AVES HOUSING

Strategic Business Plan 2026–2030

Registered Provider of Social Housing

Demonstrating compliance with the Regulatory Standards of the

Regulator of Social Housing

Economic Standards: Governance and Financial Viability | Value for Money | Rent Standard

Consumer Standards: Safety and Quality | Transparency, Influence and Accountability | Neighbourhood and Community | Tenancy

Approved by the Board of Aves Housing — June 2026

Version 3.0 — Updated to reflect regulatory engagement and First-tier Tribunal findings

Contents

1. About Aves Housing

Aves Housing is a registered provider of social housing, providing temporary accommodation to homeless and vulnerable people across south and south-east London. The organisation was originally established as London Housing Trust in October 2010 and subsequently rebranded to Aves Housing.

Aves Housing operates as a not-for-profit company limited by guarantee, registered with the Regulator of Social Housing. The organisation's primary function is to act as a social landlord, providing temporary social housing to individuals nominated by local housing authorities under Part 7 of the Housing Act 1996 and the Homelessness Reduction Act 2017.

1.1 Current Position (as at May 2026)

Metric	Detail
Legal status	Company Limited by Guarantee (not-for-profit)
RSH registration	Registered Provider of Social Housing
Total properties	82 properties across 8 London boroughs
Total bed spaces	365 rooms
Current tenants	336 tenants (301 on UC portal)
Current voids	29 rooms (7.9% void rate)
Primary income	Universal Credit Housing Costs (UC-HC) via SRS Portal
Staff headcount	25 employees (increased from 16 in July 2026)
Primary FM partner	GLETS London Ltd
UC-HC rate	£1,011 per client per month
Current bank accounts	Barclays (£344,858), Tide (£16,913), Wise (£110,455)
Total cash at bank	£572,226
Outstanding debt (GLETS)	£372,226 (agreed cap, no demand for 6 months)
Net asset position	Approximately £200,000 positive

1.2 Operating Boroughs and Nomination Agreements

Aves Housing holds nomination (referral) agreements with the following local housing authorities, each of which nominates homeless persons to Aves under their statutory duties:

Brentwood Borough Council
Bromley Council
Camden Council
Crawley Borough Council
Croydon Council Housing Needs Department
Enfield Council
Greenwich Council
Hackney Council
Lambeth Council Housing Department
Royal Borough of Greenwich – MOST Team
Wandsworth Council
Waltham Forest Housing Options
Westminster City Council Housing Options

In addition, Aves provides Specified Exempt Accommodation (SEA) at 12 Melfort Road, Thornton Heath CR7 7RL under a separate arrangement with Croydon Council, for which Housing Benefit continues to be paid.

1.3 Recent Organisational Changes

Since January 2026, Aves Housing has undergone significant operational transition. By January 2026, all London borough councils in which Aves operates had ceased Housing Benefit payments following a First-tier Tribunal decision in December 2025. Aves and its tenants subsequently applied for Universal Credit Housing Costs, and Aves has been accepted as a Social Rented Sector (SRS) Landlord with access to the SRS Portal. As of May 2026, 301 of 336 tenants are registered on the portal with the remainder expected within the month.

In March 2026, Aves' Barclays bank account was closed under the bank's regulatory compliance framework. Aves has since opened accounts with Tide and Wise, with Wise now serving as the primary operational account. A NatWest application is ongoing. During the disruption, a subsidiary company (Aves Housing UCHC Ltd) was incorporated on 24 March 2026 as a temporary measure, with ownership transferred to Aves Housing on 1 April 2026 via J30 Stock Transfer Form. UC-HC payments have now been redirected to the Wise account.

Staff headcount increased from 6 to 28 following the reallocation of operational staff from GLETS London Ltd to Aves Housing on 22 March 2026. This change has been fully incorporated into financial forecasting and was discussed at the board meeting of 16 May 2026.

2. Mission, Vision and Values

2.1 Mission

To house and support vulnerable and excluded people who either have been, or are at risk of, sleeping rough and homelessness, by providing safe, well-maintained temporary social housing in partnership with local housing authorities.

2.2 Vision

That everyone should have a safe place to live, something meaningful to do, and good relationships with other people, as well as good health to enjoy them.

2.3 Values

As a registered provider of social housing, Aves Housing commits to the following values, which underpin every aspect of our role as a social landlord:

Tenant safety first: The health and safety of our tenants in their homes and communal areas is our primary responsibility.

Transparency and accountability: We will be open with tenants, the Regulator and stakeholders about our performance, finances and decision-making.

Fairness and respect: We will treat all tenants with dignity, respond to their diverse needs, and ensure equitable access to services.

Good governance: We will maintain effective oversight, robust business planning and prudent financial management.

Value for money: We will ensure optimal use of resources while maintaining quality homes and services.

Partnership working: We will work constructively with local authorities, the police, and other agencies to promote safe and sustainable communities.

Continuous improvement: We will learn from complaints, performance data and tenant feedback to improve our services.

3. Governance and Leadership

This section sets out how Aves Housing meets the required outcomes of the Governance and Financial Viability Standard (GFV Standard 1.1), which requires registered providers to ensure effective governance arrangements that deliver aims, objectives and intended outcomes for tenants in an effective, transparent and accountable manner.

3.1 Board Composition and Structure

The Board of Aves Housing is responsible for the strategic direction, oversight and regulatory compliance of the organisation. The current board comprises:

[Board member names, roles, skills and appointment dates to be inserted]

The Board has adopted the National Housing Federation's Code of Governance. Areas of non-compliance are reported to the Regulator. The Board assesses the effectiveness of its governance arrangements at least annually (GFV Standard 2.1).

3.2 Board Meeting Schedule and Reporting

The Board meets at least quarterly. The following standing items are presented at every board meeting, following the format established in the March 2025 and July 2025 meetings:

Financial report including cashflow analysis (actual and 3-month forecast, line-by-line basis)
Health and safety compliance dashboard (gas, electrical, fire, water, asbestos, legionella)
Repairs performance report (Right to Repair Act compliance and outstanding repairs)
Complaints report (open, resolved, trends, Housing Ombudsman referrals)
Tenant satisfaction data and feedback
Risk register review
Regulatory compliance update
Safeguarding and domestic abuse report
Anti-social behaviour (ASB) cases and actions
Void management and lettings report

3.3 Board Meetings Held

Date	Documentation Quality	Notes
14 March 2025	Full documentation	Extended format with all standing items
23 July 2025	Full documentation	Extended format with all standing items
17 October 2025	Full documentation	Minutes finalised
04 February 2026	Full documentation	Minutes finalised
	Full documentation	Minutes finalised
March 2026	Full documentation	Minutes finalised
16 May 2026	Full documentation	Included full cashflow analysis, H&S, complaints, regulatory update

The Board acknowledges that during late 2025 and early 2026, the quality and completeness of board documentation fell below the standard required. This has been rectified. All future meetings will follow the extended reporting format. Complete minutes of all meetings will be provided to the Regulator.

3.4 Conflicts of Interest

The Board maintains a register of interests. The relationship between Aves Housing and GLETS London Ltd, including the historical involvement of Stephen Dellar, is fully disclosed. The Board is committed to ensuring that no arrangements inappropriately advance the interests of third parties (GFV Standard 2.6).

The management fees previously attributed to GLETS have been confirmed as an accounting error — a percentage of rent was incorrectly categorised as management fees. No management fees were paid to GLETS. This has been fully explained with supporting email correspondence from the accountant. The February 2026 business plan reference to £115,000 annual management charges was also an error and has been corrected.

3.5 Companies House Compliance

Stanford Biti, who was appointed to the Board in February 2026, will no longer serve as a board member due to personal commitments. Aves will ensure all Companies House filings are kept current.

3.6 Not-for-Profit Status

The Board has reviewed the Memorandum and Articles of Association and has concluded that no breaches have occurred. Aves Housing continues to operate as a not-for-profit in accordance with its governing documents. Specialist legal advice has been sought from Devonshires regarding the wider implications of the First-tier Tribunal findings, and updated advice is being commissioned.

3.7 Subsidiary: Aves Housing UCHC Ltd

Aves Housing UCHC Ltd was incorporated on 24 March 2026 as a temporary measure following the closure of Aves' Barclays bank account. On 1 April 2026, full ownership was transferred to Aves Housing via J30 Stock Transfer Form. The written agreement confirming all funds received and paid by Aves Housing UCHC Ltd are on behalf of Aves Housing was executed on 1 April 2026. The Companies House update was completed on 6 May 2026 following receipt of the authentication code.

Aves Housing UCHC Ltd will be retained as a dormant subsidiary to strengthen financial risk planning against future banking disruptions. At no time was Aves Housing UCHC a third-party organisation, and at no time were any funds outside Aves' control.

4. Strategic Context and Environmental Analysis

4.1 External Environment

Aves Housing operates in a rapidly changing environment shaped by several major factors:

Welfare reform: The transition from Housing Benefit to Universal Credit Housing Costs has fundamentally changed Aves' income model. By January 2026, all borough councils had ceased HB payments. Aves has successfully transitioned to UC-HC via the SRS Portal.

Regulatory reform: The Social Housing (Regulation) Act 2023 introduced four new consumer standards from April 2024, placing consumer regulation on the same footing as economic regulation. Aves must demonstrate compliance across all seven standards.

First-tier Tribunal findings: The December 2025 Tribunal decision found that Aves had not demonstrated the provision of care, support or supervision to the standard required for exempt accommodation. Aves has accepted this finding and transitioned its operating model to Social Rented Sector provision.

Housing demand: Homelessness presentations continue to rise across London boroughs, with significant demand for temporary accommodation from local authorities.

4.2 SWOT Analysis

Strengths	Weaknesses
Registered provider status with RSH	Historical governance and reporting gaps
Accepted as SRS landlord on UC portal	Dependence on single FM partner (GLETS)
82 properties, 365 bed spaces across 8 boroughs	Board documentation inconsistencies in 2025–26
Nomination agreements with 13 local authorities	First-tier Tribunal adverse findings
Cash position £572k, net positive £200k	Banking disruption requiring temporary subsidiary
All Right to Repair obligations met (zero outstanding)	Staff headcount increase not initially reflected in business planning
Lease costs 25% below market rates	Incomplete stock condition survey evidence

Opportunities	Threats
Growing demand for temporary accommodation	Regulatory downgrade risk (gradings under review)
Nomination agreements with additional boroughs	Further banking disruption
Stabilised income via UC-HC SRS portal	Changes to LHA rates or UC policy
Improved governance demonstrating regulatory compliance	GLETS financial difficulties affecting service delivery
New Decent Homes Standard 2035 alignment	Overpayment liabilities from HB transition

5. Financial Viability and Business Planning

This section addresses GFV Standard 1.2: registered providers shall manage their resources effectively to ensure their viability is maintained while ensuring that social housing assets are not put at undue risk.

5.1 Current Financial Position (as at 16 May 2026)

Item	Amount
Total bank balances	£572,226
Barclays (funds being released)	£344,858
Tide (subsidiary account)	£16,913
Wise (primary operational)	£110,455
Outstanding debt to GLETS	(£372,226)
Net position	Approximately £200,000 positive

Aves Housing remains solvent with a positive net worth. The GLETS debt has been capped at £372,226 by agreement, with any previous amounts written off. GLETS has agreed not to make demands on this debt for six months or until Aves confirms it can pay without affecting cashflow or financial position.

5.2 Monthly Financial Projections

Line Item	Monthly Amount
Income (UC-HC at 87.67% of 365 rooms)	£320,000
Less: Lease costs to landlords	(£183,147)
Less: Staff salaries	(£65,000)
Less: GLETS FM and repairs charge	(£65,600)
Total costs	(£313,747)
Monthly surplus	£6,253
Projected annual surplus	£75,041

Income projections are based on 87.67% revenue collection against 365 rooms with a zero void rate assumption (conservative — actual performance is expected to reach 95%). This provides a built-in stress margin of over 7%.

5.3 Liquidity KPI

Aves Housing maintains a minimum liquidity target of £100,000 in accessible cash at all times (GFV Standard 2.4.1(a)). This KPI has been consistently met.

5.4 Financial Reporting to Board

The Board meeting of 16 May 2026 included full cashflow analysis covering the previous three months of actual transactions and three months of forward projections. All projections are now prepared on a line-by-line basis showing individual payments and specific income items, replacing the previous practice of round-sum estimates.

Weekly cashflow reporting to the Regulator includes actual cashflows from the prior week and three-month forecasts, supported by bank statements showing opening and closing balances.

5.5 GLETS Relationship and Third-Party Arrangements

GLETS London Ltd is Aves Housing's primary facilities management partner, responsible for repairs, maintenance, communal cleaning, pest control, fire equipment, health and safety compliance, renewals and furnishings, tenancy data management, and administration.

The FM charge is £800 per property per month, equating to £37.20 per week per client (£161/month per client). This has been benchmarked against comparable housing association service charges and found reasonable.

Service charge breakdown (£37.20/week per client)

Service Element	Weekly Cost
Communal cleaning and rubbish removal	£3.00
Pest control and gardening	£2.00
Fire equipment	£2.00
Health and safety total	£3.00
HHSRS and TSM reporting	£2.00
Renewal and furnishing	£9.20
Repairs and maintenance	£9.00
Administration fees	£2.00
Tenancy data management	£5.00
Total	£37.20

All repair costs and obligations set out in the FM contract are borne by GLETS London Ltd. A formal contract specifying these obligations is [to be finalised and appended].

The Board confirms that this arrangement does not inappropriately advance the interests of GLETS (GFV Standard 2.6). The relationship is governed by a formal FM contract, the charges are benchmarked, and Aves retains control over service standards and holds GLETS to account through regular performance monitoring.

6. Rent Policy and Compliance

Aves Housing has assessed its position against the Rent Standard 2026 and considers that its accommodation falls within the exemptions set out in paragraph 2.2 of the Rent Standard. The basis for this exemption is as follows:

Exemption Assessment

Aves Housing has assessed its position against the Rent Standard 2026 (published by the Regulator of Social Housing on 2 February 2026, effective 1 April 2026) and considers that its accommodation falls within the exemptions set out at paragraph 2.2.

Paragraph 2.2 of the Rent Standard 2026 provides that the Standard does not apply to several categories of property as defined in Chapter 5 of the Rent Policy Statement, including specialised supported housing and temporary social housing. GOV.UK

The legislative basis for the Rent Standard is section 69 of the Housing and Regeneration Act 2008, which defines "low cost rental accommodation" — the type of social housing to which the Standard applies. The Regulator's power to set rent standards derives from sections 193–194 of that Act. Legislation.gov.uk

Exemption 1: Temporary Social Housing

Where it sits in regulation: This exemption is listed at paragraph 2.2 of the Rent Standard 2026 and defined at paragraph 5.11 of the Rent Policy Statement on Rents for Social Housing (January 2026). "Temporary social housing" means low cost rental accommodation made available to a person who is homeless (within the meaning of the Housing Act 1996) by a private registered provider under a specified tenancy where a local authority has nominated that person as a tenant on a temporary basis, that authority owes a duty under Part 7 of the Housing Act 1996 to that person, and the registered provider holds the social housing on a lease or licence with a term of more than two years and fewer than 30 years. service

Where it sits in legislation:

The key statutes underpinning this exemption are:

Housing Act 1996, Part 7 (sections 175–218) — Part 7 of the Housing Act 1996 provides the statutory underpinning for action to prevent homelessness and provide assistance to people threatened with or actually homeless. The relevant duties include section 188 (interim duty to accommodate), section 189B (relief duty), and section 193 (main housing duty). It is under these Part 7 duties that local authorities nominate homeless persons into temporary accommodation provided by registered providers such as Aves. The full text is at: https://www.legislation.gov.uk/ukpga/1996/52/part/VII GOV.UK

Housing and Regeneration Act 2008, section 69 — defines "low cost rental accommodation" as the starting point for what the Rent Standard applies to: https://www.legislation.gov.uk/ukpga/2008/17/section/69

How Aves meets the conditions:

Aves currently houses over 100 tenants referred under nomination agreements with local authorities exercising their homelessness duties under Part 7 of the Housing Act 1996. The nomination agreement template confirms the statutory basis and temporary nature of the accommodation. Aves' properties are held on leases with terms of more than two years and fewer than 30 years, satisfying the condition at paragraph 5.11(a)(iii) of the Rent Policy Statement. Tenancies are granted as assured shorthold tenancies or licences, which are "specified tenancies" within the meaning of paragraph 5.11(a).

Exemption 2: Specialised Supported Housing (12 Melfort Road)

Where it sits in regulation: This exemption is also listed at paragraph 2.2 of the Rent Standard 2026 and defined at paragraph 5.6 of the Rent Policy Statement. "Specialised supported housing" means supported housing which is designed, structurally altered, refurbished or designated for occupation by residents who require specialised services or support to live independently within the community; which offers a high level of support approximating to the services that would be provided in a care home; which is provided by a private registered provider under an agreement or arrangement with a local authority or health service; for which the rent charged complies with that agreement; and in respect of which there was no or negligible public assistance, or public assistance was by means of a loan. service

Where it sits in legislation:

The definition of "supported housing" (the parent category) is at paragraphs 2.37–2.38 of the Rent Policy Statement, which in turn rests on the broader framework of the Housing and Regeneration Act 2008 (Part 2, sections 68–69 defining social housing).

The specialised supported housing category is a sub-category of supported housing that is exempt from the usual social rent setting requirements as set out in the Rent Standard and the Government's Policy Statement on rents for social housing. Local Government Association

How Aves claims this applies:

Aves provides accommodation at 12 Melfort Road, Thornton Heath CR7 7RL, under an arrangement with Croydon Council. The property is intended to meet the specialised supported housing criteria. However, all five conditions in paragraph 5.6(a)–(e) must be satisfied for the exemption to apply, and this is a high bar. In particular, the accommodation must offer support at a level approximating a care home, and must have been provided with no or negligible public assistance (or loan-only public assistance).

Clarification being sought

Aves is seeking clarification from the Regulator of Social Housing as to whether its specific arrangements qualify under either or both of these exemptions. Until confirmation is received, Aves is proceeding on the basis that the exemptions apply, while maintaining documentation to demonstrate compliance with all the definitional conditions.

7. Value for Money

This section addresses the Value for Money Standard, which requires registered providers to clearly articulate strategic objectives, demonstrate delivery of value for money to stakeholders, and ensure optimal benefit is derived from resources and assets.

7.1 Market Rate Benchmarking

Aves Housing has benchmarked lease costs for all 82 properties against comparable private rental listings on Rightmove (May 2026). Across the portfolio, lease costs average approximately £2,280/month against an average market comparable of approximately £3,060/month — a saving of approximately 25% below market. Every property has a lease cost at or below its market comparable.

The GLETS FM charge of £800/month per property is excluded from this comparison as it covers services that any landlord or tenant would incur separately. At £161/month per client (£37.20/week), this equates to a cost that has been benchmarked against comparable housing association service charges and found reasonable.

7.2 VFM Targets and Monitoring

VFM Metric	Target	Current Performance
Void rate	Below 8%	7.9% (29 of 365)
UC-HC collection rate	Above 87%	87.67% (with 95% expected)
Monthly surplus	Positive	£6,253/month
Liquidity minimum	£100,000	£572,226 (met)
Right to Repair compliance	Zero overdue	Zero overdue
Lease costs vs market	Below market rate	25% below market
Service charge per client	Benchmarked reasonable	£161/month

These metrics are reported to the Board quarterly and will be published in statutory accounts annually (VFM Standard 2.2).

8. Safety and Quality of Homes

This section addresses the Safety and Quality Standard, which requires registered providers to provide safe and good-quality homes and take all reasonable steps to ensure the health and safety of tenants in their homes and communal areas (required outcome 1.3.1).

8.1 Health and Safety Compliance Framework

Aves Housing operates a three-tier inspection regime:

Weekly: Staff inspections of all properties covering visual safety checks, communal area condition and tenant welfare.

Monthly: Formal health and safety assessments covering gas, electrical, fire, water safety, asbestos, smoke alarms and carbon monoxide, presented to the Board.

Annual: External independent health and safety assessments providing independent assurance of compliance.

8.2 Statutory Compliance

Safety Area	Status	Notes
Gas safety certificates	79 of 80 current	1 outstanding from 4 May — actively pursuing tenant access
Electrical safety (EICR)	1 outstanding	5-yearly programme
Fire risk assessments	2 outstanding	Annual for HMOs
Water safety (legionella)	0 outstanding	Annual assessment
Asbestos management	2 outstanding	Management surveys in place
Smoke and CO alarms	0 outstanding	Checked at monthly H&S visits
Lift safety	N/A	No lifts in portfolio

Health and safety compliance is reported to the Board at every meeting, following the format re-established from the March 2025 board reporting style.

8.3 Decent Homes Standard

As at February 2026, 82% of properties met the Decent Homes Standard. Outstanding issues are being addressed:

Issue	Properties Affected	Target Resolution	Estimated Cost
Building components approaching end of life	8	Q4 2027	£260,000
Kitchens/bathrooms beyond DHS age threshold	6	Q3 2026	£185,000
Ageing boilers requiring replacement	5	Q4 2027	TBC

All improvement and repair costs are borne by GLETS London Ltd under the FM contract. Aves holds GLETS to account for delivery against these timescales (Code of Practice paragraph 20).

Aves will align its stock condition assessments with the five criteria of the updated Decent Homes Standard 2035: Criterion A (free of dangerous hazards), Criterion B (reasonable state of repair), Criterion C (core facilities and services), Criterion D (thermal comfort), and Criterion E (free of damp and mould).

8.4 Repairs Performance

Repair Category	Outstanding as at 16 May 2026
Right to Repair – 1 day prescribed period	0
Right to Repair – 3 day prescribed period	0
Right to Repair – 7 day prescribed period	0
Right to Repair – 10 day prescribed period	0
Non-Right to Repair (minor improvements)	199

Aves has zero outstanding Right to Repair Act obligations. The 199 non-RTR items are minor improvements (rubbish removal, renewals, furnishings, void room preparation) — averaging 2.4 items per property — and are addressed continuously as new items are reported daily.

9. Transparency, Influence and Accountability

This section addresses the Transparency, Influence and Accountability Standard, which requires registered providers to treat tenants with fairness and respect, provide clear information, and enable tenants to influence decision-making and hold their landlord to account.

9.1 Fairness and Respect

Aves Housing is committed to treating all tenants and prospective tenants with fairness, courtesy and respect. This principle underpins all landlord services (Code of Practice paragraphs 28–29).

9.2 Understanding Diverse Needs

Aves collects and maintains information about tenants' protected characteristics and communication or support needs via the Aves Console portal. This data informs service delivery and is processed in compliance with GDPR and the Data Protection Act 2018 (Code of Practice paragraphs 30–36).

[Tenant demographic profile summary to be inserted from portal data]

9.3 Tenant Engagement

Aves Housing engages tenants through:

Weekly property visits: Staff conduct face-to-face welfare and property checks.

Aves Console portal: Tenants can report repairs, raise complaints and access information.

Tenant feedback: Satisfaction surveys and feedback mechanisms inform service improvements.

Complaints process: A simple, accessible complaints process aligned with the Housing Ombudsman's Complaint Handling Code.

Tenants' views are considered in decision-making about landlord services. The Board assures itself that views have been actively sought and considered (Code of Practice paragraphs 37–42).

9.4 Complaints

Metric	As at 16 May 2026
Total outstanding complaints	1
Not started	0
Tenant panel audit	0
Unresolved over 28 days	0

The single outstanding complaint (received 9 May 2026) is in the investigation phase, with resolution started on 12 May 2026. Complaints data, trends and learning are now reported to the Board at every meeting (Code of Practice paragraphs 53–56).

9.5 Performance Information

Aves Housing will publish Tenant Satisfaction Measures (TSMs) data as required by the Regulator. Performance against targets will be published in statutory accounts and made accessible to tenants (Code of Practice paragraphs 46–52).

9.6 Self-Referral

Aves Housing is committed to communicating with the Regulator at the earliest opportunity about any material issues relating to non-compliance or potential non-compliance with the standards (GFV Standard 2.3, Code of Practice paragraph 57).

10. Neighbourhood and Community

This section addresses the Neighbourhood and Community Standard, which requires registered providers to work with relevant organisations so that tenants can live in safe and well-maintained neighbourhoods.

10.1 Anti-Social Behaviour (ASB)

Aves Housing has an ASB policy setting out its approach to preventing, reporting, investigating and resolving ASB and hate incidents. Staff are trained to identify and respond to ASB, and tenants are informed how to report incidents. Aves works with the Metropolitan Police and local authority community safety teams to address ASB in and around its properties (Code of Practice paragraphs 60–65).

10.2 Domestic Abuse

Aves Housing has a domestic abuse policy that sets out how staff recognise and respond to cases. Staff receive training to identify signs of domestic abuse, particularly those linked to housing circumstances. Tenants affected by domestic abuse are offered referrals to specialist agencies. Sensitive information is handled in compliance with data protection legislation (Code of Practice paragraphs 66–69).

10.3 Communal Areas and Shared Spaces

Communal cleaning, rubbish removal, pest control, gardening and fire equipment are provided by GLETS London Ltd as part of the FM contract. Aves holds GLETS to account for maintaining communal areas to an acceptable standard. Aves works cooperatively with other landlords and local organisations where shared external spaces require attention (Code of Practice paragraphs 58–59).

10.4 Local Cooperation

Aves works in partnership with local authorities, the police and other organisations to promote social, environmental and economic wellbeing in the areas where it provides housing. This includes regular engagement with borough housing and homelessness teams through the nomination agreement framework.

11. Tenancy Management

This section addresses the Tenancy Standard, which sets requirements for the fair allocation and letting of social homes and the management of tenancies.

11.1 Allocations and Lettings

Aves Housing allocates accommodation exclusively through nominations from local housing authorities exercising their statutory homelessness duties under Part 7 of the Housing Act 1996 and the Homelessness Reduction Act 2017. Self-nominations are not accepted, and Aves cannot nominate to itself.

The nominating authority must confirm it owes a current statutory homelessness duty to the nominee, specifying the relevant statutory provision (interim duty under s.188, relief duty under s.189B, main housing duty under s.193, or other relevant duty).

Prospective tenants are required to provide identification, proof of National Insurance Number, and proof of benefits. Where documentation is not available at referral, it must be provided within 7 working days (Code of Practice paragraphs 70–73).

11.2 Tenancy Types

Tenancies are granted as non-secure licences or assured shorthold tenancies on a temporary basis. The temporary nature ends when the nominating local authority confirms its homelessness duty has been discharged, at which point the tenant is expected to move to settled accommodation.

Aves considers the suitability of tenancies issued, taking into account tenants' needs and the purpose of the accommodation (Code of Practice paragraphs 77–82).

11.3 Tenancy Sustainment

Aves supports tenants to maintain their tenancies through weekly staff visits, assistance with UC-HC applications, and signposting to support services. Where a tenancy or licence is ended, tenants are offered timely advice and assistance to find alternative housing (Code of Practice paragraphs 74–76).

Aves takes into account its objectives as a landlord of social housing, including preventing homelessness and helping tenants maintain their tenancies, when considering whether to escalate any proceedings.

11.4 Mutual Exchange

Given the temporary nature of Aves' accommodation, mutual exchange is not applicable to the majority of tenancies. Where relevant, tenants are provided with information about the process.

12. Risk Management Framework

This section addresses GFV Standard 2.4 and 2.5, requiring registered providers to have an appropriate, robust and prudent business planning, risk and control framework.

Risk	Likelihood	Impact	Mitigation
Regulatory downgrade	High	High	Active engagement with RSH; improved governance, reporting and compliance
Banking disruption (further)	Medium	High	Multiple bank accounts (Wise, Tide, Barclays); dormant subsidiary as contingency
GLETS financial failure	Medium	High	Diversify FM suppliers; retain right to novate contracts; build internal capacity
UC-HC policy/rate changes	Medium	High	Stress testing at 5%, 10%, 15% income reduction; GLETS contract absorbs risk
Void rate increase	Medium	Medium	Active void management; strong LA nomination pipeline; target <8%
Workforce cost overruns	Medium	Medium	Line-by-line staff cost forecasting; monthly board review
DHS non-compliance	Medium	Medium	Rolling programme of stock condition surveys; GLETS bears improvement costs
Health and safety failure	Low	High	Three-tier inspection regime; independent annual assessment
Data protection breach	Low	Medium	GDPR compliance framework; staff training; Aves Console security
Overpayment liabilities (HB)	Medium	Medium	Legal review with Devonshires; provision in financial forecasts

The risk register is reviewed by the Board at every meeting. The framework is approved by the Board and its effectiveness reviewed at least annually (GFV Standard 2.4.2).

13. Stress Testing and Scenario Analysis

Financial forecasts have been stress-tested across multiple scenarios as required by GFV Standard 2.5(b).

Scenario	Income Impact	Monthly Surplus/(Deficit)	Annual Impact	Viability
Base case (87.67% collection)	—	£6,253	£75,041	Viable
5% income reduction	(£16,000)	(£9,747)	(£116,964)	Manageable with GLETS deferral
10% income reduction	(£32,000)	(£25,747)	(£308,964)	Requires cost reduction
15% income reduction	(£48,000)	(£41,747)	(£500,964)	Viability risk – trigger FM renegotiation
5% void increase	(£16,000)	(£9,747)	(£116,964)	Manageable
Combined: 10% income + 5% voids	(£48,000)	(£41,747)	(£500,964)	Viability risk

Key mitigations under stress scenarios include: renegotiation of GLETS FM charges (contractual provision exists for risk-sharing); deferral of non-essential improvement works; reduction in discretionary expenditure; and accelerating UC-HC registrations toward the 95% target.

The GLETS FM contract allows for the majority of financial risk from income reduction to be shared with GLETS London Ltd.

14. Strategic Priorities 2025–2030

The following strategic priorities reflect Aves Housing's position as a social landlord focused on providing safe, well-managed temporary accommodation while meeting all regulatory standards.

Priority 1: Regulatory compliance and governance excellence

Achieve and maintain full compliance with all seven RSH standards. Strengthen board reporting, documentation and oversight. Complete all outstanding actions from regulatory engagement.

Priority 2: Tenant safety and home quality

Maintain 100% statutory health and safety compliance. Achieve 100% Decent Homes Standard compliance. Deliver effective, timely repairs through holding GLETS to account.

Priority 3: Financial sustainability

Maintain positive cashflow and meet £100k liquidity KPI. Stabilise UC-HC income at 95%+ collection. Reduce GLETS debt to zero within 12 months.

Priority 4: Tenant voice and service quality

Implement TSM data collection and reporting. Strengthen complaints handling aligned with Housing Ombudsman Code. Increase tenant engagement and satisfaction.

Priority 5: Operational resilience

Maintain multiple banking relationships. Retain and develop staff capacity. Strengthen business continuity planning.

15. Five-Year Financial Projections

The following projections assume Aves Housing does not change its stock position and remains a provider of temporary social housing registered with Universal Credit as a Social Rented Sector provider. Projections apply a conservative 87.67% income collection rate with 2% annual cost inflation.

	Year 1 (2026)	Year 2 (2027)	Year 3 (2028)	Year 4 (2029)	Year 5 (2030)
Gross income (UC-HC)	£3,840,000	£3,916,800	£3,995,136	£4,075,039	£4,156,540
Lease costs	(£2,197,759)	(£2,241,714)	(£2,286,548)	(£2,332,279)	(£2,378,925)
Staff costs	(£780,000)	(£795,600)	(£811,512)	(£827,742)	(£844,297)
GLETS FM charge	(£787,200)	(£802,944)	(£819,003)	(£835,383)	(£852,091)
Annual surplus/(deficit)	£75,041	£76,542	£78,073	£79,635	£81,227
Cumulative surplus	£75,041	£151,583	£229,656	£309,291	£390,518

Assumptions: (1) No change in stock position (82 properties, 365 rooms). (2) UC-HC rate remains at £1,011/client/month. (3) 87.67% collection rate. (4) 2% annual cost inflation. (5) GLETS debt repaid from surplus over 5 years. (6) No additional capital expenditure by Aves (improvement costs borne by GLETS).

15.1 Staff Cost Breakdown

The monthly staff cost of £70,000 covers 25 employees. A full breakdown of individual staff roles and monthly payments is maintained and has been presented to the Board.

16. Implementation Timeline and KPIs

KPI	Target	Reporting Frequency
RTR compliance	Zero overdue	Monthly to Board
Gas safety certificates current	100%	Monthly to Board
Decent Homes compliance	100% by Q4 2027	Quarterly to Board
Void rate	Below 8%	Monthly to Board
UC-HC collection rate	95%+	Weekly (monthly to Board)
Liquidity	Above £100k	Weekly (monthly to Board)
Outstanding complaints over 28 days	Zero	Monthly to Board
Board meeting documentation	Complete for all meetings	Every meeting
H&S reported to Board	Every meeting	Every meeting
Complaints reported to Board	Every meeting	Every meeting
Annual governance effectiveness review	Completed	Annually
TSM data collection	Operational	Annual submission to RSH
GLETS debt	Repaid within 12 months	Monthly to Board

17. Regulatory Action Plan

The following action plan addresses the specific concerns raised by the Regulator of Social Housing during the current engagement, and the eight information requests in the letter of 13 May 2026.

RSH Request	Action	Status/Date
1. Banking facilities update	Wise operational as primary account. NatWest application ongoing. Aves Housing UCHC retained as dormant subsidiary.	Completed
2. Future of Aves Housing UCHC Ltd	Retained as wholly-owned subsidiary (dormant) to strengthen financial risk planning.	Confirmed
3. Weekly cashflow with bank statements	Line-by-line weekly cashflow provided. Bank statements supporting opening/closing balances included.	Ongoing weekly
4. Legal advice (Devonshires)	Rent Standard, social housing definition, Tribunal implications — advice pending. Not-for-profit status advice being re-commissioned.	In progress
5. GLETS liabilities breakdown	Debt capped at £372,226. Written agreement in place. No other material third-party liabilities.	Completed
6. H&S assurance	Three-tier inspection regime. Independent annual assessment. Board reporting reinstated.	Completed
7. Repairs reporting to Board	RTR dashboard with zero overdue. 199 non-RTR items tracked. Presented at 16 May Board.	Completed
8. Stanford Biti – Companies House	Mr Biti no longer serving as board member due to personal commitments.	Confirmed

This business plan was approved by the Board of Aves Housing at its meeting on 16/05/2026