









and social care. In these circumstances it will be important that there is a clear lead body for the investigation of the complaint which has the authority to lead on behalf of both bodies.

13. Further thought will be needed regarding how this will appear to citizens who may be receiving care from a combination of health services, social services and independent care providers, particularly given the extension of the Ombudsman's jurisdiction to investigation of a public/private health service pathway.
14. Overall we consider that it will be in the best interests of the public to have a body with explicit responsibility for ensuring that complaints processes are operating consistently and seamlessly in the best interests of the public. We would also welcome the opportunity that this presents to ensure the gathering and reporting of consistent and comparable data across public services

### **Provision for the Ombudsman to undertake own initiative investigations**

15. The Bill recognises that there are already a number of bodies that undertake this type of review and it will be important to ensure that there is no overlap with the roles of inspectorates and regulators, the Auditor General for Wales, and Commissioners.
16. Relationships between HIW and the Ombudsman have developed well in recent years and a Memorandum of Understanding has been agreed setting out how the two organisations will work together on matters of common interest.  
<http://hiw.org.uk/docs/hiw/publications/160728psowmouen.pdf> .
17. Although the Bill refers to "any person exercising regulatory functions in Wales" as a "specified person" for the purposes of consultation with the Ombudsman, it does not include the powers to co-operate, conduct joint investigations, and prepare joint reports with regulators in the same way that it does for Commissioners and the Auditor General for Wales. It would be disappointing if the legislation were to limit the ability of HIW and PSOW to work together in the interests of the public, efficiency and effectiveness.

### **Wider landscape**

18. The new powers to act as a Complaint Standards Authority and to undertake own initiative investigations represent a significant development in the role of the Ombudsman. The current role is focussed at an individual level on looking into individual complaints about public services & independent care providers in Wales. The new powers will





