

# AVES HOUSING

*Registered Provider of Social Housing*

RSH Registration No. 4664

Company No. 07422670

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## Internal Control Framework

Aligned to the RSH Regulatory Standards

Version 3.0

May 2026

*For Approval by the Board of Aves Housing on 20 May 2026*

*Next review date: May 2027*

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# Document Control

## Version History

Version	Date	Author	Approved By	Status
1.0	December 2015	LHT Board	LHT Board	Superseded
2.8	May 2016	LHT Board	LHT Board	Superseded
3.0	May 2026	Aves Housing Board	Board Meeting 16/05/2026	Current

## Document Owner and Review

**Document Owner:** Board of Aves Housing

**Operational Lead:** Director of Service

**Review Frequency:** Annually, or following any material change in operations, structure, or regulatory requirements

**Regulatory Alignment:** RSH Regulatory Standards (April 2024 Consumer Standards; Economic Standards as updated)

This document supersedes the Internal Financial Control Document (December 2015, v2.8) previously maintained under the name London Housing Trust. It has been expanded from a financial controls document into a comprehensive internal control framework covering all seven RSH regulatory standards, reflecting the RSH's expectation that registered providers maintain effective controls across governance, financial management, tenant safety, and service delivery.

## Introduction

Aves Housing is a registered provider of social housing (RSH No. 4664), providing temporary supported accommodation to adults referred by local authorities exercising their homelessness duties under Part 7 of the Housing Act 1996 and the Homelessness Reduction Act 2017. The organisation manages 82 properties comprising 365 bed spaces across eight London boroughs: Bromley, Croydon, Enfield, Greenwich, Lambeth, Lewisham, Merton/Mitcham, and Wandsworth.

This Internal Control Framework sets out the checks, procedures, and oversight mechanisms through which the Board of Aves Housing ensures compliance with all seven regulatory standards set by the Regulator of Social Housing. It is designed to provide a clear audit trail of board oversight, reduce the risk of loss through error, fraud, or non-compliance, and demonstrate to the RSH that Aves operates with the degree of skill, independence, and prudence required under the Governance and Financial Viability Standard.

## The Seven RSH Regulatory Standards

Type	Standard	ICF Section
Consumer	1. Safety and Quality	Section 4
Consumer	2. Transparency, Influence and Accountability	Section 5
Consumer	3. Neighbourhood and Community	Section 6
Consumer	4. Tenancy	Section 7
Economic	5. Governance and Financial Viability	Section 8
Economic	6. Value for Money	Section 9
Economic	7. Rent Standard	Section 10

## Principles of Internal Control

The internal controls in this framework are built on the following principles:

- Segregation of duties: no single individual has sole responsibility for any transaction from authorisation to completion and review.
- Dual authorisation: all payments, commitments, and material decisions require approval by at least two authorised individuals.
- Regular independent verification: trustees review reports, bank reconciliations, compliance data, and operational performance independently of the individuals who produce them.
- Proportionality: controls are appropriate to the size, complexity, and risk profile of Aves Housing and are reviewed annually to ensure they remain relevant and not unduly burdensome.
- Transparency: all controls, their outputs, and any failures or overrides are reported to the Board.

# Governance Structure and Responsibilities

## Board of Directors

The Board is collectively responsible for ensuring Aves Housing meets all regulatory standards. The Board meets at least quarterly, with additional meetings as required. Board meetings are structured against the RSH regulatory standards framework, ensuring every standard is considered at every meeting.

Board responsibilities include:

- Setting and overseeing the strategic direction of the organisation.
- Ensuring financial viability and maintaining access to sufficient liquidity at all times (minimum £100,000).
- Monitoring health and safety compliance across all properties.
- Reviewing complaints, tenant satisfaction, and service performance.
- Managing risk through the strategic risk register.
- Ensuring compliance with all legal and regulatory requirements, including Companies House filings, ICO registration, and RSH standards.
- Overseeing related-party transactions and ensuring no arrangements inappropriately advance third-party interests (GFV 2.6).

## Director of Service

The Director of Service is responsible for the day-to-day management of the organisation and reports to the Board. Key responsibilities include:

- Preparing and presenting board reports with accurate, complete, and timely information.
- Managing operational staff, ensuring supervision, DBS compliance, and training are up to date.
- Overseeing the relationship with GLETS London Ltd and other third-party contractors.
- Ensuring weekly cashflow reporting and forecasting is maintained.
- Escalating any material issues, risks, or potential regulatory breaches to the Board immediately.

## Declarations of Interest

All Board members and senior staff are required to declare any personal, financial, or professional interest that could create a conflict with their duties to Aves Housing.

Declarations are made:

- On appointment and updated annually.
- At the start of every Board meeting as a standing agenda item.
- Immediately upon any new interest arising.

Where a conflict exists, the individual must withdraw from discussion and decision-making on the relevant matter. Declarations and withdrawals are recorded in the Board minutes. The register of interests is maintained by the Director of Service and is available for inspection by the RSH.

## Authorisation Limits

Role	Authorisation Limit	Notes
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Role	Authorisation Limit	Notes
Board	£10,000+	All expenditure above £10,000 requires full Board approval
Chair / Director of Service (jointly)	Up to £10,000	Dual authorisation required for all payments
Director of Service (sole)	Up to £2,000	Routine operational expenditure only; reported to Board monthly
Operational Managers	Up to £500	Pre-approved budget lines only; receipts required

No individual may authorise their own expenditure, expenses, or remuneration. All payments over £500 require supporting documentation (invoice, purchase order, or contract).

# Safety and Quality Standard (Consumer Standard 1)

*Required outcomes: 1.2.1 (Decent Homes), 1.3.1 (Health and Safety), 1.4.1 (Repairs and Maintenance)*

## Health and Safety Compliance Controls

Aves Housing maintains a multi-tier health and safety compliance regime. GLETS London Ltd, as the contracted facilities management provider, is operationally responsible for delivering compliance across all 82 properties. Aves Housing retains accountability as the registered provider and holds GLETS to account through the controls below.

### Statutory Compliance Requirements

Obligation	Frequency	Responsibility	Board Reporting	Target
Gas Safety Certificates (CP12)	Annual	GLETS	Monthly dashboard	100% current
Electrical Installation Condition Reports (EICR)	5-yearly	GLETS	Quarterly	100% current
Fire Risk Assessments (HMO)	Annual	GLETS	Monthly dashboard	100% current
Legionella Risk Assessments	Annual	GLETS	Quarterly	100% current
Asbestos Management Surveys	On acquisition; reviewed annually	GLETS	Quarterly	100% current
Smoke and CO Alarms	Annual testing	GLETS	Monthly dashboard	100% operational
PAT Testing	Annual	GLETS	Quarterly	100% current
Fire Extinguisher Servicing	Annual	GLETS	Quarterly	100% current

### Three-Tier Inspection Regime

Tier 1 — Weekly site visits by Aves support and property management staff. Hazards, cleanliness, and communal area safety are checked and logged on the Aves Console.

Tier 2 — Monthly health and safety dashboard review by the Board, covering all statutory compliance certificates and any outstanding items. Any certificate within 28 days of expiry is escalated to the Director of Service.

Tier 3 — Annual independent external health and safety assessment covering all properties. Findings are reported to the Board and an action plan agreed.

### Escalation Procedure

Any statutory compliance certificate that has expired or is at risk of expiring triggers the following escalation:

1. GLETS is notified immediately and given a deadline of 7 working days to resolve (or 24 hours for gas safety).
2. If unresolved within the deadline, the Director of Service escalates to the Board Chair.

3. If unresolved within 14 days, the Board considers whether to commission an alternative contractor and/or make a self-referral to the RSH.

## Repairs and Maintenance Controls

All repairs are delivered by GLETS London Ltd under the Facilities Management Agreement. Aves monitors performance against the following KPIs:

Repair Category	Target Timescale	KPI Target
Right to Repair — 1-day prescribed	1 working day	100%
Right to Repair — 3-day prescribed	3 working days	95%
Right to Repair — 7-day prescribed	7 working days	95%
Urgent non-RTR repairs	10 working days	95%
Routine non-RTR repairs	28 calendar days	90%
Emergency out-of-hours	Attendance within 8 hours	100%

Controls:

- All repair requests are logged on the Aves Console with a unique reference, date reported, category, and target completion date.
- The maintenance KPI report is reviewed weekly by the Director of Service and presented to the Board at every meeting.
- Repeat repairs (same issue, same property within 90 days) are flagged for investigation.
- Where GLETS fails to meet any KPI for two consecutive months, Aves may issue a formal performance improvement notice.

## Decent Homes Standard Controls

GLETS is contractually responsible for carrying out all works necessary to ensure properties meet the Decent Homes Standard. Controls include:

- Annual stock condition surveys across all retained properties, assessing building component age, condition, and remaining useful life against the five criteria of the Decent Homes Standard 2035.
- Quarterly progress reports to the Board on any outstanding Decent Homes works.
- A maintained stock condition database accessible to Aves and, where required, to the RSH.
- All costs for Decent Homes compliance and improvement works are borne by GLETS under the FM Agreement. No capital contributions are required from Aves.

## Damp and Mould Controls

All reports of damp or mould are treated as urgent. Controls include:

- Inspection within 5 working days of any report.
- Root cause investigation (structural, condensation, or leak-related).
- Remediation works commissioned within the repair timescale appropriate to the root cause.
- Follow-up inspection within 28 days of completed works.

- Quarterly damp and mould case summary reported to the Board.

## Transparency, Influence and Accountability Standard (Consumer Standard 2)

*Required outcomes: 1.1.1 (Fairness), 1.2.1 (Diverse needs), 1.3.1 (Engagement), 1.4.1 (Information), 1.5.1 (Performance), 1.6.1 (Complaints)*

### Tenant Engagement Controls

Aves Housing maintains the following mechanisms for tenant voice and involvement:

- Tenant Panel: an established panel of residents that meets regularly to review service delivery, audit complaints, and feed back to the Board. The Tenant Panel Chair reports to the Board at each meeting.
- Wellbeing calls: proactive outreach to tenants, conducted by the Tenant Panel and support staff.
- Notice boards: maintained at every property displaying contact details, senior officer roles, performance information, and how to raise concerns.
- Referral agency satisfaction surveys: ongoing NPS tracking with target of 30% or above.

### Equality, Diversity and Fair Access Controls

Controls to ensure equitable access and outcomes:

- Tenant demographic data is collected and monitored, including age, gender, disability status, and protected characteristics.
- Fair access KPI: 15 referrals per week, monitored weekly.
- Barriers to access are reviewed quarterly and actions taken to address any identified gaps.
- The removal of hard ID checks at referral stage has been implemented to reduce barriers for vulnerable applicants, with documentation required within 7 working days of move-in.

### Tenant Satisfaction Measures (TSM) Controls

Aves Housing collects TSM data through tenant surveys covering the 12 tenant perception questions prescribed by the RSH. Controls include:

- Survey coverage target: 80% of tenants surveyed within any rolling 12-month period.
- TSM results are reported to the Board at every meeting with trend data and benchmarking.
- Where any TSM score falls below 80%, an action plan is developed and monitored.
- Google review monitoring: ratings tracked quarterly with a target range of 4.2–4.5 (based on Spiegel Research Center trust benchmarks).

### Complaints Handling Controls

Aves Housing operates a complaints process in line with the Housing Ombudsman's Complaint Handling Code. Controls include:

- All complaints are logged on the Aves Console with date received, client name, property, category, and target resolution date.
- KPI: zero complaints unresolved beyond 28 days.
- The Tenant Panel audits a sample of closed complaints each quarter.

- The Board receives a complaints report at every meeting showing open complaints, resolved complaints, trends, themes, and any Housing Ombudsman referrals.
- Learning from complaints is documented and service changes implemented are recorded in Board minutes.
- Root cause analysis is conducted for any complaint that exceeds the 28-day resolution target.

## **Information and Communication Controls**

Senior officer roles, contact methods, and performance information are published on property notice boards, refreshed at least quarterly. The Board reviews communication adequacy annually.

## Neighbourhood and Community Standard (Consumer Standard 3)

*Required outcomes: 1.1.1 (Shared spaces), 1.2.1 (Local cooperation), 1.3.1 (ASB), 1.4.1 (Domestic abuse)*

### Anti-Social Behaviour Controls

All reports of anti-social behaviour are logged on the Aves Console as safeguarding/incident reports. Controls include:

- All ASB reports are acknowledged within 2 working days.
- An investigation is commenced within 5 working days.
- Victim support is offered and recorded at the point of report.
- Partnership referrals (police, local authority, specialist agencies) are made where appropriate and recorded.
- Hate incidents are recorded separately and reported to the Board as a distinct category.
- ASB cases are reported to the Board at every meeting within the safeguarding and incidents section.

### Safeguarding and Domestic Abuse Controls

Aves Housing operates a safeguarding framework covering all tenants, many of whom are vulnerable adults. Controls include:

- All incidents are logged on the Aves Console and resolution is tracked against KPI.
- All staff receive safeguarding training on induction and refresher training annually.
- Domestic abuse cases are referred to specialist agencies. Staff are trained to recognise indicators of abuse.
- The Board receives a safeguarding and incident report at every meeting showing new incidents, resolution status, and any outstanding cases.
- Any safeguarding concern that cannot be resolved within 14 days is escalated to the Director of Service.

### Partnership and Local Cooperation Controls

Aves Housing maintains active partnerships with local authorities, the police, and voluntary sector organisations across all eight boroughs. Partnership activity is reported to the Board at every meeting. The organisation contributes to local authority homelessness strategies through its nomination agreements and referral pathways.

## Tenancy Standard (Consumer Standard 4)

*Required outcomes: 1.1.1 (Allocations), 1.2.1 (Tenancy sustainment), 1.3.1 (Tenure), 1.4.1 (Mutual exchange)*

### Allocations and Lettings Controls

All lettings are made through the formal nomination agreement process with local authorities. Controls include:

- Aves only accepts referrals from local housing authorities exercising their homelessness duties under Part 7 of the Housing Act 1996. Self-referrals are not accepted.
- Every referral is logged with the nominating authority, statutory duty owed, client details, and property allocated.
- The room summary, including total stock, occupied rooms, and borough breakdown, is reported to the Board at every meeting.
- Nomination agreement activity by borough is tracked and reported.

### Void Management Controls

Void management is critical to financial viability and service delivery. Controls include:

- Void rate KPI: target below 5% of total stock.
- Current vacancies are listed by property and room at every Board meeting.
- Void turnaround target: 14 days from vacancy to re-let readiness.
- Where the void rate exceeds 5%, the Board reviews void reasons and considers remedial action.
- Void works are commissioned through GLETS and tracked on the Aves Console.

### Tenancy Sustainment Controls

Aves Housing is committed to supporting tenants to maintain their tenancies. Controls include:

- Weekly visits by support staff, with visit outcomes logged on the Aves Console.
- Risk Needs Assessments conducted on move-in and reviewed every six months.
- SOS (threat of eviction) appeals are logged and tracked. KPI: all SOS appeals commenced within 5 working days.
- The Tenant Panel is involved in SOS appeal reviews.
- Departing tenants are offered advice on move-on, signposting to local support services, and assistance with housing register applications.

### Tenure Controls

Aves Housing issues licence agreements for shared exempt accommodation, as the accommodation falls outside the assured tenancy regime. Controls include:

- All licence agreements are reviewed to ensure they clearly set out residents' rights, obligations, and terms of occupancy.
- Tenure length is monitored: the Board receives a tenure breakdown at every meeting (0–3 months, 3–6 months, 6–12 months, 12–24 months, 24–36 months, 36+ months).
- Any changes in legislation or case law affecting tenure are monitored and reported to the Board.

# Governance and Financial Viability Standard (Economic Standard 1)

*Required outcomes: 1.1 (Governance), 1.2 (Financial viability). Specific expectations: 2.1–2.8.*

## Financial Controls — Income

Aves Housing receives income primarily through UC-HC payments via the DWP Social Rented Sector portal, with a small number of Housing Benefit payments from local authorities for specialised supported housing.

Controls:

- All UC-HC payments are received directly into the Aves Wise business account.
- Income is reconciled against the tenant register weekly. Any tenant not in active payment is identified and followed up within 5 working days.
- The Director of Service maintains a register of all tenants on the UC portal, with status (active, pending, ceased).
- Income receipts are verified against bank statements weekly.
- Any significant variance between expected and actual income is reported to the Board immediately.

## Financial Controls — Bank Accounts

Following the closure of the Barclays business account in March 2026, Aves Housing now operates primarily through its Wise business account, with the Tide account (held by subsidiary Aves Housing UCHC Ltd) retained as a dormant contingency.

Account	Bank	Purpose	Signatories	Status
Aves Housing	Wise	Primary operational account	Director of Service + 1 Board member	Active
Aves Housing UCHC Ltd	Tide	Dormant contingency	Director of Service + Board Chair	Dormant

Controls:

- Dual authorisation is required for all payments.
- Daily end-of-day bank balances are recorded and tracked.
- Bank reconciliation is performed weekly by the Finance Manager and reviewed monthly by the Director of Service.
- Opening and closing balances are reported to the Board at every meeting with supporting bank statements.
- The Board receives a daily cashflow chart showing the consolidated position across all accounts.
- Any instruction to open or close an account must be authorised by the Board.
- Liquidity KPI: minimum £100,000 cash balance maintained at all times. Breach of this threshold triggers an emergency Board meeting within 48 hours.

## Financial Controls — Payments and Expenditure

### BACS and Bank Transfers

All payments are made by BACS or bank transfer. Aves Housing does not permit payments by cash, cheque, debit card, or credit card.

- All BACS payments require dual authorisation.
- Only specifically authorised individuals may set up or amend standing orders or direct debits. A list of authorised individuals is maintained and reviewed quarterly.
- All payment arrangements are monitored and cancelled when goods or services are no longer being supplied.
- Payments are recorded in the accounting system with date, payee, amount, description, and supporting documentation reference.

### **Purchase Controls**

- All purchases must be within an agreed budget or spending plan.
- Invoices are checked against orders, confirming price and receipt of goods/services before payment.
- The authorisation limits set out in Section 3 apply to all purchases.
- No individual may approve their own purchase or expense claim.

## **Financial Controls — Wages and Salaries**

Aves Housing employs 28 staff. All staff are paid by BACS on the 28th of each month. The Director of Service is paid on the 10th of each month.

Controls:

- HMRC records of PAYE and NI deductions are maintained and submitted through Real Time Information (RTI).
- Statutory deductions are paid to HMRC by the required deadline each month.
- Each employee has a signed contract of employment and a signed job description.
- DBS checks are required for all staff. DBS status is tracked on a central register and reported to the Board at every meeting. Any staff member without a current DBS check must not work unsupervised with tenants.
- Personnel records are held separately from pay records.
- No individual may set their own remuneration or terms of employment. Director remuneration is set by the Board.
- Monthly payroll is reviewed by the Director of Service and reported to the Board with a line-by-line staff cost breakdown.
- Starters, leavers, and changes to pay or hours are authorised by the Director of Service and recorded promptly.

## **Financial Controls — Expenses**

A formal expenses policy applies to all Board members, staff, and volunteers without exception. Controls:

- Expense claims must include a self-declaration that the claim is accurate and incurred on Aves Housing business.
- Claims are authorised by someone other than the claimant.
- Reimbursements are made by BACS only.
- Mileage is reimbursed at HMRC-approved rates only.

## **Financial Controls — Loans**

Aves Housing currently has one outstanding loan facility with Cameron Property Developments Ltd, which the Board has resolved to repay in full as of 18 May 2026. Controls for any loan facility:

- All loans must be approved by the Board, documented in writing, and include clearly stated terms for principal, interest, fees, and repayment.
- A record of all outstanding loans, repayment history, and outstanding balances is maintained and reported to the Board.
- Where a loan involves a related party, the conflict of interest is declared, managed, and recorded. The terms must be demonstrably in Aves' interests.
- Aves must have a documented plan to meet repayment obligations as they fall due, without breaching the £100,000 liquidity threshold.

## Financial Reporting and Forecasting Controls

The Board receives the following financial information at every meeting:

- Cashflow report: actual daily balances for the prior period with bank statement support, plus a three-month forward cashflow forecast based on line-by-line projected income and expenditure.
- Income statement: turnover, direct costs, gross profit, administration costs, and net surplus/deficit.
- Balance sheet summary: assets, liabilities, and net position.
- Staff cost report: line-by-line breakdown of net pay for each employee.
- Liability schedule: all outstanding debts and commitments, including amounts owed to GLETS and any other third parties.

In addition, the Director of Service provides weekly cashflow reporting to the Board Chair during any period of heightened financial risk.

## Related-Party Transaction Controls

Aves Housing has commercial relationships with the following related parties:

- GLETS London Ltd: facilities management services across all 82 properties under a formal FM Agreement.
- Cameron Property Developments Ltd: short-term loan facility (now being repaid in full).
- Aves Housing UHC Ltd: wholly-owned subsidiary, retained as dormant contingency.

Controls under GFV Standard 2.6:

- All related-party transactions are disclosed to the Board and recorded in the register of interests.
- The FM Agreement with GLETS has been benchmarked against market rates (Rightmove comparables, May 2026) and the FM charge of £800/month per property has been benchmarked against comparable housing association service charges.
- The Board reviews all related-party arrangements at least annually to confirm they remain at arm's length, represent value for money, and do not inappropriately advance third-party interests.
- Any Board member or officer with a personal interest in both Aves and a related party must recuse themselves from relevant decisions.
- The terms of all related-party agreements are available for inspection by the RSH.

## Risk Management Controls

The Board maintains a strategic risk register which is reviewed at every Board meeting (GFV Standard 2.4, 2.5). Controls include:

- Each risk is assessed for likelihood and impact, with documented mitigations.
- New, escalated, and de-escalated risks are identified at every meeting.
- Stress testing is performed at 5%, 10%, and 15% income reduction scenarios.
- The risk framework is approved by the Board and its effectiveness reviewed at least annually (GFV 2.4.2).
- The GLETS FM Agreement includes a risk-sharing mechanism: in the event of reduced income, the parties will meet within 14 days to agree appropriate adjustments to the FM charge.

## Regulatory Compliance Controls

- Companies House filings: accounts, confirmation statements, and officer changes filed within statutory deadlines. Compliance checked quarterly.
- ICO registration: maintained and reviewed annually. Current registration expires 4 March 2027.
- RSH engagement: any outstanding RSH actions are tracked and reported to the Board at every meeting. Material issues for self-referral are identified and escalated immediately.
- Annual compliance self-assessment: the Board conducts a self-assessment against all seven RSH standards at least annually.

## Value for Money Standard (Economic Standard 2)

*Required outcome: 1.1 — Strategic objectives, VFM approach, optimal benefit from resources.*

### VFM Controls

Aves Housing demonstrates value for money through the following controls:

- Lease cost benchmarking: all property lease costs are benchmarked against Rightmove market comparables at least annually. The portfolio average is approximately 25% below market rates.
- FM charge benchmarking: the GLETS £800/month FM charge is analysed against a per-client cost breakdown (£37.20/week per client) and compared against comparable housing association service charges.
- Staff cost analysis: total staff costs are benchmarked against the previous GLETS staffing model, demonstrating a 22.5% cost reduction (£226,167 per annum).
- Void rate monitoring: the cost of voids is quantified and reported to the Board. Void reduction is a standing VFM priority.
- The Board reviews VFM metrics and benchmarking at every meeting as a standing agenda item.

### Asset Optimisation Controls

Stock changes (additions, surrenders, consolidation) are reviewed and approved by the Board. Controls include:

- Any property surrender must be supported by a VFM assessment demonstrating that the property is uneconomical to retain under the current income regime.
- Stock level, room growth history, and bed space utilisation are reported to the Board at every meeting.
- Prospective projects in the pipeline are reported with expected room additions and timeline.

## Rent Standard (Economic Standard 3)

*Required outcome: 1.1 — Compliance with Rent Standard and Rent Policy Statement, or documented exemption basis.*

### Rent Standard Exemption Controls

Aves Housing has assessed its position against the Rent Standard 2026 and considers that its accommodation falls within the exemptions at paragraph 2.2. Two exemptions are claimed:

#### **Exemption 1: Temporary Social Housing (Paragraph 5.11)**

The majority of Aves' accommodation qualifies as temporary social housing. Aves maintains the following controls to ensure the exemption conditions continue to be met:

- Every tenant housed under this exemption has a documented nomination from a local authority exercising a homelessness duty under Part 7 of the Housing Act 1996.
- The nomination agreement template confirms the statutory basis and temporary nature of the accommodation.
- A register of all nominations is maintained showing the nominating authority, the statutory duty owed, and the property allocated.
- All properties are held on leases with terms of more than two years and fewer than 30 years, as required by paragraph 5.11(a)(iii). A schedule of lease terms is maintained.
- Nomination activity by borough is reported to the Board at every meeting.

#### **Exemption 2: Specialised Supported Housing (Paragraph 5.6)**

Aves provides accommodation at 12 Melfort Road, Thornton Heath CR7 7RL under an arrangement with Croydon Council that is intended to meet the specialised supported housing criteria. Aves is seeking clarification from the RSH as to whether this specific arrangement qualifies.

### Rent-Setting Controls

Notwithstanding the claimed exemptions, Aves maintains the following rent controls:

- Core rent is set at £150 per month, which is below the applicable Local Housing Allowance rate for a shared room in all relevant Broad Rental Market Areas.
- Total rent including service charges is £1,000 per calendar month (£232 per week).
- A rent schedule is maintained for all properties and is available for inspection.
- Any changes to rent levels must be approved by the Board.
- Rent collection rate is monitored and reported to the Board at every meeting.

# Staff Safeguarding and Compliance Controls

## DBS Checks

All staff working with tenants are required to hold a current DBS check. Controls:

- DBS status for every staff member is tracked on a central register showing name, role, DBS status, contract status, and signed job description.
- The DBS register is reported to the Board at every meeting.
- Any staff member without a current DBS check must not work unsupervised with tenants. Non-compliance is escalated to the Director of Service immediately.
- DBS checks are initiated within 5 working days of a new starter's appointment.
- The Board reviews DBS compliance as a standing item and requires a remediation plan for any non-compliance.

## Staff Supervision

All staff receive regular supervision. Controls:

- Supervision frequency: at least monthly for all staff.
- Supervision records are maintained for each staff member showing date, topics discussed, actions agreed, and next supervision date.
- The Director of Service maintains a supervision tracker showing days since last supervision for every staff member, reported to the Board at every meeting.
- Any staff member overdue for supervision by more than 14 days is escalated to the relevant manager. Overdue supervision beyond 28 days is reported to the Board as non-compliant.

## Data Protection Controls

Aves Housing is registered with the ICO as a data controller (Reference ZA096367, expires 4 March 2027). Controls:

- All staff receive GDPR training on induction.
- Tenant personal data is processed in accordance with UK GDPR and the Data Protection Act 2018.
- The Aves Console system has appropriate access controls, and data is stored securely.
- Data subject access requests are responded to within statutory timescales.
- Data breaches are reported to the ICO where required and to the Board.

## Internal Control Checklist

The following checklist is completed by the Board at least annually to verify that all controls in this framework are operating effectively. The checklist is structured against the RSH regulatory standards.

### Consumer Standards Controls

Control	Standard	In Place?	Evidence	Action Required
Gas safety certificates 100% current	Safety & Quality			
EICR certificates 100% current	Safety & Quality			
Fire risk assessments 100% current	Safety & Quality			
Weekly site visits conducted and logged	Safety & Quality			
Annual independent H&S assessment completed	Safety & Quality			
Repairs KPIs monitored and reported to Board	Safety & Quality			
Decent Homes compliance tracked	Safety & Quality			
Damp and mould cases logged and resolved	Safety & Quality			
Tenant Panel active and reporting to Board	Transparency			
TSM surveys conducted and reported	Transparency			
Complaints logged, tracked, and resolved within 28 days	Transparency			
Notice boards current at all properties	Transparency			
ASB cases logged and investigated	Neighbourhood			
Safeguarding incidents logged and resolved	Neighbourhood			
Staff safeguarding training current	Neighbourhood			
Nominations logged with statutory duty recorded	Tenancy			
Void rate below 5%	Tenancy			
SOS appeals commenced within 5 working days	Tenancy			
Licence agreements reviewed for legal compliance	Tenancy			

## Economic Standards Controls

Control	Standard	In Place?	Evidence	Action Required
Dual authorisation on all payments	GFV			
Weekly bank reconciliation completed	GFV			
Liquidity above £100,000 at all times	GFV			
Cashflow report and 3-month forecast to Board	GFV			
Staff costs reported line-by-line	GFV			
DBS register current and reported to Board	GFV			
Supervision tracker current and reported to Board	GFV			
Risk register reviewed at every Board meeting	GFV			
Stress testing at 5%, 10%, 15% performed	GFV			
Related-party transactions disclosed and reviewed	GFV			
Companies House filings up to date	GFV			
ICO registration current	GFV			
Lease costs benchmarked against market	VFM			
FM charge benchmarked	VFM			
Void cost quantified and reported	VFM			
Nominations documented with statutory basis	Rent			
Lease terms comply with paragraph 5.11(a)(iii)	Rent			
Core rent below LHA shared room rate	Rent			

## Annual Sign-Off

The Board of Aves Housing has reviewed this Internal Control Framework and confirms that the controls set out herein are appropriate, relevant, and proportionate to the size, complexity, and risk profile of the organisation.

Signed (Chair):	_____
Name:	Nazmun Nahar
Date:	
Signed (Director of Service):	_____
Name:	John Aligbe
Date:	