

Housing

Ombudsman Service

Investigation Guidance

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Investigation Guidance

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1. Overview

Para 39 of the Housing Ombudsman Scheme (the Scheme) states that the Ombudsman must investigate any complaint duly made and not withdrawn. Para 40 of the Scheme states that the Ombudsman may investigate any complaint duly made but withdrawn.

The Ombudsman has a duty to formally investigate a complaint that is 'duly made' unless this has been resolved by the Triage and Mediation Team, in accordance with paras 53(b) and (c) of the Scheme or if it subsequently falls outside our jurisdiction in accordance with para 53(a) of the Scheme.

Our objective is to produce high quality casework that is impartial, consistent and thorough. Our investigations reach fair conclusions which will be recognised as such by the parties to the complaint. We also use our investigation reports to promote good practice and facilitate improvements in standards and practice across the sector.

Each investigation requires the exercise of discretion involving the judgement of the decision maker. We provide a high degree of autonomy for managers and staff who work with minimum levels of supervision. This is accompanied with high levels of accountability. All casework must meet the **Quality Standards**. We expect high levels of performance in relation to quality and quantity.

Para 43 of the Scheme states that the Ombudsman will determine complaints by what is, in his opinion, fair in all the circumstances of the case. It is, therefore, the Ombudsman's duty to investigate and assess whether the actions taken by the member landlord were fair in all the circumstances. This duty is delegated to the caseworker conducting the investigation and they are expected to act in accordance with the Scheme.

2. Inquisitorial Approach

Ombudsman services are promoted as, amongst other things, an alternative to legal proceedings. We are separate from the court and are not bound by the same rules. For example, a large proportion of our work concerns promoting effective dispute resolution by others. Unlike the adversarial court system, we take an inquisitorial approach to our investigations as set out below:

Inquisitorial	Adversarial
Decision maker performing an examining role	Parties in a dispute have responsibility for finding and presenting evidence
Gets to the truth through investigation and examination of all evidence	Gets to the truth through open competition between the two sides (in criminal cases by disproving the prosecution)
Decision maker is involved in collecting and preparing evidence and decides which witness evidence is needed	The parties decide what evidence they want to use and which witnesses to call

Precedent rarely applies – decision maker is free to make decisions on the basis of evidence and statute	Previous decisions of higher courts are binding (precedent)
The role of advocates is passive and decision maker is active (seeking evidence until they can make a decision)	The role of advocates is active and the judge is passive (referee as to process)
Decision maker plays an active role in questioning the parties directly	The judge is neutral and reserves comment until all evidence from both parties is heard
Limited rules on admissibility of evidence – up to decision maker to decide the value of evidence	Strict rules of admissibility of evidence – relating to prejudice or reliability
Decision maker can request evidence that may be unfavourable	Parties try to provide evidence favourable to their argument
Case management relies on the decision maker	Case management relies on advocates
Decision maker can exchange views with the parties at any stage – and can promote discussion to dispose of the case	Judge can't exchange views with the parties before all evidence is heard so there is little opportunity for initiative in disposing of cases

The inquisitional approach determines how we resolve complaints. In practice this means, for example:

- We have wide discretion about how we use evidence and what value we put on it
- We rarely directly question the parties
- We make specific evidence requests from landlords, but allow residents to send whatever evidence they think is relevant
- The landlord is expected to provide all of the evidence we request. Residents do not need to prove their case and do not need to provide any evidence
- We define the terms of the complaint. Our investigations do not depend on the parties' interpretation of the complaint, but rather the investigator identifies the issues they consider to be in dispute based on the evidence
- There is no evidence disclosure process to the parties. We reference evidence we have relied on, but do not send the evidence to the parties.

Our investigation is not limited to considering complaints where a legal issue has arisen, nor solely to the information raised in the complaint that was submitted. Remember, our duty is to consider what is fair in all the circumstances of the case. This means that we set the pace and decide what questions to ask to establish what occurred.

3. Purpose of the investigation

Para 52 of the Scheme sets out “what the Ombudsman’s investigation seeks to establish” specifically: “...whether the member has been responsible for maladministration (which includes findings of service failure, maladministration and severe maladministration). This may include:

- a. Failed to comply with any relevant legal obligation

- b. Failed to comply with any relevant codes of practice
- c. Failed to apply its own policies and/or procedures
- d. Delayed unreasonably in dealing with the matter
- e. Behaved unfairly, unreasonably, or incompetently; or
- f. Treated the resident personally in a heavy handed, unsympathetic or inappropriate manner”.

The investigation report presents the culmination of the work undertaken by the caseworker. It conveys all the necessary information about the complaint, the investigation process, the findings and conclusions reached and the reasoning behind this. The report has the following functions:

- A working document for internal use, including all drafts/versions;
- An element within the quality assurance process;
- An audit trail, giving clear explanation of decisions made and evidence relied upon when making those decisions;
- The public face of the Ombudsman’s casework – in anonymised form on our website;
- Informs the landlord of the complaint and the evidence relied on
- Informs the resident of the landlord’s position on the complaint.

The investigation report is sent to landlords, residents and their representatives, and to any designated person involved. The decision is also published on our website. Stakeholders will use the report to decide if the decision is fair, evidence based and properly explained. If the report does not meet these criteria this will undermine faith in the fairness of the specific decision and in the Ombudsman as an organisation, causing reputational risk. Content, style and tone are all important in conveying the fairness, competence and impartiality of our decision making.

The purpose of the report is to set out a formal record of the investigation undertaken and the determination, including any orders or recommendations. It is also a means of sharing any learning from the complaint, including sharing good practice.

The report should be clear and concise. It does not rehearse every detail of background to a complaint, but rather reflects the key information and evidence on which we rely to reach our findings. The report and findings should make sense to a reader coming across the case for the first time.

This is not a prescriptive document on how to write reports. The nature of our role makes it impossible and undesirable to impose too formulaic a structure on reports. Reports will vary in length and detail, as they should be proportionate to the complexity of the issues and the findings we make. As a minimum, the report should concisely set out the following:

- The complaint
- What happened (i.e. what went wrong)?
- What action was taken in response (both in relation to the events that gave rise to the complaint and once the complaint was made)?
- Was this action fair in the circumstances?

- Why?

Any findings reached should be supported by evidence and this should be sufficiently referenced within the report.

There are limited circumstances in which a draft decision should be sent to the parties for their consideration, prior to issuing the determination. For further information on this, see the separate **Guidance on Issuing Draft Decisions**.

4. The Complaint

Para 44 of the Scheme states that “The Ombudsman will decide how to consider and investigate complaints subject to the Scheme, taking account of the evidence of service failure presented”.

We do not simply rely upon the complaint as stated by the resident but rather look at the complaint journey. This includes the complaints procedure, the issues that were both raised and addressed and any additional issues we consider require assessment having assessed the evidence. We then define the complaint in neutral language, setting the parameters for the investigation.

We define the complaint that we are investigating in order to:

- Ensure and demonstrate our impartial approach.
- Frame the issues that the investigation will address, accurately reflecting our jurisdiction and role.
- Manage the parties expectations as to the extent of the investigation.

Practical considerations

- We must ensure that the complaint definition is clear and unambiguous.
- With multi-stranded complaints it can help to separate out each individual strand for investigation.
- Definitions should be focussed and specific. Very long definitions are difficult to follow and may confuse both the investigation and the parties.
- Objective and neutral in tone. Emotive language is not appropriate as this does not reflect our impartial role.
- Are there any jurisdiction issues? These should have been identified earlier and the parties advised accordingly. If we become aware of new issues the parties should be informed immediately.

There is no set way of defining the complaint. In this regard caseworkers and managers have delegated authority to act as decision makers on behalf of the Ombudsman. Caseworkers are therefore responsible and accountable for the decisions they make and whilst there is a considerable amount of discretion allowed, all cases must be conducted in accordance with the Ombudsman’s role and the Scheme.

As a starting point it is useful to consider the information required in the chart below when defining the complaint to be investigated:

1. Resident's wording of complaint (to both landlord and HOS)	1. Complaint the landlord considered
2. Key themes from both	
3. The Ombudsman's complaint definition	
4. Will the resident recognise their complaint from this definition?	
5. Are there any jurisdictional issues identified?	

5. Key issues – finding out what happened

Once you have your complaint definition you can start to identify the key issues that you will need to explore as part of the investigation. This is a key stage in the decision-making process. As a starting point, look at your complaint definition in isolation (so for now, briefly ignore the evidence we have). What are the key things you are going to have to find out to investigate the complaint as defined?

Example

Resident's wording of complaint	Complaint the landlord considered
<p>This flat has features that pose asbestos hazard. It is evident that the asbestos survey (made available to me on request) was not and is not comprehensive. I am told that the survey I was shown is the only survey, but it evidently did not detail all asbestos in the flat. Furthermore, all wall and ceiling surfaces throughout the flat, until proven otherwise, could pose an asbestos risk.</p> <p>In real terms, I ought to have been told that I would be living with asbestos hazards in this flat [radiators, which were detailed in the asbestos report, for example], in real terms I wouldn't have moved here had I been told. You exposed me to asbestos by not telling me of asbestos panel which has now been removed.</p>	<p>Your complaint was regarding the inadequate asbestos survey carried out to the property by the landlord's consultants, and the policies and procedures in place at the time and the quality of the Management Survey offered.</p>

Key themes from both
Adequacy of the asbestos survey
The Ombudsman's complaint definition
The landlord's handling of asbestos in the property, in particular that the resident was not informed of the presence of asbestos when offered the tenancy, and that the asbestos survey conducted was inadequate.
Will the resident recognise their complaint from this definition?

Amend if necessary
Are there any jurisdictional issues identified?
Resident already advised that HOS unable to assess any damage to her health.
Key issues stemming from complaint
<ul style="list-style-type: none"> • What was the landlord's obligation regarding identifying asbestos? • What did it do in relation to the resident's property and was this fair in the circumstances? • What was the landlord's obligation to inform residents of asbestos within their property? • What information was given to the resident and was this appropriate? • Why does the resident believe the asbestos survey to be inadequate? • How has the landlord responded to this concern and was this fair?

Once you have identified your key issues you can begin thinking about where you will find the information you need to address them. Review the evidence you have on file. Does this provide you with sufficient information to answer your key questions? If not, what do you need to find out and where will you find this?

Remember our impartial role. We are not trying to find something that went wrong, but rather to investigate the key issues fairly and without bias, assessing whether the actions/omissions that occurred were fair in the circumstances of the particular case.

Finding information

Useful information can be found on the following websites:

Internal Resources	
Our intel logs	
Factsheets	Fact sheets - Housing Ombudsman (housing-ombudsman.org.uk)
Spotlight reports	Spotlight on... reports - Housing Ombudsman (housing-ombudsman.org.uk)
Insight reports	Insight reports - Housing Ombudsman (housing-ombudsman.org.uk)

External Resources	
Shelter legal	https://england.shelter.org.uk/professional_resources/legal
The Regulator of Social Housing	https://www.gov.uk/topic/housing/regulation
Leasehold Advisory Service	http://www.lease-advice.org/
Chartered Institute of Housing	www.cih.org

6. Requesting Evidence

The Scheme sets out the obligation of members to provide information. Paragraph 12 of the Scheme states that “When the Ombudsman gives reasonable notice, the member must (without charge):

- a. allow the Ombudsman to interview the member’s staff, board or committee members;
- b. require a representative to attend any meetings convened by the Ombudsman;
- c. use its best and reasonable efforts to help the Ombudsman get information from third parties who may know about the complaint or from the member’s former members of staff; and
- d. provide such other reasonable help as the Ombudsman may request.

The majority of the required evidence will be obtained by the Triage and Mediation Team prior to the investigation commencing. For further information on requesting evidence, see the **Evidence Gathering** section of the DS&R Manual.

At the point of investigation, think about what other evidence you may need to address the issues identified. Where possible we will try and make a fair decision based on the evidence available on the file but if this is not possible because vital evidence relevant to a key issue is missing/needed, additional evidence can be requested. Any such evidence requests should be concise, open and transparent – we should be clear about what we require and why we need to see it.

Telephone enquiries can be useful for clarifying smaller issues. A note of all conversations should be kept on the database. In some circumstances, it may be appropriate to confirm the content of the call in writing.

Third parties

Generally, our evidence requests are made to the parties to the complaint, but on occasion a third party may have been involved in the complaint or hold relevant evidence. We can request evidence from third parties, but it will be a matter for the individual/organisation in question as to whether they provide the evidence.

7. Effective Decision Making

Strategic Objective 3 – Increasing Openness

The quality of our decision will depend upon the decision maker’s knowledge, experience and integrity. Caseworkers should be able to gather and analyse relevant information, observe any legal requirements and properly apply any relevant policy. Customer feedback from the people affected by the decision can also reflect on the quality of the decision and can help us identify learning. It is recommended that caseworkers regularly view and consider the customer feedback provided on their decisions.

Having the right approach can have a direct impact on the decision-making process. We need to be open and impartial whilst gathering our evidence. In keeping with our Vision of 'Improving residents' lives and landlords' services through housing complaints' we should ensure that we:

- Take the time to understand the concerns of both parties and the impact that any decision we make will have on them
- Respond promptly to communications from customers
- Keep them informed of the status of the investigation
- Understand and correctly apply any legislation relied upon
- Have gathered and considered the relevant evidence
- Advise customers of the decision and the reasons for the decision.
- Act in a timely fashion
- Observe the rules of natural justice.

Natural Justice

'Natural justice' means using a fair and proper investigation procedure. For the Ombudsman this means:

- Parties are aware of the complaint and have enough information to be able to participate meaningfully in the decision making process (the notice rule)
- Parties are given a reasonable opportunity to present their point of view and to respond to facts presented by others (for further information on this, see the **Reviews Guidance**) (the hearing rule).
- We do not act in a way that is, or could be perceived to be, biased or partial to one party over the other (the bias rule)

In practice this means, for example:

- We usually tell the parties what we are investigating before we determine the case
- We give the parties enough time and suitable means to make any comments or send evidence, e.g. some residents will want to make comments by telephone
- We approach the investigation with an open mind rather than a prejudged decision which we seek to prove or disprove. Our communications with the parties convey this open minded outlook.

8. Structure and Content

When drafting a report, we bear in mind how each section can be used to build towards a conclusion. The report should:

- Put the complaint in context
- Address the key issues identified
- Reference sufficient evidence and assessment to justify the conclusions reached, enabling the parties to understand our reasoning.

Bearing in mind the rules of Natural Justice above, the investigation report must “provide details of the investigation into the complaint setting out:

- a) the nature of the complaint, the allegations and evidence against the member; and
- b) the member’s case in reply.” (para 47 of the Scheme).

Responses from the landlord to the event and in its complaints procedure

You may not need to refer to each and every response in your report (although you should have considered them all). Think about:

- The actions and explanations offered by the landlord
- Did the landlord identify or acknowledge any failings in its handling of the matter? If so, did it take any steps to put things right?
- How did the landlord offer to resolve the complaint (e.g. compensation offer)?
- To what extent was the landlord’s response fair in the circumstances?
- Use the dispute resolution principles to help you assess (available through Hoogle)

The resident’s responses

Think about:

- Was the resident satisfied with the landlord’s responses? If not, why not?
- Why did the resident remain dissatisfied and what did they want the landlord to do?

Structure of the report

Caseworkers and managers have discretion as to how they conduct the investigation. In the interests of clarity and consistency we use an investigation report template which is available on Workpro. When using the template and drafting the report, keep in mind the ABC acronym: Accuracy; Brevity; and Clarity. Below is a summary of the headings in the template and the content to include under each heading:

Heading	Report Type	Contents
Our Approach	A, B & C	<ul style="list-style-type: none"> • Standard wording included in template, setting out the Ombudsman’s approach to investigations
The Complaint	A, B & C	<ul style="list-style-type: none"> • List all complaints to be investigated & those to be ruled OSJ • Complaint definition drafted as per table above
Jurisdiction	B & C	<ul style="list-style-type: none"> • Only used for complaints listed in the complaint definition which are not being investigated • Not used for setting out the scope or extent of the complaints we are investigating or other issues raised by the resident

		<ul style="list-style-type: none"> • Brief summary of OSJ issues and the Ombudsman’s position, with reference to relevant paras of the Scheme. • Frame comments by reference to what we can look at, rather than focussing on what we cannot investigate. • For more information on explaining our jurisdiction, see the Jurisdiction Guidance
Background	A, B & C	<ul style="list-style-type: none"> • Details of occupancy status and or property size/type, but only where relevant to the complaint. • Any other <u>relevant</u> issues that affect the resident (e.g. disability, communication issues, vulnerabilities) • Scoping paragraph – Any other <u>relevant</u> issues that offer necessary context to the complaint and explain what we are/are not investigating.
Summary of Events	B & C	<p><i>Policies, procedures & legal obligations</i></p> <ul style="list-style-type: none"> • Where necessary to set these out separate to the assessment. • Keep as succinct as possible – don’t unnecessarily quote chunks of documents • Only include details that are relevant to the assessment <p><i>Summary of Events</i></p> <ul style="list-style-type: none"> • Events detailed in chronological order (generally from issue complained of arising to end of ICP) • What was the situation/issue that gave rise to the complaint? • Why did the situation/issue become a complaint? • When and how was the issue brought to the landlord’s attention? • What was the landlord’s response? • Summary of key events, not details of every contact. Should include enough info to demonstrate that documents have been considered but should be concise and focused on the key issues •
Assessment and Findings	A, B & C	<ul style="list-style-type: none"> • Analysis of ‘what did happen’ vs. ‘what should have happened’ • Include sub-headings for separate points of complaint if helpful • Relevant info is evidence that rationally or reasonably relates to the key issues in question, eg: <ul style="list-style-type: none"> • What were the landlord’s responsibilities and what was the landlord obliged to do?

		<ul style="list-style-type: none"> • How far was the landlord's response in line with its obligations and policy/procedure? If not, why? • To what extent did the landlord keep the resident informed/updated? • To what extent did the resident fulfil their obligations/responsibilities (e.g. allowing access)? • Clearly set out the conclusions from our investigation and why, i.e a summary of the following: <ul style="list-style-type: none"> • Was the action taken by the landlord fair, reasonable & in line with obligations, policy & procedure, legislation? • Were any failings identified – by the landlord and/or the caseworker? • To what extent did the landlord take appropriate action to put things right - in relation to both the substantive issue and the formal complaint? • Is there any evidence of learning by the landlord? • If more needs to be done to put things right, what is it and why?
Determination (decisions)	A, B & C	<ul style="list-style-type: none"> • Confirmation of our findings, with reference to relevant Scheme paragraphs. • Number of findings must mirror the points of complaint in the complaint definition
Reasons	B & C	<ul style="list-style-type: none"> • Brief summary of the reasons for our findings which are explored in more detail in the Assessment • A brief paragraph/few sentences on each point of complaint. • Should not include new facts, evidence, or analysis
Orders and Recommendations	A, B & C	<ul style="list-style-type: none"> • For further information on making Orders and Recommendations, see the Remedies Guidance

Scoping paragraphs

It can be helpful to include a paragraph(s) in the Background section to clarify the scope of the investigation, address issues which have influenced the investigation process or clarify the Ombudsman's position at the outset. This can help to focus the report on the issues and events which are actually being investigated and avoid the inclusion of unnecessary information.

Further, if an aspect of a complaint that we are investigating is not within our jurisdiction to consider (as opposed to the complaint itself being outside jurisdiction)

this can be addressed in a scoping paragraph (rather than the Jurisdiction section of the report). For example:

Scenario	Scoping Paragraph
Cases where compensation for damage to health / personal injury has been raised	<i>Whilst this service is an alternative to the courts, it is unable to establish legal liability or whether a landlord's actions or lack of action have had a detrimental impact on a resident's health. Nor can it calculate or award damages. The Ombudsman is therefore unable to consider the personal injury aspects of the resident's complaint. These matters are likely better suited to consideration by a court or via a personal injury claim.</i>
We are looking at a complaint about anti-social behaviour and the resident has said the reports go back 10 years, but there have been long breaks in reports being made by the resident during that time.	<i>Although it is noted that there is a long history of ASB reports by the resident, this investigation has primarily focussed on the landlord's handling of the resident's recent reports from XXXX onwards that were considered during the landlord's recent complaint responses. This is because residents are expected to raise complaints with their landlords in a timely manner so that the landlord has a reasonable opportunity to consider the issues whilst they are still 'live', and while the evidence is available to reach an informed conclusion on the events that occurred.</i>
A number of complaints were raised and addressed during the ICP but only one has been brought to HOS for investigation.	<i>The landlord's internal complaint procedure investigated and responded to several issues. However, the resident has subsequently confirmed to this Service that they only consider the issue defined above to be outstanding and that the other issues of the complaint have been resolved. Accordingly, this investigation has focussed on and assessed the circumstances of the one issue that remains outstanding.</i>
In their submissions to the Ombudsman, the resident has referred to a number of new issues which do not relate to the complaint under investigation.	<i>In the interest of fairness, the scope of this investigation is limited to the issues raised during the resident's formal complaint. This is because the landlord needs to be given a fair opportunity to investigate and respond to any reported dissatisfaction with its actions prior to the involvement of this Service. Any new issues that have not been subject to a formal complaint can be addressed directly with the landlord and</i>

	<i>progressed as a new formal complaint if required.</i>
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Presentation

For information on how to present an investigation report (including tone, language and readability), see the **Ombudsman’s Style Guide**.

9. Bias

Bias is a disproportionate weight in favour of or against an idea or thing, usually in a way that is closed-minded, prejudicial, or unfair. It can be conscious or unconscious and can be about prejudice based on the characteristics of the parties, but is also about how you interpret information. Few people think of themselves as biased, but bias is inherent to human cognition. So you must make conscious effort to overcome it.

There are many types of bias which can undermine the fairness of our investigations:

Confirmation bias

The tendency to search for, interpret, focus on and remember information in a way that confirms one’s preconceptions. If we do not approach an investigation with an open mind we may only notice evidence which supports what we thought the outcome was likely to be.

Unconscious bias

The underlying attitudes and stereotypes that people unconsciously attribute to another person or group of people that affect how they understand and engage with them. This can apply, for example, where we perceived a resident as demanding and therefore unconsciously think that their complaint is likely to be unfounded or exaggerated.

Outcome bias

This is the tendency to judge a decision or action by its success or failure, rather than assessing the quality of the decision based upon what was known to the decision maker at the time. Just because something did not work, it does not necessarily mean that the decision to try that course of action was a bad decision. This applies where a landlord’s first diagnosis of a repair turns out to be incorrect. This does not mean the landlord was at fault.

Hindsight bias

Once all the facts are known it can seem obvious that a course of action should have been followed, or that events should have been predicted. We need to consider whether this would have been obvious at the time, in the particular circumstances of

the case. Hindsight can often be useful in identifying the potential learning from a complaint but this needs to be balanced against what was known at the time when conducting the investigation.

Anchoring bias

We tend to rely on the first piece of information introduced when making a decision. For example, when we read the landlord's final decision first we may tend to accept that version of events as correct and then unconsciously look for information to confirm that initial understanding.

10. Findings and Outcomes

We set out conclusions or findings at the end of our investigation, based upon the evidence referred to within the investigation. We consider whether the evidence has established that the landlord was responsible for any maladministration, whether it has taken sufficient action to put things right, and if not, the level of maladministration outstanding. Our findings must be proportionate to the level of service failure identified and established by the evidence. For further information on the findings we can make, see the **Outcomes Guidance**.

Whenever we make a decision, there is always at least one alternative decision that could have been made. It is therefore important that we explain our decision and that the evidence referred to in the investigation supports the finding. Giving reasons as to why we are making a particular findings helps customers understand why a particular decision was made. It also demonstrates transparency, accountability and the quality of the decision.

11. Record keeping

Good record keeping improves decision making and provides detailed information on which we base our decisions. It enhances transparency and allows greater insight and understanding if the decision is challenged. The Ombudsman publishes annual landlord reports on the complaints investigated for each landlord and also uses our records to identify topics and themes for further investigation. Good records on our cases are vital for these activities to be successful.

Files are often transferred between caseworkers and it is important that files are kept in good order.

- All case information should be recorded in Workpro. All staff are responsible for information security. For further information, see the **Information Manual** in the DPA/FOI area on Hoogle.
- Telephone calls: A record of any telephone conversation undertaken as part of the investigation should be made on Workpro, detailing the content of the conversation and any actions agreed.
- Designated persons, representatives and any involvement of an MP should be clearly indicated and recorded in Workpro under the Parties tab.

For information on the data entry requirements and administrative actions required following an investigation, see the separate guidance in the **Workpro Guidance** section of the DS&R manual and the **Publication Process Guidance**.