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## Practices & Recommendations: External Stakeholder Use of an Organizational Ethics & Compliance Hotline

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NAVEX Global reviewed ICANN's accountability mechanisms and found the Ombudsman to be a particularly well-suited resource for routing or directly handling complaints and concerns from External Stakeholders. The Ombudsman resource is well-explained with prominently displayed contact information on ICANN's public website. Further, we believe there are notable drawbacks to opening the ICANN ethics and compliance Hotline to complaints from External Stakeholders:

- Adding another resource may confuse External Stakeholders when the current Ombudsman is already setup to handle complaints of a broad nature from this group.
- Adding External Stakeholder complaint intake to the ethics and compliance hotline may greatly increase call volume, especially in the ICANN model, which is highly inclusive of External Stakeholders. We recommend that ICANN review the potential impact on cost and service levels with the call intake vendor.
- Currently the four executive level Hotline Committee members receive all the reports from the ethics and compliance Hotline. When a report is received, they meet to determine proper handling of each report. This process applied to External Stakeholder complaints may cause a significant drain on executive time.
- Because ICANN reports on allegations of internal wrongdoing go to leadership and the Board, mixing the use of the Hotline between both internal and external reporters will muddy the reporting to leadership and the Board on issues related to internal operations.

In summary, we recommend that:

- (1) The ethics and compliance Hotline be dedicated to the intake of ethics and compliance issues from employees and Business Partners only; and
- (2) Complaints from External Stakeholders are best handled by the clearly established Ombudsman process and/or other established ICANN accountability mechanisms.