

TREATY BODY MONITOR

International Service for Human Rights



Human Rights Monitor Series

COMMITTEE ON THE ELIMINATION OF RACIAL DISCRIMINATION 72ND SESSION DOMINICAN REPUBLIC'S COMBINED 9TH - 12TH REPORT 28 - 29 FEBRUARY 2008

Information submitted to the Committee	1
Themes and issues	2
Status of the Convention in domestic law.....	3
Legal framework.....	3
The situation of Haitians and Dominicans of Haitian descent.....	4
Recognition of racial discrimination.....	4
Labour conditions	5
Nationality acquisition.....	6
Identity cards	7
Access to education	7
Conclusions and next steps	8

Information submitted to the Committee

On 8 June 2007, the Dominican Republic submitted its combined 9th, 10th, 11th and 12th periodic report¹ to the Committee on the Elimination of Racial Discrimination (the Committee) in accordance with its obligation under Article 9 of the International Convention on the Elimination of All Forms of Racial Discrimination (the Convention). The Dominican Republic acceded to the Convention on 25 May 1983. The sixteen-page periodic report briefly outlined: the country's multiethnic composition, including the presence of Haitians in the Dominican Republic and the equal enjoyment of rights by nationals and foreigners; initiatives to improve the living conditions in the 'bateyes';² the expansion of health coverage in rural areas and the adoption of a comprehensive policy to care HIV/AIDS patients; the expansion of the social security system; and the initiatives adopted to combat poverty. The report further highlighted that the Dominican Republic is signatory to most International Labour Organization conventions and noted a number of laws that include anti-discrimination provisions. It is worthy of note that the report was confusing when it elaborated on the presence and influence of people of African origin. It began by stating that Dominicans see themselves as a single people regardless of their race, and paragraph 69 reads "cultural values reflect an African presence in

¹ Available at www2.ohchr.org/english/bodies/cerd/cerds72.htm

² Shantytowns in the sugar cane fields where the cane cutters, especially Haitian and Dominicans of Haitian descent, and their families live.

various communities throughout the country”. However, paragraph 7 noted that historically the category “Black, of African origin” was denied as part of the country’s ethnic make-up, and paragraph 9 notes that Dominicans prefer to classify themselves as ‘pale Indian’ or ‘brown’ rather than ‘black’. The report makes reference to discriminatory practices in discos and in the labour market against Dominicans of African origin.

On 11 December 2007, the Committee provided the list of issues and questions³ to the State Party, which sought clarification on the legal framework for dealing with racial discrimination, on the situations of Haitians in the country, on awareness raising initiatives amongst the population, on jurisprudence relating to racial discrimination, on racial profiling and on policy assessment. The reply to the list of questions was sent to the Committee members one day before the session. It was presented in brief in the delegation’s initial presentation to the Committee.

Three NGOs submitted reports⁴ in view of the Dominican Republic’s implementation of the Convention. Human Rights Advocates addressed the various forms of discrimination faced by Haitians living in the Dominican Republic and Dominicans of Haitian descent, which include unlawful arbitrary repatriations, isolation, denial of birth certificates, lack of basic needs, and poor living conditions. The report also proposed certain questions to be made by the Committee to the delegation. The Red de Encuentro Dominico-Haitiano Jacques Viau addressed the discrimination of Afro-descendants in Haiti with special focus on Haitians and Dominicans of Haitian descent. It highlighted the non-recognition of African culture as a major element of Haitian identity; the lack of affirmative policies; the exploitation of Haitian labour; non-compliance with international commitments under the Convention, the International Labor Organization, and the Interamerican Court of Human Rights; racial profiling in identity cards,⁵ the issuing of different birth certificates depending on the origin of the child’s family, and the precarious living conditions in the ‘Bateyen’ communities.⁶ The Open Society Justice Initiative focused on discriminatory laws and official practices against Dominicans of Haitian decent in relation to their right to nationality.

Themes and issues

The Dominican Republic’s delegation was headed by Alejandra Liriano de la Cruz, Undersecretary of State for Foreign Relations of the Dominican Republic. The delegation included representatives of the Prosecutor’s General Office, the Ministry of Health, the Office of the Secretary of Labour, the National Sugar Institute, the Migration Office, the National Institute for Human Dignity, the National Police Force and Congress.

In its opening statement, the delegation informed that the Dominican Republic was country with a high level of racial integration and in which racial borders where not as rigid in comparison to other countries. The head of the delegation Ms la Cruz explained that domestic law prohibited discrimination and that the Constitution referred to individual and social rights without exceptions. She added that domestic provisions on nationality and citizenship did not discriminate against any nationality and that a draft criminal code punishing discriminatory acts was being evaluated in the National Congress. Ms la Cruz also addressed the political crisis in Haiti and the difficulties that the Dominican Republic was facing in dealing with the increased illegal migration.

The review was carried out tactfully, although there was an evident tension between the Committee and the delegation was felt while discussing the existence of racial discrimination in the country, particularly against Haitians and Dominicans of Haitian descent. Many Committee members expressed their appreciation with the

³ Available at www2.ohchr.org/english/bodies/cerd/cerds72.htm

⁴ Available at <http://www2.ohchr.org/english/bodies/cerd/cerds72.htm>.

⁵ Biometric data is inserted in identity cards.

⁶ Shantytowns in the sugar cane fields where the cane cutters, especially Haitian and Dominicans of Haitian descent, and their families live.

diversity of the delegation, yet voiced discontent with the report, which they found to be very superficial, and with the delegation's approach of rejecting the existence of racial discrimination against Haitians and Haitian descendents. Committee members Mr de Gouttes and Mr Kjaerum noted that there seemed to be a discrepancy between the information provided in the periodic report and that contained in reliable reports of independent experts, NGO's and newspapers. The delegation appeared slightly bothered with the continuous allegations of racial discrimination against Haitians and Haitian Descendents, and regularly denied such throughout the interactive dialogue, reaffirming that the Dominican Republic was a multiracial country in which all racial groups saw themselves as one identity. Committee member Mr Peter stressed the importance of having an open and sincere dialogue.

Status of the Convention in domestic law

In her opening statement, Ms Patricia Mercedez, legal assistant of the Ministry of Labour, explained that national courts had acknowledged that international agreements were binding on the Dominican Republic and were part of its constitutional framework.

The Country Rapporteur Mr Avtomonov noted that the Committee appreciated that the Dominican Republic ratified the Convention with no reservations or declarations. However, he reminded that it had not yet ratified the amendment to Article 8⁷ nor had made a declaration under Article 14 recognizing the competence of the Committee to consider communications from persons within its jurisdiction claiming to be victims of racial discrimination. Mr Avtonomov said that the Committee could not compel the Government to make the declaration given its optional nature, but wanted to know the delegation's position on the matter. No further considerations were given on the matter.

Legal framework

In her initial statement, the head of the delegation, Ms la Cruz, explained that individual and social rights guaranteed by the Dominican Constitution were enjoyable by all regardless of one's nationality, and added that discrimination was prohibited in domestic law. Delegation member Ms Mercedez said that even though the Constitution had no explicit provision prohibiting racial discrimination, the fundamental rights recognized in it were not restrictive and thus did not exclude other rights of a similar nature. She underscored that equality was a fundamental part of the Dominican Republic's constitutional order.⁸

Delegation member Mr Pelegri said that a draft penal code specifying and strengthening existing legislation on racial discrimination was being discussed before the Congress. He also said that *Law 24/97* had amended Article 336 of the Penal Code by including a specific definition of discrimination and also by establishing penalties of up to two years of imprisonment for discriminatory practices. Mr Ferrare further stated that the law on freedom of expression prohibited defamation against groups of people and accordingly established penalties of up to one year of detention.

Committee member Mr Kjaerum stated that there were no questions relating to the establishment of a legal framework dealing with the matter. However, he noted that mechanisms of implementation were unsatisfactory and asked what was being done to address the gap between legislation and practice. Mr Avtonomov noted that the labour code was the only instrument that clearly prohibited discrimination and asked if there were plans to introduce anti-discrimination provisions in other laws.

The delegation responded that there was a discrepancy between the information the Committee received and the reality. It affirmed that Article 100 of the Constitution condemned any discrimination against Dominican citizens and assured the Committee that all laws were in conformity with this provision. It furthermore

⁷ The amendment introduced paragraph 6 to the article, which reads "States Parties shall be responsible for the expenses of the members of the Committee while they are in performance of Committee duties."

⁸ Articles 8(5) and 100 of the Constitution.

stressed that the Government addressed discrimination through both legislative initiatives and proactive measures.

In its concluding observations, the Committee noted with concern the absence of general anti-discrimination legislation including a definition of racial discrimination in line with Article 1(1) of the Convention. It therefore recommended that the Dominican Republic adopt comprehensive legislation prohibiting discrimination on the grounds of race, colour, descent, or national or ethnic origin. It further urged the State party to adopt expeditiously the Draft penal code and take effective steps to guarantee its enforcement.

The situation of Haitians and Dominicans of Haitian descent

The high flow of Haitians to the Dominican Republic, increased with the political crisis in Haiti, led to the discussion of the overall situation of Haitians and Dominicans of Haitian descent in the country. The delegation stated that being a developing country, the Dominican Republic was not able to cope with the disordered **illegal flow** of migrants, but underscored that its borders were not as rigid as other countries, such as the United States. It assured the Committee of the Government's will to overcome the difficulties and highlighted that the Dominican Republic had been one of the most active States calling upon the international community to assist the community of Haiti.

The delegation explained that **deportation** was possible if the entry was clandestine, or if the immigrant forged documents or overstayed the visit. It was stressed that deportation could not be ordered in case the foreigner was married, had Dominican children or had been residing in the country for more than 10 years. It was further stated that the procedure of deportation respected a number of guarantees, which include the right to hearing, to defence, to an interpreter, to make administrative appeal, and to know the reasons justifying the expulsion. The delegation continues that the Dominican Republic and Haiti held a number of bilateral agreements on deportation, establishing a time limit to carry out the procedure, that repatriation must be conducted during the day, and that the Government of Haiti would install offices in certain bordering areas to receive deportees.

Many Committee members recognized these difficulties faced by the Dominican Republic. However, Mr Peter stated that while countries were making protocols on free movement of people and services, the Dominican Republic and Haiti were establishing 'objectionable' deportation agreements. He noted that migration officials did not usually comply with the agreements and that it had been alleged that people had not been allowed to collect personal belongings or their last wages. Committee member Mr Peter said that the practice of **collective deportation** was worrying and was a violation to Article 13 of the *International Covenant on Civil and Political Rights*.

In its concluding observations the Committee recommended the state party to ensure that laws on deportation do not discriminate on the basis of race, colour, or ethnic or national origin; to ensure that non-citizens are not subject to collective expulsions; to avoid expulsions that would result in disproportionate interference with the right to family life; to ensure that non-citizens have equal access to effective remedies; and to accelerate the approval of the provision of Migration Law 285-04 setting guidelines on the principle of due process in deportation and expulsion procedures. Furthermore, it recommended the State party to ensure that access to places or services intended for use by the general public was not denied on grounds or race, colour, national or ethnic origin.

Recognition of racial discrimination

Many Committee members touched upon the non-recognition by the Government of the existence of racial discrimination in the country, particularly with regard to Haitians and Dominicans of Haitian descent. Committee member Mr Lindgren voiced that there was no clear categorization of racism in the report and Mr

Lahiri expressed disappointment with the delegation's initial statement denying the existence of racism in the country. A number of Committee members wondered what were the causes of discrimination against Haitians and Mr Peter referred to reports submitted by NGOs alleging that blackness was associated with Haiti and that all forms of Haitian culture were discriminated against. Mr Peter further noted that it was reported that Dominicans differentiated themselves from Haitians on the grounds of colour, features, accent, names and clothes. He said there appeared to be on one hand a desire of the Government to achieve the ideals of the Convention, and on the other hand an understanding that all racial groups saw themselves as one identity. Committee member Mr Thornberry expressed his discomfort with the language used in paragraph 67 of the periodic report, which stated that "racial purity" did not exist in the Dominican Republic due to a high miscegenation between blacks, whites and Asians. He explained that genetics had nothing to do with race and that discrimination could arise in a society with common genetics. Mr Cali Tzay stressed that lack of complaints relating to racial discrimination did not mean that there was no racism in the country. Committee members Mr Lindgren and Mr Lahiri stressed the importance of including racial classification in the country's census so as to be able to assess the situation and develop policies accordingly.

The delegation stated that in the Dominican Republic all lived as one community and there was no discrimination against Haitians or Dominicans of Haitian descent. As an example, Mr Falustino drew attention to the fact that the Chairperson of the Dominican Republic-Haiti Cultural Committee was a Dominican of Haitian descent and that the members of this Committee were working to protect the rights of Dominican and Haitian workers. Delegation member Mr Ferran added that there were no State policies discriminating against Haitians and that if there were any discriminatory practices they came from individuals.

In its concluding observations, the Committee reminded the State party that it is an obligation under the Convention to prohibit and bring to an end, by all appropriate means racial discrimination by any persons, groups or organizations. Furthermore, it reminded the Dominican Republic that the absence of complaints by victims of racial discrimination might be an indication of the absence of legislation, of lack of awareness on the availability of legal remedies, or of insufficient public will to prosecute perpetrators.

Labour conditions

A number of Committee members expressed their concern regarding the **labour conditions** faced by Haitians in the Dominican Republic. Committee member Mr Kjaerum noted there was a high demand for cheap labour in the sugar cane and construction industries, which had led to the traffic of workers into the country. He voiced that these workers lived under terrible conditions that some call "modern slavery", and underscored that the social and legal structures contributed to lock these people in an irreversible situation. Mr Kemal said that the work of Haitians in the country had contributed to its economic development and should be recognized. Mr Diaconu pointed out that 65 to 75 percent of workers living in 'Batteyes' were Haitians, and Mr de Gouttes requested further clarification on measures to improve the situation of agricultural workers living in the 'Batteyes'.

The delegation assured the Committee that the Government was working to meet the challenges faced and underlined a number of initiatives, including the establishment of an inspection system and a gender equality and labour unit. It also stressed the efforts made to comply with the International Labour Organization (ILO) norms and recommendations, and highlighted that the ILO had commended the Dominican inspection units as best practice. Delegation member Mr Gimenez, representative of the National Sugar Institute, said the sugar industry provided all workers with free housing, water, electricity, entertainment, education, medical care, medicines free of charge, and private insurance policy. He further voiced that immigrant workers had total freedom to choose where to work and stressed that the wages in the country were fixed by the National Salary Committee of the Ministry of Labour with no differentiation between nationals and foreigners. He stated that it was therefore incorrect to compare the conditions of these workers with modern slavery. The delegation stated that the massive flow of migrants to the Dominican Republic did pose a serious problem to the poorest

segments of the Dominican population, which had difficulties in the labour market because they couldn't compete with people coming from countries where incomes were even lower.

Committee member Mr Kjaerum voiced that the Government should bear in mind the existence of another reality behind the official labour data. In its concluding observations, the Committee recommended that the Government eliminate discrimination against dark skinned Dominicans in relation to working conditions and to address the double discrimination faced by dark skinned Dominican women working in free zones and in the informal sector. Furthermore, the Committee urged the State party to develop comprehensive policies so as to prevent, investigate and punish human trafficking for economic purposes, as well as to provide support to victims.

Nationality acquisitions

The acquisition of nationality by children born in the Dominican Republic from parents who are not Dominican's was discussed. Committee member and country rapporteur Mr Avtomonov stated that according to the State party's written replies to the list of issues, its nationality acquisition policy was based on the ground of *jus sanguini*,⁹ which is the system applied by European states. However, he noted that according to the Dominican Constitution, the Dominican Republic grants nationality on the grounds of *jus solis*.¹⁰ He therefore welcomed further clarifications on the country's nationality acquisition approach. Committee member Mr Petter and Mr Kemal noted with concern that many children born in the country but whose parents were not Dominicans had their **birth certificates denied**, later affecting a number of rights including access to school. Ms Diaconu voiced that the registration of children was a question of the right to life and should not be a citizenship matter. Mr de Gouttes further noted that the Inter-American Court of Human Rights had condemned the Dominican Republic for denying Dominican nationality for children born in the country but whose parents did not have regular documents.

The delegation answered that the Dominican Constitution does not accord Dominican nationality to all born within its territory. It clarified that the country adopted the *jus solis* and *jus sanguinis* approach, both mentioned in its legislative framework. Furthermore, it stressed that the Supreme Court, while evaluating the constitutionality of the *2004 Law on Migration*, stated that Article 11 of the Constitution should be interpreted so as to exclude Dominican nationality to children whose parents are diplomats or foreigners '*in transit*' from receiving Dominican nationality.

A number of Committee members wanted to know why the status '**in transit**', traditionally used to classify the situation of diplomats, began with the 2004 Law on Migration n. 28504 to define the situation of all 'non-residents' in the country as 'in transit'. This approach was said to affect particularly the rights of Haitians living in the Dominican Republic for several years. Mr Lindgren referred to the report 'Dominican Republic: A life in transit', issued by Amnesty International, which addresses the situation of Haitians living in the Dominican Republic for over 20 years and who are still considered to be 'in transit', imposing even more limitations to their right to Dominican nationality.¹¹ Accordingly, he stated that the length of 'in transit' time was unacceptably long.

Through the list of issues, the Committee required further information about the registration of children of foreign mothers born in the Dominican Republic in a **Foreigner Registration Book**. A number of Committee members expressed concern with the distinction made by the public administration while issuing white **birth certificates** for children born of Dominican parents and **pink** birth certificates for children born of foreign parents. Mr Lindgren stated that this distinction was unacceptable and Mr Diaconu further questioned if

⁹ Nationality or citizenship recognized to individuals with an ancestor who is a national or citizen of that State.

¹⁰ Nationality or citizenship recognised to individuals born in the territory of the related State.

¹¹ According to "Dominican Republic: a life in transit", articles in the Law on Migration of 2004 seek to limit the scope of Article 11 of the Constitution by defining all "non-residents" as people "in transit", what imposes greater limitations on their access to Dominican nationality.

children were accountable for having foreign parents. The delegation answered that the issue of pink birth certificates was an administrative measure, not meant to be racially discriminatory. The delegation also responded that the set up of a Foreigner Registration Book was not a matter of discrimination but actually a request of consulates of other countries so they could keep track of their nationals. The delegation explained that with this measure children who previously were undocumented had now an assured nationality. It stressed that these measures did not restrict the rights of these children, and alleged they have access to all services on an equal footing with Dominican nationals.

In its concluding observations the committee recommended that the Dominican Republic consider the possibility of acceding to the 1984 Convention relating to the Status of Stateless Persons and to the 1961 Convention on the Reduction of Statelessness, which prohibit deprivation of nationality on discriminatory grounds and stipulate that a State party grant nationality to persons on its territory who otherwise would be stateless. Furthermore, the Committee invited the Dominican Republic to reconsider the status of people who have been living in its territory for a long period and recommended that the State party ensure equal access to birth certificates for all children in the country, including cases of late request for birth registration.

Identity cards

Through the list of issues the Committee requested clarifications regarding information received alleging that the expedition of identity cards was denied on account of one's ethnic origin, particularly to Dominicans with Haitian descent. The delegation assured the Committee that identity documents were not denied, but stressed that the issuing of identity cards was based on a rigorous consideration of the truthfulness of the information in the document. The delegation further explained that identity card theft was common and therefore birth certificates needed to be properly verified as stated by the Circular 17 of the administrative board. It noted that the Government was in process of optimising and digitalizing all documents and that the Civil Registry had been addressed to ensure that all documents are regularized.

A number of Committee members wanted to know if in the Dominican Republic **skin and eye colours** were still identified in national **identity cards**, electoral cards and driver's licenses. If it was the case, Committee member Mr Peter questioned what were the reasons justifying the measure and Mr de Gouttes wanted to know if the Government envisaged eliminating the practice. Furthermore, Mr Prosper wondered how a mixed racial society identified who was black. He inquired whether it was the individual or the Government who identified the skin colour. The delegation confirmed that skin colour was included in identity cards so as to recognize whether the identity card was actually of the person. It further stressed that this measure should not be seen as discriminatory and noted that airports had increasingly introduced biometric data, what hadn't been understood as discriminatory. The Country rapporteur Mr Avtonomov acknowledged that the United States and the United Kingdom have increasingly introduced biometric data, but stated that he did not understand the need to include eye and skin colours in identity cards. He further said that the Government should study the link between biometric data and social economic status.

Access to education

A number of Committee members expressed their concern with the difficulties faced by Haitians and Dominicans of Haitian descent to **access education**. The Country Rapporteur Mr Avtonomov noted that the level of education of the Haitian population was lower than that of Dominicans and Mr Kjaerum added that school administrators often denied undocumented children access to education. They questioned what were the steps taken so as to overcome this reality and Mr Sicilianos further inquired how accessible university was to people born from foreign parents in the Dominican Republic. The representative of the Ministry of Education responded that there were no restrictions for foreign children to access school in the country. It explained that the annual school attendance was in compliance with the Millennium Development Goals and therefore children were registered up to the 4th grade regardless of their status or of having a birth certificate. Regarding access to higher education, the delegation stated that more than 2000 scholarships covering

transportation costs were given to Haitians. It underscored that this practice reflected the Government's commitment to cooperate with Haiti.

Conclusions and next steps

In conclusion, the Country Rapporteur thanked the delegation for replying to most of the questions posed and stressed the importance of the dialogue undertaken. He clarified that the Committee was not in a position to judge the practices of any country and that it worked on the basis of the mandate given to it. He also explained that discrimination did not come necessarily from governmental policies and that the role of the Government was to identify discriminatory practices. The Chairperson expressed the Committees' dissatisfaction with the delegation's denial of racial discrimination in the Dominican Republic wished the Government would try to assess the situation carefully. She finally hoped that in the next interactive dialogue the Committee would find an improved situation in the country.

A number of UN treaty bodies made previous concluding recommendations and observations on the same issues addressed by the Committee. The Committee on the Rights of the Child (CRC) in 2008 expressed concern that children of Haitian immigrants and Haitian descendents had restricted access to education, health and social services, and urged the State party to review all legal framework in order to examine whether it clearly prohibits any differential treatment of children with regard to race, colour, sex, national, ethnic or social origin, disability, birth or other status.¹² The CRC recommended the State party to ensure the right of each and every child to be registered, in particular children from marginalized and vulnerable groups and to ensure that birth attestations were not used as the basis for discrimination of children due to the differences in the type of issuance of the so-called 'pink certificates'. The CRC further encouraged the State party to adopt a procedure to acquire nationality applied to all children born in the Dominican Republic in a non-discriminatory manner and make sure that no child became stateless. The Human Rights Committee in 2001 expressed concern with the abuse of the legal notion of "transient aliens", and with the continuing reports of mass expulsions of ethnic Haitians.¹³ It urged the State party to guarantee the right of every Dominican national not to be expelled from the country, and to ensure that the safeguards established in the Covenant covered all persons facing deportation proceedings. It further recommended the State party to give priority in addressing the working and living conditions of Haitian workers.

The Committee recommended that the State party submit its thirteenth and fourteenth periodic reports in a single report, due on 24 June 2010

Last revised and updated: 29 May 2008.

¹² CRC/C/DOM/CO/2, available at www.ohchr.org/EN/Countries/LACRegion/Pages/DOIndex.aspx

¹³ CCPR/CO/71/DOM, available at www.ohchr.org/EN/Countries/LACRegion/Pages/DOIndex.aspx

TREATY BODY MONITOR STAFF

Gareth Sweeney, Deputy Manager, Geneva

Michelle Evans, Representative to the UN, New York

Vanessa Jackson, Human Rights Officer, New York

AUTHORS OF THE DOMINICAN REPUBLIC REPORT

Ana Carolina Ponte Vidal, Intern

ABOUT THE PUBLICATION

The *Treaty Body Monitor* forms part of the Human Rights Monitor Series produced by ISHR. It reports on each country reviewed by the six treaty bodies (all but the Committee on the Rights of the Child) and provides an overview of every treaty body session. It is currently an online publication that can be found at <http://www.ishr.ch/hrm>.

COMMENTS AND FURTHER INFORMATION

We would welcome your feedback on this publication so please send any comments and suggestions to information@ishr.ch. You can check the latest Treaty Body Monitor reports published on www.ishr.ch.

COPYRIGHT AND DISTRIBUTION

Copyright © 2008 International Service for Human Rights

Material from this publication may be reproduced for training, teaching or other non-commercial purposes as long as ISHR is fully acknowledged. You can also distribute this publication and link to it from your website as long as ISHR is fully acknowledged as the source. No part of this publication may be reproduced for any commercial purpose without the prior express permission of the copyright holders.

DISCLAIMER

While every effort has been made to ensure the accuracy and reliability of the information contained in this publication, ISHR does not guarantee, and accepts no legal liability whatsoever arising from any possible mistakes in the information reported on or any use of this publication. We are however happy to correct any errors you may come across so please notify information@ishr.ch.