

Public Comment Summary Report

ICANN Office of Ombuds Framework and Process

Open for Submissions Date:

Tuesday, 23 December 2025

Closed for Submissions Date:

Tuesday, 10 February 2026

Summary Report Due Date:

Tuesday, 24 February 2026

Category: Governance

Requester: Other

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Open Proceeding Link:

<https://www.icann.org/en/public-comment/proceeding/icann-office-of-ombuds-framework-and-process-23-12-2025>

Outcome:

The Public Comment proceeding on the ICANN Office of Ombuds Framework and Process (Ombuds Framework and Process) received 11 submissions from individuals, organizations, and community groups. These submissions have provided valuable suggestions and recommendations for improvement. Submissions concentrated on six main thematic areas related to the Ombuds Office: independence and governance of the Ombuds Office; equal and safe access; transparency and accountability; scope and authority; timing and timelines of Ombuds Office processes; and Ombuds Office processes and principles. The submissions have generated extremely useful feedback, not just for the improvement of the Ombuds Framework and Process, but also for other aspects of Ombuds Office operations.

The Public Comment proceeding on the Ombuds Framework and Process makes a valued contribution to the Ombuds Office's efforts to articulate clear standards and processes for Ombuds complaint and conflict resolution. For example, the Ombuds recognizes the need to include a clearer and more detailed commitment for the timely handling of complaints and has been provided with suggestions for how to do this from community members. The submissions also help to further clarify the Ombuds' role, scope, and responsibilities.

The Ombuds will take the community submissions into consideration in the revision of the Ombuds Framework and Process document prior to submitting it for Board approval. Operational comments related to the implementation of the Ombuds Framework and Process – such as the provision of plain language materials and visual diagrams – will inform the plans for the implementation of the Ombuds Framework and Process. Some actions have already been completed or are currently underway, such as an updated Ombuds website with more user-friendly information about the Ombuds Office and the forthcoming Annual Report with the publication of case management data and associated observations to guide systemic learning.

The Ombuds thanks everyone who took time to share their feedback and questions about the Ombuds Framework and Process. The number and quality of the submissions reflect the community’s commitment to upholding fair and respectful treatment across ICANN.

Section 1: What We Received Input On

The ICANN Ombuds sought community input on the draft ICANN Ombuds Office Framework and Process, which is being revised. The currently operative Framework was published in 2009. The revised Framework and Process reflects the evolution of the ICANN Ombuds Office (Ombuds Office, Office) to address emerging needs in the ICANN community, to clarify processes, and to further align with good practice ombuds professional standards and processes. Updates include, but are not limited to:

- Providing greater detail, including the definitions for terms used in the document, defining Ombuds Office standards and principles, and detailing Ombuds Office processes.
- Moving from using the term ‘jurisdiction’ to ‘scope’
- Distinguishing between conflict and dispute resolution and complaint processes.
- Clarifying the responsibility of parties to respond to the Ombuds Office.
- Providing a channel for giving feedback or making a complaint about the Ombuds Office.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Farzaneh Badiei	Non-Commercial Stakeholder Group	NCSG
At-Large Advisory Committee (ALAC) Policy staff in support of the At-Large Community	At-Large Advisory Committee	ALAC
Zoe Bonython	Registrar Stakeholder Group	RrSG
Registries Stakeholder Group	Registries Stakeholder Group	RySG
Sarah Wyld	Tucows	TC

Individuals:

Name	Affiliation (if provided)	Initials
Shabrina, Fidya		SF
Ana Teresa Rodríguez	ICANN Fellow 84 & 86	ATR
Enkhtsetseg Shirendev		ES
Raymond Selorm Mamattah		RSM
Alfredo Calderon-Serrano		ACS
Eunice Alejandra Perez Coello	ISOC MX	EAPC

Section 3: Summary of Submissions

This Public Comment proceeding received 11 submissions: five from organizations and groups and six from individuals.

Several responses affirmed the value of an ICANN Ombuds Office to the multistakeholder model and expressed appreciation of a clear and transparent Framework and Process.

Respondents also provided feedback on potential areas to clarify or expand the Framework and Process, addressing the following issues which are detailed and analyzed further in the following section of this document:

- Independence and governance of the Ombuds Office
- Equal and safe access to the Ombuds Office
- Transparency and accountability of the Ombuds Office
- Scope and authority of the Ombuds Office
- Timing and timelines of Ombuds Office processes
- Processes and principles of the Ombuds Office

Section 4: Analysis of Submissions

Respondents affirmed the importance of the Ombuds Office in ensuring fairness, accessibility, and trust within ICANN's multistakeholder model, especially for people lacking institutional

power, resources, or other support (NCSG, ALAC, TC). They expressed appreciation for the clarity and transparency provided by the Framework and Process document (NCSG, ALAC, RrSG, ACS), particularly in making clear the Ombuds' role and explicitly committing the Office to ethical and operational standards that are aligned with international Ombuds standards (ALAC, ATR).

A range of feedback, questions, and suggestions about the Framework and Process centered on the following:

1. Ombuds Office Independence and Governance

Complaints about the Ombuds (Office): Commenters suggest that: (i) Complaints about the Ombuds Office should be made directly to a third party such as a designated board member (ATR, RSM) or an independent review panel and not raised with the Ombuds in the first instance (RSM); (ii) the process should allow for a complaint about the Ombuds (Office) to be processed by an alternative mechanism such as the ICANN compliance function or Office of the General Counsel (RySG); and (iii) that complaints about the outcome of a case should be permitted, in addition to complaints about the quality and process of such (RSM).

Own Initiative Investigations: Commenters suggest that: (i) Board approval of Ombuds own initiative investigations should be replaced with a safeguards-based model by which the Ombuds can initiate investigations within scope subject to a written rationale and reporting (NCSG); (ii) the Board's role in the investigation initiation process (ALAC) should be a consultative rather than a veto step; and (iii) the Board should provide a detailed rationale of its decision on whether the Ombuds can pursue its own initiative investigation (NCSG, EAPC).

Ombuds Performance Review: One commenter suggests that: (i) there should be more transparency and community input into the appointment and performance review of the Ombuds (NCSG); and (ii) there should be periodic evaluation of the Ombuds' function against measurable criteria to strengthen the function and reinforce trust through accountability (NCSG).

Ombuds Recusal: Commenters suggest that the Framework and Process clarify how and for what reasons the Ombuds may recuse themselves from a substantive evaluation of a Request for Reconsideration (NCSG, EAPC).

2. Equal and Safe Access

Language accessibility: Commenters suggest that: (i) measures should be taken to address language as a potential barrier to accessing the Ombuds Office services, including materials published in plain language (NCSG, ALAC, ES, ACS); (ii) visualizations of process guidance and examples of case types could help assist understanding (NCSG, ALAC, ACS, EAPC); (iii) checklists and templates would help to assist communication with the Office (EAPC); (iv) it would be help to provide interpretation or other translation assistance (NCSG, ATR, EAPC, ACS); and (v) culturally-sensitive and tailored communications (ES, ACS).

Safe access: Commenters suggest that: (i) measures to address fears of retaliation or other safety concerns as potential barriers to accessing the Ombuds Office services, including a clear commitment to anti-retaliation in the Framework and Process, would be beneficial (NCSG, ES, ACS); (ii) the Ombuds should provide safe contact options (NCSG); (iii) disclosure related to a complaint should be limited to what is necessary and proportionate (NCSG); and (iv) trauma-informed methods of harassment complaint handling should be employed (ATR).

3. Transparency and Accountability

Reporting case data and themes: Commenters suggest that: (i) the Ombuds Office publish (with defined frequency) aggregated, anonymized case data and trends, including reporting on systemic or recurring patterns for organizational learning (NCSG, ALAC, EAPC); and (ii) the Framework and Process can be more explicit about how confidentiality is balanced with reporting for accountability and organizational learning (NCSG, EAPC).

Tracking and addressing systemic or recurring issues: Commenters suggest that the Framework and Process should define a clearer process for tracking, communicating, escalating, and addressing recurring issues, including if and how Ombuds Office recommendations for systemic improvements are acted upon (NCSG, ALAC, ATR).

Implementation of Ombuds recommendations: Commenters suggest that: (i) whether on systemic or single issues, the Ombuds should implement a publicly visible mechanism to track if and how Ombuds Office recommendations are responded to or acted upon by the Board or others to whom they are directed (NCSG, ALAC, EAPC); and (ii) the Ombuds should provide a warning to notify those who refuse to comply with remedial actions identified by the Ombuds Office before the matter is referred to the Board (RrSG).

4. Scope and Authority

Relationship between the Ombuds Office and other ICANN accountability mechanisms: Commentators suggest that the Ombuds should provide clearer guidance on the roles of and relationships between the Ombuds Office and other ICANN accountability mechanisms, use visual flow charts or case illustrations to help community members identify which is the appropriate mechanism for their concern, and explain the path(s) their case might take through the overall accountability ecosystem (NCSG, ALAC, ACS).

Ombuds role: Commenters suggest that there could be further clarification in the Framework and Process of the Ombuds role at different stages of informal or collaborative and formal or complaint processes (NCSG, EAPC).

Exclusions from scope: Commenters(s) suggest that: (i) ICANN staff should be included in scope and have access to the Ombuds Office's services (RrSG, Tucows); and (ii) the Framework and Process should clarify whether and when the Ombuds Office has jurisdiction over decisions, actions, or inactions of ICANN staff – and other out-of-scope groups such as

vendors – as they relate to concerns or complaints raised by community members (NCSG, RrSG, Tucows, FS, RySG).

5. Timing and Timelines for Ombuds Office processes

Detailed timelines: Commenters suggest that the Framework and Process document should provide more detailed timelines than the current ranges of days (NCSG, ACS, ALAC), in particular to establish expectations for ongoing or interim communications (NCSG, ACS) and in the event of delays (NCSG, ALAC, EAPC). Further, one commenter proposed specific timings for cases of different complexity (ALAC) and another proposed an expedited timeline for urgent or sensitive matters where delays could increase risk or cause harm (NCSG).

Overlapping timelines: Commenters noted that the timeline for the Ombuds Office to conclude an investigation within 60–90 days overlaps with the 90–day period the Office allows for responses to its formal requests for information (RrSG, Tucows).

Responsibility to respond to the Ombuds Office: Commenters suggest that the Ombuds should consider a duty-to-respond requirement for ICANN bodies engaged by the Ombuds and a written explanation of extension requests or delays (NCSG, EAPC).

6. Ombuds Office Processes and Principles

Process details: One comment suggests that further detail in the Framework and Process about the complaint processes – including clarifying how penalties are considered, adding criteria for case closure types, and explaining how cases are handled when information is incomplete (EAPC) – would be helpful.

Standards and Overarching Principles: Commenters(s) suggest that: (i) feedback on the Standards and Overarching Principles includes express commitment to digital safeguards for confidentiality (ATR); (ii) the Framework and Process should further emphasize individual empowerment and self-determination (ATR); (iii) the Ombuds Office should align its standards with the UN Guiding Principles on Business and Human Rights; (iv) the Ombuds Office should integrate dignity, diversity, equity, inclusion, and belonging (ATR); and (v) the Framework and Process should include clear structural and procedural guarantees of independence beyond the statement of principle (NCSG).

Section 5: Next Steps

The Ombuds Office will review all the valuable feedback received during the Public Comment proceeding and carefully consider all the submissions.

The Ombuds Office will consider and address where appropriate proposed revisions and improvements to the Ombuds Framework and Process, including clarifications and additional detail about timelines, retaliation, and standards.

All recommendations will be reviewed against Articles 4 and 5 of the ICANN Bylaws to ensure compliance with the Bylaws. Some recommendations that are out of scope for the Framework and Process will require discussion with other ICANN stakeholders before determining how to address them going forward.

Operational recommendations related to the implementation of the Framework and Process or to the Ombuds Office more generally – such as language accessibility, reporting on case data and themes, and tracking of systemic issues – will inform plans and Ombuds Office deliverables.

After considering all the comments, the Ombuds Office will finalize the Ombuds Framework and Process. Following Board approval, the document will be published on the website alongside visual diagrams, process maps, and other user-friendly resources.

The Ombuds Office will provide feedback to the community about how the submissions have been taken into consideration.

The Ombuds Framework and Process articulates what community members can expect from the Ombuds Office and what the Ombuds can and cannot do. It is important that it is clear and transparent and the Public Comment proceedings make a valued contribution to that end.