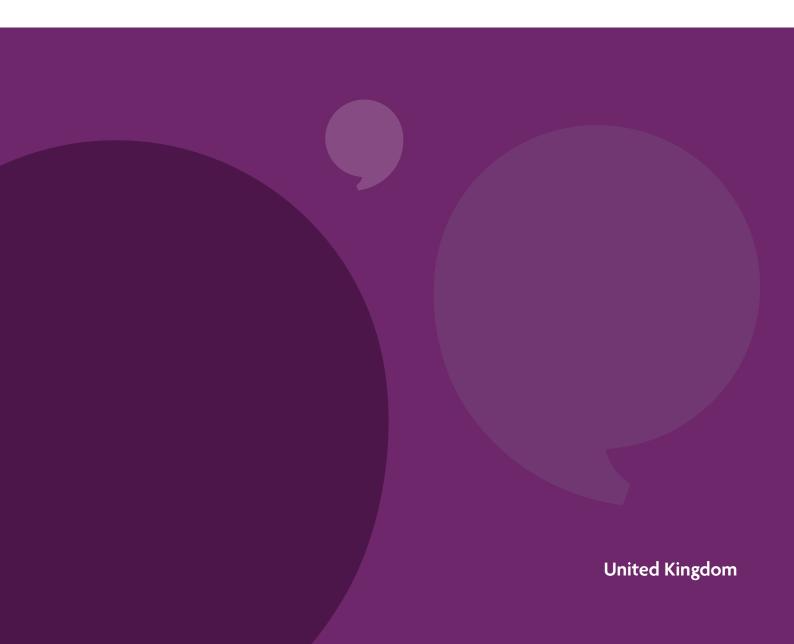


The Ombudsman, coronavirus and crisis management

An interim report

October 2020



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Introduction

Ombudsman organisations seek to preserve and protect the rights of the populations they serve. They aim to speak 'truth unto power' and obtain redress for citizens when they are failed by public administration. Through casework relating to individuals the Ombudsman then seeks to identify trends and influence public policy-making.

This is the Interim Report of a research study conducted in June 2020 by the Parliamentary and Health Service Ombudsman (PHSO) of the United Kingdom at the height of the first phase of the COVID-19 pandemic. The research questionnaire was designed, supervised and analysed by Alastair Galbraith at PHSO with support from Katie McGregor, a graduate student at Glasgow University. PHSO is grateful to the International Ombudsman Institute for generous support in distributing the questionnaire to its members, and to its members for responding so thoughtfully.

This is an interim report. The full quantitative and qualitative analysis will be published at the beginning of 2021. The research as currently analysed illustrates that, like most other public institutions, ombudsman offices have been hard hit by the COVID-19 pandemic and their operations have been compromised and sometimes even suspended. Ombudsman institutions have needed to be creative in redeploying staff and working remotely. They have had to re-calibrate the priorities for investigation and systemic review. In this, most ombudsman offices have deployed powers of 'own initiative' (where these are available) to undertake work on the impact of coronavirus on citizens.

While COVID-19 has constituted a crisis for ombudsman institutions, colleagues report longer-standing and significant associated challenges, some of which have become more acute in light of the pandemic. These challenges include a lack of public understanding of the ombudsman's role, difficulty in connecting with vulnerable and marginalised groups least likely to complain, inadequate financial and non-financial resources, and meeting the expectations of service users.

The final report will identify in detail the strategies and policies deployed to meet these challenges and the skills and conditions perceived to be necessary to achieve them. Regardless of the challenges, all contributors to the survey from across the world value the networking, exchange of good practice and comradeship manifest in the ombudsman community.

Rob Behrens, Parliamentary and Health Service Ombudsman, Manchester Ombuds Day, October 8 2020

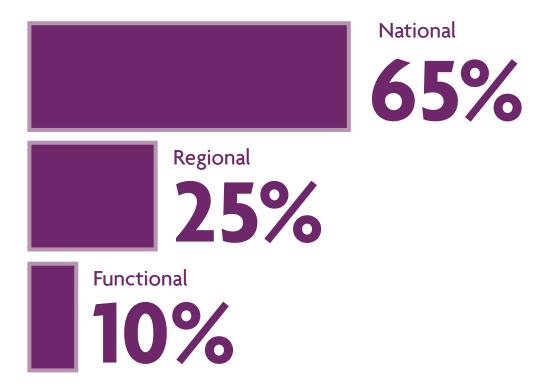
Respondents to the Questionnaire and the character of their organisations

The questionnaire was designed by PHSO with assistance from a graduate Intern from Glasgow University. It was disseminated by the International Ombudsman Institute to its members and was live for three weeks from 5 June to 26 June 2020. There were 52 completed questionnaires from 36 countries (see Annexe A).

Breakdown of different organisation types and sizes

The structure and jurisdiction of participant ombudsman organisations varies in different locations (see Figure 1, below). Of those contributing to this research, the majority (65%, n=34) have national coverage, a quarter (25%, n=13) are regionally based and a minority (10%, n=5) have functional responsibilities (i.e. for an area of industry or public administration).

Figure 1: Jurisdictional coverage of contributing organisations

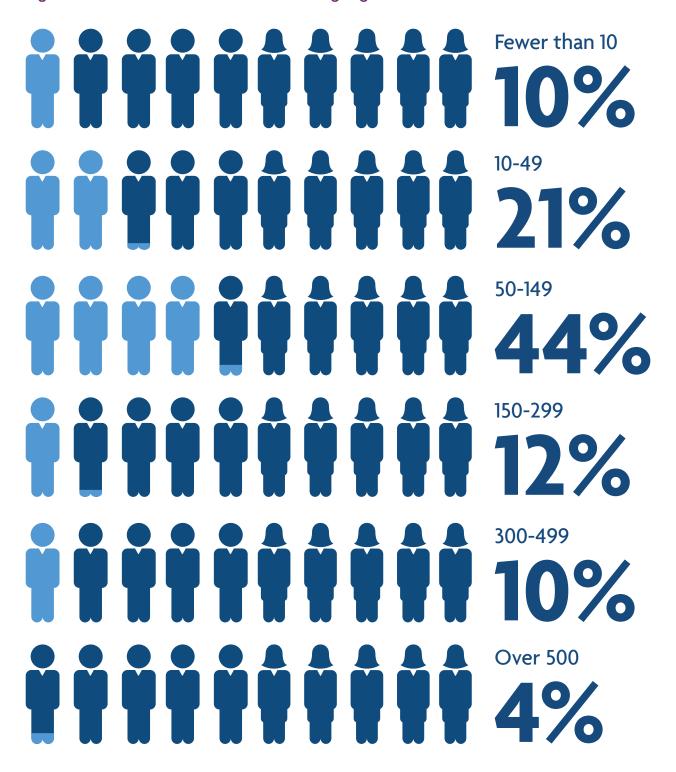


Such differing approaches are recognised and acknowledged by the <u>Venice Principles</u>¹ which state that, 'The choice of a single or plural ombudsman model depends on the State organisation, its particularities and needs. The ombudsman institution may be organised at different levels and with different competencies'.

Principles on the Protection and Promotion of the Ombudsman Institution ("The Venice Principles") European Commission for Democracy through Law, Council of Europe, Principle 4.

As well as diversity in mandate, there is also diversity in size. As Figure 2 (below) shows, 75% of offices have a workforce of less than 150 staff, with 31% having less than 50 staff. Larger offices of more than 150 staff constitute 26% of respondents. While relative smallness in size brings with it the value of agility, it makes institutions vulnerable when resources are severely constrained.

Figure 2: Size of workforce in contributing organisations



Communication strategies

In terms of how ombudsman institutions communicate, (Figure 3, below), telephone still generates the highest volume of inquiries and complaints (29%, n=15) followed by email (27%, n=14). For a sizeable proportion of respondents (23%, n=12) face-to-face remains the dominant form of communication. This is particularly the case for organisations based outside Europe and North America. The use of modes of communication which take advantage of more modern technology (i.e. webforms) is still in the minority (12%, n=6).

Figure 3: Mode of communication which generates the most inquiries/complaints



The Impact of COVID-19 and the contribution to national learning

COVID-19 has had a knock-on effect on the livelihood of countless people and organisations. Ombudsman offices and caseworkers are no exception with, for example, a move towards remote working being necessary for many staff.

With the onset of the pandemic, complaints and inquiries fell away, having an impact on the workload of staff. For example, in the UK, at PHSO and the Local Government and Social Care Ombudsman (LGSCO) offices, new and existing investigations were paused in March 2020 to avoid overburdening health service, local government and care home staff.

Ombudsman organisations have had to put in place strategies to deal not only with the communication challenges associated with remote learning, but also the need to find effective substitute work activity. The communication challenges have required (where available) creative use of online technology. This is to underpin the continuation of casehandling not affected by the pandemic, to enable the continuation of public inquiry lines, and to ensure corporate messages are disseminated and staff morale maintained.

As far as substitute activity is concerned (Figure 4, on page 9), respondents explained that there were a number of options including increasing the training, learning and development on offer

(40%, n=21) and redeploying staff into other areas of the organisation (27%, n=14). A smaller proportion (13%, n=7) have redeployed staff into other organisations directly assisting with the current crisis.



Figure 4: Strategies used to redeploy staff during pandemic



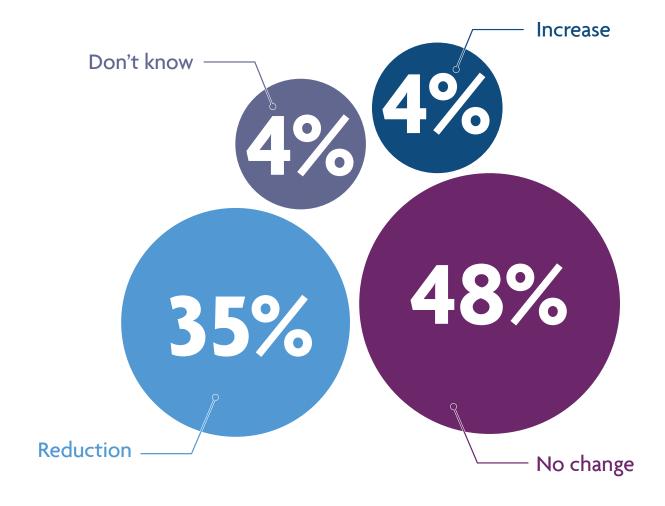
Of course, the ongoing global pandemic has had far-reaching implications in terms of the delivery of public and health services. Many of those involved in this research believe the challenges arising from COVID-19 will continue long after society returns to a greater period of stability. For example, half thought there would be an increase (50%, n=26) in the volume of inquiries and complaints they received post-crisis. Just over a quarter of respondents (27%, n=14) expected inquiries and complaints would remain around the same as previously. Only 12% (n=6) expected a decrease.

Despite many anticipating an increase, few expect a commensurate increase in funding. Just 4% (n=2) expect an increase and, worryingly, 35% (n=18) anticipate a reduction. Just under half (48%, n=25) expect levels to remain the same (Figures 5 below and Figure 6 on page 11).

Figure 5: Expected volume of inquires/complaints received post-crisis



Figure 6: Expected changes to funding received post-crisis



In terms of how complaints are handled in the future, over half (52%, n=27) of ombudsman offices think they will need to prioritise and prepare for different types of complaints (including welfare, domestic violence, and policing) arising in light of the crisis. This could create added strain on existing resources as staff members learn and adapt to new and emerging concerns. 38% (n=20) believe that the previous pattern of complaint handling will resume soon afterwards.

Thinking of strategies to deal with matters post-crisis, the majority of respondents (65%, n=34) said they would prioritise investigations which relate to cases of greatest severity and

impact on individuals rather than dealing with them according to the date received. Over a third of respondents (35%, n=18) would be using their 'own initiative' powers to investigate areas that hadn't previously been complained about or looked at. Just under a quarter of respondents (23%, n=12) would be relaxing the time limits imposed on cases which they're permitted to investigate.

Looking more closely at 'own initiative' investigations, the vast majority of responding organisations (87%, n=45) are formally able to conduct inquires on their own initiative without a citizen complaint. Overwhelmingly, respondents were in favour of the principle

that all ombudsman offices should have 'own initiative' powers. 96% (n=50) agreed with this, whilst the remaining 4% (n=2) were neutral.

Many organisations (40%, n=18) intend to use their own initiative powers to address issues which have emerged as COVID-19 has progressed. Generally, organisations intend to monitor how coronavirus response activities have been implemented and, in particular, will be examining any injustices in the way vulnerable individuals have been treated throughout the crisis. The breadth of areas which organisations intend to look at using these powers are therefore many and varied. Listed below are some of the questions which organisations are currently investigating or intend to investigate. This list will be updated and expanded in the Final Report.

Government programmes and practices

- Have the contingency plans put in place to promote un-interrupted access to public services and basic services been effective?
- How effective are government programmes and services likely to be in assisting with post-pandemic economic recovery?
- Have these plans been transparent and are the priority areas that have been selected appropriate?

Support available for vulnerable populations

• How effective have organisations been in providing information about COVID-19 to the populations they serve? Has, for example, sufficient provision been invested in ensuring that those with poorer access to ICT such as elderly people are kept up-to-date with developments that affect them?

- Has state resourcing for individuals with learning disabilities been adequate?
- Has there been state oversight in helping abused children in need of care?

Homelessness

• Many innovative and effective programmes have been introduced to assist homeless people throughout the pandemic. What lessons can be learned from these and how can they feed into more effective provision in the future?

Residential care homes

- Could different approaches have been taken to better support residents of care homes?
- Have the policies related to visits from relatives been appropriate?

Schools and disadvantaged students

 Has there been sufficient provision made available to help disadvantaged students throughout the pandemic in terms of both their education and access to meals?

Police services

- Has the use of police powers related to compulsory confinement and mobility restrictions been imposed appropriately?
- Has the use of 'spit hoods' been within the law?

Prison services

 Have policies such as the quarantining of new prisoners been effective and appropriate?

Immigration

 How effectively have the risks associated with COVID-19 being introduced to immigration detention facilities been managed?

This list highlights the scope and potential influence of ombudsman offices in mapping the consequences of the pandemic. It also signals an important dilemma for national schemes without own initiative powers (PHSO in the UK is a significant example): how to influence the policy agenda with limited scope and potential for investigation.

In light of the major upheavals caused by COVID-19, it is telling that the majority (60%, n=31) of respondents said they had adapted (or intend to adapt) their leadership style in response to the crisis and to guide their organisations through an unprecedented period.

Some have taken steps to listen more to staff and ask their opinion via surveys (a participative approach). Others have become more authoritative and have taken the view that the crisis has demanded they step up and make difficult decisions at pace and without the usual level of consultation and collaboration (an authoritative approach). And a number have recognised that the move to staff working more remotely has meant that greater levels of trust need to be placed in them to be independent, work responsibly and with increased professional autonomy (a delegative approach). These developments are addressed and assessed in the Final Report.



Ongoing challenges facing the ombudsman community

Figure 7: Greatest challenges for ombudsman organisations

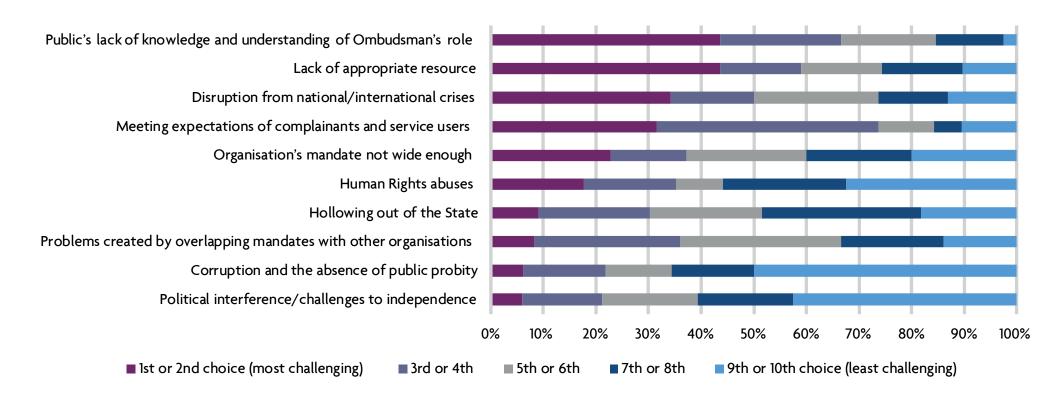


Figure 7 above sets out respondent views of the greatest challenges for ombudsman organisations. The list is chastening, and is analysed below. More detail and analysis is contained in the Final Report.

Public understanding and reaching vulnerable citizens

A common concern is the public's lack of understanding that the ombudsman is 'not an advocate for individuals but an advocate for fairness'. Whilst some members of the public expect the ombudsman to take a moral stance on individual complaints, this can be at odds with and sometimes overlook the ombudsman's overriding commitment to conduct work objectively and professionally. There can also be confusion about what the ombudsman can and cannot do. Some therefore find it an ongoing challenge to ensure members of the public understand that the ombudsman can't investigate matters beyond its jurisdiction.

Linked to this is the difficulty that organisations have in ensuring they are accessible. According to more than half of all ombudsman respondents, delivering accessibility can be very difficult. Moreover, a paradox sometimes exists whereby it is more difficult to reach the people in greatest need. As evidenced by the accounts below from specific ombudsman offices, some respondents fear that they will not be able to reach the most vulnerable sections of society.

In the words of the Catalonian Ombudsman, 'The [Ombudsman] institution is not well enough known amongst society. We need to find ways to reach the most vulnerable.' In a similar vein the Netherlands Ombudsman

suggests that, 'People who need us often do not even know we exist, or do not have time to reach out, or find it challenging to write to us.'4

In New Zealand, accessibility, 'is a big issue – particularly with a large indigenous population. We are now moving towards more accessible contact with our office particularly with use of social media.' Similarly, In Australia, 'Culturally and Linguistically Diverse [CALD] and other disenfranchised cohorts within the community are less likely to know of their right to seek our assistance.'

Meanwhile, in Ireland, 'the typical users of Ombudsman services are often articulate and comfortably off. Reaching out to people who are poor, from minority ethnic groups, disabled, lack internet access or who do not have English as a first language is always a challenge. Specific outreach programmes are run to challenge this, for instance with refugees and asylum seekers.'⁷

The physical remoteness of some ombudsman offices can create additional issues. In British Columbia, Canada, for example, 'we are physically in one location and serve a geographic area the size of Europe (albeit much smaller population!) Awareness of our office is low and thus some people who have problems with government don't know they can complain to us. Our limited communications budget and the collapse of traditional media as mechanisms to reach the public have made this more difficult.'8

² Veterans Ombudsman, Canada

³ Síndic de Greuges de Catalunya, Ombudsman of Catalonia

⁴ Netherlands National Ombudsman

⁵ Parliamentary Ombudsman, New Zealand

⁶ New South Wales Ombudsman, Australia

⁷ Ombudsman of Ireland

⁸ Ombudsperson of British Columbia, Canada

Strategies to address the above issues include outreach work, the application of new technologies to reach people remotely and the construction of diverse workforces capable of reaching and communicating with the communities they serve. However, while the success of these strategies is dependent on having a mandate which facilitates reaching out through (for example) the ability to conduct own initiative investigations, it is also partly dependent on having the requisite financial and non-financial resource.

Lack of appropriate resource

Lack of appropriate resourcing is therefore a major challenge for most ombudsman offices. This can impact on their ability to reach the sections of society most in need, meet the expectations of individuals and manage change effectively in what are often difficult political circumstances.

Numerous examples caused by lack of resources emerged from the research. In an extreme case, one respondent noted that the resources allocated to their office barely cover administrative costs. In Pakistan, 'third world economics are usually marked by resource constraint and face competitive demands by public sector institutions for financial allocations. The funds allocated mostly fall short of the requirements. This imbalance makes it incumbent upon the office to neutralise it through strict management and optimum utilisation of the available resources in order to save the institutional performance

from adverse effects'.¹⁰ Similarly, in the Republic of China (Taiwan), 'the budget of ombudsman institutions is of central significance for their effective functioning and independence ... (our) budget is not protected as it should be ... each year, the Control Yuan often faces the dilemma of being forced to cut its budget during the review session, which virtually impedes the normal operation of the supervisory authority'.¹¹

In a number of smaller schemes such as Cyprus (North), the Cayman Islands, the Cook Islands, Iceland, and the Faroe Islands, the lack of resource can even impede the appointment of qualified staff. For the Cayman Islands Ombudsman this, 'leaves the Deputy Ombudsman and Ombudsman bearing the load throughout the investigation process and particularly when it comes to producing the final reporting letters or own motion reports.'12

Of course, the problem of adequate resource is not by any means confined to smaller schemes. In the UK, '[strategic] objectives require significant investment in infrastructure, professional development, programme management, effective communication and policy development, just at the time when the budget of PHSO was cut by 24% over three years.'¹³

⁹ The Office of the Ombudsman, Malawi

¹⁰ The Provincial Ombudsman Secretariat Khyber Pakhtunkhwa, Pakistan

¹¹ The Control Yuan, Republic of Taiwan

¹² Ombudsman Cayman Islands

¹³ Parliamentary and Health Service Ombudsman, UK

Meeting expectations of complainants and service users

It is also clear that many ombudsman offices find it challenging to meet the expectations of complainants and service users. 32% of respondents selected this as their first or second most challenging issue. In Cyprus, for example, 'Meeting the expectations of citizens and especially the vulnerable groups of the society and protecting their rights in a timely and effective manner is the main challenge that our Institution faces.'14 In terms of existing complainants, this can sometimes be related to a misunderstanding of the ombudsman's roles and responsibilities. In Australia, the Commonwealth Ombudsman explains that the organisation attempts to continue providing a high-quality service in the face of such challenges: 'The fact that we can only make recommendations about matters of administration leaves some complainants dissatisfied with what we can do, and our resource limitations mean we can only investigate a minority of matters that come to us. We deal with this by seeking to clearly manage expectations, looking for high impact systemic issues that we can investigate on our "own motion", surveying complainants and agencies we oversee to test our relevance and impact, among other things.'15

Of equal concern is the difficulty with which schemes struggle to reach those who are most vulnerable in society. Often the most vulnerable individuals in society come from disadvantaged or underprivileged groups. The paradox that those who are most in need of assistance are also the least likely to seek it out (or even be aware of the services available to them) persists for much of the ombudsman world. Initiatives such as those put in place in Israel or Tuscany (peripatetic offices, regional offices, employing multilingual staff, etc) all help towards bridging this gap but may not be suitable or realistic for all schemes. The approach outlined by the National Ombudsman in The Netherlands may have wide application for a range of ombudsman organisations. It is rooted in a rigorous attempt to identify vulnerable groups (in this case including young adults, single parents, migrants and refugees, and elderly people) and the particular issues they confront. On top of this, strategies have been developed on how to reach and communicate with these groups, including the identification of intermediaries.¹⁶ This important work is discussed as a casestudy of good practice in the Final Report.

Ombudsman Mandates

23% of respondents chose the ombudsman mandate not being wide enough as their first or second choice. In the case of Ireland, the jurisdiction is judged wide 'but not fully comprehensive': 'While prisons are due to come within jurisdiction, clinical judgement remains excluded. Formerly state provided services such as public transport and utilities are also excluded. The legislation is not compliant with the Venice Principles particularly regarding independence.' In the United Kingdom, where there is no Public Service Ombudsman in England, the mandate is also out of line with Venice Principles

¹⁴ The Commissioner for Administration and Protection of Human Rights, Cyprus

¹⁵ The Office of the Commonwealth Ombudsman, Australia

¹⁶ The National Ombudsman, The Netherlands

¹⁷ Ombudsman of Ireland

and has been judged 'out of time': 18 'We are campaigning continuously for a new legislative mandate which would create one single public services ombudsman rather than the current fragmented landscape, with powers of own initiative, where the MP filter (requiring complainants to approach the ombudsman through their MP) is abolished, and where the ombudsman has regulatory oversight over the complaints process of front-line service deliverers in public and health service administration.¹⁹

As far as the Northern Ireland Police Ombudsman is concerned, 'The current legislation is out of date and has not kept pace with other police oversight regimes in the UK and Ireland.'²⁰ In Namibia, the Ombudsman also reports outdated legislation, in this case the Ombudsman Act 7 of 1990. In Belgium, the Ombudsman lacks ex-officio powers resulting in 'the Court of Audit questioning our legal mandate to perform systemic inquiries, reaching out to the most vulnerable citizens, [and] protecting whistle-blowers effectively.'²¹

In Spain, in the Basque country, there is also a need for revised ombudsman legislation to address a lack of mediation powers, a lack of supervisory powers over private sector entities delivering public services, and the need to streamline procedures on the basis of the complexity of a case.²² In Gibraltar, own-initiative powers have been approved

by resolution of Parliament but the formal legislation has not been enacted.²³ In Senegal, the Mediateur draws authority from statute law rather than Constitutional law.²⁴ In Canada, while the mandate of the Veterans Ombudsman is being reviewed, there is no current prospect of the Ombudsman reporting to Parliament rather than the Minister.²⁵

Respondents also reported problems with overlapping mandates. The most serious example of overlapping mandates occurred in Cyprus where Maria Stylianou-Lottidou. Commissioner for Administration and the Protection of Human Rights, reported that the independence of the institution was under threat from another institution.²⁶ This relates to the insistence of the Auditor-General in Cyprus to seek to carry out an administrative audit of the Ombudswoman's office when he only had the authority to perform financial audits. In the words of Andreas Potakis, Greek Ombudsman and member of the IOI World Board: 'An audit of the financial administration of an ombudsman can be carried out only as to the legality of the expenditure and not the expediency and the manner in which an office will decide to handle its cases; not the way it will decide to administer its budget.'27

¹⁸ Jim Martin, former Scottish Public Services Ombudsman

¹⁹ Parliamentary and Health Services Ombudsman, UK

²⁰ Police Ombudsman for Northern Ireland

²¹ The Federal Ombudsman, Belgium

²² Ararteko, Ombudsman for the Basque Country

²³ Public Services Ombudsman, Gibraltar

²⁴ Le Mediateur de la Republique, Senegal

²⁵ Veterans Ombudsman, Canada

²⁶ The Commissioner for Administration and Protection of Human Rights, Cyprus

²⁷ Cyprus Mail, 15 December 2019, https://cyprus-mail.com/2019/12/15/auditor-generals-interference-in-ombudswomans-office-an-infringement/

Other challenges

Less challenging amongst the majority of respondents were issues such as political interference and challenges to independence from other stakeholders, human rights abuses and corruption and the absence of public probity. However, these issues still appear to present a significant challenge within specific countries. In Albania and Pakistan political interference is mentioned. With regard to political interference, in Pakistan, 'there is a tendency of Government to curb and curtail the jurisdiction of an Ombudsman ... in the case of my office, the Government withdrew the powers initially vested in the Ombudsman to execute recommendations on his own'.²⁸

As far as human rights in Mexico are concerned, a number of human rights workers have been killed in 2020.29 The Mexico City's Human Rights Commission has recently reported on child labour in public spaces, the right to an independent life for people with disabilities and gender violence.30 In this context it seeks 'to articulate dialogue and trigger coordination between other authorities, international and civil society organizations and the victims themselves. It has provided support processes for the construction and implementation of regulatory frameworks and public policies. Examples include providing technical assistance so that the human rights approach is considered in

an integrated manner, developing training programmes aimed at public servants and other social actors related to the human rights agenda.'31

Corruption is cited in a small number of countries including Malta and Cyprus (North) and is addressed in the Final Report.

The Provincial Ombudsman Secretariat Khyber Pakhtunkhwa, Pakistan

²⁹ See <u>apnews.com</u> 26 April 2020

³⁰ https://cdhcm.org.mx/informes-especiales/

³¹ Mexico City Human Rights Commission

Conclusion

Ombudsman offices have been striving to maintain their oversight of public services at a time when citizens are relying on them more heavily than ever before.

The ongoing challenges are complex and not easy to overcome. In a real sense, they are existential since they reveal a perception of widespread lack of public understanding of the ombudsman role, a failure to engage sufficiently with vulnerable groups, and a difficulty of managing public expectations when they are engaged. All of this is complicated by a lack of resource to do the job and sub-optimal mandates which hamper effectiveness. Faced with the global pandemic of COVID-19 these challenges become even more difficult to overcome. There is also an expectation that access to resources is likely to diminish rather than improve post-crisis, with an increased level of inquiries and complaints but no additional funding to deal with them. Despite this, the ombudsman community shows itself as strong and determined, with a continued focus amongst its members to support each other and share best practice. This will be key in helping address the common challenges that are faced.

In the Final Report we examine the challenges faced by ombudsman institutions in greater detail and provide case studies of the work of particular institutions. The backgrounds, periods of tenure and leadership styles of ombudsman officers are documented, and the impact these have on effectiveness. And in positive fashion we look at values, skills and policies needed to address the challenges, including approaches to training and development strategies of the ombudsman institutions. The ambition is to 'make a friend of every hostile occasion' and strengthen the ombudsman institution in the face of adversity.



List of contributing organisations by country

- Albania (The People's Advocate Institution)
- Australia (Western Australian Ombudsman, New South Wales Ombudsman, Queensland Ombudsman, Ombudsman South Australia, Office of the Commonwealth Ombudsman, Victorian Ombudsman)
- Bahrain (The Ombudsman Office of the Ministry of Interior)
- **Belgium** (The Federal Ombudsman)
- Canada (Veterans Ombudsman, Ombudsman Ontario, Hydro One, Ombudsperson of British Columbia)
- Cayman Islands (Ombudsman Cayman Islands)
- Cook Islands (National Ombudsman)
- Cyprus (The Commissioner for Administration and Protection of Human Rights, Yuksek Yonetim Denetcisi Dairesi)
- Czech Republic (Public Defender of Rights of the Czech Republic)
- **Denmark** (The Parliamentary Ombudsman)
- Ethiopia (Ethiopian Ombudsman Office)
- Faroe Islands (Løgtingsins umboðsmaður)
- Finland (Parliamentary Ombudsman of Finland)
- Gibraltar (Public Services Ombudsman Gibraltar)
- **Greece** (The Greek Ombudsman)

- Iceland (The Althingi Ombudsman)
- Ireland (Ombudsman of Ireland)
- Israel (Israel State Comptroller and Ombudsman)
- Italy (Aosta Valley Ombudsman, Tuscany Region Ombudsman)
- Japan (The Administrative Evaluation Bureau, Ministry of Internal Affairs and Communications)
- Jordan (Integrity and Anti-Corruption Commission)
- Kosovo (Ombudsperson Institution of Kosovo)
- Malawi (Office of the Ombudsman)
- Malta (Parliamentary Ombudsman)
- Mexico (Comisión de Derechos Humanos de la Ciudad de México)
- Namibia (Ombudsman: Namibia)
- **Netherlands** (National Ombudsman)
- New Zealand (Parliamentary Ombudsman)
- **Pakistan** (Provincial Ombudsman Secretariat Khyber Pakhtunkhwa)
- Senegal (Le Mediateur de la Republique)
- Slovenia (Human Rights Ombudsman of the Republic of Slovenia)
- South Africa (Western Cape Police Ombudsman)

- Spain (Síndic de Greuges de Catalunya, Ararteko, Ombudsman for the Basque Country)
- Taiwan (The Control Yuan)
- UK (The Local Government and Social Care Ombudsman for England, Police Ombudsman for Northern Ireland, Northern Ireland Public Services Ombudsman, Scottish Public Services Ombudsman, Parliamentary and Health Services Ombudsman, Public Services Ombudsman for Wales)
- USA (Joint Office of Citizen Complaints for Dayton and Montgomery County, Ohio)



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