

Baylis Media Ltd Annual statement to IPSO January 1-December 31, 2019

Introduction (The regulated entity):

Baylis Media Ltd
Newspaper House
48 Bell Street
Maidenhead
Berks SL6 1HX

Baylis Media Ltd is the independent publisher of the Maidenhead Advertiser and the Slough and Windsor Express series of newspapers and their attendant websites. Unique among local newspapers, Baylis Media Ltd is owned by the Louis Baylis (Maidenhead Advertiser) Charitable Trust, which receives at least 80 per cent of the company's operating profits which it uses to support charities and good causes in the communities covered by the newspapers.

The Advertiser series has been published by the company since 1869, and celebrated its 150th anniversary in 2019. Ownership of the company was transferred to the Trust in 1962. The Slough and Windsor Express series, which has been published since 1812, was acquired by the company in 2008.

The company's newspapers cover East Berkshire and South Bucks, including the main towns of Maidenhead, Slough and Windsor. Both newspapers are mixed distribution, a combination of paid-for and free. The Advertiser series has a current (Jan-Dec 2019) audited circulation figure of 12,364 and readership of 28,314 and the Express an audited circulation (Jan-Dec 2019) of 24,121 and readership of 28,463. Our websites for all titles currently collectively attract an average of 80,000-90,000 unique users a week.

The complete list of Baylis Media titles:

- Maidenhead Advertiser
- Slough & South Bucks Express
- Windsor, Ascot & Eton Express
- Informing Business – quarterly business magazine (ceased publication in March 2019)
- www.maidenhead-advertiser.co.uk
- www.sloughexpress.co.uk
- www.windsorexpress.co.uk
- www.baylismediaarchive.co.uk
- www.baylismediaphotos.co.uk
- Days Gone By – One-off photo book published to mark 150th anniversary in July 2019

Publisher's responsible person:

James Preston, print and digital editor

Email: jamesp@baylismedia.co.uk

Tel: 01628 678245

Our editorial standards:

Baylis Media strives for the highest editorial standards of fair, accurate and balanced reporting as laid down in our editorial policy and objectives (attached) which includes that independent verification of facts should be sought for all stories produced by our reporting staff.

All copy goes through a copy-tasting, subbing and signing off process to maintain standards and identify errors.

News meetings are held several times a week and reporters are urged to discuss legal or ethical issues with senior staff before proceeding with a story.

Care is always taken to ensure interviewees fully understand why they are being contacted and detailed shorthand notes are kept from conversations and securely stored.

We take pre-publication legal advice from an independent legal advisor but would consult IPSO pre-publication on ethical issues where we felt there might be a potential breach of the Editor's Code.

There has not been an occasion where pre-publication advice was sought from IPSO during the timeframe of this report.

Our complaints handling process:

Baylis Media has a robust and effective complaints handling policy (again included in the attached editorial policy and objectives which is issued to all editorial staff) that seeks to resolve complaints as quickly as possible. In summary:

- We accept complaints in writing, by email or over the telephone
- If they cannot be immediately resolved complaints are escalated to senior newsdesk staff
- Records of editorial complaints which cannot be immediately resolved are kept by the editor in a complaints file which is updated to include their outcomes
- Genuine inaccuracies are corrected promptly. The resolution of other complaints depends on the nature of the complaint. It may, for example, require a simple explanation of why we did something in a particular way, a follow-up article or a letter to the editor for publication
- Information about where readers can direct complaints is carried on page two of all of our newspapers. It guides complainants to our website for a full explanation of our complaints process including how to complain to IPSO. The IPSO 'kitemark' is visible in print (on page 2) and online (at the footer of all pages and on the complaints section).
- A 'complaints' section features under the 'home' tab of all of our websites, providing information on who to direct complaints to and the Editor's Code of Practice.

Our training process:

As a small independent publisher we have very limited resources for training. All of Baylis Media's reporters are recruited from NCTJ pre-entry courses and then put through the NQJ training scheme, which includes assessments every six months with a senior member of the editorial team. In addition, we will hold one-to-one copy clinics with reporters to address problems as and when they arise.

All reporters sitting the NQJ exams for the first time are sent on an NCTJ-run two-day refresher course before sitting their exams.

Legal updates from the NMA and advice from IPSO and the code committee are shared with all editorial staff via departmental meetings supported by documentation, with journalists encouraged to keep updated information to hand, either in their desks or in a folder on their computers.

Editorial staff members were made aware of the latest version of the Editor's Code and Codebook at a meeting in June 2019. Each member of staff was issued with an updated personal copy of the updated code, which has also been provided to new recruits throughout the year.

New guidance, including the update on major incidents in June 2019, was also discussed at an editorial meeting.

Journalists are expected to make themselves familiar with updates to the code and keep a copy to hand in their desks.

A central hub, comprising the editor, deputy editor, chief sub-editor and chief reporter, is made up of senior NQJ qualified staff and offers ongoing support and guidance for more junior members of staff. They are supported by experienced sub-editors.

We do run occasional legal updates with a newspaper law trainer but none has been held within the timeframe of this report. A refresher session with the trainer was due to take place in April 2020, but this has been postponed due to the COVID-19 outbreak.

In 2019, discussions began with IPSO about representatives from the regulator visiting Baylis Media to provide a refresher session on the Editor's Code. This was held in January 2020.

Transparency regarding financial relationships

The Baylis Media editorial policy makes clear that 'we do not allow advertisers to dictate editorial content' and stories about advertisers should have a legitimate news angle. Advertising features, the content of which is controlled by the customer, should be clearly labelled as such to distinguish them from editorial.

The editorial policy on paid-for editorial content (please see attached) is as follows: "In clearly defined circumstances, such as businesses to business publications or sections, Baylis Media Ltd will publish content supplied by a customer in exchange for payment. This will be treated as editorial on the clear understanding that editorial control of the content rests with Baylis Media Ltd as the publisher. While it is accepted such content will provide raised profile for the customer as a consequence of publication, to comply with the policy it must also be factually accurate and informative, providing genuine reader interest and value. As editorial control rests with the publisher, such paid-for content will be considered to be editorial for the purposes of industry regulation and have to comply with the standards of the Editor's Code. As such, there will be no requirement for it to be labelled as 'advertorial'."

Baylis Media will only accept a free experience or review tickets if there is a legitimate news angle and will always make clear to companies that the newspaper retains editorial independence. In 2019, the company sought to clarify its position with an update to the attached editorial policy. It reads as follows: "Editorial staff members should only accept a free experience or review tickets if there is a legitimate local news angle. Coverage or a review must be considered of benefit to the wider public. An offer of a free experience must be discussed with the Editor or Deputy Editor before it is accepted. Editorial staff should indicate to the organisation or individual involved that the newspaper retains its editorial independence and make it clear that it rejects any expectation of

positive publicity in exchange for complimentary tickets. Any review of an event or experience which has been provided to an editorial staff member at a discount or free of charge should make this clear to the reader with a note at the end of the report.”

This change was communicated to staff in December 2019 and came into effect on January 1, 2020.

Our record on compliance: January 1-December 31, 2019:

There were no complaints against the publisher which have been ruled on by IPSO’s complaints committee during the period of this report.

Appendix:

A copy of Baylis Media Ltd’s Editorial policy and protocols (updated in December 2019) is included with this report.

Baylis Media Ltd editorial policy and protocols

Editorial policy:

“Baylis Media Ltd’s publications must contain comprehensive news coverage for the benefit of their audience and the wider community and those publications must reflect the views of, and provide a voice for, that community.

“News must be presented accurately, fairly and impartially so as to allow the audience to draw its own intelligent conclusions. Political neutrality must be upheld at all times. Publications must engage with their audiences and provide them with opportunities to express their views, reply to arguments and counter criticism – for example through letters pages or online comments. In the interests of fairness and balance a responsible right of reply should be available.”

Introduction

This document sets out the objectives for Baylis Media Ltd’s editorial activities and the parameters within which staff are expected to carry out editorial and newsgathering activities to the highest standards of integrity, accuracy, impartiality and balance.

The term ‘editorial activities’ covers the full range of Baylis Media’s interaction with the public, including newsgathering, publication to print and digital platforms and the use of social media.

This document sets out a framework for decision-making, including identifying and deciding appropriate editorial treatment of diverse subjects, including controversial or political material. It also sets out guidelines to assist Baylis Media staff to ensure the company operates (for the public benefit) within both the law and standards laid down by the industry.

Baylis Media Ltd’s editorial protocols are reviewed at least annually or sooner to ensure it continues to provide robust guidelines to navigate the changing world of editorial content – such as taking into account changes in legislation and industry guidance and to ensure it is up to date with the latest technological advances, for example in social media, and also to ensure it fits with the long-standing tradition of accurate, fair and impartial reporting.

Editorial objectives of Baylis Media:

Baylis Media is committed to the principles of fair, accurate and impartial reporting of local issues and aims to provide its readers and audiences with unrivalled coverage of the area it serves. Editors are required to provide products – print and digital - designed to suit the requirements of their audience.

It is also committed to acting in the public interest and for the public benefit in the broad sense of serving the needs of the local communities it serves.

It considers there to be a fundamental public interest in freedom of expression itself and for the purposes of this editorial policy ‘the public interest’ includes (but is not confined to): Any matter that affects people at large, in which they have a legitimate interest or concern about what is going on in society; or what may happen to them or others; provided investigation or publication is not motivated by malice. Core principles of this include:

- Detecting or exposing crime, or the threat of crime, or serious impropriety.
- Protecting public health or safety.

- Protecting the public from being misled by an action or statement of an individual or organisation.
- Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject.
- Disclosing a miscarriage of justice.
- Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.
- Disclosing concealment, or likely concealment, of any of the above.

In addition Baylis Media is committed to its editorial activities providing a public benefit to the communities it serves through:

- Informing – providing local people with the information they require to understand and participate in their local communities
- Representing – acting as a voice for local people to convey their opinions and experiences to each other and to others who would not otherwise hear their voices
- Campaigning – to represent (apolitically), act as a platform for identifying the needs of local people and allowing them to work together to achieve a common aim for the public benefit
- Interrogating – holding local institutions, local government, public and private sector organisations to account; exposing wrong-doing and securing the effective use of public assets for the public benefit.

Editorial control

It is the policy of Baylis Media Ltd to allow the editors of its publications (print and digital) the freedom and independence to edit without commercial or managerial interference.

However, this does not preclude management from making its views known and editors are expected to be commercially aware and to give due consideration to the advice of senior management on the content of publications. Should a serious dispute arise between an editor and the managing director that cannot be resolved it will be referred to the board of directors for arbitration, on the basis of Baylis Media Ltd's overarching commitment to serving its local community.

Subject to the direction of the board, editors are responsible for the management of editorial departments including the selection, recruitment, training, discipline and termination of employment of editorial staff. However, editors will not, without consultation with and the approval of the managing director: increase or reduce editorial staff, appoint or terminate the appointment of heads of departments or increase salaries of editorial staff other than as agreed by the board of directors.

On a day-to-day basis, Baylis Media Ltd staff exercise delegated authority to carry out the editorial activities in accordance with the editorial policy. However, final responsibility for editorial matters lies with the editor of a particular platform or publication and ultimately with the editorial director.

Editorial activity is fundamentally independent of any other body; neither Baylis Media nor staff shall cede control or influence over editorial content to any other party. Editorial content is never submitted to third parties for approval.

Key editorial principles

Baylis Media aims to adhere to the following fundamental principles in carrying out editorial activities (and in conducting background research for editorial content):

- **Impartiality** – Baylis Media Ltd's editorial activities should be non-partisan and unbiased so as to allow the audience to draw its own intelligent conclusions. Political neutrality must be upheld at all times. In so far as Baylis Media Ltd represents a particular opinion or standpoint, it is to be one that is consistent with the public interest and for the benefit of the local community.
- **Balance and fairness** - editorial activities should be fair and balanced to include the diversity of points of view on a subject and represent the views of all sections of the community.

- **Accuracy** – Every effort is to be made by editorial staff to ensure reports of factual matters, opinions and commonly held attitudes are as accurate as possible given the time and resources available and based upon reliable sources.
- **Engagement** - Baylis Media Ltd publications must engage with their audiences and provide them with opportunities to express their views, reply to arguments and counter criticism – for example through letters pages or online comments. In the interests of fairness and balance a responsible right of reply should be available.
- **Fact and Comment** - There must be a clear distinction between fact and comment.
- **Taste** - Baylis Media Ltd publications are read in family homes and their content must reflect this. While editorial content may challenge readers, nothing should be published that would offend or corrupt them. The final decision in such cases rests on the judgement of the editor.
- Valid stories in the public interest should not be suppressed through fear of a negative reaction.
- Genuine inaccuracies should be corrected promptly with the appropriate apologies, subject to legal requirements (see section on complaints policy below).
- Editors are required to ensure their publications stay within the law and abide by the Editor's Code of Conduct. In the event of a complaint, the editor will co-operate fully with the industry regulator and abide by its decision.

Staff protocol

All editorial staff are expected to maintain the highest standards of accuracy, balance, impartiality and integrity by taking personal responsibility for the content they produce. Staff are expected to adhere to the following protocols in carrying out editorial activities:

The following criteria should be used to evaluate a story to decide its importance, prominence and whether it should immediately go online:

- **Subject:** What is it about – crime, accident, environment, charity, human interest
- **Knowledge:** How many others know about it? Is it already in the public domain?
- **Timing:** How immediate is the story?
- **Impact:** How will it affect readers – is it in the public interest or of interest to the public?
- **People:** How many of our readers will be affected?
- **Effect:** How permanent an effect will the subject have?
- **Pictures:** How visual is the story and how can it be illustrated (photos, video, audio)?

Verification: The facts in all stories should be checked and verified so that stories 'stand-up' and are not based on hearsay. This can include eyewitness accounts and official sources – such as the emergency services – and confirmation from organisations and individuals involved in the issue. We should always seek independent verification of facts – for example, police confirmation of an incident. Where facts are disputed, both sides should be given to maintain a fair and balanced report.

Newsgathering and writing: Stories should be written 'straight'. Baylis Media Ltd wants tight, bright copy - but not at the expense of accuracy. Never exaggerate.

Accuracy: Check everything - accuracy must be our watchword. All facts must be verified and statements attributed.

Balance: Baylis Media Ltd's editorial content is impartial. If you have a story with criticism of any person or organisation then you must always let them respond in the copy. Getting both sides of an argument is paramount.

Political neutrality: This must be upheld at all times in news reporting of political issues, which must be fair and balanced. However, this does not prevent the publication of opinion columns criticising and holding to account politicians and political groups for their actions and decisions if that is consistent

with the public interest and for the benefit of the local community. While free to be critical of those in authority, the promotion of one political party over another must be avoided in line with the wider policy on political neutrality. Such columns will be clearly labelled as opinion to distinguish them from news reporting.

Campaigns: Our publications and editorial activities provide an independent voice for the communities they serve and reflect and report what goes on in those communities. We have no political bias and judge a story only on its newsworthiness. We will campaign on issues that have a public benefit - the purpose of improving the lives of people in our community or preventing something which would have a negative effect on the lives of our readers. Campaigns are apolitical and we will never campaign to advance the interests of a political organisation or party.

Right of reply: It is vital to give the subject of any critical story the right to reply. This right does not mean a simple phone call but every effort must be made to make contact, even holding the story over if necessary. Equally, we will not drop a story because the subject of criticism – individual or organisation - refuses to comment.

Pre-publication advice and legal issues/contentious content: Where issues give rise to a risk to Baylis Media Ltd's reputation or of legal action, flag them with the editor and senior newsdesk staff in time to allow appropriate discussion and the seeking of pre-publication legal advice if needed (for example, with potential defamation, libel, copyright, contempt of court and privacy);

Feedback and corrections

Baylis Media Ltd takes great care to ensure editorial content is factually accurate and does not misrepresent views held by third parties. If Baylis Media Ltd is made aware of a mistake or an omission, where appropriate staff will work to correct, improve or otherwise amend editorial content to rectify any mistake or omission in accordance with its complaints policy (set out below) and industry standards.

Sexism/sexual orientation: Baylis Media Ltd is committed to sexual equality and equality for all regardless of sexual orientation members of our community. Language which reinforces gender stereotypes or prejudice should not be used. Where someone's sexual orientation is a relevant factor, it may be used, but not otherwise.

Racism: People of all races and ethnic groups are to be treated equally. Avoid descriptions which reinforce prejudice. Where somebody's ethnic origin is a relevant factor, it may be used, but not otherwise.

Disability: Baylis Media Ltd is committed to the equality and fair treatment of people with disability. Avoid descriptions and language which reinforces prejudice. Where somebody's disability is a relevant factor, it may be used, but not otherwise.

Religion: Baylis Media Ltd has no bias towards or against any religion.

Taste: We produce family publications, many of which are delivered through the letterbox, and this must be kept in mind when determining editorial content. We should challenge readers, but not offend them.

- **Sex:** Graphic description in sex cases should be avoided.
- **Swearing:** In general swearing should be avoided. Milder expletives are permissible if they are part of a direct quote or used in a personal opinion column if necessary to enforce a point - but not gratuitous. Context is essential. If a stronger swearword is fundamental to a story - and usually it should not be – it should be asterisked.
- **Graphic or shocking images:** Care should be taken in deciding on the use of graphic or shocking images – such as victims of injury. Use of such images should be justifiable in that they give added emphasis to an important issue (public interest) rather than just be used for shock value.

Sensitivity: We are part of the community we serve and should treat the people we come into contact with and write about with courtesy and respect. This is particularly true of the victims of crime, tragedy and the recently bereaved.

Criminals and other wrongdoers should be exposed for what they are but readers should judge them by their actions rather than overtly pejorative language used in copy.

Suicide: In line with the Editor's Code and advice from organisations such as the Samaritans, reports of inquests into suicides should not contain enough details of the method, such as the name and quantity of drugs taken, to allow the method to be replicated from information published.

Stories from other sources: When following up a story broken by another news organisation all facts should be independently checked, new comments sourced and a new angle found if possible. In effect we must write our own story.

Private benefit: Stories with a legitimate news angle about the activities of individuals or businesses can sometimes have the consequence of giving private benefit – such as a raised profile – through details in the story. This is acceptable provided it was incidental, reasonable and it was necessary to include the information for the context of the article.

Advertisers: We do not allow advertisers to dictate editorial content. Attempts to do so should be politely rejected. Stories about advertisers should have a legitimate news angle – positive or negative. If contacted by an organisation wanting to promote itself when there is no news angle please direct them to advertising. Advertising features, the content of which is controlled by the customer, should be clearly labelled as such to distinguish them from editorial.

Paid-for editorial content: In clearly defined circumstances, such as businesses to business publications or sections, Baylis Media Ltd will publish content supplied by a customer in exchange for payment. This will be treated as editorial on the clear understanding that editorial control of the content rests with Baylis Media Ltd as the publisher. While it is accepted such content will provide raised profile for the customer as a consequence of publication, to comply with the policy it must also be factually accurate and informative, providing genuine reader interest and value. As editorial control rests with the publisher, such paid-for content will be considered to be editorial for the purposes of industry regulation and have to comply with the standards of the Editor's Code. As such, there will be no requirement for it to be labelled as 'advertorial'.

Complimentary tickets: Editorial staff members should only accept a free experience or review tickets if there is a legitimate local news angle. Coverage or a review must be considered of benefit to the wider public. An offer of a free experience must be discussed with the Editor or Deputy Editor before it is accepted. Editorial staff should indicate to the organisation or individual involved that the newspaper retains its editorial independence and make it clear that it rejects any expectation of positive publicity in exchange for complimentary tickets. Any review of an event or experience which has been provided to an editorial staff member at a discount or free of charge should make this clear to the reader with a note at the end of the report.

Baylis Media Ltd complaints policy and procedure:

IPSO and complaints

Most complaints are made directly to the Baylis Media Ltd and should be resolved as outlined in the following complaints policy.

Some complaints, however, are made to the industry regulator and the new independent press regulator IPSO has a different approach to handling these in the first instance than the Press Complaints Commission. If IPSO considers a complaint made to it to be within its remit – that there is a possible breach of the editors' code – it will first refer the complaint directly to the newspaper to resolve within 28 days.

If the newspaper fails to resolve the complaint within the time limit IPSO will consider it for adjudication and possible remedial action. If a complaint is resolved within 28 days we must inform IPSO of the outcome (but it will not be included in the annual complaints statistics).

IPSO can consider complaints from:

- Any person who has been personally or directly affected by an alleged breach of the editors' code
- A representative group affected by an alleged breach of the editor's code (provided the breach is significant and there is a substantial public interest in IPSO considering the complaint).
- A third party seeking to correct a significant inaccuracy of published information.

IPSO may reject complaints that do not show an obvious breach of the code or are without justification (such as an attempt to argue a point of opinion or lobby) or are vexatious or disproportionate.

IPSO will only accept complaints within four months from the date of the conduct or first publication of the article complained of. IPSO will consider a complaint made within 12 months of publication of an article which remains accessible online.

Before making any substantive changes to an online article or other online material in response to a complaint, editorial staff must archive a complete copy of the article or other material under complaint (this does not include trivial changes, such as changes to spelling or grammar). The archived copy must be retained for a minimum of four months from the date of the amendment to ensure that IPSO has access to a copy of the material under complaint, should it subsequently receive a complaint.

When IPSO investigates a complaint

Mediation

If we are unable to resolve the complaint IPSO will investigate if it still appears there has been a breach of the editors' code and will aim to mediate a resolution such as negotiating agreement of a correction and/or apology.

Adjudication

If the complaint cannot be resolved through mediation IPSO will decide if there has been a breach of the editors' code. If it rules there has not been a breach it will reject the complaint. If it rules there has been a breach it will issue an adjudication outlining its findings which may include the requirement for remedial action.

Remedial Action

If a complaint is upheld by IPSO the paper must publish a correction and/or the text of the adjudication. The nature, extent and placement of this will be determined by IPSO.

If the paper's arrangements for enforcing standards and compliance have been found at fault IPSO may require further remedial action to ensure the requirements of the editors' code are met.

Baylis Media Ltd general complaints policy

All editorial staff should ensure they are familiar with Baylis Media's editorial policy and the Editor's Code as this will govern both what they produce for publication and how they should resolve a complaint.

Baylis Media Ltd strives to present the news fairly, accurately and impartially in accordance with both the law and the Editor's Code of Practice.

Genuine inaccuracies should be corrected promptly and with appropriate apologies, subject to legal requirements. Corrections can only be agreed by a senior member of editorial staff.

Other complaints about editorial content - whether online or in print - should be assessed in the light of our editorial policy and the editor's code of conduct and a judgement made by senior editorial staff on what action to take. A final decision will rest with the editor.

In all cases, complaints about editorial content and conduct should be treated seriously and the complainant treated with courtesy. If the matter cannot be resolved immediately, they must be kept informed of the progress of dealing with their complaint up until its final resolution.

We should aim to resolve an editorial complaint within 24 hours if dealt with internally. Absence of staff to assist an investigation - for example the reporter who wrote a story is on holiday – may make this unachievable, but we should always aim to have a complaint internally resolved as quickly as possible, certainly no later than 10 working days from the original complaint.

- Note that IPSO requires complaints it refers to a newspaper to be dealt with within 28 days and requires a response to a complaint it is mediating within seven days.

Prompt resolution of a complaint prevents escalation to IPSO and can avoid the threat of legal action.

Many complaints can be quickly and easily resolved. Anyone wishing to proceed to a formal complaint should be asked to provide:

- A copy of the article in question (if there is one)
- A written copy of their concerns by reference to the editor's code
- Any other documents which will help us (and if need be IPSO) assess the complaint.

Procedure:

When a complaint is made:

- When a complaint is received by telephone/in person take the details of the complaint, what publication it relates to (print or online), when it was published and the details of the complainant, including contact details – phone number and email.
- If the complaint relates to an article please obtain a copy.
- If the complaint is about an online comment on one of our web stories please take the comment down immediately so the complaint can be investigated and assessed.

Is the complaint valid?

- Has there been a breach of the editors' code or any other internal Baylis Media policy or legislation concerning conduct or publication? Potential breaches of the law should be brought to the attention of senior editorial staff immediately.

Can the complaint be resolved straight away by the recipient or a senior member of staff?

- Assess the complaint and if it can be settled easily – such as a complaint about the decision to include a case in the court lists – resolve the complaint verbally. This may be as simple as an explanation about why something has been done in a particular way.
- Once resolved complete a complaint form and file it in the log.

If the complaint cannot be immediately resolved:

- Inform the complainant we will investigate and respond to them as soon as possible.
- Open a complaint file and pass it to senior editorial staff to investigate.

Resolution process:

- Assess the complaint and investigate its validity
- Decide the correct response – eg correction, clarification, amend story online or no action if complaint is not valid. This may involve taking legal advice from the Newspaper Society.

- Contact complainant to resolve complaint.
- If agreement cannot be reached the matter may then have to be referred to the regulator until a final resolution is achieved.
- Complete and file the complaint form.