



**IMPRESS is the first
truly independent press
regulator in the UK.**

Publisher Induction Pack version 1.2

Guidance on how to become compliant with the IMPRESS Regulatory Scheme

Nothing in this guidance should be read in any way which is incompatible with the IMPRESS Regulatory Scheme or other legal or regulatory requirements.

Executive Summary

Welcome to IMPRESS Membership. We are absolutely delighted that you have taken the first steps in becoming a member of IMPRESS and choosing to be regulated by the first truly independent regulator of the press in the UK. You clearly see the benefits that this can bring to your business, and choosing to be regulated shows that you take the handling of any issues that do occur very seriously. The real benefits of being regulated by IMPRESS for a publisher are:

- Giving you the opportunity to put in place (or enhance) a robust complaints process for your business (This document will help with that).
- Access to a formal escalation process when resolutions are disputed by complainants.
- Access to a low cost arbitration scheme which limits the risk of costly litigation if a legal claim for damages is made against you.
- Membership will show that you adhere to and uphold the Standards Code adopted by IMPRESS (“Code”).
- Display of the IMPRESS trust mark which we hope over time will become synonymous with trusted journalism rooted in high ethical standards.
- The trust mark will show your readers and stakeholders that their complaints will be taken seriously.
- Giving your journalists open access to our confidential whistleblowing helpline, will demonstrate that you are a responsible publisher and employer.
- Benefits of being part of the IMPRESS network which we hope over time will enable you to gain real advantages from the cost saving and revenue making ideas you gain from IMPRESS and most importantly other members from around the UK.

What IMPRESS will not do?

IMPRESS is here to regulate, but we will not get in the way of you running your business. We want to see you publishing hard hitting news stories and exercising freedom of speech as you always have. We want you to be able to get on with the business of publishing news stories, relevant to your readers and what they want to read.

What you need to do to become one of our regulated publishers?

There are a number of actions you will need to take before we can agree a regulatory contract. These actions will form the basis for compliance with the IMPRESS Regulatory Scheme. They will need to be implemented (or ready to be implemented) on the date you start being regulated by IMPRESS. This document will detail what these are and we will then check that you are compliant with the IMPRESS Regulatory Scheme before we finalise the contract with you. It is essential that you are familiar with the Standards Code adopted by IMPRESS <http://www.impress.press/standards/>. This is the initial code of standards which IMPRESS will expect members to adhere to.

Your regulation by IMPRESS will start on a date agreed as set out in a contract between us. Any complaints you receive before this date cannot be escalated to IMPRESS. IMPRESS will visit you or contact you by telephone to assess your compliance against the standards required by the IMPRESS Regulatory Scheme. Once you are compliant we will finalise contracts and you will be able to benefit from our various services.

Finally, this induction pack includes in its appendices, a series of documents which are yours to use and adapt to help you comply with the IMPRESS Regulatory Scheme. These have been designed so that you can implement them easily and carry on with the business of running your publication rather than having to write your own policies and procedures. If you have any feedback on these we would welcome this too. Please note that nothing in this guidance should be read in any way which is incompatible with the IMPRESS Regulatory Scheme or other legal or regulatory requirements.

IMPRESS Regulatory Scheme Compliance

There are a number of things you will need to put in place to ensure that you are compliant with the IMPRESS Regulatory Scheme. This induction pack includes a number of resources which are designed to help you to demonstrate that you are compliant. We realise that some publishers will have their own established processes, but where this is not the case, we have designed model policies and procedures to help. You have a number of options to consider:

- Fully adopt the IMPRESS model policies and procedures (or amended versions of these) to ensure you are compliant.
- Adapt the IMPRESS model policies and procedures and use them to enhance your own processes.
- Use your own existing processes, but make sure they are compliant with the IMPRESS Regulatory Scheme requirements that are set out below.

Before you start being regulated by IMPRESS you will need to undertake a self-assessment against the IMPRESS compliance checklist which is set out below (fuller details are available in appendix 6). IMPRESS will carry out an audit to check that you have demonstrated that you are compliant. If you adopt the model policies and processes in this induction pack you will be able to easily demonstrate to us that you are compliant. If you do not use the model policies and procedures or if you modify them significantly, then we will need to review your documents to satisfy ourselves that you are compliant. We ask that you put in place processes, enhance your current processes and collate evidence to show that you meet the four areas of compliance set out below. These areas are shown in more detail in appendix 6 - Publisher compliance checklist.

Relevant Publisher

You will need to establish whether you are a “relevant publisher” as defined by section 41 of the Crime and Courts Act, 2013. In paragraphs 34 to 40, “relevant publisher” means a person who, in the course of a business (whether or not carried on with a view to profit), publishes news-related material.

- which is written by different authors, and
- which is to any extent subject to editorial control
- which is not specifically named or referred to as exempt (Schedule 15 of the Crime and Courts Act, 2013)

If you are not a “relevant publisher” you may still apply to be regulated by IMPRESS but you will not be covered by the costs incentives provided for in the Crime and Court Act 2013 once they come into force. That is why it is important for you that we establish your status as a relevant publisher as part of our initial compliance checks.

Whistleblowing Policy

You will need to implement a whistleblowing policy which makes it clear that you will never take action to the detriment of any employee or contributor because of their use of the IMPRESS whistleblowing hotline.

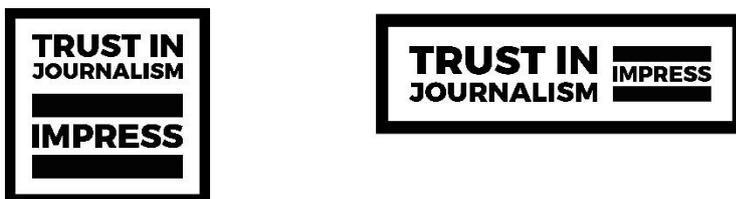
Complaints Policy and Procedure

You will need to implement a complaints policy and procedure which is compliant with the IMPRESS Regulatory Scheme. You will also need to nominate a named individual who is responsible for legal compliance and standards for each title that you publish. Wherever possible this should be someone who is not involved in editorial decision making. Small publishers will need to think carefully about how to manage conflicts of interest if the individual responsible for legal compliance and standards is also involved in making editorial decisions. As a general rule, it is suggested that individuals should not investigate complaints made about an article they were directly involved in. Where this is difficult, however, due to the small number of people involved in the publication, individuals should seek to declare any conflicts of interest. IMPRESS welcomes other suggestions from small publishers about how to manage conflicts of interest.

Publicising the Complaints Scheme

You will need to clearly show how readers can make a complaint. This should be displayed in a prominent position on your website and in any printed publication and should include the IMPRESS trust mark together with the words “Regulated by IMPRESS: the independent monitor for the press”, together with details of how to contact IMPRESS. The IMPRESS trust mark is available in both a square and landscape design (as set out in Figure 1 below). You may use either version to suit the design needs of your publication.

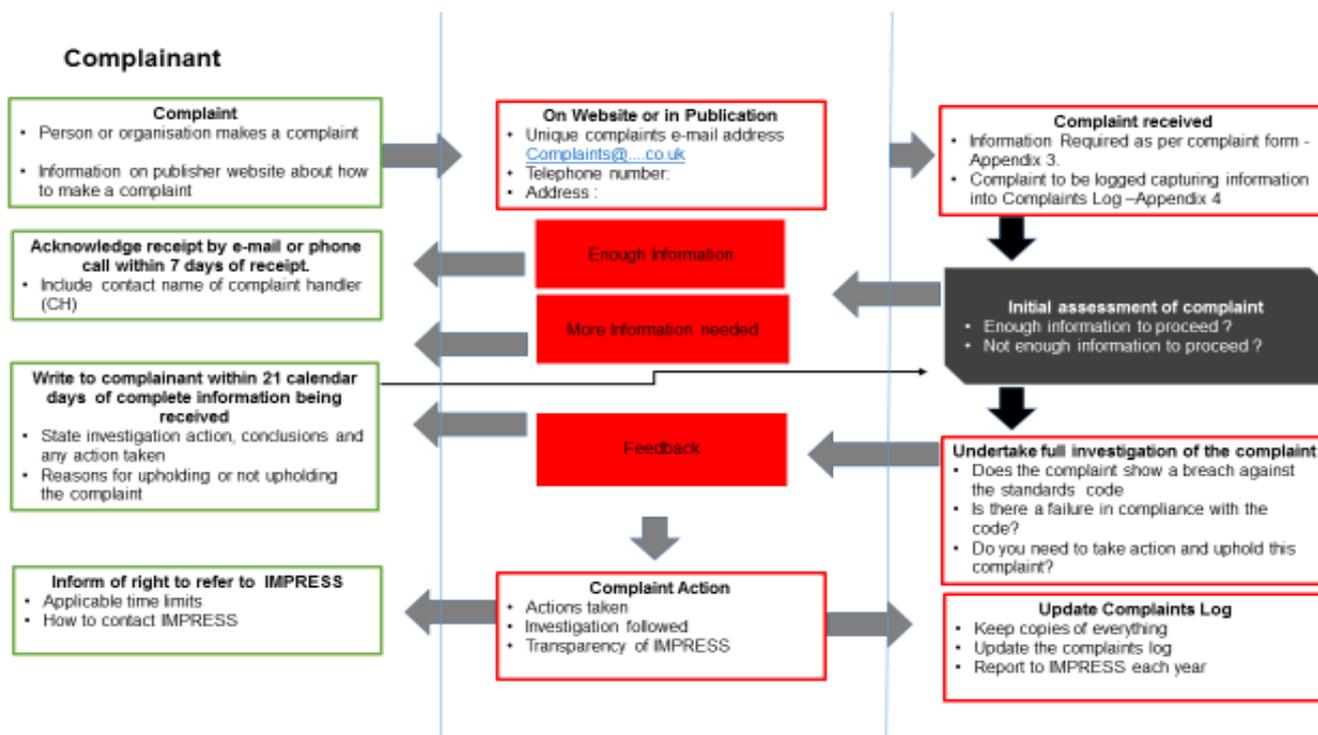
FIGURE 1: Trust mark logos



Model Complaints Process

To help you implement a complaints process we have provided an example complaint process flow in Figure 2 below. The fuller model complaints procedures are provided in appendix 2.

FIGURE 2: Example complaint process flow



Implementing a Complaints Process

You will need to produce your own complaints policy which will include the named individual responsible for handling complaints within your organisation. IMPRESS will need a copy of this.

1. There must be clear wording on your website and in any printed publication signposting readers to how they can make a complaint and of the timeframes in which complaints will be dealt with.
2. Complaints must be acknowledged within 7 calendar days of receipt.
3. Complaints must be dealt with and the complainant informed of the outcome, giving reasons within 21 calendar days of receipt.
4. You must keep a complaints log (Please see appendix 3 and 4).
5. You must update IMPRESS on an annual basis of complaints received and outcomes including detail of any actions taken and findings.
6. You will need to keep all correspondence in case of further investigation.
7. We will refer complaints back to you if the complainant has approached IMPRESS without seeking to resolve their complaint with you first.

Example Wording for Publicising the Complaints Scheme

We have included some example wording below which you may want to adapt to use on your own website or within any distributed publication. It is important that your publication(s) clearly informs readers about how to submit a complaint and that making a complaint should be an easy thing to do. It should also be clear to readers that you are regulated by IMPRESS and that if they are not satisfied with your response to their complaint, they can register a complaint with IMPRESS. You are also required to show the IMPRESS trust mark in your publication and on your website, together with the words “Regulated by IMPRESS: the independent monitor for the press”, together with details of how to contact IMPRESS.

Making a complaint

We can look into complaints about items we have published which are in our control. We adhere to the Standards Code adopted by IMPRESS and can only deal with complaints which relate to an alleged breach of the standards set out in this Code. <http://www.impress.press/standards/>.

We can only deal with your complaint if you are:

- *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 your complaint*
- *a third party seeking to ensure accuracy of published information*

We are also regulated by IMPRESS, but initial complaints must be made to us [publisher name] in writing at the following address:

e-mail: complaints@.....co.uk.

Telephone:

Address:

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

If you are not satisfied with the final response to your complaint, or if you do not hear from us within 21 calendar days of submitting your complaint, then you can refer your complaint to our Independent regulator IMPRESS at the following address:



Regulated by IMPRESS: The Independent Monitor for the Press CIC

IMPRESS, 83 Victoria Street, London, SW1H OHW

T: 020 3585 4160, E: complaints@impress.press, www.impress.press

Resource Pack

The following model documents are available for you to use or adapt to help you become compliant with the IMPRESS Regulatory Scheme.

Appendix 1: Model Complaints Policy

Appendix 2: Model Complaints Procedure

Appendix 3: Model Complaint Enquiry Form

Appendix 4: Model Publisher Complaints Log

Appendix 5: Model Whistleblowing Policy

Appendix 6: Publisher Compliance Checklist

[PUBLISHER LOGO]

COMPLAINTS POLICY OF [PUBLISHER NAME]

1. [Publisher name] views complaints as an opportunity to learn and improve the quality of its journalism and the contents of its publication(s) for the future, as well as a chance to put things right for the person [or organisation] that has made the complaint.
2. Our policy is:
 - To provide a fair complaints procedure which 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”) set out in the IMPRESS Regulatory Scheme in our assessment of all complaints
 - To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
 - To make sure everyone at [Publisher / Publication name] 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 employees and contributors of [Publisher / Publication name] 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.

Definition of a Complaint

3. A complaint is any expression of dissatisfaction, whether justified or not, about the editorial content, standards of journalism or conduct of employees or contributors involved in production of [Publisher / Publication name], that engages the standards set out in the Code.

Who Can Complain and How?

4. 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*
5. 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.
 6. 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 [Publisher / Publication name].
 7. Any employee or contributor of [Publisher / Publication name] who uses the Hotline does so with the full support of [Publisher / Publication name] and in the knowledge that they will not be sanctioned as a result of doing so, even if a subsequent independent investigation carried out by IMPRESS, into [Publisher / Publication name] finds there to be no breach of the Code or of the IMPRESS Regulatory Scheme.

Confidentiality

8. All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Compliance Records

9. In respect of each title [Publisher / Publication name] will maintain a written record of all complaints, to include the name and contact details of the complainant, the material or conduct in respect of which the complaint is made and the alleged Code breach.
10. For each complaint record, [Publisher/ Publication name] will include any steps taken by it to address the complaint, and the outcome of the complaint. 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. [Publication / Publication name] should report to IMPRESS all compliance failures of which they become aware (whether complained about or not)
12. Monitoring and learning from complaints are reviewed quarterly by [Publisher / name of Publication] to identify any trends which may indicate a need to take further action.

Responsibility

13. Overall responsibility for this policy and its implementation lies with [e.g. the board of directors/trustees, the management committee] of [Publisher / Publication name]
14. Responsibility for ensuring that complaints are managed in accordance with this policy lies with a nominated senior legal and compliance standards individual for each title.

15. Each title shall include a statement of arrangements which includes details of the internal authority structure, where responsibilities for Code compliance lie, to whom notice of failure in compliance would be reported (whether complained about or not), together with steps to deal with any failures in compliance.

Review

16. This policy is reviewed regularly and updated as required.

Adopted on:.....[date]

Last reviewed:.....[date]

Related Policies

[Publisher / name of Publication] Complaints Procedure

[Publisher / name of Publication] Whistleblowing Policy

[PUBLISHER LOGO]

STATEMENT OF ARRANGEMENTS FOR [NAME OF PUBLICATION]

Relevant complaints policies

[include the name of relevant complaints policies and procedures and the date they were adopted. Eg. Complaints Policy and Procedures adopted on dd/mm/yy, Whistleblowing Policy adopted on dd/mm/yy]

Internal authority structure

[include who owns the publication, how it is managed, who reports and is accountable to who, where editorial control lies, who is responsible for legal and compliance and how conflicts of interest are managed to ensure that editors are not responsible for investigating complaints against their own decisions]

Eg. [name of publication] is owned by [name]. It is run by a [number] person board of [insert names of board members]. [name of publication] is managed by [name] who is accountable to [name/board]. [name] is responsible for legal and compliance standards and is accountable to [name/job title]. [name] is the Editor and is accountable to [name/job title].

Person responsible for code compliance

[include name of individual/job title responsible for code compliance for the publication]

Person to whom complaints are first reported

[include name of individual/job title for the publication to whom any complaints are first reported]

Steps to deal with failures in code compliance

[to include how the publication responds to compliance failures to ensure that high standards are maintained]

Eg. Compliance failures are reported to [name]. [the board/names] review all compliance failures every quarter. A quarterly action plan is drawn up and key points arising from compliance failures are distributed to the editorial team and all contributors to [name of publication].]

[LOGO]

COMPLAINTS PROCEDURE OF [NAME OF PUBLISHER/PUBLICATION]

Stage One: Making a Complaint

1. Information on how to make a complaint is clearly publicised in [section] of [Publisher / Publication name]
2. Complaints may be sent in writing to [Publisher / Publication name] at [land address], by e-mail at [e-mail address] or telephone [telephone number] or other reasonable means where this is more convenient and practical for the complainant.
3. Complainants should provide the following information before their complaint will be considered:
 - The complainant's name, address, e-mail address and telephone number
 - If the complaint is about a news article it must include:
 - the name and date of the publication and page reference of the specific article being complained about plus the URL.
 - URL/Link to any visual or audio element of the complaint.
 - a written account of what is being complained about with clear reference made to (i) any specific words or phrases in the article that are relevant to the complaint; and (ii) any clauses of the Standards Code adopted by IMPRESS (“Code”) that the complainant believes to have been breached
 - The desired outcome or remedy sought by the complainant
 - If the complaint is about the conduct or behaviour of an employee or contributor to [Publisher / Publication name] it must include:
 - the name(s) of the individual(s) being complained about (if known) or any other information which may identify the individual (s)
 - a written account of what is being complained about with clear reference made to (i) the nature of the behaviour or conduct being complained about including any relevant times, dates, correspondence or other evidence to support the complaint; and (ii) any clauses of the Code that the complainant believes to have been breached
 - The desired outcome or remedy sought by the complainant
4. [Publisher / Publication name] will make reasonable efforts to contact a complainant by telephone, e-mail or in writing to ensure that sufficient information is provided to respond to the complaint.

Stage Two – Recording, Investigating and Resolving the Complaint

5. The complaint information should be passed to the person responsible for legal standards and compliance (“The Complaints Editor”) at [Publisher / name of Publication). They will record it in the complaints log and will acknowledge receipt of the complaint by e-mail or in writing within 7 calendar days of receipt of the complaint.
6. The acknowledgement of receipt of a complaint should say who is dealing with the complaint and when the person complaining can expect a reply. Any conflicts of interest should also be declared at this point. A copy of this complaints procedure should be attached.
7. The Complaints Editor is responsible for ensuring that the circumstances of the complaint are investigated fairly and that any conflicts of interest are managed. This may require the complainant to provide additional information, documents or other evidence to support their complaint.
8. Complainants should receive a final decision letter within 21 calendar days from the date of the receipt of the complaint.
9. The final decision letter must inform complainants that they have the right to refer their complaint to IMPRESS, stating the applicable time limits, set out in clause 4.4 of the IMPRESS Regulatory Scheme, and how to contact IMPRESS.
10. Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

Stage Three – Escalating the Complaint to IMPRESS

11. If the complainant feels that the problem has not been satisfactorily resolved by [Publisher / Publication name] at Stage Two or if the complainant feels that the complaint is so urgent that they cannot wait for [Publisher / Publication name] to respond, they can request that the complaint is reviewed by IMPRESS in accordance with its Regulatory Scheme, by contacting IMPRESS at the following address.

IMPRESS: The Independent Monitor for the Press CIC

83 Victoria Street

London

SW1H 0HW

T. (+44) (0)20 3585 4160

E. complaints@impress.press

www.impress.press

COMPLAINT ENQUIRY FORM**[PUBLISHER LOGO]****Unique Reference Number:****Date of referral****Method of referral**

Website Telephone Email Letter In person

Referral received by

COMPLAINANT DETAILS	
Full name	
Organisation (<i>if applicable</i>)	
Address including postcode	
Email address	
Landline	
Mobile	
Choose type of complainant	<ul style="list-style-type: none"> • Affected party • Representative Group (public interest) • Third party (accuracy)
Preferred means of contact	<ul style="list-style-type: none"> • Email • Telephone • Letter • Through agent only
Adjustments required (<i>e.g. the complainant is hard of hearing and needs written communication</i>)	

ARTICLE DETAILS

Name of publication

Headline of published article

Link, reference to or copy of offending publication

COMPLAINT DETAILS

Summary of complaint (50 words)

Reference to specific phrases/words or sections of the article that the complainant believes to be in breach of the Standards Code

Standards Code clauses that the complainant believes to have been breached

Outcome or remedy requested

COMPLAINT LOG OF [NAME OF PUBLISHER/PUBLICATION]

1. Unique Reference Number
2. Date of Referral
3. Method of Referral
 - E-mail
 - Letter
 - Telephone
 - Other
4. Name of Complainant
5. Organisation (if applicable)
6. Address and postcode
7. Type of complaint
 - Affected party
 - Representative group (public interest)
 - Third party (accuracy)
8. Reason for complaint
 - Content of Published article
 - Conduct or behaviour of employee/contributor
 - Other
9. Name of Publication
10. Date of Publication
11. Code standard(s) alleged to have been breached
12. Date acknowledgement letter sent
13. Date additional information requested
14. Date progress letter sent
15. Date final decision letter sent
16. Outcome of complaint
 - Upheld
 - Part Upheld
 - Rejected
 - Withdrawn
 - Other
17. Where complaint upheld, Code standards that were found to have been breached

18. Where complaint upheld, resolution that was reached

- Unpublished apology
- Published apology / correction
- Removal of article
- Other

19. Final outcome

- Resolved without IMPRESS involvement
- Complaint upheld by IMPRESS
- Complaint part upheld by IMPRESS
- Complaint rejected by IMPRESS
- Other

20. Description of action taken (if any) to improve Code compliance as a result of the complaint

WHISTLEBLOWING POLICY OF [NAME OF PUBLISHER / PUBLICATION]

Commitment

1. [Name of Publisher / Publication] is committed to the highest standards of ethical journalism. In line with that commitment we expect employees, contributors and others that we deal with, who have serious concerns about any aspect of the [Name of Publisher / Publication] work, to come forward and voice those concerns. The best way to raise a concern is to do so openly by directly disclosing to [Name of Publisher / Publication]. In circumstances where this is not practical or appropriate, employees and contributors are encouraged to contact the confidential IMPRESS whistleblowing hotline. [Name of Publisher / Publication] shall publicise the contact details of the hotline to all its employees and contributors.
2. This policy applies to all employees and contributors, paid or unpaid, temporary or permanent.

Policy Aim

3. The aim of this policy is to provide an avenue for employees and contributors to raise concerns in confidence and to receive feedback on any action taken. [Name of Publisher / Publication] guarantees to protect all whistle blowers from possible reprisals, victimisation or sanction if a disclosure has been made in good faith. For the avoidance of doubt, this include the provision that [Name of Publisher / Publication] will not take any action to the detriment of anyone for using the IMPRESS whistleblowing hotline or declines to breach the Standards Code adopted by [Name of Publisher / Publication] as part of its compliance with the IMPRESS Regulatory Scheme.

Examples of Concerns

4. The following are examples of concerns that a whistle blower may choose to raise.
 - Conduct which is an offence or a breach of the law
 - Conduct which is a breach of the Standards Code
 - Conduct which encourages others to breach the Standards Code
 - Other unethical conduct which undermines the principles and spirit of the Standards Code

Safeguards

5. [Name of Publisher / Publication] recognises that the decision to report a concern can be a difficult one to make. An individual who provides information which is true or which they believe to be true, shall have nothing to fear because they will be acting in accordance with the policy of [Name of Publisher / Publication]. [Name of Publisher / Publication] will not tolerate any harassment or victimisation of a whistle blower and will take appropriate action to protect an employee or contributor where they raise a concern in good faith.
6. Where an allegation is made in good faith which is subsequently unconfirmed, no action will be taken against the whistle blower.

7. If, however, a malicious allegation is made and it is proven that the whistle blower knew the information to be untrue at the time the concern was raised then [Name of Publisher / Publication] reserves the right to take disciplinary against the whistle blower.

Confidentiality

8. All concerns will be treated in confidence and every effort will be made not to reveal the identity of the whistle blower, unless the whistle blower consents to make their identity known. At the appropriate time, however, a whistle blower may be asked to come forward as a witness before a relevant adjudication panel, tribunal or court of law.
9. Please note that whistle blowers must:
 - disclose the information in good faith.
 - believe it to be substantially true
 - not act maliciously or make false allegations
 - not seek any personal gain

How to raise a concern?

10. The best way to raise a concern is to do so openly so that [Name of Publisher / Publication] can address the issue without delay and can protect the individual making the disclosure. In the first instance, concerns should be raised with the [Legal and Compliance representative] of [Name of Publisher / Publication].
11. It is recognised, however, particularly where concerns are very serious, that the whistle blower may prefer to disclose to a third party who can provide advice and information and who has powers to independently investigate the concerns or allegations.
12. [Name of Publisher / Publication] is regulated by IMPRESS and all employees and contributors are encouraged to contact the confidential IMPRESS whistleblowing hotline if they have concerns about serious potential breaches of the Standards Code. This is operated by the whistleblowing charity Public Concern at Work.

IMPRESS whistleblowing hotline

0800 221 8548

c/o Public Concern at Work

www.pcaaw.co.uk

Impress Regulatory Scheme				
Publisher Compliance Checklist				
Ref	Criteria	Examples of evidence that IMPRESS may look for	Comments	Review Assessment
1	“Relevant Publisher” Status			
1.1	Publisher ownership structure is clearly identified	Companies House Report Credit Report Articles of Association Memorandum of Association		
1.2	News related material is written by different authors	Recent copies of publication/URL link which clearly show the names of more than 1 contributing author next to news articles		
1.3	News related material is subject to editorial control (for web-based publications this cannot simply involve the posting or moderating of statements)	Name of Chief Editor Job Description of Chief Editor Statement of arrangements		
1.4	The publisher <u>does not</u> undertake publication of news related material in a capacity or case of description specified in Schedule 15 of the Crime and Courts Act 2013	Recent copies of publication/URL link		
2	A Whistleblowing Policy			
2.1	IMPRESS whistleblowing hotline and number is publicised to employees	Letter or e-mail to all employees advertising the service Poster visibly displayed in main office which advertises the service Copy of whistleblowing policy with relevant provision highlighted		
2.2	IMPRESS whistleblowing hotline and number is publicised to contributors	Letter or e-mail to all contributors advertising the service Copy of whistleblowing policy with relevant provision highlighted		
2.3	Whistleblowing policy makes it clear that publishers will never take action to detriment of any employee or contributor for using the IMPRESS whistleblowing hotline	Copy of whistleblowing policy with relevant provision highlighted		

2.4	Whistleblowing policy makes it clear that publishers will never take action to detriment of any employee or contributor who declines to breach the code	Copy of whistleblowing policy with relevant provision highlighted		
2.5	Employees have a specific contractual right to use the IMPRESS whistleblowing hotline without fear of sanction	Copy of whistleblowing policy with relevant provision highlighted Standard employee contract with provision for employee and employer to agree to abide by publisher policies highlighted Copy of standard employee contract with relevant provision highlighted		
2.6	Employees have a specific contractual right to decline to breach the code without fear of sanction	Copy of whistleblowing policy with relevant provision highlighted Standard employee contract with provision for employee and employer to agree to abide by publisher policies highlighted Copy of standard employee contract with contains relevant provision		
3	A Complaints Policy			
3.1	Includes arrangements for dealing with complaints	Copy of complaints policy and procedures Statement of arrangements		
3.2	Includes personnel involved in handling of complaints	Copy of complaints policy and procedures Statement of arrangements		
3.3	There is a named senior individual who is responsible for legal standards and compliance	Copy of complaints policy and procedures Statements of arrangements		
3.4	Includes an internal authority structure	Copy of complaints policy Statement of arrangements		
3.5	Includes arrangements for the recording of complaints	Copy of complaints policy and procedure Record sheet / spreadsheet		
3.6	Includes arrangements for the reporting of complaints	Copy of complaints policy Standard report		

3.7	Includes steps to deal with any failures of compliance	Copy of complaints policy and procedures Statement or Arrangements		
4	Positive Publicising of Complaints Scheme			
4.1	IMPRESS trust mark and contact details displayed in prominent position in publication	Recent copy of publication/URL link		
4.2	The publication clearly shows how to make a complaint against it	Recent copy of publication/URL link		
4.3	It is made clear in the publication that all complaints will be acknowledged by e-mail or in other written form within 7 calendar days of receipt	Recent copy of publication/URL link		
4.4	It is made clear in the publication that a final decision letter will be sent within 21 calendar days of receipt of the complaint	Recent copy of publication/URL link		