

Report issued by the British Broadcasting Corporation in relation to the review of non-editorial complaints

Dated 27 February 2024

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1 Introduction

- 1.1 The BBC commissioned this review to assess the effectiveness of the current BBC policies and processes regarding non-editorial complaints. This followed a complaint about the behaviour of a high profile BBC presenter.
- 1.2 As set out in the Terms of Reference¹, the review scope included the requirement to identify the non-editorial complaints routes into the BBC, assess the process by which complaints are reviewed, and determine any areas of weakness, alongside an action plan for improvement. The scope also included specific learnings on the processes deployed in the presenter case.
- 1.3 The work supporting this review was undertaken by Deloitte to provide an impartial and objective assessment. Their analysis, together with their findings, is set out in sections 2 and 3. The BBC action plan is outlined in section 4. We are publishing the commissioned review in full.
- 1.4 The BBC takes all complaints brought to us very seriously. We promote a workplace culture that encourages our staff to raise concerns and we recognise the need to support any individual who takes action to raise a complaint. We know it can be a difficult and demanding time for complainants, both when they decide to raise an issue and throughout the period in which their complaint is investigated, particularly for those most serious of cases. We believe it is important that all allegations are reviewed properly, and that as a public service organisation it is essential that both our staff and the public have confidence in our processes and our response to complaints.
- 1.5 The BBC has developed, over the years, a number of specialist teams and processes in response to historical reviews and recommendations on, amongst others, respect at work, whistleblowing and editorial processes and culture. We are pleased that this review confirmed that the routes by which complaints can be raised, both internally by staff and externally by members of the public, are largely well known and that each route has a specific purpose in the context of the complaints landscape faced by the BBC. Further, the review noted that our specialist teams are comprised of experienced individuals with the capability to investigate serious complaints.
- 1.6 The work undertaken raised a number of valuable insights and recommendations which we accept in full. We are delivering on an action plan, with a number of enhancements already in place. Although our existing processes and systems are, on the whole, working effectively, this review shows that we need to join them up better to ensure no matter how a complaint comes into the BBC it is escalated swiftly, when needed, and dealt with by the right people. We will also make better use of technology to manage complaints and ensure there is a complete picture of all cases across our different teams. And we will ensure that we have sufficient resources working across our specialist teams, both to manage the workload in a timely manner, to committed service level agreements, and also for the wellbeing of the individuals within these teams themselves.
- 1.7 A number of enhancements to the complaints process have already been actioned, including: (1) an escalation mechanism for serious cases providing all entry routes with a set of indicators requiring upward referral, alongside oversight by the Specialist Case Management Framework

¹ <https://www.bbc.co.uk/mediacentre/2023/review-non-editorial-complaints-process>

("SCMF"), has been implemented; (2) an executive sponsor for the SCMF, Uzair Qadeer, Chief People Officer has been appointed; and, (3) an improved process by which we allocate hearing managers to cases alongside piloting new ways to resolve issues before they become a formal grievance has been developed.

- 1.8 Part of the scope of this work was to gather specific learnings from the processes deployed in the recent presenter case. As Deloitte highlights, its review of this specific case further reinforced the need to enhance the robustness and resilience of the complaints routes and processes, which the findings and actions summarised above are designed to do. More specifically, and fundamentally for this particular case, it was identified that it is important to ensure that there is timely escalation of potentially serious complaints to senior management. It is acknowledged that this was missing in this instance.
- 1.9 We are committed to making the BBC a great place to work - building an environment where we treat everyone fairly and equally with honesty and respect - with action taken where concerns are raised. This review and these findings will further help us to do so.
- 1.10 We are grateful to Simon Cuerden, Partner and his Deloitte team for the work undertaken and their impartial and objective assessment. We are also appreciative of the valuable contribution and constructive challenge provided by Nick Serota, Senior Independent Director. And, most importantly, thank you to our members of staff who came forward to provide their valuable insights and experiences into this review.

Leigh Tavaziva

Group Chief Operating Officer

2 Overview of Deloitte's work

- 2.1 This section and section 3 provide an overview and summarise the findings of the review of the BBC's policies and processes for handling non-editorial complaints, undertaken by Deloitte², with our work supporting the review being led by Leigh Tavaziva. An overview of our work programme and any attendant limitations are set out in Appendix 1 to this report.
- 2.2 The term 'complaints' encompasses the broad range of non-editorial queries, issues, concerns and complaints which may be brought to the BBC's attention. For the purposes of this report, we have used the term 'complaint' as the collective term for all such matters which are subject to the relevant BBC policies and processes for non-editorial complaints (together, the "Complaints Processes"). The review has been comprehensive and far reaching, taking place over a four month period and considering both complaints received into the BBC from external parties and those which are internally generated. Whilst our work programme did not extend to a review of the culture within the BBC, specifically the extent to which that may affect whether someone is willing to come forward to make a complaint, where individuals volunteered such information during our discussions, we have captured this in the findings we present in section 3 for the BBC's consideration.
- 2.3 The BBC has provided us with the support required to complete our work, in particular: transparency and responsiveness; regular senior stakeholder engagement; access to numerous personnel; and, access to the large volume of documents and other information we have considered as part of the review. This has formed the basis of the findings set out in this report. We are grateful to the over 80 BBC employees who supported and assisted us with our review, including the 21 individuals who provided their experiences of engaging with the Complaints Processes.

The network of routes by which complaints can be made

- 2.4 As an organisation with over 20,000 staff, a large contingent workforce and multiple public facing operations, the BBC has a large network of routes (external and internal) through which non-editorial complaints may be made. Complaints are made by either external parties or by BBC employees, staff and freelancers, dependent on the type of complaint ("Complaints Routes"). The majority of the Complaints Routes act as entry points, passing complaints to one of the seven Complaints Routes which are responsible for triage and investigation. We refer to this sub-set of the Complaints Routes as the "Triage & Investigation Teams".
- 2.5 Each of the Triage & Investigation Teams has a specific remit and purpose in the context of the complaints landscape faced by the BBC for those areas that are in the scope of this review. Of these Triage & Investigation Teams:
- 2.5.1 Four handle more serious and complex complaints, which they either receive directly or are referred by other Complaints Routes. These four teams, which we refer to collectively as the "Complex Case Management Teams", are: Corporate Investigations; Safeguarding;

² "we", "our" and "us" in sections 2 and 3, and in Appendices 1 and 2.

Support At Work (“SAW”); and, Whistleblowing. These teams are responsible for the escalation of the most serious cases to BBC’s SCMF; and,

2.5.2 The remaining three Triage & Investigation Teams (being: Audience Services; Corporate Security; and, Manager Advice) are principally responsible for matters which are less serious and complex than those handled by the Complex Case Management Teams. Similar to the Complex Case Management Teams, these three teams receive complaints directly, or are referred them by other Complaints Routes. These three teams will also escalate matters to one of the Complex Case Management Teams if appropriate.

Summary findings in respect of the Complaints Routes and Complaints Processes

2.6 The vast majority of complaints that originate externally pass through Audience Services, which handles both editorial and non-editorial matters. Audience Services, managed by Capita, provides an effective mechanism for the initial receipt, assessment and escalation into the BBC (where required) of external complaints, with clearly documented policies and procedures, supported by a case management system to meet its requirements, and with adequate resourcing.

2.7 Given their role in handling serious and complex complaints, a particular area of focus for our work was the Complex Case Management Teams. Each of these teams has a specific area of focus, as set out in the description of their respective roles in Appendix 2. We found that these teams are staffed by experienced individuals with the capability to investigate serious and complex complaints. Our sample case file walkthroughs identified timely triage of issues and examples of communication with complainants. When addressing safeguarding and personal safety issues in particular, employee feedback to us identified high levels of comprehensive, collaborative and timely service provided by these teams. In this regard, the teams’ procedures are established and, as we set out in section 3, these procedures would be enhanced by focused improvement within the documentation of policies and procedures, triage, record keeping, consistency of case documentation, training and communication with complainants. Our findings also indicate there is merit in a review of resourcing across the Complex Case Management Teams, with a view to ensuring appropriate capacity, and the consideration of team resilience and wellbeing.

2.8 Across the Complaints Routes landscape generally, different Complaints Routes use different case management systems and complaints may be logged on these manually. Subject to the BBC undertaking a feasibility assessment taking into account the BBC’s operational requirements and legal obligations with respect to complaints, the development and deployment of a consolidated system through which complaints are reported and recorded, ultimately with case management functionality, would enhance the overall complaints process. The implementation of a consolidated system would:

2.8.1 reduce the reliance on human intervention to ensure that cases are logged on entry;

2.8.2 facilitate system-led initial triage where appropriate;

2.8.3 facilitate the production of timely operational and performance related management information; and,

2.8.4 reduce the risk that potentially serious matters are not identified and escalated to appropriately senior levels in a timely manner.

2.9 Over and above the operation of the individual teams, we consider that the BBC's overall process for non-editorial complaints would be enhanced by the establishment of a framework of overarching processes and procedures, which is subject to strategic oversight and leadership. Further, awareness raising training for BBC personnel (including those within the Complaints Routes) to signpost individuals to the consolidated reporting system should, over time, reduce the number of matters reported via other means, simplifying the process overall, and further reducing the risk of duplication and / or overlap.

The presenter case

2.10 As part of our work, we gathered specific learnings on the processes deployed in the presenter case which gave rise to the complaints review initiated by the BBC which is the subject of this report. These are set out within section 3, at paragraphs 3.23 to 3.30. The specific learnings identified from the handling of the presenter case have informed, and are covered by, areas of improvement which emerge from the findings from our review of Complaints Routes and Complaints Processes more generally, as set out within the earlier part of section 3.



Simon Cuerden
Partner, Deloitte LLP

3 Findings from the review

3.1 In this section, we set out:

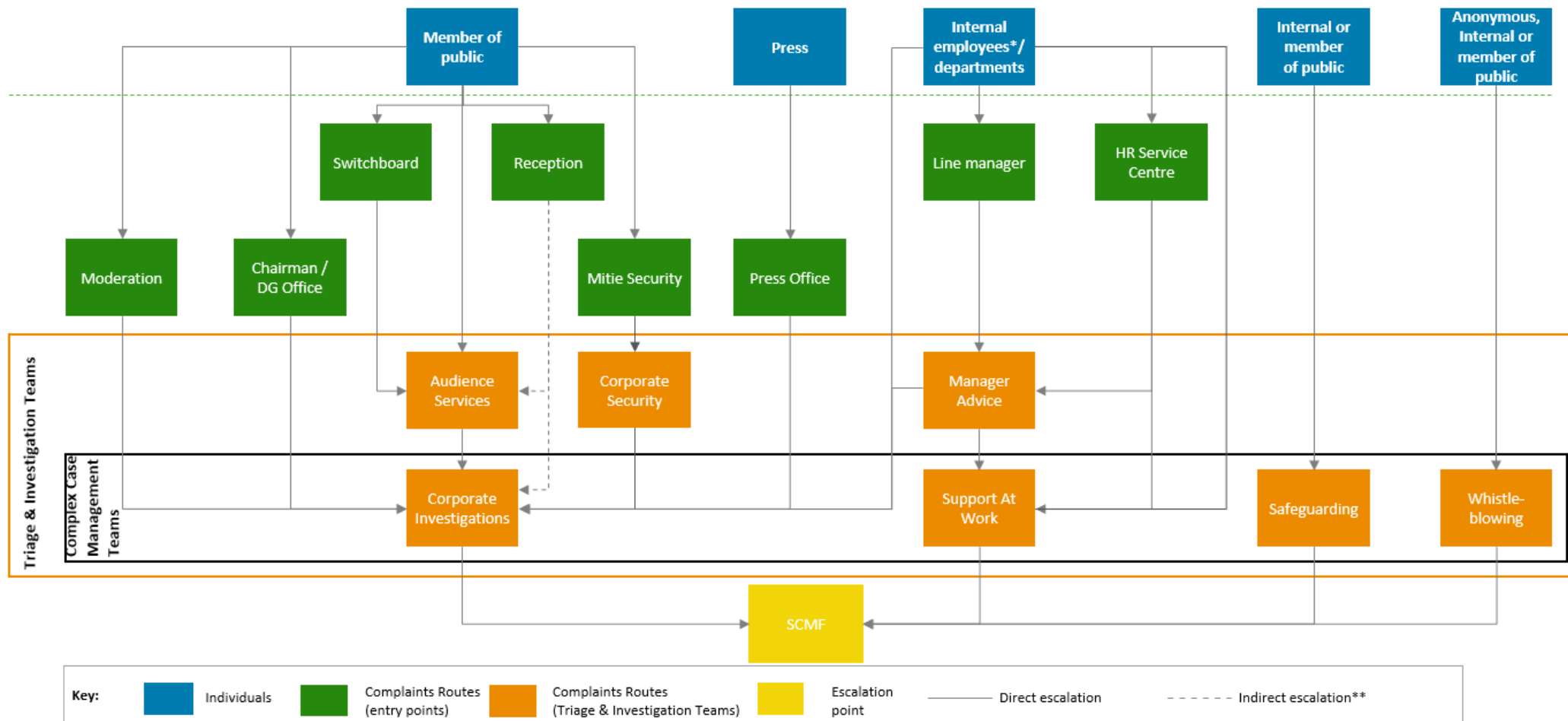
- 3.1.1 An overview of the Complaints Routes as identified through our work;
- 3.1.2 Findings in relation to the Complaints Routes and the Complaints Processes that are applied in handling such complaints which were in existence when we commenced our review; and,
- 3.1.3 Specific learnings on the initial handling of the complaint in the presenter case from when the complaint was first brought to the attention of the BBC on 18 May 2023, up to 6 July 2023, when the complaint was referred into the BBC's Corporate Press Office and escalated to BBC executive directors.

Overview of Complaints Routes

- 3.2 As a sizeable and complex organisation, the BBC has multiple channels and methods of communicating with audiences. As a consequence, it is possible that members of the public could make a complaint through any one of these multiple touchpoints. Should that occur, it is important that the complainant is directed to the appropriate Complaints Route. In respect of complaints, the BBC operates a large network of routes (external and internal) where different types of non-editorial complaints may be made. There are 18 Complaints Routes which receive complaints. Of these 11 principally act as entry points, passing complaints to other seven, the Triage & Investigation Teams, which are responsible for the triage and investigation of matters. The most serious matters are additionally subject to the SCMF, which acts as an escalation point and defines the process for those matters.
- 3.3 The network of Complaints Routes is presented diagrammatically in Figure 3.1 below³, focussing on the principal routes by which a complaint is received and progresses to one of the Triage & Investigation Teams, in particular to one of the Complex Case Management Teams. In Appendix 2, we provide a narrative description of each of the Complaints Routes shown in Figure 3.1, with brief details on how complaints are typically received into each Complaints Route.
- 3.4 In Figure 3.1 below, the Complaints Routes which are principally entry points for complaints are shown in green, with those comprising the Triage & Investigation Teams shown in Orange (with the escalation point, SMCF, shown in yellow).

³ In addition to the 15 Complaints Routes shown in Figure 3.1, there exists the Safety, TV Licensing and Legal teams, which act as standalone routes in which specific types of complaints are managed and would only infrequently be escalated through to one of the Complex Case Management Teams. Thus, there are 18 Complaints Routes in total.

Figure 3.1 – Principal process flow for non-editorial complaints



*Employees include freelancers and contingent workforce. Independent Productions are directed to either their line manager equivalent or to SAW.

**Reception does not escalate cases directly, but instead redirect complainants to Audience Services or Corporate Investigations.

Our findings in relation to the Complaints Routes and Complaints Processes

- 3.5 We summarise below the findings from our review of the BBC’s Complaints Routes and Complaints Processes⁴, which we have categorised into three overarching themes, being: (i) systems and processes; (ii) people; and (iii) governance.
- 3.6 In each theme we include brief commentary on the aspects of the Complaints Processes which are working well to provide context for our more detailed commentary on those aspects and areas for improvement.

Systems and processes

- 3.7 There is currently a large and established network of internal and external Complaints Routes in operation at the BBC. Levels of awareness of all the available Complaints Routes vary across the organisation⁵.
- 3.8 Audience Services (managed by Capita) is the main advertised route for an external complaint and it deals with the vast majority of external complaints, with these covering editorial and non-editorial complaints. Its existence is clearly documented and it is easily accessible. Audience Services has clear guidance, including its own definition of what constitutes a ‘red flag’ incident, to enable rapid triage of potential issues to the BBC Complaints Manager. Audience Services uses a system, Customer Relationship Management, to log and document all stages of a complaint from receipt to escalation into the BBC. Cases which come through Audience Services are consistently documented in the Customer Relationship Management system.
- 3.9 There are a variety of ways in which complaints can reach the Complex Case Management Teams, including: personal BBC emails; telephone; forms on Gateway (the BBC intranet); and, the centralised email inbox for each route. The other Complaints Routes shown on Figure 3.1 above (including Audience Services, discussed above) either manage less serious and complex complaints or standalone complaints, or are entry points only, routing complaints to the relevant team. Further, the Editorial Complaints teams on occasion handle non-editorial complaints which are linked to an editorial item.
- 3.10 Where complaints are received via the relevant Gateway forms, the system configuration means these are automatically logged onto the relevant systems for triage to take place. Where complaints are received via other means (for example, direct email to a member of a Complex Case Management Team), or where the complaint may have initially been directed to the wrong route (for example, to the Human Resources (“HR”) Service Centre), there can be a consequent delay in cases being triaged. In terms of the triage procedure itself, each of the Complex Case Management Teams performs its own triage using their own case management system (where applicable). There is no consolidated system for capturing initial complaint details, so, for example, it is not apparent if a case is duplicated across Complaints Routes.
- 3.11 Within the Complex Case Management Teams, the extent of process and policy documentation in respect of their individual Complaints Processes varies. All four teams rely on their experienced

⁴ In respect of non-editorial complaints received solely by either the BBC Public Service or World Service in the United Kingdom, consistent with the BBC Terms of Reference published on 21 July 2023.

⁵ That is, the in-scope areas of the BBC as set out in the preceding footnote.

and knowledgeable team members to ensure that complaints are dealt with appropriately and by the correct departments or teams. This introduces dependencies on certain individuals to ensure proper complaints handling. For complex cases, it may not always be immediately clear which Complaints Route owns a complaint. Aside from the guidelines introduced in Manager Advice in 2023 about what should be escalated to Support At Work (which we abbreviate to SAW), Complaints Routes do not have a clear or documented process for how teams should redirect complaints outside their remit or engage resource outside their route to resolve or manage a complaint.

- 3.12 The Complex Case Management Teams have different approaches to case management systems. Whistleblowing, Corporate Investigations and SAW have case management systems in place, whereas Safeguarding and SCMF previously relied on manual systems, both implementing new systems from January 2024. The systems currently in place do not interface with each other, meaning that there is no visibility across the various Complaints Routes.
- 3.13 Across the Complex Case Management Teams and within the SCMF process there are differing approaches to documentation and record management, meaning that the overall process for recording case evidence varies. There would be benefit from the establishment of a framework of overarching processes and procedures, standardising the documentation and record management approach across the various Complaints Routes (recognising that individual Complaints Routes' needs vary and therefore there will be specific requirements to be considered within the context of the overarching framework).

People

Audience Services

- 3.14 In terms of the external complaints process into Audience Services, it has detailed training documents and induction materials for its team. Audience Services is appropriately resourced to deal with the high volume of issues which come to them and it has specific training on customer service, providing an auto-acknowledgement email to complainants followed by a response within 10 days (if no escalation is required).

Complex Case Management Teams

- 3.15 Across the Complex Case Management Teams, our findings are as follows:

3.15.1 **Training:** Teams involved in assessing and managing complaints are staffed with individuals who have the appropriate skills and experience to perform their roles. Generally, individuals bring knowledge and experience gained through their careers and training is provided informally through shadowing of experienced team members, which is practical given current team sizes. Consideration could be given to standardising and formalising training for each team, for example, with a documented process or checklist for onboarding new team members and a schedule of continuing professional development to be completed by all team members at regular intervals.

3.15.2 **Resourcing:** We observed resourcing constraints within the Complex Case Management Teams (also acknowledged by the teams themselves), meaning that not all cases can be managed in a timely manner, which may impact on the ability to meet service level

agreements and reduces capacity for proactive initiatives. Individuals working in the Complex Case Management Teams are experienced and knowledgeable, but the dependency on a small group of individuals impacts resilience and staff welfare. This is compounded where teams are providing a 24/7 service given the global scale and 24/7 nature of the BBC's operations. In several employee feedback meetings, lack of resource (including in respect of hearing managers and mediators within the SAW process) was noted as a primary constraint on the effectiveness of teams, rather than the competence or diligence of team members. We note that a review of the resilience and resourcing of the hearing manager community has been undertaken recently by the BBC, and that improvements have been developed for how hearing managers are allocated to cases.

3.15.3 Communication: All teams recognise the importance of engagement with the individuals involved in the Complaints Processes (complainants, subjects and witnesses), including consideration of their wellbeing. There is a service level agreement in Whistleblowing to agree with complainants (where their identity or contact details are known) the frequency of communication, which is generally followed. Across the three other Complex Case Management Teams the principles or procedures regarding the appropriate response time to initial complaints, including how frequently to update the complainant, are not always documented. This can lead to complainants not knowing the status of their complaint, noted by some complainants to have a negative impact on their wellbeing, as well as making them feel that their complaints could have been handled in a more empathetic manner.

3.15.4 Wellbeing: The BBC has various options available to BBC employees to support them with wellbeing, including the Peer Support Network (formerly termed mental health first aiders), wellbeing support provided on Gateway, and the Employee Assistance Programme. The Complex Case Management Teams have advised us that consideration of the wellbeing of those involved in the complaint, or risks to their wellbeing arising from the issue raised in the complaint or management of the complaint, form part of their processes. A specific area for improvement would be recording these aspects formally within case documentation.

Employee considerations

3.16 Mandatory training is provided to all BBC employees across a number of modules which signposts individuals to the relevant areas of Gateway where they can seek further support if they have a concern or would like to make a complaint⁶. Leaders, namely those with line management responsibilities, receive additional mandatory training, which includes conflict resolution, and addresses bullying and harassment. This training was refreshed in June 2023. Employees we spoke with were aware of the BBC's policies with respect to conduct, including bullying and harassment and raising a grievance, and were aware that policies state they can raise a complaint without fear of retaliation. They told us that they generally found related policy documents to be comprehensive, albeit it was noted that they would appreciate some form of easily accessible

⁶ This knowledge and awareness are also important such that a BBC staff member who receives a complaint from a member of the public is able to direct that person to the appropriate Complaints Route.

summary document given the number of policy documents and their length. The BBC is currently undertaking an exercise to review and consolidate the policy document landscape.

- 3.17 The line manager role is seen by employees as important in the complaints process. Line managers noted they would benefit from a single training module and a single repository of readily accessible tools, guidelines and frameworks covering the complaints lifecycle, for all available Complaints Routes. This would assist them in their own triage of cases, escalating effectively, and communicating comprehensively to colleagues about what they can expect from the process.
- 3.18 Where complaints relate to safeguarding, addressing threats from the public and security risks, individuals feel confident and supported in raising complaints and reported high levels of comprehensive service provided by the Safeguarding, Corporate Investigations and Corporate Security teams with respect to dealing with these matters. Whilst our work did not include a review of the culture within the BBC, specifically the extent to which that may affect whether someone is willing to come forward to make a complaint, we note that some employees who we spoke with observed they feel nervous about raising a complaint. These employees said they have lower levels of confidence in how robustly the complaint will be handled if it is a grievance relating to another member of staff or talent, particularly where there is an actual or perceived power discrepancy between the complainant and the subject of the complaint.

Governance

- 3.19 The main external facing route, Audience Services, has appropriate governance, with clear documented oversight and with management information prepared monthly.
- 3.20 There is executive oversight over and governance within each of the Complex Case Management Teams. These teams typically perform checks and oversight through verbal discussions, with an area for improvement being to consider enhancing the documentation of outcomes. Where teams are resource constrained, this has a consequent impact on the frequency and regularity of verbal oversight discussions.
- 3.21 There is no framework of overarching processes and procedures for Complaints Routes, nor is there a consolidated complaints process overseen by specific leadership. Instead, the responsibility for the capture, consideration and response to complaints is subject to the various Complaints Routes and Complaints Processes that are in place, with the SCMF in place to determine the required response to the more serious complaints designated by the BBC.
- 3.22 Within the BBC (that is, outside of Audience Services), whilst management information is created by some Complaints Routes (for example Whistleblowing and Manager Advice), there is currently no consistent, technology-led management information which provides senior management within the BBC with insights into complaints across all routes. We noted some limitations within the evidenced oversight and management information for SCMF (including in respect of the ready access of related case documentation) and an absence of follow-up engagement with SCMF following investigations.

Specific learnings in respect of the Complaints Processes deployed in the presenter case

- 3.23 We set out in the paragraphs below the specific learnings in respect of processes deployed in the presenter case, over the period from initial receipt of the complaint on 18 May 2023 to senior

leadership being informed on 6 July 2023. At the time of our consideration of the presenter case up to 6 July 2023, the internal investigation into claims raised in respect of the presenter was ongoing.

- 3.24 We observe that our sample review / walkthrough of other cases across the Complex Case Management Teams, SCMF and Audience Services and our review of emails into the Corporate Investigations and SAW inboxes, as described at sub-paragraph 2.iv of Appendix 1, indicated that the related matters were appropriately progressed on receipt.
- 3.25 The original entry point to the BBC for the complaint was a BBC location in Cardiff on 18 May 2023. The complainant was correctly signposted to Audience Services as the entry point for their complaint. Once the complainant had contacted Audience Services, the complaint was escalated to Corporate Investigations on the same day (19 May 2023).
- 3.26 Upon receipt of the complaint, Corporate Investigations performed initial triage and sought to initiate contact with the complainant. Documentation of the triage performed is insufficient to evidence what was considered contemporaneously and what internal enquiries or searches were undertaken at that time. We consider that, based on the incident only being escalated to SCMF on 6 July 2023, the primary learning from this case is that the potential wider significance of this issue for the BBC was not recognised within Corporate Investigations at the time of complaint receipt / triage. As an immediate measure in response to the presenter case, the BBC implemented an escalation mechanism, including guidance about the features of a complaint requiring escalation. The features of the presenter case are captured by this escalation mechanism and guidance.
- 3.27 In addition to the case not being escalated following triage, secondary learnings which we have identified are:
- 3.27.1 With regard to the initial contact on 18 May 2023, in addition to signposting to Audience Services (which happened), it was recorded in the security report that the incident would be escalated to the relevant Regional Operations Security Manager, albeit this escalation did not take place. However, as the complainant had been signposted to Audience Services, and contacted them on 19 May 2023 (the day after visiting the BBC location in Cardiff), there was very limited consequent impact on the timing of the complaint being received into the BBC;
- 3.27.2 The case was not logged on the incumbent case management system (Perspective) contemporaneously, meaning that there was no opportunity for wider visibility of the case within the BBC; and,
- 3.27.3 There was no documented process for contact with the complainant and / or follow up, such that when initial attempts to contact the complainant were unsuccessful, the steps to be taken were not sufficiently clear and the process followed was not documented.
- 3.28 The specific learnings outlined above reinforce the importance of the findings from our review to enhance the robustness and resilience of the Complaints Routes and Complaints Processes. In particular, a consolidated case reporting system and management information would provide a mechanism for senior management visibility and oversight over matters being handled by the Complex Case Management Teams, even if the complaint had not otherwise been escalated for

their attention, providing mitigation and addressing the primary learning set out in paragraph 3.26. It also removes the reliance on cases being manually logged by individuals, addressing the secondary learning in sub-paragraph 3.27.2.

- 3.29 Additionally, and with regard to the secondary learnings set out in sub-paragraphs 3.27.1 and 3.27.3, formalised frameworks for documentation, record and case management (including with regard to escalation as noted above) would, importantly, introduce consistency to aspects of the response and initial progress of an individual complaint, including for contact with complainants, the documentation requirements for triage, and initial evaluation and investigation activities.
- 3.30 The aspects of our findings which are relevant to the facts and circumstances pertaining to the presenter case, discussed above, are addressed by the BBC's action plan, particularly action plan items 1.ii and 5.iii which address the primary learning from this case.

4 BBC management's action plan

The action plan, accepted by the Executive Committee, that will be implemented by management is set out below.

We will:

1. Develop an overarching **framework** for complaints processes overall, including:
 - i. Processes and service level agreements for recording and triaging complaints across all routes; guidelines and good practice for case documentation; appropriate service level agreements for each of the Complex Case Management Teams; and, roles and responsibilities within each route – to be applied across all complaints routes consistently.
 - ii. Initiate a feasibility and requirements assessment for centralised reporting and case management tools to:
 - a. Enhance visibility and oversight of complaints logged through the different routes, with particular emphasis on those cases within the Complex Case Management Teams to give a complete picture of all cases across the teams dealing with them; and,
 - b. Enable complaints to be logged on initial receipt, whether from external sources (including from Audience Services) or arising internally.
2. Enhance **awareness and training** in connection with Complaints Routes and Complaints Processes, specifically:
 - i. Provide greater clarity for all staff of the routes available when raising a complaint;
 - ii. Consolidate training for line managers on effective complaints handling; and,
 - iii. Consolidate training for new team members in areas that undertake triage and investigation of complaints and develop a schedule of refresher training as part of a programme of continuing professional development.
3. Initiate a review of **resourcing** to enhance and build resilience. The review to include:
 - i. An assessment of the level of resourcing needed to support regular workload volumes;
 - ii. The mechanisms by which teams access additional resourcing when required; and,
 - iii. The implementation of an out-of-hours response.
4. Develop **communication**, specifically with respect to:
 - i. A common and consistent approach for engaging with complainants across the lifecycle of a complaint, including target resolution times for closure and the frequency of providing updates as the case progresses, in line with the newly-developed service level agreements;

- ii. Further highlighting the support networks available to complainants, subjects and witnesses throughout the process; and,
 - iii. Building on the tone from the top, role modelling and championing of behaviours to emphasise the transparent culture, in line with the BBC Values and BBC Code of Conduct, with respect to raising non-editorial complaints.
5. Increase **governance** of the overall complaints process, i.e. consolidated across the different routes, by:
- i. Designating a senior executive-level sponsor and introducing oversight of the overall complaints process through regular governance meetings;
 - ii. Implementing an independent quality assurance programme to ensure ongoing effectiveness of design and execution of the related Complaints Processes, including ensuring there is an audit trail for decisions made; and,
 - iii. Developing a set of management information, common and consistent across all routes, to enable those charged with the governance of the overall complaints landscape to execute their responsibilities and facilitate the identification of insights regarding complaint themes and recurring issues. Consider moving to system-led management information to enable more efficient monitoring of the whole system of complaints.

Appendix 1: The work performed by Deloitte and attendant limitations

Work performed

1. Deloitte⁷ designed the programme of work in order to develop our understanding of the Complaints Routes and the associated Complaints Processes that are currently in place within the BBC in respect of non-editorial complaints, in the context of the BBC Terms of Reference. As set out in section 2, the term 'complaints' encompasses the broad range of non-editorial queries, issues, concerns and complaints which may be brought to the BBC's attention. For the purposes of this report, we have used the term 'complaint' as the collective term for all such matters which are subject to the Complaints Processes which we considered. These cover both external complaints – those originating from outside the BBC – and internal complaints – those originating from within the BBC.
2. In overview, our work programme has comprised the following key steps in relation to non-editorial complaints received solely by either the BBC Public Service or World Service in the United Kingdom:
 - i. identifying the Complaints Routes through which complaints are received, together with the nature of issues received into them;
 - ii. identifying and understanding the Complaints Processes for each of the Complaints Routes, that is, the relevant BBC policies and processes relating to receipt and triage, escalation, evidence gathering, co-ordination between business units within the BBC, roles and responsibilities, governance and oversight. Holding discussions with over 60 individuals who are involved in the operation of the BBC's Complaints Routes and Complaints Processes and considering various material relating to the Complaints Routes and Complaints Processes that has been made available to us. Seeking to understand such aspects as the resourcing deployed in each Complaints Route, the training provided to BBC personnel and how the progress of complaints was logged, including the use of any case management systems;
 - iii. consideration of any overlap between Complaints Routes, the overall oversight of non-editorial complaints and the role of the SCMF;
 - iv. by reference to complaints activity in the year ended 30 June 2023, reviewing a sample of complaints for those Complaints Routes where complaints are evaluated and progressed, that is, the Triage & Investigations Teams and notably within the Complex Case Management Teams. This work included the review / walkthrough of 85 cases across the Complex Case

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Management Teams, SMCF and Audience Services and the review of over 160 emails into the Corporate Investigations and SAW inboxes. As we explain below, there were data protection and confidentiality considerations that were relevant in our review of complaints and hence this impacted on the material and information that the BBC was able to share with us; and,

- v. holding discussions with a sample of BBC employees and staff who have made complaints, a sample of line managers from within the BBC and a sample of BBC employees drawn from what the BBC refer to as the Next Generation Committee of employees, speaking to 21 individuals in total to obtain their feedback on Complaints Processes.
3. Our work programme did not extend to an assessment of the conclusion reached by the BBC in its evaluation of any individual complaint, or a review of cultural features which might impact on the complaints landscape within the BBC, for example, the willingness of BBC employees and freelance staff to make formal complaints.

The data protection, confidentiality and other protections and limitations relating to the work performed

4. In our work we have sought to comply with our obligations under Data Protection Legislation in respect of personal data processed by us in connection with our work. As requested by the BBC, in our review of sensitive cases we did not view personally identifiable information (for example, names, addresses, phone numbers, email addresses), but instead relied on the relevant BBC teams to provide us with appropriately redacted versions of documents.
5. Sections 2 and 3 set out our findings based on detailed work performed by us up to 19 October 2023. We cannot rule out the possibility that, had further work been conducted, our findings might have been different or that we may have identified additional matters to bring to the BBC's attention.
6. In this context, and as is typical of reviews of this nature, we have assumed that the material and other information made available to us are reliable and complete for the purpose of our work. Further, in the course of our work, we have drawn on explanations and commentary provided to us through fact-finding discussions. Our work in connection with this report should be considered in that light and we cannot accept any liability for our findings being as a result of material, information, explanations and commentary being incomplete or inaccurate.
7. Our work has been specifically designed in connection with the BBC Terms of Reference that were published on 21 July 2023, with our findings set out in this report drawn from our programme of work. Our work has not considered any other aspects of the BBC's processes and controls. The action plan set out in section 4 is the sole responsibility of the BBC.

Limitations on the use of Deloitte's findings as presented in this report

8. The findings presented in this report were prepared by Deloitte for the BBC in accordance with our agreed engagement terms and having regard to the above content of this appendix. Our work performed, and therefore our findings, are solely in connection with the review of non-editorial

complaints that was set out in the BBC Terms of Reference published on 21 July 2023. These findings should not be used for any other purpose or in any other context, and Deloitte accepts no responsibility for their use in either regard.

9. Our findings are provided exclusively for use by the BBC. No party other than the BBC is entitled to rely on our findings for any purpose whatsoever and Deloitte accepts no responsibility or liability to any party other than the BBC in respect of our work or our findings.
10. We also draw to the attention of any reader of this report that:
 - i. Our findings do not constitute professional advice to any reader. It is a matter for any reader to seek specific advice about their specific circumstances.
 - ii. To the fullest extent possible by law, Deloitte disclaims any liability arising out of any subsequent reader's use (or non-use) of this report, including any action or decision taken as a result of such use (or non-use). The BBC have advised Deloitte that it similarly disclaims any such liability.
11. All copyright and other proprietary rights in this report relevant to Deloitte remain the property of Deloitte, with Deloitte reserving its rights to the fullest extent possible by law.

Appendix 2: Complaints Routes descriptions

1. In this appendix, we provide narrative descriptions of each of the Complaints Routes shown in Figure 3.1, including brief details on how complaints typically reach each Complaints Route team.

Complaints Route	Description	Typical entry points
SAW	Responsible for the consideration of all cases relating to bullying and harassment and grievances. Co-ordination of the SCMF involving key experts	<ul style="list-style-type: none"> - Direct approach from a complainant. - Via a Bullying and Harassment Form or Grievance Submission Form on Gateway. - Into a specific SAW email inbox. - Via another team (including HR Service Centre, or other HR Business Partners). - Via the Business WorkFlow (BWF) system from other BBC teams (including Corporate Investigations, Whistleblowing and Audience Services).
Corporate Investigations	Conducts internal investigations relating to serious criminal or legal matters occurring on BBC premises, or allegations regarding suspected criminal behaviour, policy breaches or other inappropriate behaviour. Also deals with a variety of other matters, including where BBC staff are victims or targets of incidents such as malicious or nuisance communications or where BBC staff are the subject of complaints or allegations.	<ul style="list-style-type: none"> - Emails into a specific Corporate Investigations email inbox. - A member of the Corporate Investigations team being directly contacted. - Submission of an online report on Gateway.
Safeguarding	Responds to safeguarding concerns reported by both internal and external parties in relation to productions and matters which involve under 18s or adults at risk.	<ul style="list-style-type: none"> - Emails to the Safeguarding email inbox from both internal and external parties. - Email or verbal reports directly to a member of the Safeguarding team. - Support requests from other BBC teams (for example, the Safeguarding team may be required to support the Whistleblowing team due to the nature of the whistleblowing case).

Complaints Route	Description	Typical entry points
Whistleblowing	The BBC maintains a formal Whistleblowing Policy which provides a confidential mechanism for individuals to raise concerns. It is available to: BBC employees; casual staff; agency staff; freelancers; trainees; home workers; contributors; and, suppliers and contractors (and their staff).	<ul style="list-style-type: none"> - A staff member's line manager, a more senior manager or HR Business Partner (who should then contact the Whistleblowing team immediately). - The Director of Quality, Risk and Assurance. - The Senior Non-Executive Director (with Sir Nick Serota listed in the Whistleblowing Policy). - Navex Global (an anonymous whistleblowing service).
Manager Advice	Provides Manager level employees access to advice accessed via a link on the Manager Advice page within Gateway. Managers are able to browse the site for guidance, policies, letter templates or forms, or are able to speak to Manager Advice advisers for additional help and coaching. Topics covered by Manager Advice include leave (including absence management), benefits, wellbeing, career and development, working in the BBC, and resolving grievances, disciplinary and capability cases.	<ul style="list-style-type: none"> - Telephone. - Webform.
Corporate Security	Provides security services to the BBC and its staff. The Corporate Security team investigates incidents of theft and criminal damage, as well as providing security assessments and advice on BBC events and individuals to identify and address security risk.	<ul style="list-style-type: none"> - Report from Mitie Security. - Direct complaints to a Corporate Security Manager by email, telephone or in person. - A report submitted on Gateway.
Audience Services	Manages editorial and non-editorial complaints, allegations, requests and queries from members of the public. Approximately 60% of complaints are editorial rather than non-editorial.	<ul style="list-style-type: none"> - Webform. - Telephone. - Post.
Mitie Security	Provides third-party security personnel to guard BBC buildings. The team is overseen by the BBC Corporate Security team.	<ul style="list-style-type: none"> - Direct approach from member of the public.
Press Office	Manages media enquiries from external news outlets.	<ul style="list-style-type: none"> - Telephone or email to the Press Office or direct to Press Office team members. - Monitoring of online communication channels.
HR Service Centre	Contains both HR Helpdesk and Contingent Workforce teams. The HR Helpdesk team deals largely with employee HR queries, and the Contingent Workforce team receives similar queries from freelancers.	<ul style="list-style-type: none"> - Telephone. - Email. - Webforms.
Switchboard	Individuals who call the BBC Switchboard to make a complaint are directed to Audience Services, either by direct transfer, or by providing contact information.	<ul style="list-style-type: none"> - Telephone.

Complaints Route	Description	Typical entry points
Moderation	This team's primary role is to identify potentially harmful content (comments, images and links) submitted to BBC social media sites and the BBC website. Although this is not a route whereby an individual will directly reach out to make a complaint or allegation, there is potential for Moderation to identify an issue during their monitoring activities which it will be appropriate to escalate to one of the Complex Case Management Teams.	- Monitoring activities.
Chairman / DG Office	Receives editorial and non-editorial complaints, threats, allegations, requests and queries from external and internal sources which it then triages and passes to the appropriate team to handle within the BBC.	- Email or letter addressed to the Chairman, Director General or a Board Member. - Webform.
Reception	Operated by Mitie in 11 BBC sites, with additional sites run locally by the BBC. Complaints are rarely raised at Reception (usually relating to noise or the TV Licence). Reception typically signposts to Audience Services or the Duty Facilities Manager.	- Telephone. - In person.
Line manager or line manager equivalent	Line managers (or commissioners in the case of individuals working on independent productions) may be the initial person that individuals go to, in order to raise or discuss a possible complaint. If the matter is not resolved informally by the line managers or line manager equivalents, they can escalate it into one of the formal routes (or signpost complainants to these routes for them to escalate the matter).	- Direct approach from team members.

2. In addition to the Complaints Routes, SCMF acts as the framework by which the most serious cases are managed. It was introduced in 2017 to provide a process to involve appropriate individuals from across the organisation at a sufficiently senior level to drive action and effectively manage risks to the BBC once a complaint of significance had been escalated into the SCMF process. Escalation into the SCMF process is via a referral from SAW, Corporate Investigations, Safeguarding or Whistleblowing. SCMF is administered by SAW which looks to coordinate an initial call with the SCMF group within 48 hours of the case notification.