Policy Compliance Dashboard

AFPUB-2026-GEN-002-DRAFT02

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Summary of the problem (1)

- The AFRINIC RSA* mandates members to comply with the AFRINIC policies developed via the PDP.
- Section 4.c of the RSA states the irrevocable commitment of the member for using the services for the purpose for which it was requested and in full unreserved compliance with AFRINIC policies.
- This is of key importance, because a member not following the policies may be impacted in the evaluation of future requests by AFRINIC, the revocation of the services or even the closure of the member (section 4.b.iii).
- Just to be clear, “services” are defined in the RSA, under section 1.c, and those include number resources, among others. So, the impact for a member that is not following the PDP process and CPM changes, may be of catastrophic business consequences.

Summary of the problem (2)

- The PDP is continuously updating the CPM, and it is obvious that some members may not be following, up to date, all the details and possible impact in their services/resources, while the RSA states that AFRINIC, at its own discretion, can investigate the use of the services.
- Every Policy in the CPM indicates what and how things should be done. Lack of conformity with any part of the CPM, even if not clearly stated, it is considered a lack of compliance, following a coherent interpretation of both the RSA and the CPM.
- Consequently, members should be protected against this situation, in a simple manner that allows them to know their up-to-date policy compliance, get alerts about the lack of compliance and consequently react to address those.
- There should be always equal opportunities for any member to correct mistakes before reaching a fatal point.

Addressing the problem

- This proposal provides the framework for a “Policy Compliance Dashboard”, to be developed by AFRINIC, and incorporated to MyAFRINIC (and future members communications platforms).
- This proposal will allow periodically review of the policy compliance status of each member, as much automated as possible, so they can receive automated notifications of any issue. Warnings will be also sent to the staff, and only in cases of a continued and repeated lack of compliance, or severe violation of certain aspects of the CPM, AFRINIC will be able to take further actions according to the RSA.
- AFRINIC will implement this policy in phases, according to Board and internal staff decisions, depending on the availability of resources, in order to avoid impact in day-to-day operations. For example, a first phase may be integrating in the MyAFRINIC the overall dashboard framework (GUI, notifications, non-compliance tracking), followed by the already existing automated tools (as indicated by analysis impact 4.3 on v1 of this proposal). Then, each part of the RSA and CPM can be addressed, one by one, or even several of them in parallel. This way, there is not a specific timeframe, and it can be accommodated to the available resources, results for each part of the RSA/CPM being integrated and tickets being generated and resolved, etc.
- It is clear that there is a one-time investment in implementation, as with the majority of the policies, however, the advantages for the staff, community and membership are obvious, including a huge saving of resources in manual tracking and allowing the membership to be up-to-date with the compliance even with policy changes. Those advantages may also be considered by the board in terms of recruiting staff for the implementation, if needed, depending on the progress of the implementation project.

Proposed Text (1)

1 Policy Compliance

AFRINIC services are provided to members under the umbrella of the RSA/bylaws mandate, which in turn ask for compliance with policies.

Those policies are documented in the CPM, which is continuously updated by the PDP.

For the avoidance of doubt, compliance must be understood as following the established rules. For instance, whenever a policy mandates specific and accurate data to be registered, the lack of that registration or its accuracy constitutes a lack of compliance.

2 Policy Compliance Dashboard

AFRINIC “Policy Compliance Dashboard” shows to each member its status of compliance with the applicable resource policies, collected by means of a periodical monitoring, automated as much as possible.

The dashboard automation will need to be accommodated along the evolution of the CPM as it evolves through the PDP, in order to display new details.

The implementation of the automation for compliance/non-compliance determination, will be made without the need to capture personal data or intrusion in the members’ networks. Understanding that compliance with the policies can’t be 100% objectively measured, the implementation effort should consider mainly those than can be as much as possible objectively automated and could suggest possible signs of lack of compliance.

Proposed Text (2)

3 Notifications

The dashboard:

a) Will automatically send notifications to members and staff as soon as a possible non-compliance is detected, showing previous history if available.

b) Will send reminders to the members and staff for possible non-compliance.

Proposed Text (3)

4 Lack of Compliance

The dashboard is a tool that helps to determine possible lack of compliance, however is up to the staff to verify the information obtained by the automated testing. Following the RSA/bylaws prerogatives, AFRINIC is able to initiate a more exhaustive investigation and take further actions (such as service withholding, revocation or even member closure), when there is evidence suggesting that there is lack of compliance.

References

AFRINIC RSA:

- https://afrinic.net/membership/agreements
- https://afrinic.net/ast/pdf/services/afrinic-rsa-en-201801.pdf

Similar policies or procedures, for the same/similar purposes, also exist in the other regions.

- APNIC:
  https://www.apnic.net/community/policy/resources#4.2.-Closure-and-recovery

- ARIN:
  https://www.arin.net/participate/policy/nrpm/#12-resource-review

- LACNIC: An equivalent proposal reached consensus (pending implementation):
  https://politicas.lacnic.net/politicas/detail/id/LAC-2019-9?language=en

- RIPE NCC:
  https://www.ripe.net/publications/docs/ripe-694
  https://www.ripe.net/publications/docs/ripe-716

Appendix

- Some previous text in the previous version of this proposal has been moved here:
  - Examples of dashboard items
  - Example of Notifications, Revocation procedures, etc.

Impact Assessment (1)

3.2 Clarity of Policy Text

- Appendices 6 & 7 aren’t normative, so must not be subjected to staff evaluation. Moreover, the staff suggested in previous versions to move it to appendices.

3.3.6 HR

- AFRINIC should be already confirming the compliance with CPM, so the proposal will actually reduce the workload as many aspects could be automated.

Impact Assessment (2)

3.3.7 Legal

- Facilitating members compliance with the PDP is part of the PDP Scope (handling resources) otherwise, the CPM will be limited to 10-20% of the actual content.
- Non-normative examples in a proposal facilitate the understanding, there is nothing in the PDP that disallows that.

4. Recommendations on Policy Wording

- As said, is not normative, there is no difference in including examples in section 2 (“how this proposal address the problem”), which is also non-normative. An appendix is best, as used even in RFCs.

5. Staff Clarification Requests

- History retention periods depends exclusively on implementation; the proposal is silent on that on purpose.