

***Complaints Policy  
and Procedure***

***30 January 2026***

## Complaints Policy

### 1 Introduction

- 1.1 Paddle Scotland is committed to maintaining the highest standards of integrity, transparency, and service in all that we do. We recognise that, from time to time, concerns or complaints may arise, and we view these as an opportunity to listen, learn and improve.
- 1.2 We are committed to handling all complaints fairly, consistently and transparently, ensuring that they are dealt with promptly and respectfully, and in line with relevant legislation, regulatory requirements and recognised best practice. All complaints will be taken seriously and considered on their merits, without bias or prejudice, and with due regard for confidentiality.
- 1.3 This policy provides a clear and fair process for raising and resolving such concerns. Its purpose is to ensure that all complaints are handled promptly, consistently, and sensitively, with the aim of achieving a fair outcome and learning from feedback to improve our practices.
- 1.4 We view complaints not as a negative reflection on our organisation, but as an important opportunity to listen, reflect, and strengthen the way we operate. By responding effectively to complaints, we can enhance trust, accountability, and the quality of our engagement with members, volunteers, athletes, partners, and the wider paddlesport community.

### 2 Purpose and Scope

- 2.1 This policy applies to anyone who interacts with our organisation, including members of the public, participants, partner bodies, and staff or volunteers acting in the course of their duties.

### 3 Matters not Covered by this Policy

- 3.1 While Paddle Scotland aims to deal fairly and openly with all concerns raised, there are some matters that fall outside the scope of this Complaints Policy. The policy is not intended to cover:
  - **Safeguarding concerns**, which are addressed through Paddle Scotland's safeguarding policies.
  - **Personal disputes** between individuals, such as disagreements between members, clubs, or coaches, unless there is evidence of misconduct or a breach of Paddle Scotland's codes or policies;
  - **Appeals or disciplinary matters**, which are addressed under separate disciplinary or appeal procedures;
  - **Whistleblowing concerns**, which should be raised under Paddle Scotland's Whistleblowing Policy; or
  - **Requests for information** or general feedback that do not constitute dissatisfaction with a decision, service, or conduct.
- 3.2 Additionally, Paddle Scotland cannot consider complaints about matters that are outside of its influence or control. For example, issues relating to facilities owned or managed by third parties, decisions made by independent event organisers, or the actions of individuals or organisations not affiliated with Paddle Scotland. In such cases, we will, where possible, direct the complainant to the most appropriate organisation or authority.

### 4 Relationship to other Policies

- 4.1 This Policy forms part of the overall policy framework for Paddle Scotland but specifically relates to the following policies, plans and procedures:
  - Paddle Scotland Anti Bullying and Anti Harassment Policy
  - Paddle Scotland Anti Fraud Anti Bribery and Corruption Policy

- Paddle Scotland Code of Conduct
- Paddle Scotland Conflicts of Interest Policy
- Paddle Scotland Data Protection Requirements
- Paddle Scotland Disciplinary Procedures
- Paddle Scotland Equality Policy
- Paddle Scotland HR Policies
- Paddle Scotland Malpractice and Maladministration Policy
- Paddle Scotland Safeguarding Policies
- Paddle Scotland Whistleblowing Policy

## **5 Accountability/Reporting**

5.1 Paddle Scotland is committed to principles of transparency and accessibility. To meet these objectives:

- This Policy will be made publicly available and listed on the Paddle Scotland website.
- Training in relation to the Complaints Policy and investigation procedure and timescales will be provided to Board Directors and staff.

## **6 Policy Review**

6.1 This policy is subject to continuous review and will be reviewed:

- On a three-year rolling basis, unless there are changes to legislation or guidance.
- Following any significant complaints, or issues within the approved complaints procedure.

## **7 Points of Contact**

7.1 For further advice or guidance on this policy, the following can be contacted:

- Chief Executive Officer

## Complaints Procedure

### 8 Reporting a Complaint

8.1 Complaints may be made in writing, by email, or verbally (either in person or by telephone). We recognise that not everyone feels comfortable or able to put their concerns in writing, so we will make reasonable efforts to record and confirm verbal complaints accurately. All complaints should include as much relevant information as possible to help us understand and address the issue effectively.

8.2 Where appropriate, complaints may also be submitted through an authorised representative or advocate. The organisation will ensure that the process for raising a complaint is accessible, fair, and responsive, and that no individual is treated unfavourably for raising a genuine concern.

### 9 Complaints Procedure

9.1 Complaints should be submitted to Paddle Scotland with as much information as possible as it can be difficult to deal with a complaint with limited information. Paddle Scotland may contact the complainant to ask for further information so that we can fully investigate the complaint.

9.2 If you raise a complaint to Paddle Scotland, we aim to:

- **Acknowledge** the complaint as soon as possible, and within **five working days**.
- **Clarify** whether it falls within the definition of a complaint under this policy, or whether another policy is applicable (i.e. whistleblowing complaint, grievance).
- **Consider** whether the complaint can be addressed through other means (i.e. mediation).
- If required, **investigate** the cause(s) of the complaint and **within twenty working days**, where possible. If it has not been possible to investigate the cause(s) of the complaint within twenty days, we will write to you to provide an explanation why and to confirm a timeline for investigation.
- **Resolve** the complaint, where possible, or provide a response as to why this is not possible.

### 10 Escalating a Complaint

10.1 If a complainant is not satisfied with our response, they can request their complaint to be escalated. The complainant must do this **within 14 days** of the date of the complaint response being issued by Paddle Scotland.

10.2 The escalation will be considered by the Chief Executive who will determine the appropriate action in response. This may be a review by a member of staff not involved in the original investigation, a panel of two or more individuals, or consideration by the Board or Committee.

10.3 The Chief Executive will aim to provide you with a final response following consideration by the individual, panel, Board or Committee **within four weeks** of the escalation referral. Please note that this decision will be final.

### 11 Unreasonable Persistent or Vexatious Complaints

11.1 Paddle Scotland does not expect employees or key volunteers to tolerate unacceptable behaviour by complainants at any time during the general complaints' procedure. Unacceptable behaviour includes behaviour, which is abusive, offensive or threatening and may include:

- Using abusive or inappropriate language on the telephone or face to face
- Sending multiple emails

- Leaving multiple voicemails

11.2 Raising legitimate queries or criticisms of a complaints procedure as it progresses, e.g. if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious or an unreasonably persistent complainant.

11.3 Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it, in line with the procedure, should not necessarily cause them to be labelled vexatious or unreasonably persistent.

11.4 Paddle Scotland defines unreasonably persistent and vexatious complainants as those complainants who, because of the frequency or nature of the complaints, hinder the work of the organisation. The description 'unreasonably persistent' and 'vexatious' may apply separately or jointly to a particular complainant. Examples include the way or frequency that complainants raise their complaint with employees, or how complainants respond when informed of a decision about their complaint. Features of an unreasonably persistent and/or vexatious complainant are listed below. The list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category.

- have insufficient or no grounds for their complaint and be making the complaint only to annoy (or for reasons that he or she does not admit or make obvious);
- refuse to specify the grounds of a complaint despite offers of assistance;
- refuse to cooperate with the complaints investigation process or disciplinary investigation process while still wishing their complaint to be resolved;
- refuse to accept that issues are not within the remit of the general complaints or policy and procedure or disciplinary regulations despite having been provided with information about the scope of the policies and procedures;
- refusal to accept that issues are not within the power of Paddle Scotland to investigate, change or influence (examples could be a complaint about sportscotland, or something that is the responsibility of another organisation);
- insist on the complaint being dealt with in ways which are incompatible with the complaints procedure, the disciplinary regulations or with good practice (e.g. that there must not be any written record of the complaint);
- make what appear to be groundless complaints about the person dealing with the complaint(s) and seek to have them dismissed or replaced;
- make an unreasonable number of contacts by any means in relation to a specific complaint or complaints;
- make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the complainant (an example of this could be a complainant who insists on immediate responses to numerous, frequent and/or complex letters, faxes, telephone calls or emails);
- raise numerous subsidiary or new issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process;
- introduce trivial or irrelevant new information whilst the complaint is being investigated and expect this to be taken into account and commented on;
- change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed;
- adopt an excessively 'scattergun' approach, e.g. pursuing a complaint or complaints not only with Paddle Scotland, but at the same time with sportscotland, the Scottish Government, a Member of Parliament, their local council, elected councillors, the police, solicitors and/or any other body;
- refuse to accept the outcome of the complaint process or disciplinary process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given;
- make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure or disciplinary procedure has been concluded and insist that the minor differences make these 'new'

complaints which should be put through the full complaints or disciplinary procedure;

- persistently approach Paddle Scotland through different routes about the same issue;
- persist in seeking an outcome which has been explained is unrealistic for legal or policy (or other valid) reasons;
- refuse to accept documented evidence as factual;
- complain about or challenge an issue based on a historic and irreversible decision or incident.

11.5 If it is suggested that a complainant is acting in an unreasonably persistent or vexatious way the either the Chief Executive, another member of the senior management team or the Chair will ensure that the complaint is being, or has been, investigated properly according to the complaints procedure or the disciplinary regulations before any further action is taken.

11.6 Paddle Scotland will take action to protect employees and key volunteers from inappropriate behaviour. If a complainant behaves in a way that is unreasonably persistent or vexatious, this procedure will be followed:

- The Chief Executive or another appointed person will contact the complainant in writing or by email to explain why their behaviour is causing concern and ask them to change this behaviour. They will explain the actions that Paddle Scotland may take if the behaviour does not change.
- If the disruptive behaviour continues, they will issue a reminder letter to the complainant advising them that the way in which they will be dealt with by Paddle Scotland in future will be restricted. The Chief Executive or other appointed person will make this decision following consultation with the Chair and inform the complainant in writing of what measures have been put in place and for what period.

11.7 Any restriction that is imposed on the complainant's contact will be appropriate and proportionate and the complainant will be advised of the period of time the restriction will cover. In most cases restrictions will apply for between 3 and 12 months but in exceptional cases may be extended. In such cases the restrictions would be reviewed on a 6 monthly basis.

11.8 Restrictions will be tailored to deal with the individual circumstances of the complainant and may include:

- prohibiting the complainant from making contact by telephone except through a third party acting on their behalf;
- prohibiting the complainant from sending emails to individual and/or all employees or volunteers and insisting they only correspond by letter;
- requiring contact to take place with one named member of staff only;
- restricting telephone calls to specified days/times/duration;
- requiring any face-to-face contact to take place in the presence of an appropriate witness;
- letting the complainant know that Paddle Scotland will not reply to or acknowledge any further contact from them on the specific topic of that complaint (in this case, a designated member of staff may be identified who will read future correspondence)

11.9 When the decision has been taken to apply this policy to a complainant, the CEO or appointed person will contact the complainant in writing (and/or as appropriate) to explain:

- why Paddle Scotland has taken the decision;
- what action(s) are being taken;
- the duration of that action; the right of the complainant to contact the Board of Directors about the fact that they have been treated as a vexatious/persistent complainant.

11.10 Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff and/or volunteers Paddle Scotland will consider other options, e.g. reporting the matter to the police or taking legal action. In such cases, Paddle Scotland may not give the complainant prior warning of that action. In every case, full and complete records of all decisions and actions will be maintained in line with the Paddle Scotland Data Protection Policy and Privacy Notice.