



Modern Slavery and Human Trafficking Statement 2025

Ocean Housing Group is committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

Our business

Ocean Housing Group is a major affordable housing provider and residential developer in Cornwall. The Group is governed by a non-asset holding parent company with 33 key central service employees supporting its 2 operating subsidiaries, Ocean Housing and Gilbert and Goode.

Ocean Housing is a regulated social housing provider with charitable objectives. It manages around 5,000 homes throughout Cornwall, it has an estimated turnover of £31 million in 2025/2625 and employs 154 employees. There is an ambition to build over 60 new affordable homes in 2025/2625 with investment spend of £11 million, in addition, a further £9 million is being invested in 2025/2625 improving our existing homes, primarily energy improvement works.

Our wholly owned residential development and construction subsidiary, Gilbert and Goode, builds new homes for sale on the open market as well as building new affordable homes for Ocean Housing and other local social housing providers. Profits from Gilbert and Goode help to deliver more affordable homes and services through Gift Aiding to Ocean Housing. Gilbert and Goode employ 26 employees and have a turnover of £24 million for 2024/25. The majority of this turnover comes from the sale of 30 open market residential homes.

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another or others to exploit them for personal or commercial gain.

Our [governance and financial structure](#) can be found here and [information about our business](#) can be found here.

Our approach

Ocean Housing exists to provide new affordable homes for those in housing need, improve the homes of its existing tenants and deliver maintenance and management support services to vulnerable people in our communities in Cornwall.

Ocean Housing has charitable objectives and all surpluses generated in that company go back in to the delivery of great services, supporting our customers and building new homes.

In Gilbert and Goode, the Group carries out residential development, but will a sole objective of supporting the local economy and all profits are ploughed into Ocean Housings plans for building new affordable homes and improving existing homes. There are no profits from Gilbert and Goode that are not ultimately re-invested in the Groups charitable objective of providing high quality social housing for those in need throughout the County of Cornwall

Our ethos is reflected in one of our behaviours and values and our Equality, Diversity & Inclusion Strategy, which sets out our commitment to Equality and Diversity in all our dealings as an employer, provider of housing, support services, community services and being a partner of choice in the community.

It states: ***The aim of this Strategy is to create a great place to work and a great company to do business with. A business whose diversity reflects its community and a business that is committed to creating an environment free from discrimination or harassment and advances equality of opportunity and inclusivity for everyone.***

Information about our approach to [equality and diversity](#) can be found here.

Leadership and responsibility

Our Group Board of directors is ultimately responsible for the organisation and ensures we comply with the Modern Slavery Act 2015.

All employees are then responsible for ensuring we meet the requirements of the Act.

Employee awareness and training

During 2023/24, Ocean Group secured Investors in People Gold award. The Group are aspiring to achieve Platinum recognition by the end of the decade. Plans to achieve this ambition are set out in a clear People Strategy and Equality, Diversity and Inclusion Strategy. Fundamental to this approach is high quality training and investment in colleagues and this includes safeguarding training for all employees. This ensures that our colleagues are effectively skilled to help them identify people who may be at risk of abuse and know how to respond; the training covers, domestic abuse, modern slavery and human trafficking. New employees receive safeguarding training, relevant to their role, as part of their induction. Refresher awareness sessions in respect of safeguarding and modern slavery for all employees is managed on a rotational basis, at least every 2 years.

We have safeguarding policies and procedures available on our intranet, and a safeguarding lead at senior management team level. We proactively work with employees and other agencies to identify, report and act on safeguarding concerns; these are fully investigated and reviewed, with any new learning shared with colleagues.

Information about [safeguarding](#) can be found here.

Our supply chains

In 2025/26 we are expecting to spend around £60 million on contracts, materials and services, which are predominantly based in the UK. We work with a number of consortiums and frameworks, and have procurement processes that are EU compliant and a contractor code of conduct. Underpinning these documents is Ocean's Procurement Strategy and the policies of Advantage Southwest, a local procurement club of which Ocean is an integral member. The Group are actively working towards embracing the changes arising from exit of EU regulations to the new UK Procurement Act.

Our Procurement Strategy and related procedures require new suppliers to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking. We also include provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.

We will assess any evidence of non-compliance and take appropriate remedial action. We will only trade with those businesses who fully comply or taking verifiable steps towards compliance with the Modern Slavery Act 2015.

Information about our [contractors and procurement strategy](#) can be obtained from our Strategic Procurement Manager via email at enquiries@oceanhousing.com.

People services practices, policies and procedures

One of the Groups our four strategic corporate objectives is to be a great place for our employees to work.

Our people services practices fully comply with current employment legislation and good practice. Employment related policies are updated and reviewed annually and approved by our Group Board. Colleagues are updated on changes in employment related policies via monthly 'team talks', intranet, and regular updates of the Employee Handbook. All new employees are introduced to relevant policies as part of a structured and comprehensive induction within the first month of their employment.

Temporary, agency and fixed term appointments workers are sourced via reputable agencies, who meet the requirements upon our suppliers to make a declaration in regard slavery or human trafficking, as detailed above. There are strong procedures in place in respect of all appointments with evidence of documentation necessary. Direct employment is pursued wherever possible.

The Ocean Group has a formally established Consultative Forum with our employee and recognised trade union representative, which meets quarterly. The meeting allows transparent sharing of the Groups commitment and values to the wellbeing of its employees, customers, tenants and wider community. The relief of poverty and eradication of abuse and slavery being a commitment of the Group in how it engages in life and communities of Cornwall.

The Group has a range of wellbeing policies and procedures and have adopted to pay at least the Voluntary Living Wage to all our employees.

A Health and Safety Committee, with union representation, meets quarterly to ensure compliance and good practice across the business in respect of health and safety. The Group holds the ISO accreditation 45001, along with ISO 9001 for quality management and ISO 14001 for environmental.

Information about [recruitment](#) can be found here and our key employment policies can be requested by emailing jobs@oceanhousing.com.

Principle risks, mitigations and actions

The principle risks for Ocean in relation to modern slavery and trafficking are considered as being,

- smaller contractors or work which is sub-contracted in our supply chain
- tenants pulled into modern slavery and human trafficking through poverty or coercion.

Mitigations taken by Ocean to manage modern slavery and trafficking risk are,

- strong safeguarding policies, procedures and training, sound colleague awareness
- sound procurement and contract management procedures for contractor appointments.

Ongoing plans to strengthen the effective mitigation of modern slavery and trafficking risks,

- delivering refresher training to all colleagues along with induction for new employees
- continuing to reinforce awareness with employee, business partners and contractors.
- regularly reviewing relevant policies and processes (ie recruitment and procurement)

Statement sign off

This statement is made pursuant to the Modern Slavery Act 2015 section 54. This statement has been reviewed by the Executive Group and approved by the Group Board.



Andrea Smith, Group Chair



Jitinder Takhar, Group Chief Executive

Modern Slavery and Human Trafficking Action Plan 2025/26

Ref	Action	Lead	Times cale
1.	Awareness presentation on modern slavery and human trafficking at the 'all employee' monthly Team Talk briefing.	Deputy Chief Executive	November 2025
2.	Deliver safeguarding training for colleagues and identify any additional awareness training needed.	Head of Neighbourhood Service	Oct 2025
3.	Further review of procurement processes to ensure compliance of contractor checks and ongoing contract management reviews. Update Procurement Strategy and processes if necessary.	Strategic Procurement Manager	December 2025
4.	Review and up-date of our ESG Report	Group Director of People and Governance	Oct 2025
5.	Education and awareness raising via Modern Slavery training within induction process and rotational on-line learning.	Head of People Services	March 2026
6.	Monitoring supply chain to ensure business only uses specified reputable employment agencies to source temporary labour.	Head of People Services	March 2026
7.	Annual review of Modern Slavery Statement, compliance check, approval, and update publication on website.	Deputy Chief Executive	March 2026