other users, except where such actions are lawful, proportionate, and for a justifiable purpose.
- e The contract(s) between registry and registrars 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(s) between registry and registrars commits registrars to respect the right to freedom of expression of registrars, 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(s) between registry and registrars 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(s) between the registry and registrars contain 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 requires registrars to inform registrants of the availability of alternative options to register domains.
- k The contract(s) between registry and registrars commits registrars who choose to limit the registration of domains, to do so in line with human rights and clearly communicate it with appropriate due process.

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

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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for impacted
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Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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- a The registry ensures that its terms of service is 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
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Does the registry ensure that registrars inform registrants about their contractual commitments to the registry and about 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	Describe key impacts and who is impacted	Assess numbers impacted	Severity of consequences for impacted
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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 registrars to ensure that their platforms and services are accessible for people with disabilities.						
d	The registry strives to ensure that its domains are widely available, accessible and affordable to all.						
e	The registry ensures that no registrant is excluded from access to a domain by its registrars, unless such exclusion is based on national law of the country of the registrar.						
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	Describe key impacts and who is impacted	Assess numbers impacted			Severity of consequences for impacted		
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	A minimum of personal data is collected. Data is obtained by lawful and fair means and is based on free, unambiguous and informed user- consent. Users are allowed to withdraw their consent .						
b	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.						
c	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.						
d	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.						
e	When data is used to identify user patterns, it is used in an anonymized form.						
f	Employees have a duty of confidentiality by law and written agreements regarding non-disclosure.						
g	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.						
h	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.						
i	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.						
j	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.						
k	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.						
l	The registry is aware of and complies with relevant national laws, international guidelines, and industry standards regarding the transfer of personal data.						
compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry respect the privacy of registrants and other users, and take measures to protect their personal data?							
D.3.4 Security in services and operations							
Human rights impact scenario							
Services provided by the registrar are not secure due to lack of precautionary measures.							
Probability	Describe key impacts and who is impacted	Assess numbers impacted			Severity of consequences for impacted		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has documented DNSSEC signing procedures in place.						
b	The registry has formal security control frameworks in line with ISO standards.						
c	The registry implements (or otherwise ensures that registrars implement) current applicable privacy standards (e.g. DNS over TLS, or DNS over QUIC).						
d	The registry requires registrars to offer both IPv4 and IPv6 for all their services.						
e	A regular security review and audit of software platforms is performed through independent third party audits.						
f	If the registry's registrars have services hosted on third-party hosting or distribution platforms, the applicable legal framework and terms of service comply with human rights standards.						
g	Through the contracts with the registrar and/or registrant it is clearly communicated in which jurisdictions and under which terms of service their data is handled.						
h	If the registry has physical servers located in different physical locations in different jurisdictions, the registry ensures that security standards are met in all locations and jurisdictions.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry apply sufficient, appropriate, and up-to-date 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	Describe key impacts and who is impacted	Assess numbers impacted			Severity of consequences for impacted		
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	In any operations to ensure stability of the TLD, policies and procedures are in place to ensure the privacy, freedom of expression and other human rights of registrants and users.						
b	The registry has in place a system to monitor system function.						
c	Registrars are informed in case of technical failure.						
d	The registrars are required by the registry to inform clients in case of technical failure.						
e	Registrars are informed in case of security breaches.						
f	Registrars are required by the registry to inform registrants in cases of security breaches.						
g	The registry has standardised its processes in accordance with international standards, such as ISO 9001 or equivalent.						
h	The registry has a system in place, or requires its registrars to have a system in place, to mitigate DNS attacks (e.g. amplification attacks).						
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 ensure the ongoing maintenance and function of domain and hosting services?							
D.5 Amending, Transferring, and Terminating 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	Describe key impacts and who is impacted	Assess numbers impacted			Severity of consequences for impacted		

Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a						
b						
c						
d						
Human rights compliance question						
Does the registry have systems in place to modify domains in a way that aligns with national regulation and that is 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	Describe key impacts and who is impacted			Assess numbers impacted	Severity of consequences for impacted	
Indicators						
a					COMMENTS	FOLLOW-UP ACTION
e						
b						
c						
d						
f						
g						
h						
i						
j						
Human rights compliance question						
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	Describe key impacts and who is impacted			Assess numbers impacted	Severity of consequences for impacted	
Indicators						
a					COMMENTS	FOLLOW-UP ACTION
b						
c						
d						
e						
f						
g						
i						
compliance question						
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?						
Probability						
Does not occur						
Isolated incidents may occur						
Occurs systematically						
Scale of impact						
0 - 500 persons						
500 - 5,000 persons						
5,000 persons and above						
Severity						
Low						
Medium						
High						

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 adverse human rights risks prior to launching new products, services, and/or policies?						

F.2 Responding to 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 organizational 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						Assess for legality
b						
c						
d						
e						
f						

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 in order to prevent interference with the rights to privacy and freedom of expression?							
F.4 Third-party Requests							
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Third-party requests that interfere with the right to privacy or the right to freedom of expression are subject to operational processes that assess the request for human rights compliance.						
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	Third-party are requested to provide details regarding the necessity and justification for any restrictive request in written form.						
d	When third-party 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, and/or 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	Third-party 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.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry have procedures in place to handle third-party requests in order to prevent interference with the rights to privacy and freedom of expression?							
F.5 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 made aware of the registry's policies related to human rights, and of the human rights principles they are required to adhere to as part of their contracts with the registry.						
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.6 Transparency, Communication, and Reporting							
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, users, governments, and third-parties in clear language and an accessible form.						
b	Requests that interfere with individuals' right to privacy are documented and communicated to customers and other relevant stakeholders to the fullest extent possible, e.g. through a transparency report.						

c	Requests that interfere with individuals' freedom of expression are documented and communicated to customers and other relevant stakeholders to the fullest extent possible, e.g. through a transparency report.
d	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.
e	The registry provides clear instructions to third parties about lawful requirements for access to user data, content removals, and any other processes that have potential human rights implications.
f	Subject to legal restrictions, affected registrants and users are informed requests, as well as the action taken.
g	The registry publishes information and procedural guidelines on any fast-track content removal arrangements it may have with third parties (e.g. "trusted notifiers").
h	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 AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry allow all interested stakeholders to access information on commitments, policies, procedures, and performance on human rights?						

F.7 Access to Remedy

Indicators	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Registrants and users 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 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, collaborates in, or otherwise ensures 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 registrant does not agree with a decision made by said registry.					

Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Do registrars, 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?						

Probability	Does not occur	Isolated incidents may occur	Occurs systematically
Scale of impact	0 - 500 persons	500 - 5,000 persons	5,000 persons and above
Severity	Low	Medium	High