



# Modern Slavery and Human Trafficking Statement

**Organisation Name:** Wren Psychology Ltd

**Date:** 01/03/2026

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## 1. Organisation Structure, Business and Supply Chains

Wren Psychology Ltd is a UK-based independent provider of psychological assessment and support. We are a small organisation comprising few staff and a network of qualified clinical associates who support service delivery.

Our services are delivered primarily through digital platforms, including a secure clinical system (Cliniko), with limited reliance on physical infrastructure.

Our supply chains are relatively simple and low risk, consisting primarily of:

- Self-employed clinical associates (e.g. psychologists, speech and language therapists)
- IT and software providers (e.g. practice management systems)
- Administrative and business support services

We do not engage in manufacturing or complex international supply chains.

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## 2. Policies in Relation to Slavery and Human Trafficking

We are committed to a **zero-tolerance approach** to modern slavery and human trafficking in all its forms.

Our approach is supported by internal policies and procedures, including:

- Recruitment and onboarding procedures ensuring all staff and associates have the legal right to work in the UK
- Safeguarding policies aligned with healthcare standards
- Whistleblowing procedures enabling staff to raise concerns confidentially
- Code of conduct expectations for all associates and suppliers

We are committed to acting ethically and with integrity in all business relationships.

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### 3. Due Diligence Processes

We apply proportionate due diligence processes to mitigate the risk of modern slavery within our business and supply chain:

- Verification of identity, qualifications, and professional registration for all clinical associates
- Confirmation of right-to-work status in the UK
- Use of formal contractual agreements with all associates and suppliers
- Engagement only with reputable organisations and professionals
- Ongoing oversight of associate relationships through performance and governance processes

Given the nature and scale of our organisation, these processes are regularly reviewed to ensure they remain appropriate and effective.

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### 4. Risk Assessment and Management

We recognise that the risk of modern slavery within our organisation is **low**, due to:

- Our small size and professional workforce
- The regulated nature of clinical roles
- Our predominantly UK-based supply chain

Potential areas of risk may include:

- Use of self-employed associates
- Third-party service providers (e.g. IT platforms)

To manage these risks, we:

- Conduct appropriate checks during onboarding
  - Maintain direct relationships with associates rather than layered subcontracting
  - Use established, reputable suppliers
  - Monitor ongoing compliance through regular engagement and oversight
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### 5. Effectiveness and Performance Indicators

We assess the effectiveness of our approach through the following indicators:

- 100% of staff and associates verified as having the right to work in the UK
- 100% of associates subject to appropriate onboarding and compliance checks
- No reported incidents of modern slavery within our organisation or supply chain
- Ongoing review of policies and procedures



Given our size, oversight is maintained directly by senior management, enabling prompt identification and management of any concerns.

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## 6. Training and Capacity Building

We ensure that staff and associates are aware of modern slavery risks through:

- Inclusion of modern slavery awareness within onboarding processes
- Safeguarding training, which includes recognising signs of exploitation
- Clear guidance on how to report concerns

As the organisation grows, we will expand formal training provision where appropriate.

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## 7. Legal Status and Commitment

While we do not currently meet the threshold of a “*relevant organisation*” under Section 54 of the Modern Slavery Act 2015 (i.e. turnover of £36 million or more), we voluntarily publish this statement in line with best practice and NHS expectations.

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## 8. Continuous Improvement and Assurance

We are committed to continuous improvement in our approach to preventing modern slavery. Should any gaps be identified in our policies or processes, we will ensure these are addressed prior to contract award and strengthened as part of ongoing contract delivery.

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## Approval

This statement has been approved by senior management and will be reviewed annually.

**Signed:**

**Name:** Dr Michelle Marlborough

**Position:** Clinical Director

**Date:** 01/03/2026