

# The Elmley Dray School

18–20 Marina Drive, Minster-on-Sea, Sheerness, Kent ME12 2DP

**Inspection date**

14 December 2023

**Overall outcome**

**The school is likely to meet the relevant independent school standards if the material changes relating to the school provision are implemented**

## Main inspection findings

### Part 1. Quality of education provided

*Paragraphs 2(1) to 2(2)(b), 2(2)(d) to 2(2)(e)(iii), 2(2)(g) to 2A(2), 3 and 4*

- The school is requesting to change from a mainstream provision to one that caters for pupils with special educational needs and/or disabilities (SEND). Pupils will have a diagnosis of autism and/or other sensory or social and emotional difficulties. The age range of pupils will change from three to 11 years currently to become nine to 19 years. Proposed changes to the school's curriculum reflect these requested changes to the school's context.
- At the last material change inspection, evidence indicated that this part of the independent school standards (the standards) was likely to be met if the material changes requested are granted. This continues to be the case. Leaders intend that pupils will follow a suitably broad and balanced curriculum, incorporating subjects covered by the national curriculum. The school's curriculum policy lays out leaders' intentions for pupils' learning to be holistic, engaging and exciting, helping them to re-engage with education after a likely period of absence prior to joining the school. Pupils will follow a core of English, mathematics, science, computing, and personal and social development, supplemented by experiences of other subjects. As they move from key stages 2 and 3 into key stage 4, pupils will access a range of suitable qualifications, including GCSEs where this is appropriate. Plans across all four proposed key stages are fit for purpose.
- Some pupils are likely to join the school needing specific help to become fluent readers. Leaders have given sufficient thought to how this will be achieved via an age-appropriate reading scheme. Training to deliver this scheme will form part of the induction process for new staff joining the school. Pupils will have frequent opportunities for reading planned into their timetables in order to help promote a love of reading.
- Although the requested age range for the school extends to the age of 19, there will not be a post-16 curriculum as such. Instead, pupils will be able to stay at the school

beyond the age of 16 if needed in order to complete their key stage 4 studies. The nature of this provision will depend very much on the needs of pupils joining the school.

- Personal, social and health education (PSHE) and relationships and sex education are planned into the school's timetable. Leaders are alert to the need for this provision to match pupils' different stages of physical and emotional development and have plans for how this will be managed. Similarly, appropriate thought has been given to how pupils will learn about future career options and preparation for the world of work.
- Currently, most schemes of work take the form of outline plans, although those for English, mathematics and some key stage 4 subjects are more advanced in detail. Leaders intend to employ qualified teachers with experience of working in a specialist setting, who will be able to use their experience and expertise to bring long-term planning to life for pupils. Leaders have suitable plans for recruiting appropriate staff should the material change request be granted.
- Leaders have given sufficient thought to how they will check how well pupils are learning the intended curriculum. They plan to use these checks to support their ongoing reviews of pupils' progress against their education, health and care (EHC) plan targets.
- The relevant standards in this part are likely to be met should the material change request be granted.

## Part 2. Spiritual, moral, social and cultural development of pupils

### *Paragraphs 5 to 5(d)(iii)*

- At the last material change inspection, the standards in this part were judged as likely to be met if the material change request were to be granted. As for part 1, this continues to be the case.
- Leaders demonstrate a convincing understanding of the personal development needs that pupils joining the school are likely to have. Leaders have experience of working with pupils with similar needs and understand the school's local context. The school's plans for pupils' spiritual, moral, social and cultural development are based appropriately on this knowledge.
- Time for PSHE sessions has been prioritised in the school timetable. The curriculum overview incorporates a relevant range of topics, such as learning to stay healthy and safe. Alongside this, curriculum planning shows where opportunities to learn about different cultures, spirituality and moral dilemmas are built into pupils' learning, for example as part of the Spanish and psychology curriculums. Leaders intend to link with nationally recognised events, such as Holocaust Memorial Day, in order to make best use of available resources to support pupils' learning.
- The school has already begun developing a calendar of relevant activities to promote pupils' understanding of fundamental British values, such as democracy and mutual respect and tolerance of those with different faiths and beliefs. They anticipate needing to flex their plans in response to any priorities that may emerge, for example relating to friendship issues or events in the local or wider community. Leaders intend

to ensure that resources and materials used to deliver the curriculum reflect the cultural diversity of modern Britain.

- Thought has been given to how pupils can be supported and encouraged to contribute to their school community and beyond. While keen for pupils to have ownership of how this part of the school's provision evolves, leaders describe some initial links they have already made with local businesses and organisations that may be able to support this work.
- This standards in this part are likely to be met should the requested material changes be granted.

### Part 3. Welfare, health and safety of pupils

#### *Paragraphs 7 to 7(b), 32 and 32(1)(c)*

- The school's safeguarding arrangements are fit for purpose. The written safeguarding and child protection policy reflects current statutory guidance. Leaders are alert to potential risks to children, including those specific to the local area and the school's context. They have thought about how they will help pupils to understand and manage potential risks via specific aspects of the taught curriculum.
- The proprietor chair, as interim headteacher, will take on the role of designated safeguarding lead in the first instance. He has undertaken suitable training to equip him for this role. The other director is booked to attend designated safeguarding lead training in January, in order to be able to deputise for the interim headteacher where necessary. Because the directors are related to each other and will initially be the only people involved in running the school, they have sensibly made arrangements for an impartial third party who is independent of the school to provide support in the event that a concern is raised about one of them.
- Leaders have thought about how they will establish an effective culture of safeguarding in the school. Their plans for staff training and induction are appropriate. They have given thought to how concerns about pupils will be reported and recorded. They intend to purchase an online system to help them to do this, once the material change request has been granted.

#### *Paragraphs 11, 12, 14 and 16*

- The school's health and safety policy is fit for purpose. The interim headteacher will be responsible for implementing this policy in the immediate term. He has undertaken appropriate training to carry out this role. As the school grows, the intention is then to employ someone who will take on oversight of health and safety, as well as other recruitment and administrative aspects.
- Systems are in place for making daily, weekly and more periodic checks on the school site. Some of these checks, such as on fire equipment, are already being carried out and have been recorded appropriately. External companies have made checks on aspects such as external lighting and fire extinguishers.
- The school intends to open with a very small number of pupils and to grow gradually over time. Initially, the two directors will be based full time on site. Once pupils are admitted to the school, leaders intend to prioritise the recruitment of additional staff,

using the funds provided by pupils' fees. They have given appropriate thought to how staff breaks will be managed without compromising pupils' safety. For example, they intend to use a large room on the edge of the playground as a lunchtime 'chill-out' and games space so that pupils can be supervised by a relatively small number of adults.

- The school's risk assessment policy is fit for purpose. Risk assessments for classrooms and the kitchen are already in place. Leaders intend to write individual risk assessments for each pupil once enrolled at the school, taking account of their individual needs. They intend to allocate ownership of each risk assessment to a named person, who will keep these under review.
- The relevant standards in this part are likely to be met if the request for the material changes is granted.

#### Part 4. Suitability of staff, supply staff, and proprietors

*Paragraphs 18(2) to 18(2)(e), 18(3), 19(2) to 19(2)(d)(ii), 19(3), 20(6) to 20(6)(c), 21(1) to 21(3)(b) and 21(5) to 21(6)*

- Currently, the two directors are the only adults formally associated with the school. Their interim leadership roles are being carried out on a self-employed basis, pending the recruitment of permanent staff. A volunteer is providing informal support with the business administration aspects of the school. Another volunteer from another local community interest company (CIC) is acting as an external source of impartial advice and support during the school's 're-start' phase.
- Since the last inspection, appropriate action has been taken to improve arrangements for the recruitment and vetting of staff. These arrangements are now fit for purpose. An external company has been contracted to carry out these checks on any relevant adults. Appropriate checks have been made on the four adults currently associated with the school. Relevant documents have been independently verified, using support from the external, impartial volunteer. The Department for Education (DfE) has undertaken its own routine checks on the chair of the proprietor body.
- The software purchased to manage the single central record remains in place from the last inspection. The chair of the proprietor body has sufficient knowledge of how the system works but recognises the need to strengthen his own knowledge about which checks are required on which adults, rather than relying on the guidance of the company contracted to make these checks. He understands what the different types of checks are for and where he can seek further advice, including in the relevant statutory guidance.
- Leaders do not intend to use supply or temporary staff once the school is back up and running but anticipate that this will be necessary during the initial re-start phase. They intend to use recruitment and supply agencies to help them source suitable staff during this initial phase. Leaders intend to carry out their own recruitment and vetting checks on any temporary staff, in addition to any checks carried out by their referring agency.

- The school is likely to meet the relevant standards in this part if the material change request is granted.

## Part 5. Premises of and accommodation at schools

### *Paragraphs 23(1) to 23(1)(c), 24(1) to 24(1)(b), 24(2) and 25 to 29(1)(b)*

- The school has sole occupancy of its site, which comprises a main building, two further classroom spaces, plus outside playground space and some storage buildings. The premises have previously been used and operated for a school. As a result, the premises are fit for purpose, as was indicated at the last material change inspection.
- Classrooms provide suitable learning environments for the number and age of pupils that the school intends to accommodate. Rooms are light, clean and well maintained, with furniture appropriate for its intended purpose. Acoustics are suitable. One room is appropriate for more practical subjects, such as art and textiles. The well-equipped kitchen provides a conducive space for pupils to be able to participate safely in cooking lessons. There is also a suitably furnished sensory room and other quiet spaces for pupils who would benefit from time away from their classrooms.
- Toilet and washing facilities are fit for purpose. Some of the toilets are in need of refurbishment, being of a size more suitable for younger pupils. Leaders have plans to update the existing facilities, removing the existing cubicles that are no longer needed. Nevertheless, current provision is suitable for the number of pupils that the school intends to accommodate. Handwashing facilities with hot and cold running water are available in the toilet facilities. During this inspection, the temperature of the hot water was turned down to prevent the risk of scalding.
- As stated at the last inspection, pupils are likely to access provision for physical education off site at the local sports centre. Nevertheless, there is suitable space for pupils to be able to get changed at school if needed. There is plenty of outside space on the school site for pupils to be able to play, with access to a climbing frame and outdoor games, such as giant chess. Leaders intend to develop a nature area in one of the quieter parts of the site. External lighting is fit for purpose.
- There is a medical room that provides adequately for pupils should they become unwell. Toilet and washing facilities are available in this space, as well as a place for pupils to lie down. There is also a lockable first-aid box for the secure storage of any medications brought into school. Leaders do not anticipate admitting pupils with complex medical needs at the school.
- Leaders have ensured that there is sufficient access to drinking water throughout the school. Running water supplies, such as in the kitchen, are labelled as such. Additionally, there is access to bottled water in some of the rooms.
- The school is likely to meet the relevant standards in this part should the material change request be granted.

## Part 8. Quality of leadership in and management of schools

### *Paragraphs 34(1) to 34(1)(c)*

- Leadership arrangements have changed since the last inspection. The proprietor body now consists of two directors, who are also temporarily occupying the roles of interim headteacher and interim director of curriculum and examinations respectively. They have suitable experience of working in independent special schools.
- Leaders have addressed weaknesses evident at the last inspection. Where relevant, they have sensibly sought advice and support from people who are independent of the school. They have undertaken a range of relevant online training. Consequently, they have been able to ensure that the relevant independent school standards would be likely to be met should the requested material changes be granted. They are alert to where their knowledge and that of other staff recruited to the school will need to be further enhanced through ongoing training and have suitable plans to achieve this. They recognise that their initial heavy involvement in the day-to-day running of the school will not be sustainable as the school grows and have appropriate plans to recruit more staff and leaders when finances permit. They also understand the potential complexities of their current dual roles, exacerbated by their being husband and wife, and have taken appropriate steps to mitigate these in the immediate term.
- Leaders demonstrate suitable knowledge of the welfare needs that pupils joining the school are likely to have. This places them well to ensure that these needs are met. Their plans for the type of holistic education that the school intends to provide are fit for purpose.
- This part of the independent school standards is likely to be met should the material change request be granted.

### Schedule 10 of the Equality Act 2010

- The accessibility plan is available on the school's website. It shows sufficient consideration at this point, given that there are not currently any pupils enrolled at the school.

## **Compliance with regulatory requirements**

The school is likely to meet the requirements of the schedule to the Education (Independent School Standards) Regulations 2014 ('the independent school standards') and associated requirements that are relevant to the material change.

## School details

|                         |          |
|-------------------------|----------|
| Unique reference number | 119005   |
| DfE registration number | 886/6057 |
| Inspection number       | 10319885 |

This inspection was carried out under section 162(4) of the Education Act 2002, the purpose of which is to advise the Secretary of State for Education about the school's likely compliance with the independent school standards relevant to the material change that the school has applied to make.

|                                      |                                      |
|--------------------------------------|--------------------------------------|
| Type of school                       | Primary school                       |
| School status                        | Independent day school               |
| Proprietor                           | Elmley Dray CIC                      |
| Chair                                | Thomas Furnell                       |
| Headteacher                          | Thomas Furnell (Interim Headteacher) |
| Annual fees (day pupils)             | £47,000                              |
| Telephone number                     | 01795 485 039                        |
| Website                              | elmleydrayschool.co.uk               |
| Email address                        | info@elmleydrayschool.co.uk          |
| Date of previous standard inspection | 26 to 28 November 2019               |

## Pupils

|                                     | School's current position | School's proposal | Inspector's recommendation |
|-------------------------------------|---------------------------|-------------------|----------------------------|
| Number of pupils on the school roll | 0                         | 40                | 40                         |

## Pupils

|   | School's current position | School's proposal |
|---|---------------------------|-------------------|
| Gender of pupils                                    | Mixed                     | Mixed             |
| Number of full-time pupils of compulsory school age | 0                         | 40                |



|  |   |    |
|--|---|----|
| Number of pupils with special educational needs and/or disabilities                              | 0 | 40 |
| Of which, number of pupils with an education, health and care plan                               | 0 | 40 |
| Of which, number of pupils paid for by a local authority with an education, health and care plan | 0 | 40 |

### Staff

|   | School's current position | School's proposal                                   |
|---|---------------------------|---|
| Number of full-time equivalent teaching staff | 2                         | Increasing towards 8 to 10 once school roll is full |
| Number of part-time teaching staff            | 0                         | 0   |
| Number of staff in the welfare provision      | 0                         | Increasing towards 9 once school roll is full       |

### Information about this school

- Elmley Dray School is a small independent school. It originally opened as Elliott Park School in September 1985 and was known by this name when the school had its last standard inspection in November 2019. It was briefly known as The Stefan Taye School before adopting its current name in September 2023.
- Since the last standard inspection, the school has ceased to operate. While it remains registered and open as an independent primary school, there are currently no pupils on roll. Leaders intend to redesignate the school as an independent special school for pupils with autism and/or sensory or social and emotional difficulties. Pupils will have EHC plans and will be placed at the school by local authorities.
- The school's proprietor body arrangements have undergone a number of changes since the last standard inspection. The school is currently owned and operated by Elmley Dray CIC, which comprises two directors. These directors are currently the only staff working at the school, temporarily occupying the roles of interim headteacher and interim director of curriculum and examinations. The school does not have a governing body.
- The school operates from a single site, of which it has sole use.
- The school does not use any alternative provision.

## Information about this inspection

- This inspection was commissioned by the DfE in response to a request for a material change to the school's operating arrangements. Leaders have requested three changes: to redesignate the school as a special school; to change the age range from three to 11 years to nine to 19 years; and to reduce the number of pupil places from 69 to 40. In making recommendations to the DfE about whether to grant these requests, the inspector considered whether the school would be likely to meet the relevant standards in parts 1, 2, 3, 4, 5 and 8 of the independent school standards.
- If granted permission for the material change, leaders intend that the school will cater exclusively for pupils with EHC plans for autism and/or associated sensory or social and emotional needs.
- This is the third material change inspection to consider this requested change, which also involves changing the age range and number of pupils accepted by the school. Previous material change inspections took place on 13 March 2023 and 6 July 2023. On both of these occasions, the school was judged as not likely to meet the relevant independent school standards if granted permission for the requested material changes.
- The inspector met with the proprietors, who are also the interim school leaders, to discuss their plans for the school and explore a broad range of relevant evidence relating to the standards. She toured the school site to evaluate its suitability for the intended changes. She considered the school's safeguarding arrangements, including recruitment and vetting checks, and looked at the school's single central record. She considered information provided by the school and available on the school's website.

## Inspection team

Kathryn Moles, lead inspector

His Majesty's Inspector

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