The Bristol Cable

Complaints response process

March 2024

Criteria

Every Bristol Cable policy should try to keep the following in mind:

- 1. **Our approach, culture and values:** Reflecting our culture; striving to promote integrity, equity, accountability and trust.
- 2. **Compassionate culture:** Prioritising what is best for good team working, power dynamics, wellbeing and cohesion.
- 3. Legality & affordability: Checked by the People Lead and Workplace Lead within these parameters.
- 4. **Framing:** People may use our policies to gauge what kind of organisation we are. If they did, we'd like them to get a sense of our approach and values in the way that the policy has been written: with accessibility, the trust we place in our staff, and approachability in mind (rather than being legalistic and punitive).

1. Principles

The Bristol Cable is committed to accuracy, fairness, openness, transparency and collective learning.

The Bristol Cable recognises the need to take swift action to address complaints and where necessary offer apology, clarification, correction or other suitable recourse.

The Bristol Cable fosters a working culture of continual learning, including from incidents involving complaints and reviewing the actions taken. We view complaints as an opportunity to learn and improve the quality of our journalism and the contents of our publication for the future, as well as a chance to put things right for the person (or organisation) that has made the complaint.

2. Resources

IMPRESS Standards Code Complaints and responses folder (internal access only) Previous complaints procedure

3. Policy Overview

Our policy is:

- To provide a fair complaints procedure that is clear, convenient and easy to use for anyone wishing to make a complaint (in particular those that are vulnerable or who have disabilities)
- To uphold and adhere to the Standards Code ("Code") <u>https://impressorg.com/standards/</u> set out in the Impress Regulatory Scheme in our assessment of all complaints
- To publicise the existence of our complaints procedure so that readers know how to contact us to make a complaint
- To make sure everyone working for us knows what to do if a complaint is received
- To make sure all complaints are dealt with promptly and fairly, with decisions based on sufficient investigation of the circumstances and (where appropriate) offer a suitable remedy
- To make sure that complaints are, wherever possible, resolved and that trust in our journalism and our publication(s) remains strong
- To gather information about all the complaints we receive to help continually improve the quality of our journalism and our publication(s)
- To submit an annual report to Impress of all complaints received and their outcomes

 To submit any complaint that is not resolved by us in a timely or satisfactory way to Impress and to comply with directions issued by Impress relating to its Regulatory Scheme

To make available to all our employees a confidential whistleblowing hotline which is independently operated by Impress and not to take any action to the detriment of anyone who uses the hotline or declines to breach the Code.

4. Who Can Complain and How?

Complaints may come from any person or organisation who is:

- personally and directly affected by an alleged breach of the Code
- a representative group affected by an alleged breach of the Code, where there is public interest in the complaint
- a third party seeking to ensure accuracy of published information

A complaint should be received by email or in writing although complaints are accepted by other reasonable means where it is not convenient or practical for the individual complainant to complain in writing.

A complaint should be clearly marked as such. General enquiries and requests for corrections will not normally be dealt with as a complaint under this policy unless the complainant makes it clear that they wish to make a complaint.

A complaint should include the desired outcome or remedy sought by the complainant.

A complaint should engage at least one specific clause from the Impress Standards Code.

5. Complaint handler

The Editorial Lead should act as the complaints handler, making sure the complaints process is followed. If the editorial lead is also the author or coordinator of the story in question, then another complaints handler should be assigned.

6. Avoiding complaints

Authors are required to provide all sources used. Subeditors are ultimately responsible for fact checking.

Pieces that may be controversial are to be flagged with the media team by the team member responsible, and, where possible, should not be scheduled just before the weekend or annual leave for the author/responsible team member. Any pieces that may have legal repercussions are to be discussed with the Editorial Lead for possible escalated discussion with expert advisors (e.g. Mike Jempson, lawyers).

7. Process

- 1. Criticism/complaint is received social media, direct communication, relayed from author, email, phone call.
- 2. Article is flagged to the author/coordinator responsible and then shared in #team-content-feedback channel on Slack.
- 3. Where appropriate, initial communication is relayed to the person making the complaint acknowledging receipt of complaint (in cases where the complaint is to be investigated)
- 4. Complaint handler, and the author/coordinator of the piece convene meeting as soon as possible. Feed in may also be sought from other coordinators at an editorial meeting
- 5. Pieces can be pulled and replaced temporarily with a statement saying the article is under review.
- 6. Action is decided based on the type and significance of the complaint (see below)
- 7. A response will be drafted and shared for review with appropriate persons, (including advice from outside the team)
- 8. Consideration will be made as to whether the complaint warrants a public or private response
- Meetings to discuss complaints should be minuted and filed in the <u>Complaints and responses folder</u> including remedial actions and/or outcomes of the complaint.
- 10. This record will be made available to Impress and to the public (in a redacted form, where necessary), for publication by Impress in its annual report.
- 11. We will report to Impress all compliance failures of which we become aware (whether complained about or not)
- 12. Monitoring and learning from complaints are reviewed regularly to identify any trends which may indicate a need to take further action.
- 13. All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

14. We will aim to acknowledge complaints by e-mail or in writing within 7 calendar days and will normally respond with a final decision letter within 21 calendar days. If we uphold the complaint, we will include the remedial actions we have taken.

8. Complaint of personal harm/defamation

Complaint handler and coordinators to assess the validity of the complaint, seeking legal and ethical advice as necessary.

9. Alleged factual inaccuracy

Complaint handler and coordinators to assess whether the alleged inaccuracy is valid, referring to primary sources as necessary.

"A significant inaccuracy, misleading statement or distortion must be corrected, promptly and with due prominence, and — where appropriate — an apology published." Editor's Code

Minor factual inaccuracies should be corrected straight away and a note should appear on the article with the date and details of the correction. These statements should always appear in italics, beneath the article.

Corrections/retractions/apologies should be published on social media and in the same channels as the original piece appeared.

10. Opinion- or analysis-based critique

Criticisms as a matter of opinion will not usually warrant an organisational response, although coordinators/author can contribute to conversations.

If the criticism is significant and could lead to reputational damage to the Cable, the Media Circle should meet and formulate a response, for example, a blog post.

11. Social media

Social media communications after an article is corrected/ retracted or is under review.

When a tweet/post regarding an article that has been corrected/retracted has already had traction:

- Issue a tweet/post announcing the correction and send it in the format which **quotes** the original tweet/post so followers can see what it being corrected for context.
- Issue another tweet/post with the correction and the message: "Please see our correction."
- Delete original incorrect tweet/post
- Retweet/repost correction on all channels the incorrect tweet/post was shared through.

OR when tweet/post has had little if any traction:

- Delete tweet/post and follow immediately with tweet/post which explains that a tweet/post was deleted and why

When an article is under review:

- Issue a tweet/post which quotes the original tweet/post and announces that the article linked is under review.
- When a decision is made, follow the above procedures.

12. Escalating the Complaint to Impress

If the complainant feels that the problem has not been satisfactorily resolved by the Bristol Cable or if the complainant feels that there are justifiable reasons why the complaint is so urgent that they cannot wait for Us to respond, they can request that the complaint is reviewed by Impress in accordance with its Regulatory Scheme, by contacting Impress using the following details:



W: <u>impressorg.com/complaints</u>

E: <u>complaints@impressorg.com</u>

T: 020 3325 4288

A complainant must bring a complaint to Impress within four months of the first publication or the act complained of, or within four months from when the complainant should reasonably have known that there was cause for complaint and in such case not later than 12 months from the first publication or act complained of.

13. Whistleblowing Rights of Employees and Contributors

Employees or contributors are encouraged to contact the Impress confidential whistleblowing hotline ("the Hotline") if they are being pressurised to breach the standards set out in the Code or if they have concerns that the standards set out in the Code are not being adhered to more generally by Us.

We will publicise the contact details of the Hotline to all our employees and contributors.

Any employee or contributor who uses the Hotline does so with Our full support and in the knowledge that they will not be sanctioned as a result of doing so.

We guarantee to protect all whistle-blowers from possible reprisals, victimisation or sanction if a disclosure has been made in good faith even if a subsequent independent investigation carried out by Impress into our journalism finds there to be no breach of the Code or of the Impress Regulatory Scheme. For the avoidance of doubt, We will not take any action to the detriment of anyone who uses the Impress whistleblowing hotline or declines to breach the Standards Code adopted by Us as part of our compliance with the Impress Regulatory Scheme.

14. Review

This policy is reviewed regularly and updated as required.

Authorisation and revisions			
Created		2019	
Revised by:	Maya Kaufman, Matty Edwards	March 2024	
Authorised by:	Coordinators	23 April 2024	

Authorised by:	Directors	June 2024

Policies should be reviewed every 2 years, unless:

- We approve a proposal that changes the policy
- There's a change to the organisation that will change the policy
- There's a change in the law that affects the policy.