



*Elmley Dray
School*

Elmley Dray School Modern Slavery Statement 2025 - 2026

This statement is made on behalf of Elmley Dray CIC (company number 14498669) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the year September 2025 until August 2026.

Elmley Dray recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out Elmley Dray's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

Structure, business and supply chains

Elmley Dray is Specialist Educational Provision, working within an economically deprived area of Kent and the UK.

Our suppliers are UK based and key supply areas cover business resources, maintenance/repairs, local authority (Kent) and small businesses within the county of Kent.

Our approach

We work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human

trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

Policies, documentation and key relationships

The following key policies and documentation detail our approach to protecting our learners and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Compliments, Concerns and Complaints Policy
- Whistleblowing Policy and Procedure
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy
- Safeguarding, Child and Vulnerable Adult Protection Policy
- Code of Conduct
- Supplier terms and conditions

In addition, we work closely with TES Safeguarding to help reduce risks and improve employee working and pay practices.

Identifying and addressing risks

We recognise as a Community Interest Company that there are two main avenues of risk through which modern slavery could impact Elmley Dray. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our learners. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

Supply chain

We have a limited exposure to the use of suppliers but we have expectations that they have regulations set out in order to engage with the school. All suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS check. We publish our standard terms and conditions to ensure providers looking to contract with us are aware of our standards. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

All staff cover modern slavery within their CPD programme.

Safeguarding

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and learners through a culture of safeguarding in everything we do. We have a Designated Safeguarding Lead and Deputy Designated Safeguarding Lead in our school. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice. Through their leadership and encouragement, Elmley Dray will proactively work with the local authorities, the local safeguarding partnerships, the LADO, MASH and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Elmley Dray is committed to high levels of training and CPD for all staff within safeguarding including detailed training about early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is reviewed at every governance (PAT) meeting (six per academic year). Safeguarding policy is reviewed at least annually (more frequently following any incident and/or legislative change or local trend) by the Designated Safeguarding Lead (DSL) and ratified by the Director/s. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education. The safeguarding team meet weekly to review cases, practice and updates. All staff receive weekly briefings and circulars. We work closely with multi agency partners to ensure compliance is maintained. Elmley Dray also works closely with TES Safeguarding ensuring that our statutory safeguarding responsibilities are compliant and of high quality.

Key performance indicators to measure effectiveness of steps being taken

Training

Every member of staff, whether or not they are based in the school, is trained on the policy (in person and via e-learning). All staff have to declare annually that they have read and understood the policy. In addition, Elmley Dray also has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of disciplinary action.

Early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks is crucial in ensuring that we are always vigilant of our vulnerable learners, and ensuring our staff are able to support our commitment to safeguarding. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk learners, staff and visitors to the school.

We continually enhance the knowledge of our staff to prevent slavery and human trafficking and child sexual exploitation. Safeguarding awareness sessions for modern

slavery (and trafficking) at school level are included within our staff safeguarding CPD programme.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users.

Reporting

To date, no referrals have been made in relation to modern slavery.

Version control - Approval and review

Version No.	Approved By	Approval Date	Main Change	Review Period
1	Hayley Furnell	September 2024	Initial policy approved	Annually
1.1	Hayley Furnell	September 2025	Annual review	Annually



Hayley Furnell, Director,
on behalf of Elmley Dray School
Dated: September 2025
Next review: September 2026