

[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].]