



Hexagon Housing Association

Complaint Code Self-Assessment Form 2025/26

This self-assessment applies to Hexagon Housing Association and its subsidiary Horniman.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Defined as such in Complaints Policy, section 2.2: Hexagon uses the Housing Ombudsman's definition of a complaint as follows: "A complaint shall be defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents". The wording is the same in section 2.1 of the Complaints Procedure.	The complaint definition in the policy and procedure mirrors the Housing Ombudsman's definition. This is also embedded in frontline complaints training and onboarding.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Clearly stated in Complaints Policy, section 2.3: "Whenever you express dissatisfaction, including when you do not use the word "complaint", we will give you the choice to make a complaint." And section 1.4 "You are entitled to make your complaint through a representative, and be represented or accompanied at any meeting with Hexagon. Hexagon will accept complaints raised on your behalf so long as we receive your written consent. Where correspondence is received on behalf of a customer from a Councillor, MP, or Advocacy Service, consent will be assumed" Also in our Complaints Procedure, section 2.2: "The resident does not need to use the word "complaint" for the complaints procedure to apply: whenever a resident expresses dissatisfaction, we must offer them the opportunity to make a complaint. Additionally, if a resident asks that their comment be treated as a complaint, this must enter the complaints process."	In addition to this clear definition in our Policy, this is also explicitly covered in our training which has been delivered to all frontline teams, and is required as part of the onboarding for all new frontline staff

1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Clearly stated in Complaints Policy, section 2.4: “Hexagon recognises the difference between a service request and a complaint. Hexagon uses the Housing Ombudsman’s definition of a service request as “a request from a resident to their landlord requiring action to be taken to put something right”. Service requests will be logged, actioned, and reviewed. If you express dissatisfaction with our handling of your service request, we will give you the choice to raise a Stage 1 complaint. We will not stop our efforts to resolve the service request if you complain”. Section 2.5 of the Complaints Procedure directs staff to Appendix B of the HOS Complaints Handling Code via hyperlink “see Appendix B of the Housing Ombudsman’s Complaint Handling Code for flow charts and case studies distinguishing complaints and service requests”	Our policy and procedure makes this distinction clear, with explicit reference to the HOS guidance on the subject.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy, section 2.4 states " If you express dissatisfaction with our handling of your service request, we will give you the choice to raise a Stage 1 complaint. We will not stop our efforts to resolve the service request if you complain"	The policy expressly requires a Stage 1 complaint where the resident expresses dissatisfaction with its handling and confirms that work to resolve the service request must continue.
1.6	An expression of dissatisfaction with services made through a	Yes	Section 3.5 of the Complaints Policy states "Hexagon will gather	The policy distinguishes survey feedback from complaints while requiring information on how to make a complaint whenever resident feedback is requested. Dissatisfied survey responses are reviewed for learning.

	survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.		feedback from residents and service users through surveys to support learning and improvement of services. We will review dissatisfied responses to surveys, but they will not be considered a complaint under this policy. We will include information on how to make a complaint whenever we ask for resident feedback"	
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy section 3 covers "When we will not consider a complaint". These are the same grounds listed in section 2.2 of the HOS Complaints Handling Code 2024. Section 3.1 of the policy states "Each complaint will be considered on its own merits", and section 3.4 states "If Hexagon refuses to consider or escalate your complaint, we will	The only exclusions permitted under our policy are those specified by the HOS Complaints Handling Code 2024. We have a template Exclusion Letter, which ensures that this is clearly and consistently communicated. This template is referred to in our Procedure (Section 5.5)

			explain why in writing and inform you of your right to take the complaint to the Housing Ombudsman". Section 5 of our Complaints Procedure covers "Refusing a Complaint." It refers to Section 3 of the Policy. Section 5.2 states "When intending to refuse a complaint because the event it relates to is more than twelve months ago, as per Section 3 of the Policy, the Complaints Handler will contact the complainant to ask why the complaint is being raised after twelve months, and will have due regard for any vulnerabilities or extenuating circumstances that caused the delay (for example an extended hospital stay). We will accept a complaint raised outside of the twelve-month timeframe where a reasonable explanation is provided". Section 5.5 states "Where a Complaint Handler finds that we will not consider the complaint, they will send an Exclusion Letter, using the	
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			approved template. This will explain our reason for not accepting their complaint, with reference to the appropriate section of our Complaints Policy. It will also inform the resident of their right to bring their concern to the Housing Ombudsman if they do not agree with our decision to exclude their complaint"	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago; Legal proceedings have started (defined as details of the claim having been filed at court); Matters that have previously been considered under the complaints policy.	Yes	As noted above, these grounds are noted in our Policy (section 3.1) and Procedure (section 5) and are the only grounds under which a complaint may be excluded. Our Policy and Procedure specify how we apply those grounds on a case-by-case basis, and the requirement to communicate clearly to residents which ground is being used, if we are excluding a complaint, and their right to refer that decision to the HOS.	
2.3	Landlords must accept complaints referred to them	Yes	Section 5.2 of our Complaints Procedure states "When	The need to apply discretion and consider each complaint on a

	within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.		intending to refuse a complaint because the event it relates to is more than twelve months ago, as per Section 3 of the Policy, the Complaints Handler will contact the complainant to ask why the complaint is being raised after twelve months and will have due regard for any vulnerabilities or extenuating circumstances that caused the delay (for example an extended hospital stay). We will accept a complaint raised outside of the twelve-month timeframe where a reasonable explanation is provided"	case-by-case basis is highlighted to staff in the procedure and is regularly emphasised in case reviews and staff meetings.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the	Yes	As noted above, this is explicitly stated in our Complaints Policy (section 3.4) and Complaints Procedure (section 5.5)	We have template letters for complaint exclusions to ensure explanation and reasons are given, and signposting the resident to the Ombudsman.

	Ombudsman may tell the landlord to take on the complaint.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	The first line of the section of our policy that relates to excluding complaints (section 3) states 3.1:"Each complaint will be considered on its own merits". The same section also states "we will apply discretion to accept complaints outside this time limit where there are good reasons to do so"	The policy requires each complaint to be considered on its own merits and the procedure requires the handler to consider vulnerabilities and extenuating circumstances when applying the 12-month exclusion.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and	Yes	This is addressed in a number of places in our Complaints Policy, including section 1.6."This policy aims to: provide a fair and accessible complaints process"; section 4.1:"A complaint can be made to any Hexagon staff member. It can be made by: telephone...email...letter... verbally in person...or through the form on the Hexagon website"; section 12.1: "Hexagon will comply with the Equality Act 2010 and make reasonable adjustments to our Policy and processes in line with the Act"	In addition to the relevant sections of our policy, the module in which we record complaints within our housing management system includes, as part of the complaint logging process, a requirement that the relevant officer

	reasonable adjustments of residents who may need to access the complaints process.		section 12.2: "Hexagon will keep a record of any disabilities a resident has disclosed and any reasonable adjustments agreed. These will be kept under active review."; section 12.3: "Hexagon will adhere to our Vulnerable Residents and Reasonable Adjustments Policy, and our Translation and Accessible Communication Policy" and 12.4: "An Equality Impact Assessment Screening was completed and no negative impact was identified"	confirm whether any reasonable adjustments are needed on each case.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	This is addressed in our complaints policy, section 4.1: "All complaint can be made to any Hexagon staff member." and in more detail by our procedure section 1.2: "Hexagon has established a Complaints Team to investigate complaints, but residents can make a complaint to any member of staff" and section 2 "Procedure for frontline staff" which states "If a resident makes a complaint directly to you, in person or over the phone, you must record the details of their complaint	In addition to the relevant section of our policies and procedures, Hexagon has a Complaints Training for Frontline Staff, which has been delivered to all frontline teams, and is a mandatory part of the onboarding process for all new frontline staff members. This training

			and confirm with them that you have understood their complaint correctly. You must ask their desired outcome and record this, and you must explain that you will refer this to the Complaints Team", section 2.14 provides the contact details for the complaints team; section 2.15 states "On the day that you receive a complaint, you must email the Complaints Team with the resident's details, the details of the complaint (including the time and date received), and their desired outcome. If you have resolved the complaint, you must include what actions you have taken or agreed to take and confirm that you agreed this with the resident". Section 3 of the procedure also includes a detailed process map explaining how frontline staff should respond when they receive a complaint.	session clearly explains the complaints process, and how to pass complaints on to the complaints team.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that	Yes	Section 2.1 of our policy states "when things go wrong, Hexagon wants you to make a complaint so that we have an opportunity to investigate, learn, and to put right any wrongs." The avenues through which we accept complaints are well-publicised on our website and in our residents' newsletter.	Our performance data indicates that we received a high proportion of complaints relative to our size as a landlord. While this does indicate to us that there are service improvements we need to make, it also suggests that

	residents are unable to complain.			there are not significant obstacles preventing residents from making complaints.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Our Complaints Policy clearly describes the two stage process in section 5 (Stages of complaints). Section 5.1 states "The Complaints policy has two stages. If you are not satisfied with the resolution at Stage 1, you can escalate it to Stage 2. If you are unsatisfied with our final response at Stage 2, you can take your complaint to the Housing Ombudsman"; section 5.2 describes clearly, and in detail, what happens at Stage 1, and section 5.3 does the same for Stage 2. This policy is available on our website.	The policy sets out the two-stage process, the purpose and requirements of each stage and the applicable response times. The policy is published on Hexagon's website.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Section 2.7 of our policy states "Hexagon will publicise the details of our Complaints policy, including information about the Housing Ombudsman service and Code, on our website and in our quarterly newsletter."	We publicise the policy (including details of HOS and Code) on our website and in our newsletter.
3.6	Landlords must give residents the opportunity to have a representative deal	Yes	Section 1.4 of our policy states "You are entitled to make your complaint through a representative, and be represented or	Residents may use a representative and may be represented or accompanied at meetings. The procedure sets out the consent and communication arrangements for representatives, including MPs, councillors and support workers.

	with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		accompanied at any meeting with Hexagon. Hexagon will accept complaints raised on your behalf so long as we receive your written consent. Where correspondence is received on behalf of a customer from a Councillor, MP, or Advocacy Service, consent will be assumed" Section 2.17 and 2.18 of our Procedure provide more detail ("A resident may make a complaint through a representative, for example a friend, family member, support worker, or local councillor / MP. They must provide satisfactory evidence of consent from the resident. Contact the resident through their preferred contact method to confirm consent. Confirm with the resident how they want us to manage communication about the complaint")	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Section 1.6.3 of our Policy states that the policy aims to "Promote the Housing Ombudsman Service"; section 2.7 states "Hexagon will publicise the details of our Complaints policy, including information about the Housing Ombudsman service and Code, on our website and in our quarterly newsletter"; section 7 ("The Housing Ombudsman Service") provides more detail, including section 7.1 ("You can seek advice	In addition to our policies and procedures, all of our template letters prominently include the details of the Housing Ombudsman Service

			and guidance from the Housing Ombudsman Service at any stage of your complaint. This service is completely independent of Hexagon and is free to tenants") section 7.2 and 7.3 ("If we fail to acknowledge or respond to your complaint within the timeframes in this policy, you can raise this with the Ombudsman. If Hexagon refuses to accept or escalate your complaint you have a right to raise this with the Ombudsman...If you are dissatisfied with our Stage 2 response, you may take the case to the Housing Ombudsman Service") and section 7.4 which provides the contact details for the Housing Ombudsman Service. Our Procedure also addresses this, including sections 1.4 and 1.5 ("Complainants can seek advice and guidance from the Housing Ombudsman at any time. They can escalate their complaint to the Ombudsman for investigation once they have exhausted our complaints process. They can also escalate their complaint to the Ombudsman if we refuse to accept or escalate their complaint, or if we do not respond to the complaint within our target timeframes. If you are responding to a complaint, you must make the complainant aware of their right to access support from the	
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			Ombudsman and supply the Ombudsman's contact details which are detailed below")	
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Section 2.6 of our policy states "Complaints will be handled by Hexagon's Complaints team"; our Procedure provides more detail. Section 1.2 states "Hexagon has established a Complaints Team to investigate complaints". Section 4 provides detail about how the complaints team assigns and acknowledges complaints, Section 6 describes how complaints are investigated. Section 11 specifies that liaison with the HOS will be managed by the Complaints Team and section 10 describes the reporting process for notifying our governing body of complaints.	We have a specialist, centralised Complaints Team who are responsible for complaint handling, liaison with the Ombudsman and reporting to the Board. We recognise that the complaints service requires additional capacity, to achieve sustained compliance with the Code in practice, and have taken a number of actions to strengthen leadership and accountability within the complaints function. A Head of Customer Experience has been appointed to provide strategic oversight, and a permanent Complaints Manager is now in place with responsibility for day to day management. We are actively recruiting to a permanent Senior Complaints Investigator. Following recruitment, we expect to realise the benefits of having a full establishment. The effectiveness of the new operating model will continue to be reviewed as part of the Complaints Improvement Plan.
4.2	The complaints officer must have access to staff at all levels to	Yes	Section 2.6 of our Policy states "Complaints will be handled by	The policy gives the Complaints Team access to staff at all

				levels and authority and autonomy to resolve disputes quickly and fairly. The procedure requires colleagues to prioritise requests for information and sets clear deadlines for information needed during investigations.
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	facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.		Hexagon's Complaints team. This team will receive training and support to ensure they... Have access to staff at all levels to facilitate quick resolution of complaints...Have the authority and autonomy to resolve disputes quickly and fairly at all stages of the process". Section 1.3 of our Procedure states "Hexagon takes complaints seriously, and all staff should prioritise responding to and learning from complaints. All staff are expected to co-operate fully and helpfully with the Complaints Team"	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Section 2.1 of our Policy states "when things go wrong, Hexagon wants you to make a complaint so that we have an opportunity to investigate, learn, and to put right any wrongs." Section 2.6 states "Complaints will be handled by Hexagon's Complaints team. This team will receive training and support to ensure they... Deal with complaints on their merits in a competent, empathetic and efficient manner." Section 11.1 of our Policy states "Hexagon will use complaints as a source of intelligence to identify issues and introduce positive	The policy identifies complaints as a core service and requires a trained Complaints Team. The procedure requires all staff to prioritise responding to and learning from complaints and to co-operate with the Complaints Team. Training is also provided to frontline staff. As an element of the Complaints Improvement Plan, we are developing and rolling out enhanced complaints training. Training needs will be consistently reviewed and effectiveness monitored through the Plan.

			changes in service delivery." Section 1.3 of our Procedure states "Hexagon takes complaints seriously, and all staff should prioritise responding to and learning from complaints." Section 8 of our Procedure covers "Lessons Learned" and details how learning from complaints is captured and communicated.	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Our Complaints Policy is the single policy for all complaints covered by this Code. Section 1.7 of our Policy notes "Hexagon has a separate Building Safety Act Complaints Policy" for complaints under the Building Safety Act 2022, however section 1.8 confirms that complaints covered by that policy will also be handled in line with the requirements of this main Complaints Policy.	We have a separate complaints policy for complaints made under the Building Safety Act, in line with the requirements of that Act. However our principles are consistent across both documents and our Complaints Policy is the central document for all complaints covered by the HOS Code.

5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Section 5.1 of our Policy states "The Complaints policy has two stages". Section 5.2.6 makes clear that, where a complaint is resolved at first point of contact, it will still be regarded as a stage 1 complaint, and a formal stage 1 response letter will be issued. This is reiterated in section 2.10 of our Procedure. The process maps in our procedure, and sections 4, 6, and 7, all provide more detail on how specifically the two stage process works.	Our procedure provides guidance to staff on how to resolve complaints at first point of contact, whilst still logging these as complaints, referring the details and resolution to the complaints team for record keeping and issuing of a formal response letter to the resident confirming the resolution agreed at first contact.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Section 5.1 of our Policy states "The Complaints policy has two stages. If you are not satisfied with the resolution at Stage 1, you can escalate it to Stage 2. If you are unsatisfied with our final response at Stage 2, you can take your complaint to the Housing Ombudsman." As noted above, this is reiterated in several other sections of our policy and procedure.	Our process has two stages

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Section 8 of our Policy covers "Complaints from residents of co-operatives and managing agents" and states in section 8.1 "Complaints from residents of co-operatives and managing agents will be handled in line with this policy, except that the Stage 1 investigation and response will be completed by the co-operative or managing agent. If you are unhappy with the response at Stage 1, you can request a Stage 2 review which will be completed by Hexagon." Section 8.2 states "Co-operatives and managing agents must offer a complaints process that adheres to the timeframes, standards, and specifications of Hexagon's Complaints Policy and to provide a Stage 1 response to complaints in line with this Policy."	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 8.2 of our Policy states "Co-operatives and managing agents must offer a complaints process that adheres to the	The policy establishes a two-stage process, with Stage 1 investigation followed by a Stage 2 review and final response. The procedure provides detailed process steps for both stages.

			timeframes, standards, and specifications of Hexagon's Complaints Policy and to provide a Stage 1 response to complaints in line with this Policy. Where complaints are escalated to Stage 2, Co-operatives and Managing Agents must send all of the relevant information to Hexagon, and Hexagon will complete a Stage 2 review of the complaint.". Hexagon has communicated this policy, and the requirements of the HOS code to all third parties that manage properties we own.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Section 5.2.1 of our Policy states "A complaints handler will log your complaint on our complaint handling system and contact you within 5 working days of receiving your complaint and provide a written acknowledgement that sets out our understanding of your complaint and the outcomes you are seeking... If any aspect of the complaint is unclear, we will ask you for clarification and ensure	This is also set out in our template letters

			you agree with how we have defined your complaint." Section 5.3.2 makes the same provision for Stage 2. Section 4 of our Procedure (Assigning and Acknowledging Complaints) states in 4.5 "Confirm with the complainant that we have a mutually agreed definition of their complaint."	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Section 5.2.1 of our Policy states the acknowledgement will set out "which aspects of the complaint we are, and are not, responsible for." Section 5.3.2 makes the same provision for Stage 2. Section 4 of our Procedure states in 4.5.3 "Confirm which aspects of the complaint Hexagon are, and are not, responsible for."	This is set out in the relevant template letters
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take	Yes	This is explicitly stated in section 2.6 of our Policy which states "This team will receive training and support to ensure they: Deal with complaints on their merits in a competent, empathetic and efficient manner. Act	The policy requires complaint handlers to act independently, keep an open mind, consider evidence carefully and address actual or perceived conflicts of interest. Residents are given a fair opportunity to explain their position.

	measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		independently, have an open mind, and consider all information and evidence carefully. Take measures to address any actual or perceived conflict of interest." Further, section 6 of our Policy states "Our complaints process aims to enable you to be heard and understood. You will be given a fair chance to set out your position." Also, section 1.7 of our Procedure states "Any member of staff involved in handling a complaint must declare if they have any conflicts of interest, such as a personal or business relationship with any of the involved parties."	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	This addressed by sections 5.2.4 and 5.2.5 of our Policy, the latter of which states "If we have been unable to give you a full response within 10 working days of acknowledging your complaint, we will keep you updated about the progress of your complaint at regular intervals which we will	The policy and procedure require agreed intervals for keeping residents informed where a response will fall outside the normal timescale. Extension letters are used to explain the delay and revised timeframe.

			agree with you." Section 5.3.6 and 5.3.7 makes the same provision for Stage 2, with reference to the 20 working day deadline, as appropriate for Stage 2 cases under the HOS Code. Section 6.4 of our Procedure states "Where a response to a complaint will fall outside the timescales set out in this policy, the Complaint Handler must agree with the resident suitable intervals for keeping them informed about their complaint." Section 7.8 makes the same provision for Stage 2.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Section 12.1 of our Policy states "Hexagon will comply with the Equality Act 2010 and make reasonable adjustments to our Policy and process in line with the Act. Our Complaints Team will complete appropriate training to manage complaints in line with the Act." Section 12.2 states "Hexagon will keep a record of any disabilities a resident has disclosed and any reasonable	In addition to the relevant sections of our policy, the module in which we record complaints within our housing management system includes, as part of the complaint logging process, a requirement that the relevant officer confirm whether any reasonable adjustments are needed on each case.

			adjustments agreed. These will be kept under active review."	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Section 3.4 of our Policy states "If Hexagon refuses to consider or escalate your complaint, we will explain why in writing and inform you of your right to take the complaint to the Housing Ombudsman." Section 5.3.3 states "If we decline your request to escalate your complaint to Stage 2 under the exclusions set out in this Policy, we will provide you with a written explanation of our reasons and inform you of your right to take your complaint directly to the Ombudsman." Where the exclusions do not apply, we will always accept your request to escalate your complaint to Stage 2." Section 7.1 of our Procedure states "All escalation requests must progress to Stage 2 unless an exclusion ground now applies."	In addition to our policy and procedure, our template letters for excluding complaints also make this clear
5.12	A full record must be kept of the complaint, and the outcomes at	Yes	Section 6.14 of our Procedure states "The Complaint Handler	All documentation associated with the complaint, including the

	each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		must keep comprehensive records of all phone and in-person communications, log copies of all sent and received written communication, including all relevant communications sent and received to colleagues and third parties." Section 4.7 of our Procedure states regarding receipt of complaints "you must email the Complaints Team with the resident's details, the details of the complaint (including the time and date received), and their desired outcome."	original complaint and associated correspondence, Hexagon's response, and any supporting documents, are attached to the case in our housing management system.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Section 6 of our Policy sets out the range of remedies that can be offered, and section 5.2.5 confirms that complaints can be resolved at first point of contact: "Where you have made your complaint by phone or in person to another member of staff outside of the Complaints Team, and they are able to resolve the issue to your satisfaction at this first point of contact, they will do so with your agreement." Section 2.6 of our Policy states the Complaints team	Remedies can be offered at any stage, including apology, explanation, action to remedy service failure, reconsideration of decisions, financial remedy and service or policy changes. The policy also provides for resolution at first point of contact.

			will "Have the authority and autonomy to resolve disputes quickly and fairly at all stages of the process." Section 6.9 of our Procedure lists the range of remedies available and section 6.10 states "Any remedy offered must reflect the impact on the resident as a result of any fault identified.". Our Compensation Policy (section 4.2.1 – 4.2.8) lists the remedies Hexagon will consider, stating "Hexagon will consider remedies to put a situation right which may include:.. Acknowledging where things have gone wrong... Providing an explanation, assistance, or reasons... Apologising.. Taking action if there has been a delay... Reconsidering or changing a decision... Amending a record... Providing a financial remedy... Changing policies, procedures or practices". Our Compensation Procedure (section 5) provide more detail on how specifically compensation offers are handled by the complaints team, this section makes clear that the complaints team is empowered to provide remedies, including	
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			section 5.9 ("The Complaints team will decide upon the appropriate remedies for addressing complaints, based on policy and procedure".) and section 5.11, which specifies the relevant financial delegations.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Section 9 of our Policy states "Hexagon expects all complaints to be handled with mutual respect and reasonable behaviour. Hexagon considers all harassment, verbal abuse, aggression and violence to be unacceptable behaviour. This will not be tolerated and will be handled according to Hexagon's "Managing Unacceptable Behaviour from Complainants" Policy." Section 12 of our Procedure covers "Managing Unacceptable Behaviour from Complainants" in detail, including evidence requirements (section 12.1 "The behaviour must be clearly recorded, and evidenced wherever possible"), review requirements (section 12.6 "Any restrictions set must be subject to	The policy and procedure contain specific arrangements for managing unacceptable behaviour, including evidence requirements, proportionate restrictions, review periods and senior management oversight.

			a review period"), and the process for regular review (section 12.7). Our Policy on Managing Unacceptable Behaviour from Complainants covers this in detail, and is available on our website.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Section 12.1 of our Procedure states "In considering how to manage unacceptable behaviour, the Complaints Team must have due regard for the complainant's care and support needs, physical and mental health, disability, and other protected characteristics under the Equality Act 2010." Our "Managing Unacceptable Behaviour Policy" provides further detail on proportionality and Equality Act considerations, including sections 2.2 and 2.3 which state "This Policy will be implemented in accordance with Hexagon's responsibilities and duties under relevant legislation, including the Equalities Act 2010. Hexagon will show due regard for an individual's medical condition	The procedure requires due regard to care and support needs, disability, vulnerabilities and other protected characteristics when managing unacceptable behaviour. Restrictions must be subject to review and the resident is given routes to challenge the decision.

			and vulnerabilities such as mental health issues and learning disabilities when implementing this Policy...Hexagon will respond to requests for reasonable adjustments in line with our Vulnerable Residents and Reasonable Adjustments Policy and our Translation and Accessible Communication Policy”	
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most	Yes	Section 5.2.5 of our Policy states "Where you have made your complaint by phone or in person to another member of staff outside of the Complaints Team, and they are able to resolve the issue to your satisfaction at this first point of contact, they will do so with your agreement." Section 2.9 of our Procedure states "Try to resolve any	Resident-facing staff are encouraged to resolve complaints at first point of contact wherever possible, including in our complaints training for frontline staff. When a complaint is logged in our housing management system, it passes through a "Triage" stage, which includes

	stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.		complaints made to you at this first point of contact." Section 6 of our Procedure covers Stage 1 Investigation	an assessment of the risks and vulnerabilities associated with the complaint.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Section 5.2.1 of our Policy states "A complaints handler will log your complaint on our complaint handling system and contact you within 5 working days of receiving your complaint and provide a written acknowledgement that sets out our understanding of your complaint and the outcomes you are seeking." Section 4.6 of our Procedure states "The Complaint Handler will send an Acknowledgement Letter, using the approved template, to the resident within 5 days of Hexagon receiving the complaint."	Our performance against this target is monitored and reported. Our compliance with this target is aided by our CRM system which generates reminders and flags due dates. This is supplemented by our management information system, which uses a series of Power BI dashboards to monitor our performance in near-real time, and are reviewed daily by the complaints team.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Section 5.2.3 of our Policy states "You will normally receive a full response within 10 working days of your complaint being acknowledged." Section 6.3 of our Procedure states "Landlords must issue a full response to stage 1 complaints within 10	Our Complaints Policy and Procedure comply with the requirement. We do however recognise that performance during this period demonstrates that we have not consistently achieved the required response timescales in practice. This reflects capacity constraints and a historic backlog driven by significantly higher complaint volumes. A complaint improvement action plan is in place which includes the recruitment of permanent staff and strengthened case management.

			working days of the complaint being acknowledged."	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Section 5.2.3 of our Policy states "If the complaint is complex, we may need a further 10 working days to issue our response. We will not extend the timeframe any further than this without good reason." Section 5.2.4 states "Whenever we need more time to respond than the initial 10 working days from your complaint being acknowledged, we will always tell you, explain the reasons." Section 6.4 of our Procedure states "Where a full response cannot be provided within 10 working days of the complaint being raised, it is the responsibility of the Complaint Handler to contact the complainant as early as possible to inform them of the delay, and the fact that we are extending the deadline, using the	We also have template letters to ensure explanation is provided

			approved Extension Letter Template. Wherever possible, this extension should not exceed a further 10 working days."	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 5.2.4 of our Policy states "Whenever we need more time to respond than the initial 10 working days from your complaint being acknowledged, we will always tell you, explain the reasons and tell you how to contact the Ombudsman to challenge this extension."	This is also set out in our template letters to ensure compliance.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 5.2.8 of our Policy states "We will issue our formal Stage 1 response letter as soon as the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly." Section 6.11 of our Procedure states "Where remedies include actions that will take time to complete, we will not delay issuing our response. We will include the outstanding actions and timeframes on our Response Letter and ensure these actions are	All follow-up actions are logged in our housing management system, and assigned to a named officer who is responsible for completing those actions and communicating progress to the resident. Oversight it provided by the relevant officer's line manager.

			allocated to colleagues/contractors to complete." Section 6.12 states "Where the remedy includes some service or action (for example, arranging remedial works or rescheduling an appointment) the Complaint Handler will notify the relevant department(s) of what needs to be done by logging the action in our housing management system and assigning it to the appropriate officer. The assigned officer will be responsible for ensuring those actions are completed in good time, keeping the resident updated while they are pending, and accurately recording the actions once they are completed"	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Section 5.2.3 of our Policy states "When issuing a full response, we will ensure we address all points raised in your complaint, as set out in the agreed definition of your complaint. We will also provide clear reasons for any decisions, referencing relevant policies, law, or good practice, wherever appropriate."	This is also set out in our template response letters.

6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Section 5.2.5 of our Policy states "If you raise additional related complaints during the investigation, we will incorporate these into our Stage 1 response. If this would unreasonably delay our response, or if the new issues are unrelated to the issues already being investigated, we will log your additional complaints as new Stage 1 complaints." Section 4.7 of our Procedure states "Where residents raise additional complaints during the investigation, these should be incorporated into the Stage 1 response if they are related and the Stage 1 response has not been issued. Where incorporation would unreasonably delay the response, or if the new issues are unrelated to the issues already being investigated, the complaint should be logged as a new complaint."	The policy and procedure set out when related additional issues should be incorporated into the existing Stage 1 complaint and when they must be logged as a new complaint, ensuring this does not create unreasonable delay.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint	Yes	Our Stage 1 Response Letter Template is structured to include all of these elements in clear, plain language. Section 1.6 of our Procedure states "All written	Compliance with this is supported by our template letters.

	stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.		communication to complainants should be in plain language, avoiding jargon and acronyms."	
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 5.3.1 of our Policy states "If you are not happy with the response to all or part of your complaint at Stage 1, you can escalate all or part of your complaint to Stage 2." Section 7.1 of our Procedure states "All escalation requests must progress to Stage 2 unless an exclusion ground now applies." Our policy and procedure do not include any further stages after stage 2. Section 5.1 of	Our template response letters also inform residents that they can escalate to Stage 2 if they are not satisfied with our response at Stage 1.

			our policy states "The complaints policy has two stages""	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Section 5.3.2 of our Policy states "We will log your stage 2 complaint on our complaint handling system and contact you within 5 working days of your escalation to Stage 2 and provide a written acknowledgment that sets out our understanding of issues outstanding and the outcomes you are seeking from the Stage 2 review." Section 7.2 of our Procedure states "The assigned Complaint Handler will acknowledge the complaint within 5 working days of the escalation request being received using the approved Stage 2 Acknowledgment Letter Template."	Our performance against this target is monitored and reported.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Section 5.3.2 of our Policy states "It is helpful if you tell us why you are not satisfied with our Stage 1 response, and what outcomes you want from this Stage 2 review, but you do not need to." Section 7.3 of our Procedure states "Whilst it is helpful if the resident explains their reasons for escalating the complaint and tells us	Our policy includes that it is helpful if a resident explains their reasons for escalation and the outcomes they are seeking, however our procedure makes very clear that staff cannot require an explanation, and cannot refuse to escalate a complaint

			what outcomes they are seeking from a Stage 2 review, residents cannot be required to explain their reasons for requesting a Stage 2 escalation. We are expected to make reasonable efforts to understand why a resident remains unhappy. We cannot refuse to escalate a complaint to Stage 2 because we do not understand the reasons for escalation."	because they do not understand the resident's reasons for escalation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 5.3.1 of our Policy states "Your Stage 2 review will never be handled by the same person who handled your case at Stage 1."	The policy and procedure require Stage 2 to be handled by someone who did not investigate or issue the Stage 1 response. The Director/Head of Service approving Stage 2 must also not have been materially involved in the Stage 1 decision.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Section 5.3.6 of our Policy states "You will normally receive a full response to your Stage 2 complaint within 20 working days of your escalation request being acknowledged." Section 7.7 to 7.9 of our Procedure confirms the same timeframe	Our Complaints Policy and Procedure comply with the requirement. We do however recognise that performance during this period demonstrates that we have not consistently achieved the required response timescales. This reflects capacity constraints and a historic backlog driven by significantly higher complaint volumes. A complaint improvement action plan is in place which includes the recruitment of permanent staff and strengthened case management.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint	Yes	Section 5.3.6 of our Policy states "If the complaint is complex, we may need a further 20 working days to issue our response. We will not extend	This is also set out in our template letters to ensure explanation is provided to the resident.

	and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.		the timeframe any further than this without good reason." Section 5.3.6 states "Whenever we need more time to respond than the initial 20 working days from your complaint being acknowledged, we will always tell you, explain the reasons." Section 7.9 of our Procedure states "When a full response cannot be provided within 20 working days of the complaint being raised, it is the responsibility of the Complaint Handler to contact the complainant as early as possible to inform them of the delay, and the fact that we are extending the deadline, using the approved Extension Letter Template. Wherever possible, this extension should not exceed a further 20 working days."	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 5.3.7 of our Policy states "Whenever we need more time to respond than the initial 20 working days from your complaint being acknowledged, we will always tell you, explain the reasons and tell you how to contact the Ombudsman to challenge this extension." Our	This is also set out in our template letters to ensure the Ombudsman's information is always included.

			Extension Letter Template includes the Ombudsman's contact details.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 5.3.8 of our Policy states "We will issue our formal Stage 2 response letter as soon as the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly." Section 7.10 of our Procedure states the same requirement for Stage 2 responses.	The policy and procedure require the Stage 2 response to be issued once the answer is known, rather than waiting for outstanding actions to be completed. Actions are logged, allocated and monitored to completion with resident updates.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Section 5.3.5 of our Policy states "When issuing a full response, we will ensure we address all points raised in your complaint, as set out in the agreed definition of your complaint. We will also provide clear reasons for any decisions, referencing relevant policies, law, or good practice, wherever appropriate." Our Stage 2 Response Letter Template is structured to ensure all points are addressed with clear reasons,	This is also set out in our template response letter.

			referencing relevant policy, law and good practice.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Our Stage 2 Response Letter Template is structured to include all of these elements in clear, plain language, including signposting to the Housing Ombudsman Service. Section 1.6 of our Procedure states "All written communication to complainants should be in plain language, avoiding jargon and acronyms."	This is set out in our template response letter.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 5.3.1 of our Policy states "Stage 2 is not another investigation. It is an independent review by a member of the Complaints Team of how your complaint was handled at Stage 1. Your Stage 2 review will never be handled by the same person who handled your case at Stage 1. The Complaints Manager will oversee the Stage 2 process and may escalate complex or high-risk complaints to an appropriate member of the leadership team where necessary"	

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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing	Yes	Section 6 of our Policy states "Where your complaint is upheld, at any stage, we will take action to put things right" and lists all of these remedies: "Acknowledging where things have gone wrong; Providing an explanation, assistance, or reasons; Apologising; Taking action if there has been a delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices." Section 6.7 of our Procedure lists the same remedies and confirms they may be offered	The policy and procedure provide a broad range of remedies and require the organisation to acknowledge service failure and take action to put matters right. Remedies may include apologies, explanations, action on delays, financial remedies and service improvements.

	policies, procedures or practices.		"Where a complaint is upheld, or partially upheld."	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 6.2 of our Policy states "Any remedy offered will reflect the impact on you as a result of any faults identified." Section 6.8 of our Procedure states "Any remedy offered must reflect the impact on the resident as a result of any fault identified." Section 6.10 of our Procedure lists factors to consider including "length of time that a situation has been ongoing; frequency with which something has occurred; severity of any service failure or omission; number of different failures; cumulative impact on the resident; resident's particular circumstances or vulnerabilities."	The policy expressly requires remedies to reflect the impact of identified faults. The procedure sets out factors including duration, frequency, severity, number of failures, cumulative impact and resident circumstances or vulnerabilities.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Section 6.9 of our Procedure states "The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion." Section 6.11 states "Where remedies include actions that	This is also set out in our template letter

			will take time to complete, we will not delay issuing our response. We will include the outstanding actions and timeframes on our Response Letter and ensure these actions are allocated to colleagues/contractors to complete." Section 6.12 states "The assigned officer will be responsible for ensuring those actions are completed in good time, keeping the resident updated while they are pending, and accurately recording the actions once they are completed."	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 6.10 of our Procedure lists factors to consider in formulating a remedy which align with the Ombudsman's guidance: "length of time that a situation has been ongoing; frequency with which something has occurred; severity of any service failure or omission; number of different failures; cumulative impact on the resident; resident's particular circumstances or vulnerabilities." Our Compensation Policy and Procedure also reference	From our complaints procedure: Factors to consider in formulating a remedy can include, but are not limited to, the: length of time that a situation has been ongoing; frequency with which something has occurred; severity of any service failure or omission; number of different failures; cumulative impact on the resident; resident's particular

			the Ombudsman's remedies guidance.	circumstances or vulnerabilities.
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements; b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any	Yes	Section 11.3 of our Policy states "Hexagon will produce an annual complaints performance and service improvement report which will be reported to our governing body and published on our website." Section 8.5 of our Procedure lists all of these requirements: "Hexagon will produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: the annual self-assessment against the Code...; a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; any findings of non-compliance with the Code by the Ombudsman; the service	This is completed in time for submission to the Ombudsman by its annual deadline each year. It is also shared with our Customer Service Committee and Board for scrutiny.

	other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.		improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of Hexagon."	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Section 11.3 of our Policy states "Hexagon will produce an annual complaints performance and service improvement report which will be reported to our governing body and published on our website." Section 8.7 of our Procedure states "The annual complaints performance and service improvement report must be reported to the Board and published on the section of our website relating to complaints. The Board's response to the report must be published alongside this."	The policy and procedure require the annual complaints performance and service improvement report to be reported to the Board and published on the complaints section of the website, with the Board's response published alongside it.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 11.4 of our Policy states "Hexagon will complete an annual self-assessment against the Housing Ombudsman's Complaint Handling Code and submit this to the	The policy requires an additional self-assessment following a significant restructure and/or change in procedures. The procedure requires self-assessment annually and following changes to process.

			Ombudsman. Hexagon will also complete a self-assessment following any significant restructure and/or change in procedures." Section 11.1 of our Procedure states "A self-assessment against the HOS Complaints Handling Code must be completed annually, and additionally following any changes to process, and published on our website."	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 11.4 of our Procedure states "Additionally, the Self-Assessment will be reviewed and updated at any time if the Ombudsman requests we do so."	The procedure expressly requires the self-assessment to be reviewed and updated whenever the Housing Ombudsman requests this.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.	Yes	Section 12.8 of our Procedure states "If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. We must provide a timescale for returning to compliance with the Code."	The procedure sets out the required response to exceptional circumstances preventing Code compliance, including notifying the Ombudsman, informing affected residents, publishing the position and providing a timescale for returning to compliance.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 6.2 of our Policy states "We will also look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint." Section 8.1 of our Procedure states "At the completion of all complaints (at Stage 1 and Stage 2), the Complaint Handler will record the lessons learned from the complaint. The Complaints Team will regularly communicate these lessons to the relevant department to support departmental service improvement plans."	This is embedded as part of our process for every complaint.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and	Yes	Section 11.1 of our Policy states "Hexagon will use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery." Section 8.1 of our Procedure states	The policy and procedure establish complaints as a source of intelligence for identifying systemic issues and service improvements. Lessons are recorded at case closure and themes and trends are reviewed by senior management.

	introduce positive changes in service delivery.		"The Complaints Team will regularly communicate these lessons to the relevant department to support departmental service improvement plans." Section 8.4 states "Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks, or policies and procedures that require revision."	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Section 11.3 of our Policy states "Hexagon will ensure we are transparent and accountable in our learning from complaints. Hexagon will produce an annual complaints performance and service improvement report which will be reported to our governing body and published on our website. Hexagon will report on learning and improvements from complaints to our residents, staff, and relevant committees."	The policy requires learning and improvements to be reported to residents, staff and relevant committees. The annual complaints performance and service improvement report is reported to the Board and published with the Board's response.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or	Yes	Section 12.1 of our Procedure states "Hexagon's Data Quality and Performance Manager is the lead person as accountable for complaint	The Complaints Manager is identified in the procedure as the lead person accountable for complaint handling and for assessing themes and trends, systemic issues, serious risks and required policy or procedural changes.

	trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		handling. They will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision."	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Section 11.5 of our Policy states "Hexagon has a Member Responsible for Complaints (MRC) appointed on the Board who has lead responsibility for complaints to support a positive complaint handling culture." Section 12.5 of our Procedure states "Hexagon will appoint a member of the Board to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC')."	Hexagon's Board has nominated a member to act as the MRC
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information	Yes	Section 11.5 of our Policy states "The MRC is responsible for ensuring the Board receives regular information on complaints that provides insight on Hexagon's complaint handling performance. The MRC has access to suitable	Hexagon's MRC has full access to the complaints team, including all management information, may attend team meetings, and may discuss any aspect of complaint

	and staff to perform this role and report on their findings.		information and staff to perform this role and report on their findings." Section 12.6 of our Procedure states "The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings."	handling they wish with any member of the complaints team
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Section 12.7 of our Procedure states "As a minimum, the MRC and the Board must receive: regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and the annual complaints performance and	The Customer Services Committee of Hexagon's Board receives updates on complaints at every meeting. These updates cover points (a) to (c) here.

			service improvement report." The Monitoring, Auditing and Reporting section of our Procedure confirms "Performance reporting to Resident Groups and Board Committees."	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Section 1.8 of our Procedure states "Hexagon aims to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and act within the professional standards for engaging with complaints as set by any relevant professional body." Section 1.3 states "all staff should prioritise responding to and learning from complaints. All staff are expected to co-operate fully and helpfully with the Complaints Team.	The procedure establishes a standard objective for collaborative complaint resolution, collective responsibility for identified shortfalls and adherence to relevant professional standards. Staff are also required to co-operate with the Complaints Team.