

Statement of the Non-Commercial Stakeholders Group on the CCWG-Accountability Work Stream 2 Draft Recommendations to Improve Diversity

The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on the Cross-Community Working Group on Accountability Work Stream 2 Draft Recommendations to Improve Diversity. We thank the Diversity Subgroup ('the subgroup') for their efforts in preparing these recommendations and applaud the time taken in developing them. This is a particularly important issue to the NCSG, as we are the most diverse body in the Generic Names Supporting Organization, with individual and organisational members from 128 countries. As a network of individual and organisational academics, Internet end-users, and civil society actors representing the interests of non-commercial registrants, we represent a broad cross-section of the global Internet community, and understand the importance of diversity in ensuring our bottom-up, formulated views are broadly representative.

In this comment, we will respond to each of the eight recommendations:

Recommendation 1: Key Elements of Diversity

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.

Recommendation 2: Elements of Diversity Relevant and Applicable to Each SO/AC

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.

Recommendation 3: Initial Assessment of Diversity for each SO/AC

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.

Recommendation 4: SO/AC/Group Strategy and Timeline for Achieving Diversity

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.

Recommendation 5: Annual Re-Assessment of SO/AC/Group Diversity

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.

Recommendation 6: ICANN should provide support and tools for the SO/AC/Groups to assist with diversity related activities, strategies, and assessments

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.

Recommendation 7: Process for dealing with diversity-related complaints and issues.

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.

Recommendation 8: ICANN should support the capture, analysis and communication of diversity information

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.

Conclusion

In general, the proposed recommendations offer a basic framework to improve diversity within ICANN by defining, measuring, and promoting diversity. However, the mechanisms should also address what data is required to be collected in order to measure diversity, a methodology for how said data should be collected, and a framework for its analysis. Privacy and data protection concerns must be considered carefully for these activities.

Thank you for considering our recommendations. We are at your disposal should any clarification regarding our remarks be required.