



Paddles UP TRAINING

Complaints Procedure

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Introduction

It is the goal of Paddles Up Training (PUT) to provide excellent customer service, awards and products but we recognise that occasionally, things do go wrong. We take all complaints we receive seriously and aim to resolve all problems promptly following a full investigation. To ensure that we provide the kind of service you should expect of us, we welcome your feedback. This document outlines the process followed when we receive complaints and what to do if you are unhappy with the outcome

What will happen if you complain?

We will acknowledge your complaint within 5 working days.

Whilst most concerns can be resolved quickly, occasionally more detailed enquiries are needed. Within the next 10 working days, we will contact you with an update outlining the actions we will take to investigate your complaint. Once our investigation is concluded we will provide you with a written report detailing our findings and the steps we will be taking as a result of the investigation. Due to the varied nature of the investigations required we are unable to provide firm timelines, but do commit to undertaking any investigation as efficiently as possible.

How to make a complaint/ Complaints Procedure

If you are not happy with your experience with PUT we would encourage you to:

1. In the first instance, you could try to seek a resolution with the course provider or the member of staff you are working with.
2. If the issue has not been satisfactorily resolved you can escalate your complaint using this direct link to our complaints form:
<https://forms.paddlesuptraining.com/live/form/PaddlesUpTrainingForms/formpera/SzPoAt5Kh7-gGyqoY6lGFmBv7SvKOtTFmcgKJf92h9A> This form is submitted to the Responsible Office, Lead Standards Officer and Delivery Centre Lead to ensure the complaint is handled appropriately. In the event

that you wish to find out more prior to submitting a complaint, or feel that email is a more suitable mechanism then you can write to

coaching@paddlesuptraining.com

Note: Paddles Up Training will appoint a suitable officer to conduct the investigation and they will request / collect information from all parties as required to investigate the complaint. This may be from any person involved in the complaint, but collection and verification will be done by the officer.

3. If you remain unhappy with the outcome of the investigation, you can follow the appeals process outlined in your correspondence or contact darryll.shaw@paddlesuptraining.com, Paddles Up Training's Responsible Officer by email.

If you are the subject of a complaint

Paddles Up Training recognises the impact that having a complaint made about you may have. We will inform you at the soonest reasonable opportunity of the situation, and will ensure that you have the opportunity to provide evidence in advance of any outcome being arrived at.

The investigating officer will utilise the impact assessment guidance (at appendices 1) to identify what immediate actions are required to protect the standards and quality of awards delivered under the Paddles Up Training delivery centre banner. This may result in the pausing of provider status whilst the investigation is ongoing.

Support available during the complaints process

We have a support process available for any Employee, Trainer, Standards Officer, Provider or Complainant involved in this process. We commit to offering a support officer, who is someone outside the investigative process (usually a Standards Officer), to those who have a complaint made against them. The role of the support officer is to provide someone to help prepare for the evidence gathering phase and be a person who can listen and hear concerns independently. They will have no formal involvement in the investigation, but are duty bound to pass on to the

investigating officer any areas that need investigation or consideration as part of the process.

The role of the supporting officer is to be a critical friend for those involved in the process. They can advise on the mechanics of investigations, but do not represent formal legal advice. They will receive no information about the complaint from anyone within Paddles Up Training. They are not intended to act as legal counsel, a therapist or councillor, but will be an experienced coach and course provider themselves so they understand the occupational demands of course delivery and coaching.

How we manage complaints

This also applies to our management of Appeals, suspected occurrences of Malpractice and Maladministration and Whistleblowing reports received.

Following acknowledgement of the complaint we will identify a suitable investigating officer, normally a member of PUT Staff, Standards Officer or Trainer with occupational competency. They will be responsible for making sure the investigation is carried out efficiently, effectively and in accordance with the procedures in this policy. They will work to establish the facts of the case by reviewing all evidence associated with the case. At all times, we will make sure any personnel assigned to the investigation have:

- The appropriate level of training and competence
- No previous involvement or personal interest in the matter

We will conduct all investigations in a fair, reasonable and legal manner, making sure we consider all relevant evidence without bias. Investigations may include:

- Establishing the facts relating to the allegations in order to determine whether irregularities have occurred
- Identifying the cause of the irregularities and those involved
- Establishing the scale of the irregularities

- Evaluating any action already taken by the Tutor, Assessor, Provider or staff member
- Determining whether remedial action is required to reduce the risk to current registered Learners and to preserve the integrity of the qualification (where relevant)
- Ascertaining whether any action is required in respect of certificates already issued (where relevant)
- Obtaining clear evidence to support any sanctions to be applied to the Assessor, Tutor, Provider or Learner, and/or to members of staff, in accordance with Paddles Up Training [Sanctions Policy](#).
- Identifying any adverse patterns or trends

The investigation would usually involve a request for further information from relevant parties and interviews with relevant parties involved in the investigation. All parties are welcome to bring a third party to any meetings (virtual or in person). It should be noted that the role of the third party is to provide support, activities such as note taking would be normal, but the third party would not be permitted to present evidence or ask questions without prior agreement - they should be independent from the process. If you are under the age of 18 and raising a complaint then we require a parent or legally appointed guardian to attend any meetings. Their presence is to support you as the complainant and ensure that we meet our safeguarding responsibilities.

We will:

- Make sure all material collected as part of an investigation is kept secure
- Retain all records and original documentation concerning a completed investigation that ultimately leads to sanctions for at least three years. If an investigation leads to invalidation of certificates, criminal or civil prosecution,

all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for a further three years thereafter.

- Expect all parties, who are either directly or indirectly involved in the investigation, to fully cooperate with us
- Confirm the accuracy of, or discount any evidence, that is not directly gathered by us during the investigation. At any time during the investigation, we reserve the right to impose sanctions on the Assessor, Tutor, Provider, Learner and/ or staff member in accordance with Paddles Up Training [Sanctions Policy](#) to protect the interests of Learners and the integrity of the qualifications.

If the investigation is internal, relating to a member of staff, the investigation summary will be agreed by the Chief Executive Officer, along with the relevant internal managers, HR and appropriate internal disciplinary procedures will be implemented.

If appropriate, we may find that the complexity of a case or a lack of cooperation from a party means that we are unable to complete an investigation. In such circumstances, we will consult the British Canoeing Awarding Body (in the case of BCAB award delivery) or the Paddles Up Training Responsible Officer in order to determine how best to progress the matter.

If a member of our staff is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation, the appointed staff member is responsible for overseeing the work of the investigation team:

- To make sure due process is being followed
- To make sure appropriate evidence has been gathered and reviewed
- For liaising with relevant external parties and keeping them informed

Report

On completion of an investigation, we will produce a summary of the findings and outcomes which will be sent to the parties concerned. The summary will:

- Identify where the breach, if any, occurred
- Confirm the facts of the case
- Identify who is responsible for the breach (if any)
- Confirm an appropriate level of remedial action and/or any sanctions to be applied

If it was an independent/third party that notified us of the suspected or actual case of malpractice, we will also inform them of the investigation outcome – normally within 20 working days of making our decision – in doing so, we may withhold some details if disclosing such information would breach a duty of confidentiality or any other legal duty.

Timescales

We aim to take action and resolve all stages of any investigation as swiftly as possible, whilst recognising that we are duty bound to ensure that we have undertaken a thorough investigation. The investigating officer will have made contact with any relevant parties and will be able to provide updates as requested during the investigation. Unless notified otherwise, the investigating officer will update parties every 20 working days until the investigation is complete.

Outcomes

If the investigation upholds the complaint or appeal, or confirms malpractice or maladministration has taken place we will consider what action to take in order to:

- Minimise the risk to the integrity of certification now and in the future
- Maintain public confidence in the delivery and awarding of qualifications

- Discourage others from carrying out similar instances of malpractice or maladministration
- Discourage others from behaviours which have breached the standards or codes of conduct
- Ensure there has been no gain from compromising our standards

The action we take may include:

- Imposing actions in relation to Assessor, Tutor, Provider, Learner and/ or staff member with specified deadlines in order to address the instance of malpractice/maladministration or behaviour which led to the complaint and to prevent it from recurring.
- Imposing sanctions on the Assessor, Tutor, Provider, Learner and/ or staff member – if so, these will be communicated in accordance with Paddles Up Training [Sanctions Policy](#) along with the rationale for the sanctions selected.
- If certificates are deemed invalid, inform BCAB why they are invalid and any action to be taken for reassessment and/or for the withdrawal of the certificates. We will also inform the affected Learners, letting them know the action we are taking and that their original certificates are invalid and ask them, when possible, to return the invalid certificates to us.
- We will amend our records to make sure duplicates of the invalid certificates cannot be reissued.
- Amending aspects of our qualification assessment and/or monitoring arrangements and associated guidance to prevent the issue from reoccurring.
- Informing relevant third parties of our findings in case they need to take action in relation to the issue.

In proven cases of malpractice and/or maladministration by an Assessor, Tutor, Provider, Learner and/ or Staff member, we reserve the right to charge for any re-sits

and reissuing of certificates and/or additional external monitoring visits or remote actions required, in addition to the costs of the investigation. The fees will be the current prices for such activities, expense fees will be at cost, for charges for time, please see the [Delivery Centre Fees](#) document. In addition to the above we will record any lessons learned from the investigation and pass these onto relevant internal colleagues to help prevent similar instances of maladministration or malpractice from reoccurring.

What can I do if I am unhappy with the outcome of my complaint?

If your complaint concerns assessment decisions for Coaching, Leadership or Personal Performance Awards then our [Appeals Procedures](#) may be more applicable.

If you are not happy with the way your complaint has been dealt with, you can consider escalating it to [British Canoeing Awarding Body](#).

Policy Review Arrangements

We will review this policy on an ongoing basis as part of our continuous improvement activity and revise it as and when necessary in response to customer and learner feedback, changes in our policies and processes and actions from allegations.

In addition, we may update this policy in light of operational feedback to make sure our arrangements for dealing with suspected cases of malpractice and maladministration remain effective.



Contact us

If you have any queries about the contents of the policy, contact our customer service team:

Tel: 0300 0119 500

Email: coaching@paddlesuptraining.com

Darryll Shaw

Paddles Up Training Responsible Officer

Further Reading

[Appeals Procedures](#)

[British Canoeing Awarding Body](#)

Appendices 1

Impact Assessment for Complaints and Appeals

This document outlines the process for assessing the impact and severity of a complaint or appeal on the awards that are delivered by providers on behalf of Paddles Up Training. This Impact Assessment is carried out prior to any compliant investigation commencing and is designed to support Paddles Up Training to apply consistency in decision making. As a result of the Impact Assessment, whilst an investigation is ongoing, we may be required to suspend the provider service agreement of any provider involved in an investigation. The impact assessment is carried out by either the Responsible Officer, Delivery Centre Lead or Lead Standards Officer. The impact assessment can be revisited at any point during the investigation as evidence is disclosed and reviewed.

1. Key Assessment Factors

Complaints are evaluated based on the potential impact across six key areas:

- **Learner Impact**
- **Operational Impact**
- **Reputational Risk**
- **Safety/Regulatory factors**
- **Financial impacts to the Delivery Centre**
- **Historical factors**
-

Intake Triage: The complaint must be scored within **5 working days** of receipt, using the details provided.

Documentation: The final score and the rationale for it must be logged in the complaint folder. This is reviewed post-resolution to identify trends.

2. Scoring System and Weighted Factors

The initial impact score is calculated by adding the points up using the table to identify relevant scores in each factor group. It is possible for multiple criteria in each factor group to be scored (max 6 points per row) with the exception of the operational impact scoring.

The following areas are then accounted for prior to a final score being given. These all receive a negative score of 1, adjusting the final scoring of the triage system.

- **No history of upheld complaints (in past three years) (-1)**
- **Held full provider status for more than 5 years? (-1)**
- **Has delivered more than 3 courses in discipline/environment in past three years (-1)**

Score Interpretation:

- **1 - 10** The provider may continue to deliver courses whilst the investigation is underway
- **11+** Scores of 11 or more are considered severe. Such results justify the immediate suspension of the provider service agreement pending the full investigation to protect the integrity of the qualification, delivery centre or risk to learners.
- A Single Score in any 'red zone' would constitute immediate interim suspension of Provider Service Agreement.

Factor Group	Criteria for 3 Points	Criteria for 2 Points	Criteria for 1 Point	Potential Score (Max)
Learner Impact	More than 12 learners / Certification affected by Incident	Between 2 to 12 learners / certifications affected by incident	1 learner / certification affected by incident	3
Operational Impact	More than 5 courses scheduled in the next 3 months	Between 2 & 5 courses scheduled in the next 3 months	Less than 2 courses scheduled in the next 3 months	3
Reputational Risk	Potential for negative media or public concern	Potential damage to the credibility of the Delivery Centre or Awarding Body	Potential damage to the credibility of the award scheme	6
Safety / Regularity	Direct threat to learner welfare or safety AND/OR potential breaches of relevant laws based on jurisdiction AND/OR potential breaches of the Provider Service Agreement	Potential for compromise to the integrity of an award or qualification that has been certificated AND/OR potential breaches of the Terms and Conditions of Course Authorisation	Potential to expose breaches of Paddles Up Training or Awarding Body providership requirements	6
Financial	Potential for loss of Delivery Centre Status if complaint is upheld	Potential costs associated that may have to be borne by the Delivery Centre - i.e. reassessments	Potential for length of investigation taking more than 10 hours	6
History / Scale (within 3 years)	Previous upheld complaint	Corrective guidance directly provided previously to person at focus of investigation as a result of informal evidence received	Scope of complaint includes failure to follow interim guidance provided	6