

DRAFT Compendium Document

This document is meant to provide guidance on the Standards of Practice. While not binding, an ombuds can use this document—within the context of the unique situation and workplace that they are experiencing—as an explanatory resource.

When this document contains guidance that is not applicable or contrary to an ombud's set duties, the Standards of Practice remain precedent. (or binding?)

This document is updated [insert interval—yearly or as needed] by [insert process]. IOA members should submit proposed revisions, questions, or requests for clarification to [insert].

General definitions:

- **Confidential Ombuds Information**—Includes not only personally identifiable information about visitors, but notes and communication conducted in the course of an ombud's practice.
 - An ombuds shall only maintain Confidential Ombuds information in a secure location, and in a manner as to reasonably protect it from disclosure to or inspection by others, including from the organization.
 - An ombuds program should implement a consistent and standard practice for the prompt destruction of Confidential Ombuds Information.
 - While digital records, including email, phone logs, swipe card access may remain outside of the control of an ombuds, adhering to the consistent and standard practice for the prompt destruction of the Confidential Ombuds Information within the control of an ombuds.
 - Confidential Ombuds Information is not a public record and is exempt from [insert state public records act].
- **General information**—Any information that is not Confidential Ombuds Information, such as services, programs, or principles of the ombuds.
 - Information that is shared as General Information about visitors shall be aggregate, non-identifiable information.

- **Ombuds**—The ombuds title itself should hold the weight of its importance and the duties incorporated in these standards. Thus, the emphasis on a specific designation or classification within a title (ex: G-5; vice president, Director, faculty, associate ombuds) shall not impact compliance with these standards.
 - Subject to any specifically established privileges (ex: legislative protection or charter), those working within an ombuds program, but not specially an ombuds (ex: data-manager, administrative assistant) should be provided with the same level of deference under these standards to the extent possible.
- **Ombuds program**—The term “program” is used throughout this document as a general term for an entity with an established ombuds. Office, department, facility, job title, ancillary duty, or other synonym (or plural) for the work of an ombuds may be used in an ombud’s specific workplace. This term seeks to incorporate all of the different classifications that an ombuds may structurally be working in.

Guidance and Intent

Proposed IOA General Practice Standards—General Standards		GUIDANCE and INTENT
1.1	<p>An ombuds serves as a uniquely independent, impartial, informal, and confidential resource—<i>empowering</i> both organizations <i>and their people</i> to navigate concerns with trust and integrity.</p>	<ul style="list-style-type: none"> ● <i>And their people</i> <ul style="list-style-type: none"> ○ If an ombud program serves external visitors (ex: citizens, patients, parents calling to report concerns), this phrase is meant to capture their inclusion within the work of the ombuds program. ● <i>Empowering</i> <ul style="list-style-type: none"> ○ Often noted as the 5th standard, an ombuds works to ensure that as organizations and their people navigate the decisions and challenges that arise, they do so with knowledge, support, and guidance.

1.2	<p>When an organization establishes an ombuds program, compliance with these standards will be upheld by the organization and the ombuds.</p> <p>A charter, policy, terms of reference, or a detailed program description, accepted by organizational leadership and publicized, will articulate the basis on which the ombuds operates, including through the incorporation of these standards.</p> <p>Adherence to these standards facilitates outcomes that build trust, enhance relationships, improve communication, and address conflict within the organization.</p> <p>These standards are interdependent and non-severable; when one standard is specifically emphasized, the remaining standards are incorporated by reference.</p>	<ul style="list-style-type: none"> ● <i>Establishes</i> <ul style="list-style-type: none"> ○ An ombuds program is established when an individual is hired or assigned to complete the work of an ombuds. ○ SEE EXAMPLES (of charters, or institutions without—ex: Cal-Berkley) ● <i>Accepted by organizational leadership</i> <ul style="list-style-type: none"> ○ Examples of acceptance include: payment to an ombuds, publicizing an ombuds program, ratification or passage of a charter, granting of office space or other resources. ● <i>Publicized</i> <ul style="list-style-type: none"> ○ Such publication can include a hiring announcement, website for the ombuds, or listing of the ombuds program on any documents or website (ex: referral list).
1.3	<p>An Ombuds:</p> <ul style="list-style-type: none"> ● works directly with individuals and groups at all levels of the organization to address concerns; ● facilitates open communication, dialogue, and collaborative problem-solving to resolve conflicts; ● helps participants identify options and connects them with appropriate resources; ● identifies and brings forward issues and procedural irregularities that affect individuals or the organization; and 	<ul style="list-style-type: none"> ● <i>Sole discretion</i> <ul style="list-style-type: none"> ○ The independence of an ombuds is paramount, but an ombuds does not work in a silo. While an ombuds ultimately decides how to conduct their work, such a decision may be reached after consulting internal and external stakeholders or references, including other ombuds. ○ If an ombuds program employs more than one ombuds, administrative and tactical decisions may be made by the highest

- provides feedback to the organization on emerging or systemic concerns.

ranking ombuds without violating these standards. However, great care should be taken to ensure that subordinate ombuds are given the same latitude to comply with these standards in a manner that is genuine and reflective of the work and the unique approach of each ombuds.

- *Organization*
 - An ombuds may be tasked with serving visitors that are not employed by the organization but related to it (ex: patients, community members); as such, constituency guidance should be made clear when an ombuds program is established.
- *Assists*
 - An ombuds is not a passive employee of an organization, and foundationally, an ombuds work begins along one of three paths:
 - The visitor takes action (ex: the visitor speaks to their supervisor);
 - The ombuds intervenes on behalf of the visitor (ex: contacting an audit office with a hypothetical or directed question, conducting research, speaking to relevant leaders about themes or patterns of saturation); or,
 - The visitor pursues formal action outside of an ombuds program (ex:

		<p>filing a formal report).</p> <ul style="list-style-type: none"> ○ While these three paths can overlap and diverge, an ombuds works to empower a visitor to select the path that aligns with their goals, while also realizing any obligations of duties an ombuds may have to other visitors.
1.4	<p><i>An Ombuds and program staff keep professionally current through relevant educational opportunities and professional development.</i></p>	

IOA General Practice Standards—Independence		GUIDANCE and INTENT
2.1	<p><i>An Ombuds is independent in appearance, purpose, practice and decision-making.</i></p> <p><i>An ombuds program operates independently from other organizational entities or functions to safeguard the program from the influences or pressures of other organizational functions.</i></p>	<ul style="list-style-type: none"> ● <i>Independently</i> <ul style="list-style-type: none"> ○ The tenant of independence is the foundational standard to the work of an ombuds and ombuds program to which all other standards flow from. ○ In addition to ensuring an ombuds does not, in their professional capacity, create an appearance of impropriety, care should be taken to ensure that there is not a structural appearance of impropriety that would cause a visitor to question the independence of an ombuds. Factors such as publicized organization charts or office location should be considered when evaluating this standard. ● <i>Influences or pressures</i> <ul style="list-style-type: none"> ○ Internal and external influences or pressures

		<p>may seek to impact the work of the ombuds, but the ombuds has a duty to comport their work in accordance with these standards.</p> <ul style="list-style-type: none"> ○ However, in instances where influences or pressure are not related to the work of the ombuds program (ex: budgeting or funding cuts for all departments), the ombuds should respond to those in a manner which aligns with these standards.
2.2	<p><i>An ombuds program shall report to the highest level of senior leadership within the organization needed to ensure the program's independence, which is interdependent with the standards of impartiality, confidentiality, and informality.</i></p>	<ul style="list-style-type: none"> ● <i>Highest level of senior leadership</i> <ul style="list-style-type: none"> ○ Determination of whether this substandard is met should be determined by the ombuds as part of the application process. If there is a reorganization of an organization or change in personnel that impacts or undermines the program's ability to meet this standard, the ombuds shall work to educate and advocate for change in congruence with these standards and any governing documents which establish the program. ○ If there is an ombuds program with associate or assistant ombuds, as well as any support staff, such individuals do not need to report to the highest authority in the same way the most senior member of the ombuds program reports to. (Ex: an assistant ombuds can report to the associate ombuds; administrative staffing or interns can report to an assistant ombuds).

		<ul style="list-style-type: none"> ● <i>Safeguard the work</i> <ul style="list-style-type: none"> ○ Administrative functions (ex: time-off approvals, budgeting approvals, annual evaluations) conducted by other offices, would not typically violate the independence of an ombuds program. However, these are areas where an ombuds is encouraged to maintain records in case of instance of possible retaliation following performance (execution) of ombuds duties. ● For additional guidance regarding evaluations, please the <u>Methods of Ombuds Evaluations Guide. [Document to be created]</u> ● Is this information still missing: <ul style="list-style-type: none"> ○ <u>language Jacqueline suggested from Foundations</u> ○ <u>Include seniority of ombuds aspect (Youssoupha Niang comments in Basecamp) in Compendium. Aspects of influence and competencies and access to those in highest level in terms of providing feedback.</u>
2.3	<p><i>If the ombuds has non-ombuds duties, those duties must not interfere with their ombuds duties, or the ability to adhere to the principle of independence and the interdependent standards of impartiality, confidentiality, and informality.</i></p> <p><i>[Compendium: Discussion about how to make it clear ombuds can serve in other capacities such as ex officio on committees without compromising independence.]</i></p>	<ul style="list-style-type: none"> ● <i>Non-ombuds duties</i> <ul style="list-style-type: none"> ○ Except as necessary for the internal supervision of an ombuds program, [Not sure what the ABA language is aiming for here] an ombuds and ombuds program staff shall not serve in additional roles or functions within the organization that could compromise impartiality or could be reasonably perceived

as compromising impartiality.

- An ombuds declines involvement when the ombuds determines that they may have a real or perceived conflict of interest.
- If it is possible to prevent a conflict (ex: if an ombuds is teaching a course, ensuring students understand what capacity they are interacting with the individual as—professor of ombuds, such a distinction remains with the ombuds), ensuring that secondary conflicts do not arise (ex: attending faculty staff meetings) must be considered by an ombuds to ensure this standard is met.
- It is the responsibility of an ombuds to clearly communicate when they are engaging in non-ombuds duties.

- *Ombuds duties*
 - The knowledge and perspective of an ombuds is often called upon in service on committees and task forces. Such work aligns with the duties of an ombuds outlined in Standard 1.3. However, to ensure that independence or impartiality is not compromised, an ombuds should serve as an ex-officio or advisory member, without a vote, and make clear their role.
 - When an ombuds engages in administrative duties related to the running of the program (ex: financial or personnel decisions), such actions do not comprise this standard, even

		though the actions may demonstrate an element of partiality. When completing administrative duties, an ombuds shall take care to ensure such partiality is based on neutral and unbiased information.
2.4	<p><i>An Ombuds has the authority to select Ombuds program staff and to manage the Ombuds program staff and to manage the program budget and operations without undue influence or limitations.</i></p>	<ul style="list-style-type: none"> ● <i>Authority to select</i> <ul style="list-style-type: none"> ○ The ability to independently decide what candidate fulfills the needs of an ombuds program is paramount. While an ombuds hiring process may include the input of other stakeholders, the ultimate decision should remain with the ombuds. ○ If a place of employ has objective criteria that all employees, or employees within a certain job criteria must meet (ex: absence of a criminal record, passing of a substance test, language requirement), removal of such candidates by a hiring partner such as human resources does not compromise this standard. ● <i>Manage the program budget</i> <ul style="list-style-type: none"> ○ An ombuds should have autonomy regarding the allocation of their budget. ○ It is not atypical for an organization to have a budgeting or purchasing officer that an ombuds may work with, and such a working arrangement does not compromise this standard.

		<ul style="list-style-type: none"> o If an ombuds is required to advocate for financial resources or there is a change to their budget allocation, an ombuds should ensure that such a change is not related to the completion of their duties. [SAME LANGUAGE—FIND]
2.5	<p><u>An Ombuds program</u> has the sole discretion over whether and how to engage regarding individual, group or systemic concerns.</p> <p>Acting on their own initiative, an Ombuds may bring a concern to the attention of the appropriate individuals.</p>	<ul style="list-style-type: none"> • <i>Whether and how</i> <ul style="list-style-type: none"> o The work of an ombuds often requires a tactical analysis of how best to address the matter—taking into account the wishes of the visitor with information that the ombuds knows that a visitor may not have access to. Thus, while an ombuds will try to honor the wishes of a visitor, competing factors may impact the next steps that an ombuds chooses to take. o For examples of actions that an ombuds may consider taking, see: ADD MARY ROWE article about how to accomplish different things as an ombuds.
2.6	<p><i>An Ombuds has access, as permitted by law, to relevant individuals and information within the organization as necessary to fulfill their role.</i></p>	<ul style="list-style-type: none"> • <i>Access</i> <ul style="list-style-type: none"> o The work of an ombuds is inherently relational, with the ability to work and share trends or discuss situations with various stakeholders. Access should not be construed as impacting their independence. • <i>Individuals and information</i> <ul style="list-style-type: none"> o The use of organizational systems and

		<p>resources by the ombuds not compromise the ombuds program's independence.</p> <ul style="list-style-type: none"> ▪ However, if an ombuds thinks that there is a conflict of interest between the obligations of an ombuds under these standards and the legal strategy proposed by an organization's legal team, an ombuds should be provided with independent counsel at the expense of the organization. ○ The use of organization systems and resources by an ombuds for a personal matter (ex: consulting leaves office, benefits, HR, ability services, recreational facilities) does not compromise an ombud's independence.
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Proposed IOA General Practice Standards—Impartiality		GUIDANCE and INTENT
3.1	An ombuds functions as an <i>impartial, neutral, and unbiased</i> resource.	<ul style="list-style-type: none"> ● <i>Impartial, neutral, and unbiased</i> <ul style="list-style-type: none"> ○ There may be instances where an ombuds has a personal relationship to a party or aspect that a visitor is seeking assistance for (ex: in a prior role, having actually drafted the policy the visitor has a concern with). In such a situation, an ombuds has the responsibility to raise the conflict of interest as soon as they are aware of the conflict (APPEARANCE OR

ACTUAL), allowing the visitor to either waive the conflict of interest (knowing, informed, and voluntary) or be referred to other resources.

- In many employment settings, system-wide surveys or data collection methods may be occasionally proctored (ex: workplace evaluations by third-parties; parking surveys). An ombuds completing such a survey from the perspective as an employee does not compromise this standard, but should take care in ensure that **confidential ombuds information** is not shared.
- When an ombuds engages in administrative duties, including personnel decisions (ex: hiring, performance evaluation for a subordinate ombuds), such actions do not comprise this standard, even though the selection of a candidate demonstrates an element of partiality. In such instances, an ombuds shall take care to insure such partiality is based on neutral and unbiased information.
- An ombuds, in their personal life, will naturally hold certain opinions and beliefs, and may robustly engage as a citizen or participant in their community. An ombuds should take care to try to separate their personal and professional worlds, to the extent possible, to preserve the integrity of this standard.

		<ul style="list-style-type: none"> ○ SEE Guidance—Can I hold opinions as an ombuds (ex: office decals and decorations, social media, C-P-X test in the US)
3.2	An Ombuds has <i>no personal interest in</i> , and incurs no gain or loss from, the outcome of a matter.	<ul style="list-style-type: none"> ● <i>No personal interest in</i> <ul style="list-style-type: none"> ○ While an ombuds may be personally and interested and invested in serving the profession and the role well, an ombuds should not be financially impacted by the decision of a visitor in any direct or indirect manner outside of the workplace.
3.3	<p>An ombuds fairly and objectively considers the implications of options and alternatives discussed with participants, including possible impacts on participants, others, and the organization.</p> <p>The ombuds promotes equitably administered processes but does not advocate on behalf of anyone.</p>	<p><i>I have some notes on multi-partiality and considering how to take actions when considering how the action impacts other. However, I was hoping that someone else could better explain this.</i></p>

Proposed IOA General Practice Standards—Informality		GUIDANCE and INTENT
4.1	<p>Use of the ombuds program is <i>voluntary</i>. Consultation with the Ombuds is (shall) not (be) a required step in any formal disciplinary process or grievance policy.</p> <p>An ombuds program is an informal resource that is not authorized to act, speak, or accept formal notice on behalf of the organization, and works with individuals who freely and voluntarily seek assistance.</p>	<ul style="list-style-type: none"> • <i>Voluntary</i> <ul style="list-style-type: none"> ○ It is important that an ombuds ensures that visitors not only voluntary seek the services of an ombuds program, but do so without implicit coercion or pressure. <ul style="list-style-type: none"> ▪ If an ombuds is presenting at mandatory meeting (ex: a staff meeting), the inherent requirement that an employee attend is not considered implicit coercion or pressure, but the ombuds should take in care in ensuring that any participation asked of the ombuds (ex: completion of a survey or answering of questions, is voluntary).
4.2	<p>An ombuds program is an informal and off-the-record resource.</p> <p>The Ombuds <i>does not make</i> business or policy decisions, adjudicate issues, participate in disciplinary or grievance processes, or <i>conduct formal investigations</i> for the organization.</p>	<p><i>Commentary on what is meant by off the record and that organization is not on notice when ombuds is contacted.</i></p> <ul style="list-style-type: none"> • <i>Does not make</i> <ul style="list-style-type: none"> ○ Any decision that an ombud makes in alignment with ombuds administration duties (ex: submitting a proposed budget for the ombuds program) does not violate this standard. • <i>Conduct formal investigations</i> <ul style="list-style-type: none"> ○ While the duties of some ombuds programs include initial inquiries or proposed investigation plans, the actual conducting of

		such investigations is beyond the scope of an ombuds.
4.3	<i>An ombuds takes action related to issues with the permission of those contacting the ombuds and at the sole discretion of the ombuds unless such action can be taken while safeguarding the identity of those contacting the ombuds program or an exception to confidentiality applies.</i>	<i>Compendium: How to intervene while protecting identity. Tension between visitor autonomy and ombuds discretion. Track for larger review.</i> <i>I was hoping that someone else could better explain this/ the language in 3.3 could be duplicated in large part here.</i>
4.4	<i>An Ombuds program is not considered an agent of the organization authorized to receive notice of claims, complaints, or grievances against the organization unless specifically and expressly required by law. The Ombuds may refer individuals to the appropriate place where formal notice of claims can be made.</i>	<i>Commentary about international ombuds programs - Youssoupha Niang to add given NGO reliance on administrative policy and not law.</i>
4.5	<i>The Ombuds maintains no permanent records containing personally identifiable information. The Ombuds has a consistent practice for the timely elimination of personally identifiable information.</i>	<i>Compendium: Acting in a way that limits creation of information with reality of digital age.—Added to the general definitions section. Personally identifiable information means information that could compromise confidential information.</i>

Proposed IOA General Practice Standards—Confidentiality		GUIDANCE and INTENT
5.1	<p><i>The identity of those seeking assistance from the Ombuds, as well as communications and information specifically relating to them obtained within the scope of providing ombuds services is confidential information.</i></p>	<ul style="list-style-type: none"> • <i>Confidential information means confidential ombuds information</i> ADD finalized definition from general definitions section at the top
5.2	<p><i>An ombuds, an ombuds program, and the organization shall protect confidential information. Others cannot waive this requirement.</i></p> <p><i>The principle of confidentiality is limited only by specific requirements in the laws of a state, territory, region, country, or associated union, and only to the extent required by such laws.</i></p>	<ul style="list-style-type: none"> • <i>Protect</i> <ul style="list-style-type: none"> o An ombuds program should have a process for not only protecting confidential ombuds information, but a process for its timely destruction. o SEE SAMPLE SOP [TO BE CREATED] o Insert information about implied contract and contractual law, IOA Confidentiality Primer, and information in the Foundations video. • <i>Others cannot waive</i> <ul style="list-style-type: none"> o While a visitor has the authority to self-disclose anything related to their experience with an ombuds, disclosure by an ombuds should still comply with section 5.4 of the Standards of Practice. o A change to an ombuds program by administrative action (ex: a change in a charter) would not constitute a waiver by an entity. • <i>In the event of any formal or legal proceeding, the Ombuds will assert any and all applicable testimonial privileges, immunities, and legal protections available under the governing law of the organization to safeguard the confidentiality of communications and the identity of those who seek assistance.</i>

		<ul style="list-style-type: none"> • Need to add note explaining last sentence: that some programs like NGOs are not limited by specific requirements in the law or defined by case law and therefore are able to define confidentiality as protected in administrative policies. Youssoupha to advise further
5.3	<p><i>The ombuds and ombuds program staff do not disclose Confidential Ombuds Information and shall oppose disclosing Confidential Ombuds Information in any formal or informal, administrative, or legal matter within or external to the organization.</i></p>	<p><i>if disclosure is compelled, for example to prevent manifest injustice or a because the court determines the interests served by disclosure clearly outweigh the interests served by ombuds, it should be in-camera review to protect confidential information to the fullest extent possible.</i></p>
5.4	<p><i>Exceptions:</i></p> <p><i>Notwithstanding that an ombuds and ombuds staff do not disclose Confidential Ombuds Information, the following exceptions apply to the most limited extent possible, when:</i></p> <p><i>Exceptions- An ombuds program, including all ombuds and ombuds program staff, may only disclose Confidential Ombuds Information to the most limited extent possible, when:</i></p>	<ul style="list-style-type: none"> • <i>Most limited extent possible</i> <ul style="list-style-type: none"> o An ombuds should take particular care when an exception applies to ensure that information not being sought is not disclosed, that confidential information about other visitors is not disclosed, and XYZ. o Means of limitation may include redacting ancillary information, seeking an <i>in camera</i> review process, or asking for special counsel to be provided to ensure compliance without excess disclosure. • <i>Imminent risk of serious harm</i> <ul style="list-style-type: none"> o An ombuds is tasked with determining how to

<p><i>An ombuds program, including all ombuds and ombuds program staff, may only disclose confidential ombuds information, to the most limited extent possible, when:</i></p> <ol style="list-style-type: none"> <i>1. an ombuds determines that there appears to be an imminent risk of serious harm;</i> <i>2. the participant has granted the ombuds or the ombuds program express permission to assist with informal resolution of a concern; whether or not to disclose is at the sole discretion of the ombuds. Any such permitted disclosure does not constitute a waiver of confidentiality regarding other Confidential Ombuds Information.</i> <i>3. the ombuds, in their professional judgment, determines that disclosure of confidential information about a specific matter is required to defend the ombuds or ombuds program from an allegation of professional misconduct raised in a formal proceeding or investigation;</i> <i>4. expressly required by law.</i> 	<p>interpret this phrase within the context of their work environment, and while such an evaluation may evolve, program or self-standards would be prudent to have already established.</p> <ul style="list-style-type: none"> o Harm categories that may be considered include physical, emotional, financial, patient safety, or national security. ● <i>Express permission</i> <ul style="list-style-type: none"> o Permission does not need to be written to formalized. o An ombuds shall consider whether the express permission given by visitor may inadvertently reveal other information impacting other visitors, which may be a reason not to disclose the information. However, an ombuds—if deciding not to disclose such information—should creatively consider how to address the matter in accordance with these standards. ● <i>Allegation of professional misconduct raised in a formal proceeding or investigation</i> <ul style="list-style-type: none"> o The work of an ombuds is nebulous, and at times, a visitor may unintentionally or intentionally make choices which could reflect negatively on the competencies or ethics of an ombuds. If a matter elevates to a formal proceeding or investigation from an internal (ex: human resources) or external (ex: professional organization or accrediting body such as a state bar) entity, an ombuds, to <i>the most limited extent possible</i>, may break confidence to defend themselves.
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- o If a matter does not rise to a formal proceeding or investigation, an ombuds may work to dispel misinformation through explaining what an ombuds does, how they would typically address a hypothetical situation, or provide examples regarding their typical course of practice.
- o The ombuds is a position of trust, and while there may be instances where an ombuds cannot fully dispel how another views them or their role, an ombuds demonstrates credibility by adhering to these standards, even if other roles would afford a more public manner in dispelling inaccurate information.
- o ADD LANGUAGE FROM ELLEN's ETHICS LAWYER
- *By law*
 - o In addition to compliance with the laws of an ombud's jurisdiction (ex: mandatory reporting minor or elder abuse), as required by law may also include in accordance with a judicial order or mandate such as a litigation hold.
 - o Questions about confidentiality and privilege and compliance with the law should be understood by an ombuds within the context of their organization and may be uniquely impacted by the laws of a state, territory, region, country, or associated union, including implied contracts and statutory privilege.
 - o In the event of any formal legal proceeding, an ombuds will assert any and all applicable testimonial privileges, immunities, and legal

		<p>protections available under the governing law of the organization to safeguard the confidentiality of communications and the identities of those who see assistance.</p> <ul style="list-style-type: none"> o In such instances, an ombuds shall, to <i>the most limited extent possible</i>, comply with such requirements. o For additional information related to this exception, see (INSERT LINK) to MARY ROWE's ARTICLE).
5.5	<p>The Ombuds <i>may provide</i> non-confidential information about the ombuds program in any <i>appropriate forum</i>. The Ombuds shares <i>data, trends, or reports</i> in a manner that protects confidential ombuds information.</p>	<ul style="list-style-type: none"> ● <i>May provide</i> <ul style="list-style-type: none"> o Given the duties of an ombud vary greatly by role or by country, there are some ombuds whose duties include investigatory components. Thus, this language is intended to provide an ombuds with the requisite discretion to complete those duties or honor such obligations in the context of this standard. ● <i>Appropriate forum</i> <ul style="list-style-type: none"> o An ombuds should consider the impact of how and where such information is shared, noting whether such an action would place an organization on notice. o Moreover, given the innate trust required for the work of an ombuds program, the ombuds should take care to ensure that relevant stakeholders are aware of and have access to the information if not

already known. (ex: if saturation has not be reached within a department, but the aggregate data will show that 10% of visitors from the year came from said department, courtesy would dictate adding that department head as a relevant stakeholder).

- *Data, trends, or reports*
 - Information that is shared should be **general information**.
 - In addition to annual reports, such data, trends, or reports may be used for research, educational, or informational purposes.