

PHSO business plan 2019-20

independence | fairness | excellence | transparency

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Welcome from the Ombudsman and Chief Executive

Welcome to our business plan for 2019-20.

The plan sets out how we will deliver against the second year of our three-year strategy to become an exemplary Ombudsman service. In the strategy we set out three strategic objectives: to improve the quality of our service, whilst remaining independent, impartial and fair; to increase the transparency and impact of casework; and to work in partnership to improve public services, particularly front-line complaints handling.

The plan also sets out the resources we require, how we will measure success, and the risks we face in delivering the strategy. Finally, the business plan sets out our ambition to improve our approach to equality, diversity and inclusion, following the agreement of our new Equality and Diversity Strategy.

We have achieved a significant amount in the first year of the strategy, ranging from the roll out of a comprehensive programme of professional skills training aimed at improving the quality of casework, through to completing a number of scoping exercises relating to our major strategic projects on early dispute resolution and making our casework more transparent. We must continue to strike an effective balance between being ambitious and being realistic, building on the success of our staff survey results to deliver an exemplary service.

We have undertaken considerable planning to ensure that this business plan is deliverable and activities included are carefully phased across 2019/20 and 2020/21. We will also be flexible across the next two years and use in-year learning we generate from implementing the significant volume of change to help us both deliver activity more quickly where possible, or move it back if this is needed. We are confident that the activities in this plan coupled with this flexibility in approach set a solid foundation for the overall delivery of our strategy.



Rob Behrens CBE Ombudsman and Chair



Amanda Campbell CBE Chief Executive

Part 1 who we are

Who we are

We were set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments.

We share findings from casework to help Parliament scrutinise public service providers. We also share our findings more widely to help drive improvements in public services and complaint handling.

Role

We combine the two statutory roles of Parliamentary Commissioner for Administration (the Parliamentary Ombudsman) and Health Service Commissioner for England (Health Service Ombudsman). The powers are set out in the Parliamentary Commissioner Act 1967 and the Health Service Commissioners Act 1993.

We are not part of government or the NHS in England. We are neither a regulator nor a consumer champion.

We are accountable to Parliament and our work is scrutinised by the Public Administration and Constitutional Affairs Committee.

Vision

To be an exemplary public services ombudsman by providing an independent, impartial and fair complaints resolution service, while using our casework to help raise standards and improve public services.

Values

PHSO's values have been developed in close consultation with our staff so we all have a shared understanding about the type of ombudsman service we want to be.

The values are:

- **Independence** we are independent from organisations we investigate, holding them to account for service failure or injustice
- **Fairness** we listen carefully to complainants and the organisations we investigate and we make impartial and fair decisions based on relevant evidence
- **Excellence** we learn from engagement with complainants and organisations we investigate to improve our accessibility, efficiency, effectiveness and the quality of our decisions

• **Transparency** - we communicate with those using our service and then publish information about our findings, how we are performing and how organisations we investigate have implemented our recommendations.

The Board

While the Ombudsman in law is a corporation sole, we are governed by a unitary, decision-making board of executives and non-executives. Their purpose is to lead, provide stewardship and to preserve and build our reputation.

The Board is led by its Chair, Rob Behrens CBE, who was appointed Parliamentary and Health Service Ombudsman on 6 April 2017. The Chief Executive Officer, Amanda Campbell CBE, and her senior executive team are also members of the Board.

The non-executive Board members bring an external perspective to our corporate governance. They come from diverse professional backgrounds and bring a wide range of experiences.

Part 2 from strategy to business plan a review of 2018/19

Progress against the Strategy so far

In 2018/19 we put the foundations in place to deliver our strategy. Key achievements this year include:

- Significant improvements in staff survey results for 2018/19 our engagement score has risen from 60% to 67%, giving us confidence we are on the right path to changing our culture and having a more engaged workforce
- We have invested in our staff, putting in place a new operating model, with all casework staff receiving professional skills training, leading to accreditation for senior caseworkers to equip our staff to deliver a high quality casework service
- Alongside this, our staff have undertaken training in 'plain English' in report writing to improve the quality of our service and improve trust and confidence in what we do
- Piloting new approaches to resolving cases earlier where possible in our intake team, and developing plans for a wider pilot across the Office
- In addition to all of this activity improving the skills of our staff, we have managed to reduce significantly the queues experienced by those using our service
- We held our second open meeting and annual lecture, and have released a number of podcasts, continuing our ambition to become a more transparent and outward looking organisation
- We published a transparent set of principles and case studies about the use of financial remedy to help our complainants and organisations we investigate to have greater confidence and to know what to expect
- We have reviewed how we use clinical advice and published the results of this work, setting out how we plan to change our approach and become an exemplary ombudsman service
- We have developed a new ICT & Digital Strategy which sets out our investment in technology to both equip our staff with the technology they need to deliver improvements in our casework, and to enable us to publish our casework
- An independent panel undertook a peer review of value for money into PHSO, which concluded that PHSO provides an important service that goes beyond investigating complaints and that, as a result of strong leadership and new ways of working, offers good value for money for taxpayers.

From Strategy to Business Plan - 2019/20

For **objective 1**, the main focus in the second year of the strategy is to complete the work we have already started to improve our service. This year's business plan outlines the critical work which we will continue on quality improvements in casework and to develop internal accreditation of senior caseworkers. We will also formalise alternative / early dispute resolution approaches into full pilot activity and research what tools we can use.

By the end of 2019/20, this work will mean that we have a greater understanding of what approaches will help us meet our strategic goal of closing cases more quickly and efficiently. The new focus groups with complainants that we plan to introduce into our Service Charter process will also give us a more sophisticated understanding of how we can provide an even better service, helping us become an exemplary ombudsman.

For **objective 2** in 2019/20, we will start to test how we can publish more casework online. This will follow a critical piece of work around improving the quality of final case reports. These activities will deliver against our objective for greater transparency.

By the end of 2019/20, we will have sought views externally on what the final approach to publishing casework should look like. Through this process we will have also established Key Performance Indicators (KPIs) and other metrics we will put in place to measure the success of our approach by the end of 2020/21. At the same time we will have increased transparency by publishing more data, including in relation to compliance with our recommendations, and other information about our service so that our work can be better scrutinised.

For **objective 3**, we will continue to collaborate more with other ombudsman services and strengthen our external relationships. We will also have set out as part of our Comprehensive Spending Review (CSR) bid what resources we require to meet the full ambition of this strategic objective.

By the end of 2019/20, we will have developed a set of complaint standards in partnership with organisations across the health sector for frontline complaints managers. We will also have begun work to consider how these could be adapted more widely for other organisations we investigate and begun to develop tools to support their implementation in line with our, and others, CSR settlements.

Part 3 business plan key activities

What we will deliver in 2019/20

The following pages set out the specific activities we will undertake in 2019/20 in order to achieve the deliverables in the strategy. The activities are grouped against each strategic objective and have a relevant owner.

The focus of the plan is on transformation activity to facilitate the delivery of the strategy.

STRATEGIC OBJECTIVE 1 To improve the quality of our service, whilst remaining independent, impartial and fair

Deli	iverable from the strategy		y Required to Succeed ine Description)	Accountable Officer	Timing of 19/20	delivery
	1. Review and implement any necessary changes to operational policies	1.1.1	• •	AD Policy & Service Quality	(Q1 start) (Q4 finish)	-
		1.1.2	Implement Quality standards and measures (linked to Objective 2, 3.1.1) *NEW*	AD Policy & Service Quality	(Q1 start) (Q2 finish)	-
		1.1.3	Launch the new approach to Continuous Improvement *NEW*	AD Policy & Service Quality	(Q1 start) (Q1 finish)	-
Service		1.1.4	Complete the review of existing processes using new methods from Objective 1, 1.1.3	AD Policy & Service Quality	(Q1 start)	(Q4 finish)
	1.2 1.3 1.4	Comm	ence and implement a review of the Joint Working Team	Executive Director of Strategy	Activity has completed	
Improving our		1.2	Strengthen internal reporting from the Liaison Team into quality improvement work *NEW*	AD Partnerships	(Q1 start) (Q4 finish)	-
<u>m</u>		1.3	Implement new ways of working to how we manage cases over the 12 months' time limit *NEW*	Assistant Director - Casework	(18/19 start) (Q1 finish)	-
		Implement new ways of working to how we manage case reviews *NEW*	Assistant Director - Intake & Resolutions	(18/19 start) (Q1 finish)	-	
		1.5	Implement new ways of working to how we manage cases that are not in public interest to investigate *NEW*	Assistant Director - Casework	(18/19 start) (Q1 finish)	-

STRATECIC OR IECTIVE	1 To improve the quality o	of our sorvice, whilst romaining	g independent, impartial and fair
STRATEOR ODJECTIVE	<u>i</u> To implove the quality o	n our service, windstremaining	s muchennent, impartiat and rai

eliverable from the strategy	Activity Required to Succeed (Headline Description)	Accountable Officer	Timing of 19/20	f delivery 20/21
2. Review how we draw upon clinical advice for resolving complaints, adapting our operating model and training as needed	2.1 Implement the review of the Clinical Advice Project	Director of Operations and Quality	(Q1 start)	(Q4 finish)
3. Develop our Service Charter to broaden how we monitor and measure performance, improving our accountability by publishing clear	Identify and implement an approach to include feedback from organisations we investigate into the Service Charter	Director of Strategy & Insight	Activity is c completion	
information about the range of work we do and how well we are doing against agreed standards, which can be compared with other organisations	3.1 Integrate new forms of insight into Service Charter reporting (for example focus groups) *NEW*	AD Partnerships	(Q2 start) (Q4 finish)	-
	3.2.1 Complete benchmarking of data with LGSCO and Ombudsman Association	AD Business Management	(18/19 start) (Q2 finish)	-
	3.2.2 Implement recommendations of benchmarking project	AD Business Management	(Q3 start)	(Q4 finish)
4. Identify early complaints resolution methods we can easily introduce and incorporate into staff training	Commence and complete research into early dispute resolution (EDR) approaches (including existing EDR, new EDR, and complex EDR & mediation)	Director of Strategy & Insight	Activity is c completion	
	Formalise existing EDR into casework processes, including training, performance measurement and evaluation	Director of Strategy & Insight	Activity is c completion	
	Develop approaches to new EDR, including performance measurement	Director of Strategy & Insight	Activity has completed	
	4.1 Commence and complete pilot on new EDR approaches, including evaluation	AD Partnerships	(18/19 start) (Q4 finish)	-
5. Scope how we will pilot and evaluate mediation and other more complex early	5.1.1 Research and select an approach to <i>complex</i> EDR and mediation, including training for pilot, performance measurement	AD Partnerships	(Q2 start) (Q4 finish)	-

STRATEGIC OBJECTIVE 1 To improve the quality of our service, whilst remaining independent, impartial and fair

		Activity Required to Succeed (Headline Description)	Accountable Officer	Timing o	Timing of delivery	
Den	resolution methods, in consultation with our stakeholders Pilot the use of mediation and other early resolution methods Evaluate mediation and other dispute resolution pilots, implementing the most successful as part of our new 'Ombudsman toolbox'	5.1.2 Commence and complete pilot on <i>complex</i> EDR and mediation, including evaluation	AD Partnerships	-	(Q1 start) (Q4 finish)	
	6. Complete the delivery of our new operating model and initial staff training	Continue Phase 2 professional transformation training	Executive Director of Operations & Strategy	Activity has completed		
itation		6.1 Complete implementation of professional skills programme and in-house accreditation	Executive Director of Operations & Strategy	(18/19 start) (Q4 finish)	-	
Accreditation	7. Build on staff training programme by taking steps towards acquiring professional accreditation Begin accreditation of caseworkers	7.1.1 Consider project with external partner on approach to externally validated accreditation	Executive Director of Operations & Strategy	-	(Q1 start) (Q3 finish)	
	Build the approach from our pilots into our training and accreditation programme, so staff are fully equipped to use these methods	7.1.2 Consider external accreditation of caseworkers	Executive Director of Operations & Strategy	-	(Q4 start) (21/22 finish)	
Governance	 8. Review our Governance and begin to introduce the changes we think are needed Introduce changes following our governance review Develop options for involving complainants in improving our service, to improve confidence and trust in our decision making 	8.1 Implement changes from review of the transparency of our key decision making forums, with a focus on Board and Quality Committee	AD Governance	(18/19 start) (Q4 finish)	-	

<u>Stf</u>	STRATEGIC OBJECTIVE 1 To improve the quality of our service, whilst remaining independent, impartial and fair									
		Activi	Activity Required to Succeed		Timing of delivery					
Deli	verable from the strategy	(Head	line Description)	Officer	19/20	20/21				
		8.2	Implement changes from review of how the voices and perspectives of service users can input to Board and Quality Committee discussions, building on the discussions that have taken place at Quality Committee	AD Governance	(18/19 start) (Q4 finish)	-				
Spending	9. Prepare our Spending Review bid and deliver current savings commitments	9.1	Submit spending review bid taking into account resources required to deliver the final year of the strategy and to fully achieve strategic objective 3	Director of Resources	(18/19 start) (Q2 finish)	-				

			Accountable		f delivery
Deli	iverable from our strategy	Activity Required to Succeed (Headline Description)	Officer	19/20	20/21
	1. Start publishing quarterly data about the health complaints we receive	Commence and complete project scoping approach to publication of health data	AD Insight & Public Affairs	Activity has completed i	
	Publish the first annual report on the complaints we receive about the health system, highlighting trends and key insights as we already do for	Identify datasets and format and begin publication	AD Insight & Public Affairs	Activity is o completion	
	parliamentary cases	1.1 Publish annual report on the complaints we receive about the health system, according to approach agreed in 2018-19	AD Insight & Public Affairs	(Q1 start) (Q4 finish)	-
ency	2. Develop an approach to enable us to publish more information about our findings and the level of compliance with our recommendations	2.1 Commence and implement an approach to measuring compliance with our recommendations	AD Insight & Public Affairs	(18/19 start) (Q4 finish)	-
	3. Scope a project for publishing the vast majority of our casework online, as well as exploring what other material we should publish	Commence and complete scoping of the parameters and ambition of publication	Director of Comms	Activity is o completion	
	Begin publishing some of our casework online				
Transparency		3.1.1 Deliver improvements in quality of final investigation reports and letters through establishing a template (This activity is linked to quality improvement activities under strategic objective 1) *NEW*	AD Insight & Public Affairs / AD Policy and Service Quality	(Q1 start) (Q2 finish)	-
	casework online drawing out insights for the organisations we investigate	3.1.2 Develop an approach to publication *NEW*	AD Insight & Public Affairs	(Q1 start) (Q2 finish)	-
		3.1.3 Deliver an online solution that facilitates publishing much more of our casework	AD Insight & Public Affairs	(Q1 start)	(Q4 finish
		3.2.1 Promote our work externally to help others understand our work and role through -publication of monthly case summaries	Director of Comms	(18/19 start)	(Q4 finish
		3.2.2 Deliver a programme of speaking opportunities, podcasts, events and thought leadership pieces	Director of Comms	(18/19 start)	(Q4 finish
	4. Build on our training programme to improve the quality of our investigation reports	e This element of the strategy will be delivered through activities in Strategic Objective 1 (1.1.1) and Strategic Objective 2 (3.1.1) S		See Obj 1 1.1.1 & Obj 2 3.1.1	See Obj 1 1.1.1 & Obj 2 3.1.1

<u>S</u>	STRATEGIC OBJECTIVE 2 To increase the transparency and impact of our casework									
Deliverable from our strategy		11/	Activity Required to Succeed (Headline Description)	Accountable Officer	Timing of 19/20	f delivery 20/21				
	Deliverable from our strategy 5. Publish a transparent set of principles and case studies about the use of financial remedy and work with national organisations to explore how we can better explain who we are and what we do to organisations we investigate		Finalise financial remedy guidance	Director of Legal & Professional Services Director of Legal & Professional Services	Activity has completed i Activity has completed i	been n 2018/19 been				
•			Develop external engagement events programme (including Ombudsman's annual open meetings, podcast series, Ombudsman association, and a wider thought leadership campaign)	Director of Comms	Activity has completed i now part of activity	n 2018/19				

		hip to improve public services, especially front-line compl			
Deli	iverable from our strategy	Activity Required to Succeed (Headline Description)	Accountable Officer	Timing of 19/20	delivery 20/21
	1. Review the challenges to casework posed by the structural changes and new organisational arrangements being introduced across the health and social care sectors, working with LGSCO, as needed	Provide response to any pre-legislative scrutiny Committee convened on Health Service Safety Investigation Bill and share PHSO thinking on impact of changes	Director of Legal & Professional Services	Activity has completed	
NG		1.1 Develop and finalise initial Memorandum of Understanding with non-statutory Health Service Investigation Branch	Director of Legal & Professional Services	(18/19 start) (Q3 finish)	-
working	2. Explore how we can share the experiences we have had delivering our Strategy 2018-21 with ombudsmen colleagues and invite them to share their views on what we should include in our next strategy	2.1.1 Consult with Ombudsman through existing channels on approach and recommend options	Director of Strategy & Insight	-	✓
Partnership		2.1.2 Deliver option identified for engagement	Director of Strategy & Insight	-	~
ng	3. Build on and strengthen existing external relationships, while developing new strategic partnerships with the shared aim of setting	Scope and develop initial partnership plan that reflects options for different levels of investment	Director of Strategy & Insight	Activity has completed	
Supporti	common standards and expectations for resolving complaints, starting with the NHS, identifying tools and training opportunities to help meet	Commence and implement a review of External Liaison Team to assess effectiveness of driving improvements in complaints handling	AD Partnerships	Activity has completed	
Su	these standards	3.1 Consider options for internships for university students	AD HR	(Q1 start) (Q3 finish)	-

STRATEGIC OBJECTIVE 3 To	work in partnership to	o improve public services	, especially front-lin	e complaint handling
	• • •		· · ·	

					Timing of	f delivery
C	Peliverable from our strategy	Activit	y Required to Succeed (Headline Description)	Accountable Officer	19/20	20/21
	4. Work with our partners to develop and publish a number of new tools and training options for improving frontline complaints handling across the public sector, consulting with target audiences and piloting different delivery methods to test what works		short and long term options for tools and other products that n usefully develop in partnership	Director of Strategy & Insight	Activity has completed	
	Begin to roll out tools and training materials where we think they are most needed Complete the roll out of those tools and training approaches we find work best, and re-launch a new	4.1.1	Choose with partners the tools and training material where we think this is most needed	AD Partnerships	(Q1 start) (Q4 finish)	-
	version of 'My expectations' to reflect any changes we think are needed as part of this process, ensuring the revised guidance is co-produced with both the people who use our service and our partners	4.1.2	Complete the roll out of tools and training approaches we find work best	AD Partnerships	-	✓
		4.1.3	Re-launch a new version of 'My expectations' to reflect any changes we think are needed	AD Partnerships	-	✓

<u>B</u>	JSINESS CRITICAL ENABLERS Setting the fou	Indatio	ons for an exemplary ombudsman service			
						f delivery
De	liverable from our strategy	Activit	y Required to Succeed (Headline Description)	Accountable Officer	19/20	20/21
	1. Create an integrated approach to learning and development	1.1.1	Develop a formal three-year Learning and Development Plan for the whole organisation based on skills required to deliver the strategy	AD HR	(18/19 start) (Q4 finish)	-
		1.1.2	Roll out leadership and management training programme	AD HR	(18/19 start) (Q4 finish)	-
	2. Create a leading and supportive HR service	2.1	Complete the HR Service review (including system requirements), implement recommendations and evaluate	AD HR	(18/19 start)	(Q4 finish)
	Revi 2.2 2.3	Review	v HR policy and procedures against best practice	Director of HR	Activity is o completion	
People		2.2	Complete review of pay and reward, agree new pay and reward policy, implement recommendations and evaluate	AD HR	(18/19 start) (Q4 finish)	-
Pe		2.3	Complete review on approach to appraisal, and evaluate	AD HR	(18/19 start)	(Q4 finish)
		Implen	nent the senior structure review and evaluate	Director of HR	Activity is o completion	
		2.5.1	Develop behaviours framework supporting our values (linked to the competency framework and appraisals process)	Director of HR	(18/19 start) (Q1 finish)	-
	2.5.2 Comm	2.5.2	Communicate values to staff	Director of HR / Director of Comms	(18/19 start) (Q1 finish)	-
		Comme	ence and complete EDI review	Director of HR	Activity has completed i	
Tec	3. Develop an exemplary IT service to support our strategic objectives ensuring we have the right tools	3.1.1	Commence the IT Service review and implement recommendations	AD ICT & Accom'tion	(18/19 start) (Q1 finish)	-

			Timing o	f delivery
Deliverable from our strategy	Activity Required to Succeed (Headline Description)	Accountable Officer	19/20	20/21
	3.1.2 Implement new arrangements following exit from Capita contract	AD ICT & Accom'tion	(18/19 start) Q3 finish)	-
	Develop a new IT and Digital Strategy	Director of Resources	Activity has completed i	
	3.2 Implement recommendations of the IT and Digital Strategy (and identify Capital Plan)	Director of Resources	(Q1 start)	(Q4 finish
	Deliver IT accessibility improvements for staff	AD ICT & Accom'tion	Activity is o completion	
	3.3 Review home and mobile working (Smart Working)	Director of Resources	-	(Q1 20/21 (Q4 finish
	Commence and complete approach to Dynamics 365	AD ICT & Accom'tion	Activity replaced wit 3.4.1 and 3.4.2 below	
	3.4.1 Implement new casework management system (CMS rebuild) Phase 1 *NEW*	Executive Director of Strategy & Operations	(18/19 start) (Q4 finish)	-
	3.4.2 Implement new casework management system (CMS rebuild) Phase 2 *NEW*	Executive Director of Strategy & Operations	-	(Q1 start) (Q4 finish
	3.5 Implement new procurement system *NEW*	Director of Resources	-	(Q1 start) (Q4 (finish)
	3.6 Implement new finance system (linked to Business Critical Enablers 2.1) *NEW*	Director of Resources	-	(Q1 start) (Q4 (finish)

BUSINESS CRITICAL ENABLERS Setting the foundations for an exemplary ombudsman service								
					Timing of delivery			
Deliverable from our strategy		Activity Required to Succeed (Headline Description)		Accountable Officer	19/20	20/21		
		3.7	Put in place new MI automation functionality *NEW*	Director of Resources	(Q1 start) (Q4 finish)	-		
Assurance	4. Ensure robust assurance of our data	4.1	Evaluate cyber security arrangements against good practice and identify opportunities to strengthen arrangements	AD Information Assurance / AD ICT & Accom'tion	(18/19 start) (Q4 finish)	-		
	5. Develop greater transparency of the information we hold	5.1	Commence and complete publication scheme, considering scope of organisational transparency	AD Information Assurance	(18/19 start) (Q4 finish)	-		
		5.2.1	Commence work with NHS Digital to consider options for securely exchanging information electronically to improve information security	AD Information Assurance	(18/19 start) (Q4 finish)	-		
		5.2.2	Implement agreed approach for exchanging information and assess impact on casework	AD Information Assurance	-	(Q1 start) (Q4 finish)		
	6. Demonstrate an improved approach to monitoring and assessing value for money	6.1.1	Implement quick win value for money (VFM) metrics	AD Business Management	(Q1 start) (Q4 finish)	-		
		Comme	ence and complete research into new approach to VFM	AD Business Management	Activity has completed i with the pul independent and next ste detailed in 6 6.1.3	n 2018/19 olication of t VFM study eps are		
		6.1.2	Implement new approach to VFM	AD Business Management	(Q1 start) (Q4 finish)	-		

BUSINESS CRITICAL ENABLERS Setting the foundations for an exemplary ombudsman service								
				Timing of delivery				
Deliverable from our strategy		Activity Required to Succeed (Headline Description)	Accountable Officer	19/20	20/21			
		6.1.3 Host VFM symposium to propose VFM methodology across ombudsman schemes *NEW*	AD Business Management / AD Insight & Public Affairs	(Q2 start) (Q3 finish)	-			
Accommoda	7. Provide an effective working environment	Commence and complete a review of London accommodation options working with LGSCO, and implement recommendations	AD ICT & Accom'tion	Activity has completed i				
том	8. Ensure target operating model is fit for purpose following changes relating to delivery of the strategy	A Target Operating Model review will be undertaken at an appropriate time following the delivery of key pieces of activity in the strategy which propose impact on the Service Model	Executive Director of Operations & Strategy	Activity has been completed in 2018/19				
tegy	9. Review current strategy and develop new strategy	9.1.1 Review progress of the strategy in light of feedback from stakeholders and the outcome of the CSR (to inform onset of new strategic planning activity) *NEW*	Director of Strategy & Insight	(Q3 start) (Q4 finish)	-			
Strategy		9.1.2 Develop new strategy *NEW*	Director of Strategy & Insight	-	(Q1 start) (Q4 finish)			

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