

COMPLAINT HANDLING PROCEDURES

WORD COUNT MEDIA PTY LIMITED

1. PRINCIPLES

- 1.1. *Word Count Media Pty Limited* (“WCM”) recognises listening to and responding to complaints, and taking action when warranted, is important for both accountability and continuous quality improvement.
- 1.2. Though WCM is not an MEAA member, WCM abides by the *MEAA Journalist Code of Ethics* (<https://www.meaa.org/meaa-media/code-of-ethics/>) thereby committing themselves to principles including:
- 1.2.1. Honesty;
 - 1.2.2. Fairness;
 - 1.2.3. Independence; and
 - 1.2.4. Respect for the rights of others.

2. DEFINITIONS

2.1. Decision-maker

- 2.1.1. A decision-maker includes a director of WCM.

2.2. Complaints

2.2.1. Written complaint

A ‘written complaint’ is made in writing and lodged with WCM by letter, email or web form submission. It does not include comments and other user-generated content posted to social media, discussion boards or other interactive services.

2.2.2. Editorial complaint

An ‘editorial complaint’ is a written complaint about one or more specific items of WCM content, in most instances content that has already been published by WCM.

2.2.3. Complaint content

Complaints should acknowledge and correct or clarify, in an appropriate manner as soon as reasonably practicable:

- 2.2.3.1. Significant material errors that are readily apparent or have been demonstrated; or
- 2.2.3.2. Information that is likely to significantly and materially mislead.

3. PROCEDURE FOR HANDLING COMPLAINTS

3.1. Receipt and assessment

- 3.1.1. Written complaints and editorial complaints should be promptly referred to a decision-maker.

- 3.1.2. A decision-maker will write to the complainant, as necessary, to acknowledge receipt of their complaint.
- 3.1.3. A decision-maker will assess the complaint. In assessing the complaint, a decision-maker will consider:
 - 3.1.3.1. The seriousness of the matter;
 - 3.1.3.2. The likelihood of harm;
 - 3.1.3.3. The potential to mislead;
 - 3.1.3.4. The proximity of the person raising the matter to the substance of the matter;
 - 3.1.3.5. The scale of audience response; and
 - 3.1.3.6. The degree of risk of damage to public trust and confidence in WCM.

3.2. Complaint resolution

- 3.2.1. Following assessment of the complaint, WCM will endeavour to resolve complaints where practicable and warranted.
- 3.2.2. A complaint is resolved where a decision-maker takes steps to remedy the cause of complaint usually prior to, or within thirty (30) days of WCM receiving the complaint.

4. TERMINATION OF CORRESPONDENCE

4.1. Frivolous, vexatious, not in good faith

- 4.1.1. In cases where a complainant repeatedly submits complaints which are frivolous, vexatious or not made in good faith, it may be appropriate to consider terminating all correspondence. Decisions to terminate correspondence on this basis may only be made by a decision-maker.
- 4.1.2. If a decision is made to terminate correspondence, a decision-maker will write a letter to the complainant advising of the decision and stating the reasons it was made.

4.2. Unable to satisfy complainant after reasonable efforts

- 4.2.1. WCM will also consider terminating correspondence with a complainant on a particular issue in cases where WCM has clearly been unable to satisfy a complainant, despite reasonable efforts having been made. The correspondent should be advised that WCM will not continue to engage in correspondence on that particular matter. However, complaints about new issue should be considered and a new response provided where appropriate.