

## Data Quality Narrative

At the core of Nominet's .uk register is our database of who has registered the domain names managed by Nominet. The register includes the name of the person or organisation that registered the domain name (the registrant) and their trading name, if this is different. The register also includes the registrant's address. Registrants' names and addresses are made available to the public via the WHOIS service on the Nominet website. Non-trading individuals are allowed to opt-out of having their address published in WHOIS results.

Improving and maintaining the quality of the data that we have for registrants and that we publish in our WHOIS database is a key objective for Nominet. We believe it plays an important part in ensuring that .uk is a trusted and safe space. We have and will continue to take steps to achieve this objective and believe that registrars play a key role in assisting us in doing so. The Data Quality Policy sets out some of the ways we expect registrars to help us improve our data quality. It is important to note that this data quality policy is not intended to change our WHOIS policy, contract terms, or acceptable use policy.

Consumers, rights-holders, and law enforcement agencies have become increasingly reliant on the information that is contained in the WHOIS in order to contact the registrant and/or host of the domain name in relation to the prevention or detection of systems abuse, or to establish or defend legal rights (including as a precursor to using Nominet's Dispute Resolution Service).

By producing this Data Quality Policy, we are articulating our current expectations and also taking into account the recent feedback to our consultation on second level domain registrations, in which we set out proposals for validation and verification of registrant contact data in the registration of second level domains, and to the Registrar Agreement Review.

In our consultation on second level domain registrations, we noted a high degree of support for strong data quality standards, particularly from business groups and law enforcement agencies. However, many respondents, chiefly registrars including those working with businesses, highlighted that requiring a verified link between a registrant's name and their address would set a burdensome standard that may be difficult to implement effectively, although the quality and veracity of the name and address data itself may actually be quite adequate. We also heard that registrars employed different methods for ensuring data quality – all of which were effective. Smaller registrars might have direct knowledge of the registrant's contact details, whilst larger operations were using payment details to check data or other forms of validation. There was broad support from all groups for any validation to be against available third party databases.

With a register of more than 10.5 million domain names, ensuring that data is kept up-to-date, accurate, and complete is a major task. Our own extensive data quality programme has been in place for more than two years and has resulted in over one million records being updated. Our audit programme uses trusted, commercially available third party databases against which we validate contact data.

Our registrars have always had an obligation to ensure that data that they submit to us is accurate and complete. With this data quality policy, we are articulating further our expectations as to their role in ensuring our objective to maintain trust in .uk. While our aim is to make the data in the .uk

register as accurate and complete as possible, we recognise that it is not always possible to automatically validate data submitted by customers, and therefore we will not at this point expect registrars to ensure that all data submitted by them can be validated by us. That being said, we do expect registrars to take steps to ensure that as much of the data they submit to us is as accurate and complete as possible. We will therefore establish a minimum threshold percentage of registrant data submitted by a registrar which we must be able to validate. This threshold will take into account different factors such as the type of Tag that they use and how long they have used it for; the market and customer-base predominantly served by the registrar; and the geographic makeup of their customer base. For example, a registrar who only uses a Self-Managed Tag for their own domains should have 100% data accuracy and completeness. Likewise, a registrar whose business is predominantly brand management focused, should equally demonstrate a very high standard of data. A registrar with a high proportion of international registrants may need additional support.

Approximately 10% of .uk domains are registered to international registrants and we recognise that the validation of contact details for registrants based outside of the UK can sometimes be more challenging. However, we are of the view that these details should be subject to the same standards and that consumer confidence in the quality of all of our data must be consistently high across all of our namespaces. To place a lower standard on non-UK data would mean placing UK registrants at a disadvantage. We will therefore continue to validate as much non-UK data as we can against our third party data sources, which cover a number of different countries and territories. We will work with our registrars to support them in improving the quality of data in this particularly challenging area.

These thresholds will be monitored through Nominet's continuing validation of registrant data submitted to us. Where we have determined that data cannot be automatically validated, we have outlined in the Data Quality Policy what we expect registrars to do to resolve the issue.

For domains on Accredited Channel Partner Tags, we will require the registrar to take appropriate steps in order to allow it to confirm to Nominet that the data is Valid. For example the registrar may choose: to ask the registrant to provide corrected data; to confirm that the data is reliable based on its own knowledge or information from a trustworthy third party source; or, to obtain documentary evidence that the data is reliable such as a utility bill or similar document. Registrars must suspend domain names within 30 days where they are unable to Validate data.

For domains on Channel Partner and Self-Managed Tags, where we have not been able to validate data we will contact the registrant directly in order to allow corrected data or documentary evidence to be provided to us by the registrant. Contact details for domain names which cannot be confirmed as Validated within 30 days of the date of submission of the data will be suspended by us.

Domain names that have been suspended for more than 30 days due to poor quality data will be cancelled, whether that suspension was instigated by the registrar or by Nominet.

Our WHOIS will indicate whether data has been validated. If the domain has been suspended due to it not meeting validation, this will also be shown in our WHOIS.

We will audit Accredited Tag Users for their compliance with the data quality policy. This might be done by using sample data, assessing the registrar's documented data quality process, using mystery

shopping exercises, and comparing performance against relevant periods. As we have communicated, we will always seek to work with a registrar to resolve any breaches of our policies and contract and to understand how that breach has occurred.

We will develop a reporting tool that will allow registrars to easily report on consistent data quality metrics in a relatively automated way. This will also ensure that reporting on metrics is meaningful and measurable.

The .uk register has a very high standard of data quality, which we believe to be amongst the highest across top-level domains. We know that improving data quality is a continuous process and we will continue to maintain our objective to raise standards by working with our registrars. We will seek to publish data quality metrics for the register as a whole in a meaningful way, and set some clear targets against which we will report to our stakeholders. We will also be considering how we can work with our registrars to publish their data quality metrics and to celebrate high standards in our Channel. As our stakeholder expectations evolve, so may our standards. Any change to this policy will be consulted on with our stakeholders.