Anti-Slavery & Human Trafficking Policy

2026 - 2028

‘Because Children Deserve Better’

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1. Policy statement

Modern slavery is a serious crime and a violation of fundamental human rights. Pivot is committed to acting ethically and with integrity, and to taking proportionate steps to reduce the risk of slavery, servitude, forced or compulsory labour, and human trafficking within our organisation and supply chains.

Although Pivot is not required to publish a modern slavery statement under the Modern Slavery Act 2015, we maintain this policy as part of our commitment to ethical practice, safeguarding and responsible procurement.

Overall oversight of this policy sits with the Associate Director of People and Compliance, with approval by the COO. Modern slavery risks will be considered proportionately through relevant HR, safeguarding, procurement and contract management processes. Any significant concerns, trends or risks identified will be escalated to senior leadership for review and appropriate action.

This policy applies to all staff and others working for, or on behalf of, Pivot, including employees, agency workers, volunteers, contractors, consultants, suppliers and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. Responsibility for the policy

HR has overall responsibility for this policy and for ensuring it reflects Pivot's legal, ethical and safeguarding responsibilities.

Line managers are responsible for supporting implementation of this policy, responding to queries and escalating any concerns promptly.

Managers should ensure staff understand how to raise concerns and should seek advice from HR where modern slavery risks may arise in employment, procurement or partnership arrangements.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR team.

3. Compliance with the policy

All staff must read, understand and comply with this policy.

Everyone working for, or on behalf of, Pivot has a responsibility to help prevent, identify and report concerns about modern slavery or exploitation.

Any concern or suspicion should be reported to the HR team as soon as possible. If you are unsure whether something may be a concern, speak to your manager or HR for advice.

Pivot encourages openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. No one should suffer detrimental treatment for reporting a concern. If you believe you have been treated unfavourably as a result of raising a concern, you should contact HR or use the Grievance Procedure where appropriate.

4. Communication and awareness of this policy

Awareness of this policy will be included in relevant induction, management and procurement processes, with further guidance provided where appropriate.

Our expectations on modern slavery should be communicated to relevant suppliers, contractors and partners at the start of the relationship and reinforced where appropriate.

5. Breaches of this policy

A breach of this policy by an employee may result in disciplinary action, up to and including dismissal.

We may end our relationship with any individual or organisation working on our behalf if they breach this policy or fail to address concerns appropriately.