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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 667 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 In carrying out our work, we have reviewed the BBC's policies and processes for handling non-editorial queries, issues, concerns and complaints. In carrying out our work, we have reviewed the relevant BBC policies and processes for non-editorial queries, issues, concerns and complaints. 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 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

Gi ddcfh 5h K cf_ flG5K ÎŁ; and, Whistleblowing. These teams are responsible for the escalation of the most serious cases to BBC@ 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, Wc`UVcfUhhj Y`UbX`hja Y`m`gYfj]W`dfcj]XYX`Vm`h`YgY`hYUa g``=b`h`]g`fY[UfXz`h`Y`hYUa gDdfcW`Xi`fYg` 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 capaci.000008871ETQq0i71 0 595.32 842.04 reW*nBT/F3 9 Tf1 0 0 1 14

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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 667077 and escalated to BBC executive directors.

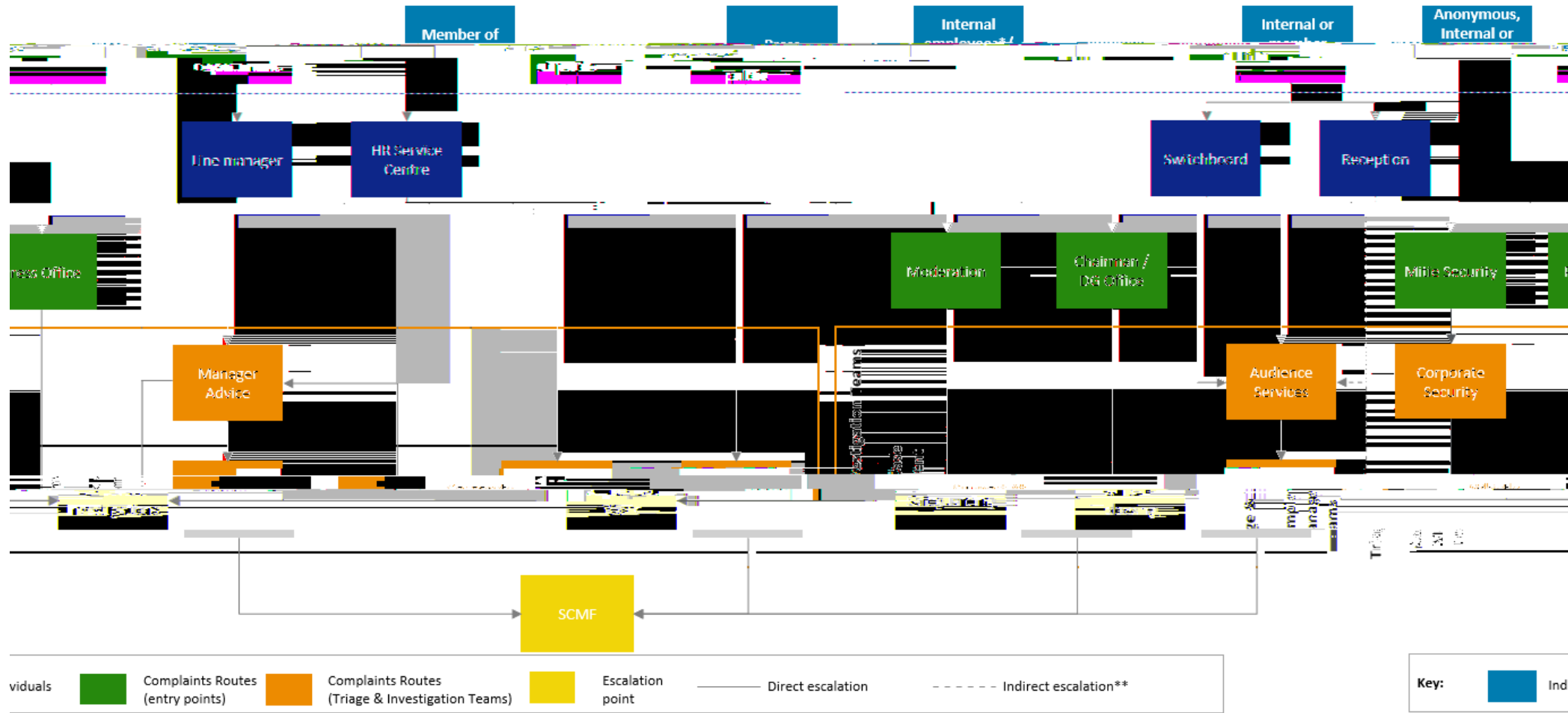
Overview of Complaints Routes

3.2 As the 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 principal

Figure 3.1 - Principal process flow for non-editorial complaints



ers and contingent workforce. Independent Productions are directed to either their line manager equivalent or to SAW.

*Employees include freelan

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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

agreements

summary document given the number of policy documents and their length.

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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

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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. ~~Enhance visibility and oversight of complaints logged through the different routes, with particular emphasis on those cases within the Complex Case Management Teams~~
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

- 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

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 be different.
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 been conducted in accordance with the BBC Terms of Reference. 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 (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	<p>Responsible for the consideration of all cases relating to bullying and harassment and grievances.</p> <p>Co-ordination of the SCMF involving key experts</p>	<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	<p>Conducts internal investigations relating to serious criminal or legal matters occurring on BBC</p>	

