

Investigation standards

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About this Document

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Acknowledgment of Country

We acknowledge Aboriginal and Torres Strait Islander people as the Traditional Custodians of this land. We recognise the continuing connection to land, waters, culture and community of all Aboriginal and Torres Strait Islander peoples. We pay our respects to their Elders past and present and recognise the strength, resilience and diversity of all Aboriginal and Torres Strait Islander peoples across this land.

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Introduction

The purpose of this document is to provide staff and the wider community with a transparent explanation of the Ombudsman’s expectations and approach in exercising its investigative powers.

The Ombudsman’s power to investigate serves a dual purpose. It can resolve individual complaints. It can also achieve better public administration.

One way to improve public administration is to investigate systemic issues identified across any of our areas of work. This includes issues identified in a wide variety of general complaints, as well as child deaths, family and domestic violence fatalities and the oversight of all child safe organisations.

Our goal for these systemic investigations is to improve the experience citizens have with public authorities and to improve public administration in measurable ways particularly where such improvements may save time and money, redress a significant power imbalance, prevent harm or save lives.

This document supports these goals by outlining how consistent and good quality investigative work is performed under the *Parliamentary Commissioner Act 1971 (the Act)*. It includes fifteen standards for the five phases of a systemic investigation, as set out in Figure 1.

Scope of this framework

The standards set out in this document apply to staff undertaking systemic investigations into administrative decisions and actions by organisations within our jurisdiction. These major investigations usually result in the tabling of a report in the Western Australian Parliament.

The standards do not cover investigations into individual child deaths or family and domestic violence fatalities, or, reportable conduct investigations undertaken under section 19ZB(1)(a) of the Act. Neither do they cover minor investigations¹; investigations into Charitable Trusts; or Energy and Water Ombudsman Scheme investigations. Many of the processes and standards are nonetheless likely to be relevant to these investigations.

This document provides a high-level overview of processes, standards and expectations, and does not encompass all relevant legal obligations nor detail all potential steps in an investigation.

Figure 1. Phases of a systemic investigation.



¹ For this document, minor investigations refer to smaller scale investigations initiated without the intent to table a report in Parliament. The relevant Minister is not notified of the initiation of these investigations.

Topic Selection

Investigations can be initiated in three main ways under our Act:

- In response to a complaint or notification;
- In response to a referral by a committee or House of Parliament; or
- Under the Ombudsman's 'own-motion'.²

Systemic investigations are generally initiated under the Ombudsman's 'own-motion', meaning they involve the use of discretion. The use of discretionary powers can be justified when an investigation addresses matters of public administration affecting a wide group of people, a group of especially vulnerable people, or features of public administration, or an organisation's policies, procedures or practices, that have wide or deep impact, in the community.

Topic selection for systemic investigations is informed through several means, including:

- Identification of patterns and trends in complaints and notifications;³
- Identification of public sector challenges and risks in service delivery;
- Consultation with key public sector stakeholders, the Parliament, community groups and expert advisory bodies; and
- Consideration of findings and recommendations from previous reports and publicly available information.⁴

As systemic investigations can be resource intensive, each topic must be carefully considered to ensure the most effective use of public funds. The initiation of a systemic investigation constitutes one of many

potential actions that could be taken in response to an issue of concern. In many cases, other tools such as education, engagement, system reviews⁵ or minor investigations may be used to resolve the issue with fewer resources.

We use the following criteria to determine the relative merits and priority of proposed systemic investigations:

- Significance (i.e. to what extent are people affected by the issue?);
- Feasibility (i.e. can we efficiently and effectively complete this investigation?); and
- Potential for impact (i.e. will this investigation likely lead to improvements and benefit the community?).⁶

A summary of our approach to topic selection is set out in Figure 2.

Standard 1

Topics selected for systemic investigation must represent an effective and efficient use of our resources.

² *Parliamentary Commissioner Act 1971*, ss 15, 16, 19B(5), 19ZB.

³ For the Reportable Conduct Scheme, this can include information obtained via systems reviews and investigations initiated under s. 19ZB(3) of the Act.

⁴ This includes, but is not limited to, the consideration of Hansard, media monitoring and reports by other oversight bodies.

⁵ This only applies to the Reportable Conduct Scheme.

⁶ A list of questions to be considered when assessing prioritisation of potential topics is set out in Appendix A.

Figure 2. Systemic investigation topic selection approach



Project planning

Project planning is a critical step in ensuring systemic investigations are conducted well. Staff must develop a project plan articulating:

- The objectives of the investigation;
- The proposed scope of the investigation including the key questions to be answered;
- The methodology including how evidence will be gathered and analysed;
- The primary and secondary stakeholders who will be consulted;
- The risks and risk treatments for staying on track; and
- The total staff cost and elapsed time to completion.

Project conduct will not be approved in the absence of this gateway approval.

Each of these elements of the project plan are summarised below.

Objectives and scope

The objectives should clearly define the key questions or issues that the investigation seeks to address and must be consistent with our statutory role.

Ombudsman investigations focus on whether administrative actions are lawful, fair and reasonable. This work complements, but is distinct from, the work of the Office of the Auditor General, which primarily focuses on efficiency and effectiveness.

The scope should define the boundaries of the investigation, including the activities subject to investigation. The scope will include specific key questions (i.e. lines of inquiry) that will be answered as part of the investigation. Staff should have regard to the following matters in developing lines of inquiry.

Risk guidance and success criteria

Every investigation will:

- Identify the risk guidance applicable to the activity subject to investigation; and
- Identify the success criteria upon which the activity and good public administration can be assessed.

Staff must address these two matters in their lines of inquiry as it helps frame the desired performance characteristics of the activity subject to investigation and the context in which day to day decisions by public administrators are made. More specifically, unclear or absent risk guidance for an activity or deliverable can result in public administrators experiencing heightened decision making uncertainty. Similarly, where relevant success criteria for an activity has not been identified or monitored, public administrators can have difficulty leading and delivering to specification, or guiding meaningful and continuous improvement, toward that goal.

Geographical equity and joined-up service provision

Western Australia is a large and geographically diverse State and modern government often requires more than one government agency to deliver desired or funded outcomes.⁷ Where applicable, staff should seek to assess:

- The extent of any service disparity for people living in metropolitan and non-metropolitan areas; and
- The extent of any joined-up service provision between one or more government agencies, necessary to achieve specified outcomes.

⁷ The Premier of Western Australia has recently noted that ‘joining up in the sector’ is critical to the delivery of priorities. See Public Sector Commission, *Spotlight on the government’s priorities*, Government of Western Australia, 5 September 2025, Accessed 27 January 2025.

These two lines of inquiry will help assess the level of equity of service delivery in what are often complex and challenging operating environments.

Standard 2

Staff must have regard to an organisation's risk guidance and success criteria when gathering and interpreting evidence.

Standard 3

Where applicable, staff should seek to assess the extent of any service disparity between metropolitan and non-metropolitan areas as well as any joined-up service provision.

Methodology

The methodology provides an overview of the steps to be taken to complete the investigation. It should be carefully considered so that relevant and robust evidence is obtained in relation to identified key questions of the investigation.⁸

The Act provides considerable flexibility in how investigations are conducted.⁹ Accordingly, the methodology may involve:

- Undertaking research on best practice and comparisons with other jurisdictions;
- Meeting with staff of the organisation concerned and other relevant stakeholders;
- Reviewing documents such as policies, case files, complaints and correspondence;

- Analysing data; and
- Undertaking site visits.

While our methodology is flexible, the range of findings available to us under our Act are more limited. The Act sets out the 'opinions' that can be made in relation to the actions of the organisation, including that they were wrong, were contrary to law, or were unreasonable, unjust, oppressive, or improperly discriminatory.¹⁰ Each of these opinions will have different evidence requirements. For example, an opinion of 'contrary to law' will require evidence of an activity breaching relevant legislation while an opinion of 'unreasonable' may be best evidenced by demonstrating that an activity did not comply with relevant policies, procedures or good practice.¹¹ To enable such opinions to be made, staff should ensure that the methodology includes steps that provide for a thorough understanding of relevant policy, legislation and industrial instruments, as well as what good practice comprises, in relation to the topic under investigation.¹²

Should the methodology involve fieldwork, the identification of appropriate standards or criteria is particularly important. For example, the review of case files to assess the compliance of administrative decisions with relevant legislation will necessitate the development of criteria and/or test plan to clearly define what the legal requirement is and how it will be assessed, including consideration of the sampling approach to ensure results are generalisable. This supports consistent and objective analysis and findings.¹³

⁸ Audit standards relevantly note the importance of obtaining 'sufficient' and 'appropriate' evidence. Sufficient and appropriate refers to the quantity and quality (e.g. relevance, validity and reliability) of the evidence required to make persuasive findings to a knowledgeable person. See International Organisation of Supreme Audit Institutions, *ISSAI 3000: Performance Audit Standard*, 2019, Vienna, Austria, pp. 25-26.

⁹ Section 19(3) of the Act states that the Ombudsman '...is not required to hold any hearing for the purposes of an investigation, and [he or she] may obtain information from such persons and in such manner, and make such inquiries, as [he or she] thinks fit.'

¹⁰ A full list of opinions is set out in s. 25(1) of the Act.

¹¹ Ombudsman New South Wales, *Training notes - investigation planning and management*, 2016, Accessed 18 August 2025.

¹² Commonwealth Ombudsman, *Investigations Policy – Ombudsman Act 1976 (Cth)*, version 1.1, August 2023, p. 39.

¹³ The Commonwealth Ombudsman notes that an assessment framework '...clearly set out the authorities and standards against which the agency's information should be assessed. This helps ensure consistency and objectivity in each investigators' analysis and findings'. Commonwealth Ombudsman, *Investigations Policy – Ombudsman Act 1976 (Cth)*, version 1.1, August 2023, p. 39. Audit standards require criteria to be 'relevant, understandable, complete, reliable, and objective'. See International Organisation of Supreme Audit Institutions, *ISSAI 3000: Performance Audit Standard*, 2019, Vienna, Austria, p. 15.

Standard 4

Staff must ensure the investigation methodology enables relevant and robust evidence to be obtained with respect to key questions.

Stakeholder consultation

The project plan should detail the primary and secondary stakeholders to be contacted as part of the investigation. This will include representatives from the organisation concerned but may also include other stakeholders such as relevant experts, peak bodies, trade unions, persons affected by the issue and Aboriginal Community Controlled Organisations.

Early consultation with key stakeholders and the organisation concerned is preferred to elicit views and information on the availability of data and previously unknown issues. Staff must always be mindful of the Ombudsman's role as an independent and impartial officer of Parliament. We cannot advocate for any individual or organisation and cannot act in a way that may compromise our actual or perceived independence.¹⁴

Standard 5

Staff must consult with stakeholders to obtain valuable insights but must not compromise our actual or perceived independence in doing so.

Standard 6

Staff must ensure there are appropriate consultation arrangements with Aboriginal and/or Torres Strait Islander people and communities.

Identified risks and mitigations

Our investigations often involve highly sensitive and confidential information involving vulnerable people. Proactive risk management is therefore critical in both the planning and undertaking of systemic investigations. Examples of potential risks include:

- Breaching confidentiality;
- Lack of cooperation by organisations;
- Harm to children or other vulnerable groups; and
- Perception of bias and erosion of community confidence.

Staff should identify appropriate mitigations for each identified risk. The mitigations should reduce the potential impacts of that risk and ensure an appropriate and timely response should the risk eventuate.

Standard 7

Staff must proactively identify and manage risks associated with the investigation.

Staff and time requirements

All investigations must have suitable project disciplines in place that include regular reporting against an agreed framework. Appropriate supervision of investigation activities ensures that:

- The investigation is undertaken in a timely manner and to a high standard;
- The investigator is provided with ongoing guidance and direction;
- Timely decisions are made at key project milestones and in response to project critical issues that may arise; and
- The Deputy Ombudsman and Ombudsman are aware of progress to inform their engagement with

¹⁴ The Commonwealth Ombudsman notes "In the planning phase we may choose to share an investigation scope or request for information with the relevant agency or organisation if we think it will assist us in our investigation.... In most cases it will be preferable to simply settle the scope ourselves and then request (or require) the provision of specified information and documents, rather than risking being perceived to be allowing the agency to influence the scope of our independent investigation." See Commonwealth Ombudsman, *Investigations Policy – Ombudsman Act 1976* (Cth), version 1.1, August 2023, p. 13.

stakeholders and facilitate forward planning decisions.

In practice, this will involve frequent meetings between the investigator and their supervisor, regular reporting on project milestones to the Deputy Ombudsman (as well as ad-hoc reporting on critical issues), and meetings involving the Ombudsman at key project milestones, such as when preliminary findings are considered.

The opportunity cost of preferencing one investigation over another or spending more time than is necessary on an investigation, carries real costs and reputational risk.

The project plan should detail linear and interdependent activities and timeframes to meet project milestones. The project plan should also include total staff costs and elapsed time till project completion. In estimating staff costs, staff should consider the skills required to finalise the investigation.

The time to complete an investigation should not exceed 36 weeks without sufficient cause and explanation. The standard or average time to complete an investigation should be 26 weeks. The time to complete an investigation does not include the planning phase but includes conducting the investigation and communicating the outcomes of the investigation to ensure findings are current and have maximum impact.

Standard 8

Staff must demonstrate how resources will be applied to complete the investigation within approved timeframes.

Project Conduct

Communication practices

Staff are required to inform the relevant Minister and the principal officer of the organisation subject to investigation of our intention to undertake the systemic investigation.¹⁵ The letter to the principal officer will request they nominate a senior officer as a contact for the investigation. An 'entry meeting' is typically conducted with the senior officer and other relevant staff to discuss the scope of the investigation and the evidence required. This will include arranging access to suitable facilities within the organisation as well as relevant information management systems.

This initial work to ensure clear expectations among all parties supports timely and cooperative investigations.

Following the entry meeting, staff should seek to obtain relevant documentation directly from the designated senior officer while located within the agency. This may include policies, procedures, correspondence, complaints records, meeting minutes and relevant data. This approach is preferable to formal written requests given the potential for delays arising from the need to make further requests where initial information provided is inadequate. However, it is acknowledged that a formal written request may still be required in limited circumstances, such as where there is complex data extraction/analysis or where we seek to obtain a statement from the agency.

If there are difficulties in obtaining requested information, staff should consult with the Ombudsman or Deputy Ombudsman on the use of legislated powers to:

- Enter premises and inspect anything within those premises;
- Require a public authority or officer to produce a statement of information;
- Compel a person to attend an interview and answer questions under oath or affirmation; and
- Compel a person to produce documents.¹⁶

Any request for information should be consistent with the approved methodology and to the extent possible, minimise regulatory burden on the organisation. In addition, communication with the organisation should always be professional and seek a mutually respectful and cooperative relationship. This includes demonstrating a 'no-surprises' approach through regular feedback on the status of the investigation, including the sharing of proposed findings.

Standard 9

Staff must be professional and seek a mutually respectful and cooperative relationship with organisations, including demonstrating a 'no surprises approach'.

Analysis of evidence

Staff should develop 'working papers' in relation to the key questions of the investigation. The working papers document the evidence that has; and has not, been considered, the analysis undertaken and any proposed findings. This may be an iterative process, with additional information sought to clarify and/or corroborate certain matters.¹⁷ It is possible that the analysis of evidence may result in new avenues of

¹⁵ This does not apply to investigations undertaken for the purpose of the Reportable Conduct Scheme.

¹⁶ *Parliamentary Commissioner Act 1971*, ss. 20(1), 21. Use of such powers will need to be in accordance with delegations and recorded appropriately. Where sensitive information is requested, the use of such powers may be requested by the agency and necessary to protect staff involved.

¹⁷ As different forms of evidence have different strengths and weaknesses, staff should carefully consider the extent to which sources of evidence will need to be corroborated to ensure findings are well-founded and defensible. For further relevant guidance,

inquiry that are beyond the scope or resources allocated to the project. Any material changes to the scope of an investigation, the required resourcing or time to completion will require Deputy Ombudsman approval.

For any proposed opinion, the working paper will need to present a logically structured, evidence-based argument. For example, if the proposed opinion is that an organisation has acted contrary to law, the working paper must refer to applicable legislation and clearly set out evidence of the legislation being breached.

The Act further sets out opinions on what should be done in response to these conclusions, including changes to practices, legislation or other mitigating actions.¹⁸ Opinions on these proposed actions can be the subject of recommendations to the organisation. Staff should be open to the possibility that the investigation may not result in findings that merit the preparation of a formal report to Parliament. In such circumstances, staff should discuss with the Deputy Ombudsman whether more informal and cost-effective reporting mechanisms (e.g. a public statement or a letter to the organisation) would be more appropriate.

Standard 10

Staff must ensure all key findings of the report are supported by sufficient and well documented evidence.

Ethical and legal obligations

Good conduct is essential to our reputation as well as the impact of our work. Staff undertaking investigations must act with integrity, including

complying with our Code of Conduct and applicable legal obligations. Key considerations include:

Confidentiality

The Act includes secrecy provisions and requires all investigations to be undertaken 'in private'.¹⁹ This encourages cooperation and protects those who provide information during an investigation. The Act sets out limited circumstances where information can be disclosed and includes specific restrictions on publishing certain information obtained under the Reportable Conduct Scheme.²⁰ Staff must carefully consider decisions to disclose information and must not disclose or use any information obtained during an investigation unless lawfully authorised to do so.

Conflicts of interest and bias

The Ombudsman is an independent and impartial body. Staff must declare, register and take steps to manage any real, perceived or potential conflicts of interest relating to an investigation. More broadly, staff must demonstrate an objective approach to the undertaking of investigations. Objectivity relates to the mindset of staff as well as the evidence collected.

Record keeping

Good records promote accountability and transparency. Consistent with our record keeping policies, all communications, evidence and decisions made regarding an investigation must be thoroughly and accurately recorded and securely stored on record keeping systems.²¹

Should a complaint be received about the handling of an investigation, it must be forwarded to the Director Integrity Investigations for their consideration.

see International Organisation of Supreme Audit Institutions, *GUID 3920: The Performance Auditing Process*, 2019, Vienna, Austria, pp. 31-34.

¹⁸ A full list of opinions is set out in s. 25(2) of the Act.

¹⁹ *Parliamentary Commissioner Act 1971*, s. 19(2).

²⁰ *Parliamentary Commissioner Act 1971*, ss. 19ZI, 19ZH, 19ZJ, 22A, 22AA, 22B, 22C, 23.

²¹ Relevantly, the Australian Government Investigation Standard requires documentation of decisions to include the context of the decision; the decision itself; the reason/rationale for the decision; the person making the decision; the date of decision; and, any detail of the actions associated with the implementation of the decision. See Australian Federal Police, *Australian Government Investigations Standards*, Commonwealth of Australia, October 2022, p. 11.

Reporting

Finalising the report

The report of the investigation will summarise the public interest, the evidence and conclusions set out in the working papers. The report will generally include:

- An Ombudsman’s foreword or executive summary;
- A Background, which provides sufficient context to support understanding of the report by a person unfamiliar with the issue;
- Recommendations to alter or improve aspects of public administration including the organisation’s response to each recommendation;
- An analysis of the evidence, which make an accurate, balanced and persuasive argument for any findings; and
- Appendices outlining the methodology, which transparently sets out the sources of information and the criteria used to reach conclusions.

Staff should ensure the report is written in Plain English, be visually impactful and communicated on social media to ensure the report is broadly accessible to the general community, understood and readily acted upon by relevant decision makers. Information that may detract from the arguments being made (e.g. complex methodological information, data analysis assumptions, non-essential background information) should be placed in appendices rather than in the main body of the report.

Staff should take particular care in the development of recommendations, which must be proportionate, practical and consider the costs, as well as the benefits, of proposed improvements. The ‘SMART’ approach (i.e. specific, measurable, achievable,

relevant and time-bound) should be considered during recommendation development.

Standard 11

Staff must present report findings in a clear, efficient and engaging manner.

Standard 12

Staff must ensure proposed recommendations are evidence-based, proportionate and practical.

The draft report must be subject to additional quality assurance steps, including:

- The report being circulated to relevant staff to peer-review the analysis and findings;
- Presentations to senior management for further scrutiny of proposed conclusions; and
- The Deputy Ombudsman and Ombudsman reviewing the draft report.

The report must be finalised by the Ombudsman. Under the Act, the power to make a report or recommendation cannot be delegated.²²

Procedural fairness

Prior to the tabling of a report, staff must afford procedural fairness to any person that has been the subject of an adverse comment in the report.²³ As our investigations are concerned with identifying areas for administrative improvement, the relevant ‘person’ in nearly all investigations will be the head of the organisation subject to investigation.²⁴

²² *Parliamentary Commissioner Act 1971*, s. 11(1).

²³ *Parliamentary Commissioner Act 1971*, s. 25(7).

²⁴ The notable exception to this is investigations undertaken under s. 19ZB(1)(a) of the Act.

In practice, this will involve:

- Staff providing a copy of the report (or an extract of the report where relevant) to the head of the organisation. The draft report will include a statement prohibiting the recipient from disclosing the report's contents to people without a need to know;
- The head of the organisation being provided an opportunity to respond to any adverse comments and to inform us of any factual inaccuracies;
- The head of the organisation informing us whether they accept or do not accept any recommendations in the report; and
- The response being carefully considered by us, which may result in changes to the report. The Act requires the person's 'defence [to be] fairly set forth in the report' and so their response should be incorporated in the report.²⁵

Additional procedural fairness requirements apply to investigations undertaken under the Reportable Conduct Scheme.

If the report does not contain any adverse comments, staff are still required to provide the organisation an opportunity to comment on the subject matter of the report.²⁶

Standard 13

Staff must provide procedural fairness to persons the subject of an investigation.

Publishing the report

The report must be provided to the principal officer and the responsible Minister if it includes opinions on actions to be taken in response to adverse findings of the investigation (which may include recommendations).²⁷ In practice, this is done by providing an embargoed copy of the report shortly before its tabling in Parliament. The report becomes publicly available once it is tabled in Parliament.

Staff should prepare materials to accompany the release of the report, including a media release, report summary, presentation/s and social media content. The report is further circulated to relevant stakeholders, including members of Parliament, other ombudsmen and interested parties.

²⁵ *Parliamentary Commissioner Act 1971*, s. 25(7).

²⁶ *Parliamentary Commissioner Act 1971*, s. 19(4).

²⁷ For investigations undertaken for the purpose of the Reportable Conduct Scheme, providing the report to the responsible Minister is only required if the organisation is a department or authority.

Monitoring and follow-up

The tabling of a systemic investigation report does not conclude our involvement in a matter. To enhance ongoing awareness and impact of the report, staff should consider further targeted communications for difference audiences. This may include:

- Social media content;
- Submissions to relevant Parliamentary committees/inquiries;
- Presentations to peak bodies and other relevant stakeholders; and
- Development of additional accessible documents summarising the report (e.g. designed for children, people with low literacy, or non-English readers).

A further important process to ensure investigations are impactful is through the monitoring of recommendations. Under the Act, organisations can be required to provide information on the steps taken or proposed to be taken to implement a recommendation. Organisations must also provide reasons if they have not implemented, or propose to implement, a recommendation.²⁸

Staff should ensure all agency recommendations are subject to follow-up. The extent and formality of follow-up will depend on the investigation and should be communicated with agencies. Systemic issues that present a higher level of ongoing risk and would benefit from detailed further scrutiny should be considered as a potential topic for a stand-alone follow-up report tabled in Parliament. Otherwise, staff assessment of the implementation of recommendations can occur through an exchange of letters with the agency and consideration of public reporting in our annual report.

The tabling of a report also provides an opportunity to consider learnings and improvements to the way we work. Staff should arrange a post-project debrief process to facilitate consideration of:

- Lessons learnt from the investigation that can inform improvements to the undertaking of future systemic investigations;
- Any matters of concern to be considered as a topic for future systemic investigations (or other types of engagement); and
- Any potential improvements to our own policies, procedures and practices.

Standard 14

Staff must follow-up the extent to which recommendations are implemented and successfully achieve intended outcomes.

Standard 15

Staff must have a continuous improvement mindset when undertaking systemic investigations.

²⁸ *Parliamentary Commissioner Act 1971*, ss 25(4)–25(5).

Appendix A: Factors in determining merits of proposed systemic investigation

Significance of the issue



- Has the issue been the subject of complaints or other notifications to us?
- How widespread and to what extent are people impacted by the issue?
- Is it a recent or ongoing issue?
- Are vulnerable people more likely to be impacted by the issue?
- To what extent do risks appear to be appropriately managed?

Feasibility of the investigation



- Is the topic within our jurisdiction and powers to investigate?
- Can the investigation be completed in a timely manner?
- Do staff have sufficient capability and capacity to undertake the investigation?
- Are we best placed to investigate this topic?

Likely impact of the investigation



- What is the potential for the investigation to make practical improvements to administration?
- To what extent could the investigation benefit the broader community?
- What is the level of public and Parliamentary interest in the identified issue?
- Have there been other reviews of the issue done recently or are in progress by us or other oversight agencies?
- Does a systemic investigation represent the best use of our resources, or are there other tools at our disposal that will more efficiently address the issue?

Appendix B: List of investigation standards

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1. Topics selected for systemic investigation must represent an effective and efficient use of our resources.	5
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3. Where applicable, staff should seek to assess the extent of any service disparity between metropolitan and non-metropolitan areas as well as any joined-up service provision.	8
4. Staff must ensure the investigation methodology enables relevant and robust evidence to be obtained with respect to key questions.	9
5. Staff must consult with stakeholders to obtain valuable insights but must not compromise our actual or perceived independence in doing so.	9
6. Staff must ensure there are appropriate consultation arrangements with Aboriginal and/or Torres Strait Islander people and communities.	9
7. Staff must proactively identify and manage risks associated with the investigation.	9
8. Staff must demonstrate how resources will be applied to complete the investigation within approved timeframes.	10
9. Staff must be professional and seek a mutually respectful and cooperative relationship with organisations, including demonstrating a 'no surprises approach'.	11
10. Staff must ensure all key findings of the report are supported by sufficient and well documented evidence.	12
11. Staff must present report findings in a clear, efficient and engaging manner.	13
12. Staff must ensure proposed recommendations are evidence-based, proportionate and practical.	13
13. Staff must provide procedural fairness to persons the subject of an investigation.	14
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