**Strawman Privacy Action Plan for NCSG**

There are a number of issues in ICANN at the moment, which have impacts on privacy:

1. Response to the EWG report, which made four concrete recommendations re privacy policy:
   1. Develop a system for anonymous domain registration for groups and individuals at extreme risk, using secure credentials
   2. Develop binding corporate rules for ICANN
   3. Continue work on accreditation of privacy/proxy services
   4. Establish a mechanism to accredit and log those who wish to access user information beyond the basic public contact data, notably law enforcement officials and the IP constituency, but also potentially including third party data rich services such as who was.
2. Response to the 2013 RAA and the call for comments on data retention requirements.
3. Response to the ATRT report, particularly regarding respect for privacy and expected management standards and metrics. At the moment, this element is lacking.

A few possible goals which we have not discussed in a fulsome manner, might include:

1. Seizing this opportunity, upon receipt of the EWG report and capitalizing on the movement to mature the ICANN bottom-up multistakeholder model during the Netmundial discussion, with a view to moving up a notch or two on the maturity model with respect to privacy.
2. Getting a comprehensive privacy policy in place that will set policy for all the other instruments, rather than the other way around
3. Putting in place binding corporate rules, that respect existing data protection law where it applies, and raise the bar for other jurisdictions that do not have it.
4. Naming a person who is accountable for all aspects of privacy compliance, usually called a data protection authority or chief privacy officer.
5. Making sure that we move forward on the privacy protective recommendations of the EWG, and develop a constituency both inside and outside ICANN that will help us implement them, particularly with respect to anonymous domain registration, which is an important but complex item with high symbolic value.

Action plan

1. Point out to the Board that their current privacy policies are inadequate (done in Singapore).
2. Followup with a detailed criticism of what exists, with suggestions for improvement (started working group at Singapore, draft is started). Next step is to recommend (somehow) binding corporate rules for the organization.
3. Endorse the EWG recommendations (done in the NCSG comments, more work will be required after London)
4. Respond to questionnaires which are being sent out to gather stakeholder views, as they may sway EWG recommendations to the Board.
5. Start a campaign to gather support for anonymous domain registration, and start figuring out how to implement (waiting for an outline of work from Stephanie P)
6. Staff up the Privacy/Proxy working group (done, and thank goodness we have so many on the team, they are needed). Align with allies (breakfast in Singapore). Need to strategize on how best to maintain positions on this group, next step probably will be to support registrars in sending comments on the RAA.
7. Figure out a strategy for the recommendations to accredit access to the RDS or Whois replacement. LEAs are the easy part, what about law firms acting for IPC actors?

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