



Cobalt

Medical Charity

Diagnosis • Research • Education

Registered Charity No: 1090790

Cobalt Health Anti-Slavery and Human Trafficking Policy

CONTENTS

Policy Details3

1. INTRODUCTION AND POLICY AIMS 3

2. ANNUAL STATEMENT 3

3. CONTENT OF THE STATEMENT 3

4. ADDITIONAL ACTION POINTS..... 3

10. DISSEMINATION 3

11. REFERENCES/RELATED COBALT DOCUMENTS 4

12. EQUALITY IMPACT ASSESSMENT SUMMARY..... 4

Version	Revision	Date	Approved By
1	Creation of the new policy	Sep 23	SMT

1. INTRODUCTION AND POLICY AIMS

This policy ensures that Cobalt complies with s.54 of the Modern Slavery Act 2015, which sets out the responsibilities for employers and employees.

Cobalt is committed to acting ethically and with integrity in all business dealings and to taking steps to ensuring that all of our business operations are free from involvement with slavery or human trafficking.

2. ANNUAL STATEMENT

Cobalt will publish an annual slavery and human trafficking statement. A link to this statement will be on the homepage of the website and will be signed and approved by the Company Secretary.

The Company Secretary is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Cobalt has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

3. CONTENT OF THE STATEMENT

The following items will be included in the statement.

1. The structure of our Charity, the business operations of the Charity and the supply chains.
2. Our policies in relation to slavery and human trafficking.
3. The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
4. Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk.
5. An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
6. A statement about training about slavery and human trafficking available to employees.

4. ADDITIONAL ACTION POINTS

In addition to producing the annual statement, Cobalt is committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure.
- Acting ethically and fairly in all activities.
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK.
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also Operate in accordance with the Act.
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015. This person is Malcolm MacKeith, Company Secretary.
- Identifying and addressing any areas of high risk in our supply chain.
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

10. DISSEMINATION

This policy will be published internally on *SharePoint* and externally on the *Cobalt Website*. Cobalt Managers of all grades will be responsible for ensuring that all staff is made aware of its existence and promoting awareness of the contents.

11. REFERENCES/RELATED COBALT DOCUMENTS

- Annual Anti-Slavery and Human Trafficking Statement
- Procurement Policy
- Equality, Diversity and Human Rights Policy
- Freedom to Speak Up Policy
- Whistle Blowing Policy
- Protection of Vulnerable adults Policy
- Safeguarding Children Policy

12. EQUALITY IMPACT ASSESSMENT SUMMARY

Cobalt is committed to promoting equality, diversity and fair treatment to all staff, patients and visitors regardless of race, nationality, ethnic origin, gender, marital status, mental or physical disability, religion or belief, sexual orientation, age or social exclusion.

We do this by making sure that all of our processes, policies and procedures undergo an impact assessment to make sure that they do not disadvantage any groups from our community.

EIA undertaken by:

Title and Department:

Outcome:

Policy promotes equality, equal opportunities and improved relations and will be reviewed in 3 years' time	✓	Full Equality Impact Assessment to be carried out	
--	---	---	--

Signed: 

Date: 04/09/2023