



Cobalt

Medical Charity

Diagnosis • Research • Education

Registered Charity No: 1090790

Cobalt Health Anti-Slavery and Human Trafficking Policy

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| Version | Revision | Date | Approved By |
|---------|----------------------------|--------|-------------|
| 1 | Creation of the new policy | Sep 23 | SMT |
| 1.1 | Addition of Appendix 1 & 2 | Dec 23 | SMT |
| 2 | Annual review and upgrade | Aug 24 | 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, CEO.
- Identifying and addressing any areas of high risk in our supply chain.
- Providing mandatory training for all employees to make them aware of their responsibilities, including how to identify concerns, steps to be taken and internal and external support.

5. 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.

6. 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

7. 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

Appendix 1: Process for reporting suspected modern-day slavery or human trafficking

According to the 2016 Independent Anti-Slavery Commissioner, Kevin Hayland, one-in-five victims report having come into contact with healthcare services during the time they were being trafficked.

By asking the right questions, remaining vigilant and reporting suspicions to the correct authorities, Cobalt staff can save victims from modern slavery.

Spotting the signs of modern slavery is not always easy. Victims are often fearful of their controllers and may try to hide their situation due to fear of retributions against themselves, friends or family. However, many healthcare staff are already aware of potential victims, in fact, one-in-eight NHS staff in England think they have seen a victim of trafficking in their clinical practice.

Be aware of behavioural and physical signs that victims might show, including:

- Refusal to give name or contact information
- No identification documents
- Appearing malnourished or dishevelled
- Appearing fearful or scared of staff, authorities or a specific individual
- Being in the presence of a controller
- Inappropriate clothing
- Being in the presence of another person who translates for them

Whilst seeing only one of these signs might not be a direct indication of modern slavery, seeing several of these signs should raise suspicion.

If you suspect that someone is a victim of modern slavery it is important that you remain safe. Direct confrontation, especially in the presence of the controller, is not advised. If you are suspicious or feel uncomfortable about a patient's situation, then make sure you stop and consult. Sharing your suspicions with another staff member ensures potential victims do not go unnoticed.

There are a number of options available to you, including:

- Share your suspicions with your line manager.
- Talk to the Safeguarding Lead
- Ask for advice or refer a patient to a relevant social care organisation
- Download the STOP APP and share your suspicions with STOP THE TRAFFIK. The app contains advice on the signs of modern slavery and provides a quick and accessible reporting mechanism. This is a great reporting tool to use if you are unsure about the situation but still want to share. The STOP APP can be downloaded by anyone, anywhere in the world who has access to a smartphone. The app is anonymous, confidential and secure – it allows you to submit suspicious activity quickly by sending a text based message. You can read more about the app and the work of STOP THE TRAFFIK here: <https://www.stopthetraffik.org/what-we-do/stopapp/>
- If you suspect modern slavery, report it to the Modern Slavery Helpline on 08000 121 700 or the police on 101.

In an emergency where you think that someone is in immediate danger always call 999. Don't leave it to someone else. Your information could save a life.

Appendix 2: Flow Chart of reporting suspected modern-day slavery or human trafficking



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