

This submission relates to section 2 of the Interim Complaints Framework – 'Editorial Complaints Procedure'.

1) **Section 2.2:** The proposed framework continues the practice of responding to complaints in two stages: stage 1a and stage 1b. Seeing as responses received at stage 1a all too often do not address the issues raised by the complainant in a serious manner and thus do not resolve the complaint, members of the public are in most cases obliged to continue to stage 1b.

Were the two stage system to be abolished and all complaints addressed seriously at stage 1, the system would be streamlined and made more efficient, preventing the waste of public resources, making the system more cost-effective and more 'user friendly'.

2) **Section 2.3:** The complaints form on the website for stages 1a and 1b limits the word count, making it difficult for members of the public to address complex matters. The system would be improved by addition of the possibility of attaching supporting documents (e.g. maps, historic documents).

3) **Section 2.4** – 'Complaints that the BBC may not investigate' – includes elements previously seen in the 2012 ['expedited complaints procedure'](#). In the past that procedure raised significant concern among members of the public who felt that it was abused in order to avoid serious handling of their complaints. Clearly a mechanism for close monitoring of the employment of that clause needs to be adopted.

4) **Section 2.5.1:** states:

"You should make your complaint within 30 working days of the date on which the content was broadcast or published (e.g. on a BBC website or on a BBC social media site)."

That clearly contradicts the BBC's [Guidance on Removal of BBC Online Content](#) which describes online content as "a matter of public record" and states:

"However long ago our online content was first published, if it's still available, editorial complaints may legitimately be made regarding it."

Complaints concerning content that is still available online should not therefore be limited to a 30 day period.

5) **Section 2.5.4:** states:

"If the BBC receives a number of complaints about the same issue, it may: [...] send the same response to everyone and/or publish it on the BBC's complaints website."

Those template 'one size fits all' responses frequently do not address the substance of points made in individual complaints. Some licence fee payers simply give up after receiving such a reply and while that indeed is one way of 'minimising costs', whether or not it is in

keeping with the BBC's status as a publicly funded body is obviously a different question altogether.

It is clearly necessary to conduct a comparison of the expense saved through the use of template responses with the cost incurred by the need to further respond to those complainants who, having received an unsatisfactory generic reply, take their complaint to the next stages of the complaints process. It may actually be more cost effective – and much better for customer satisfaction – to simply respond to complaints from members of the public with a relevant reply which addresses the issues raised.

6) **Section 2.5.4:** In our experience, more often than not the time-frame for responding to complaints both at stage 1a and stage 1b is not upheld.

7) **Section 2.6:** A member of the public making a repeat complaint at stage 1b receives a reference number which is different to the one for the same complaint made at stage 1a. Obviously that is confusing – a complaint should be handled under the same reference number throughout the entire process.

8) **Section 2.7.1:** In the past, consideration of editorial complaints has sometimes included consultation with or references to people/bodies outside the BBC. Those sources have on occasion been less than impartial (see one example [here](#)) and even associated with political campaigning relevant to the issue raised in the complaint. We would urge the BBC to ensure that any consultation with 'experts' and academics excludes partisan sources.

9) **Section 2.7.1:** A major issue concerns the procedures implemented after a complaint has been upheld. While this document states that the BBC values "feedback about our work" and uses it "to help make our services better" and refers to "fixing problems" and taking "action to correct it", sadly that all too often is not the case.

i) The BBC News website currently has no dedicated corrections page of [the kind seen in reputable newspapers](#). Hence, when corrections are made to online articles users remain unaware of the fact that information they previously read was inaccurate.

Relatedly, the use of footnotes informing the public that a correction has been made to an online article is erratic and amendments are sometimes made without notification.

The introduction of a dedicated corrections page on the BBC News website would make corrections more visible and accessible, increase the likelihood that people will receive the corrected information (which is, after all, the whole point of making corrections) and contribute to the BBC's transparency as well as reducing the likelihood of waste of public funding on unnecessary complaints on the same topic.

ii) On other BBC platforms – especially radio – even when a complaint has been upheld a correction is often not forthcoming. The policy behind that unsatisfactory state of affairs is found again in this document:

Pages 4 & 6: "Where we agree that the BBC has got something wrong, **this could mean** changing the way we do something, issuing an apology, publishing a correction or clarification, or simply providing you with a considered reply." (emphasis added)

Page 15 (section 2.5.4):

"If the BBC believes it has made a mistake, in appropriate circumstances the BBC **may**:

- apologise individually to the complainant;
- publish a public response, correction or apology online at www.bbc.co.uk/complaints; and/or
- broadcast an on-air correction or apology." [emphasis added]

Page 19 (Section 2.7.1) states:

"When a complaint has been upheld or resolved, the ECU will publish a summary of the matter on the complaints pages of bbc.co.uk (unless it is inappropriate to do so for reasons of privacy or confidentiality). In the case of upheld findings, it will include a note of the action taken as a result of the finding. The ECU will let you know when the summary has been published."

Publication of the ECU's findings on the complaints pages is of course important and welcome but that action does not suffice.

In the past we have been informed by the ECU that the practical steps to be taken after a complaint has been upheld are left to the discretion of the division of the BBC concerned:

"At this stage, it's for the management of the Division responsible for the programme (BBC Radio in this case) to notify me of the action they propose to take as a result of the finding, so any decision about broadcasting a correction will be theirs in the first instance (though it's also open to me to say whether I consider the action adequate)."

One cannot but question the efficacy – and commitment to transparency – of a publicly funded complaints system which apparently does not include a mechanism to ensure that audiences are automatically informed in the most efficient manner possible of the fact that they were given misleading information, rather than the outcome being dependent upon decisions made by individual departments.

In cases in which an editorial complaint concerning an issue of accuracy or impartiality is upheld it is clearly in the public interest for audiences to be advised of its result in the form of a prominent correction. That should be a matter of BBC policy rather than being left to individual decision makers.

We therefore urge the BBC to introduce a system whereby when an editorial complaint is upheld at any stage of the complaints procedure, the relevant BBC content will, as a matter of policy, be appropriately edited and marked so that audiences will receive the corrected information.

Hadar Sela

Managing Editor

BBC Watch <https://bbcwatch.org/>

hadarsela@bbcwatch.org