



# Cobalt

Medical Charity

Diagnosis • Research • Education

Registered Charity No: 1090790

## Cobalt Health Anti-Slavery and Human Trafficking Statement

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# CONTENTS

Policy Details .....3

1. ANNUAL STATEMENT pursuant to Section 54 of the Modern Slavery Act, 2015 ..... 3

2. OUR ORGANISATION, STRUCTURE AND SUPPLY CHAINS..... 3

3. POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING ..... 3

4. DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING ..... 3

5. RISK AND COMPLIANCE ..... 3

6. ACTIONS UNDERTAKEN IN THE LAST 12 MONTHS..... 4

7. OUR CONTINUING COMMITMENT ..... 4

Version	Revision	Date	Approved By
1	Creation of document	Sep 23	SMT & Board

## 1. ANNUAL STATEMENT pursuant to Section 54 of the Modern Slavery Act, 2015

Cobalt is dedicated to preventing modern slavery and human trafficking from taking place within our business and our supply chains and we place the same expectation on our suppliers.

## 2. OUR ORGANISATION, STRUCTURE AND SUPPLY CHAINS

Cobalt Health (Cobalt) is a registered independent medical charity and company limited by guarantee providing healthcare solutions to the NHS and private sector. With the vision to pioneer innovation in medical diagnosis, Cobalt invests in equipment, integrated research, and education to improve the outcomes of patients now and in the future. Each year diagnostic imaging is provided for over 130,000 patients at imaging centres in Cheltenham and Birmingham, and through a fleet of fourteen MRI, CT and PET/CT mobile scanners.

Cobalt's Head Office is located at Linton House, Thirlestaine Road, Cheltenham, GL53 9AS. All our c180 workforce are based within the United Kingdom, and all of our activities are conducted within the United Kingdom.

The following link provides more information regarding the nature of our business - [Medical Imaging Centre | Cobalt Health](#)

The nature of our work requires that we work in conjunction with a range of suppliers. In addition to those supplying staffing, our supply chains include those providing, maintaining and transporting diagnostic equipment, healthcare and clinical consumables, utilities, and professional services from third parties, including consultancy, IT support, training, cleaning and construction services.

## 3. POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Cobalt is committed to acting ethically and with integrity in all activities and complying with The Modern Slavery Act of 2015. We have a zero tolerance towards human trafficking and modern slavery as set out in our Anti-Slavery and Human Trafficking Policy. Through our Procurement Policy, we ensure that our suppliers are aware of our stance and expect them to adopt the same high standards. We have a robust Whistleblowing Policy in place, through which any concerns can be reported.

## 4. DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains;
- Scrutinise any identified areas of risk within our business and supply chains;
- Adopt a zero tolerance approach to slavery and human trafficking throughout the organisation and our supply chains;
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

## 5. RISK AND COMPLIANCE

We have conducted a high-level assessment of our supply chains. We do not operate in any high-risk sectors or locations and have assessed the risk of modern slavery or human trafficking as being low.

We will continue to evaluate the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring.

We ensure our suppliers are aware of our policies and expect them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Should we identify a potential risk we will take prompt and appropriate action to put remedial measures in place.

We will not support or deal with any business that we know to be involved in slavery or human trafficking. If there is evidence that a supplier is non-compliant with our policies we will take action to address the shortfall either through a performance improvement plan or ultimately through termination of the contact.

## 6. ACTIONS UNDERTAKEN IN THE LAST 12 MONTHS

We have implemented measures proportionate to the assessed risks, including:

- The review and assessment of the risks of modern slavery and human trafficking in our supply chains;
- Training of the key staff involved in the procurement of services;
- The review and continued implementation of employment policies and practices that are designed to treat individuals with dignity and respect, to treat people fairly and not exploit them;
- Continuation of robust appropriate pre-employment checks on all our workers, and requiring any recruitment agencies we partner with to do the same, to ensure that they are not under any form of duress equivalent to slavery or subject to any form of human trafficking;
- Assessing and selecting from primarily UK based suppliers who adhere to ethical standards and have a similar commitment to, and who are not involved in, modern slavery or human trafficking.
- The ongoing communication of our policies such as Freedom to Speak Up, Safeguarding and Whistleblowing, which provide routes to report any concerns, including those related to modern slavery and human trafficking within Cobalt or Cobalt's supply chains.

## 7. OUR CONTINUING COMMITMENT

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- To re-assess the risk posed to the Charity in connection with the Act.
- To review of the training in place for staff, with a commitment to introduce mandatory modern slavery for all staff to understand the meaning of modern slavery and human trafficking and to be alert to potential concerns;
- To update of our supplier agreements to reference The Act and include a requirement for suppliers to confirm their compliance with The Act.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Cobalt's anti-slavery and human trafficking statement for the financial year ending April 2023.

Approved by Board of Trustees



Signature: Malcolm MacKeith

Company Secretary

Date: 1<sup>st</sup> September 2023