Flimby Primary School

RESTRICTIVE INTERVENTIONS, INCLUDING USE OF REASONABLE FORCE POLICY AND PROCEDURES

Approved by			
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MAINTAINED SCHOOLS - Head teacher is free to approve this Policy and procedures and to determine the review period. It does not require approval by the Governing Body but they are required to monitor recording and reporting. Governing Bodies must formulate a 'Behaviour principles written statement' (published on the school website).
ACADEMY AND INDEPENDENT SCHOOLS - This Policy and procedures must be approved by the Governing Body/LAB. GB/LAB are free to determine the review period.
ALL SCHOOLS - Policy and procedures must be brought to the attention of pupils, parents, and relevant others at least annually.

REVIEW SHEET

Each entry in the table below summarises the changes to these procedures made since the last review (if any).

Version Number	KAHSC Version Description	Date of Revision/Review
1	Original – earlier version of KAHSC 'Model Positive Handling procedures' has been withdrawn. This new Policy meets the requirements of schools to have a Policy and procedures on 'Restrictive interventions including the use of reasonable force'. DfE suggest that schools may choose to have this Policy as a standalone document or the procedures can be appended to the school Behaviour Policy (see Model Behaviour Policy on KAHub). If school choose to have a separate document, it must be published alongside the Behaviour Policy on the school website.	March 2026
2	Updated to include information on restrictive interventions records transfer and retention (point 14, page 9 refers).	May 2026

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RESTRICTIVE INTERVENTIONS INCLUDING THE USE OF REASONABLE FORCE POLICY AND PROCEDURES

1. Introduction

To maintain the safety and welfare of our pupils, it may sometimes be necessary to use restrictive interventions including the use of reasonable force on a pupil, as permitted by law.

These procedures were developed to support staff and inform the school community in response to publication of the Department for Education (DfE) – 'Restrictive interventions, including use of reasonable force, in schools' guidance, which came into force on 1 April 2026. Page 14 of that document contains statutory guidance from the DfE issued under section 93A of the Education and Inspections Act 2006, the rest is non-statutory advice and these procedures outline this school's approach.

These procedures should be read in conjunction with the school Behaviour Policy and procedures.

Throughout government guidance, when the word "must" is used, the person in question is legally required to act. When the word "should" is used, the advice set out should be followed unless there is good reason not to.

Flimby Primary School (hereinafter referred to as 'the school') has drawn these procedures from the guidance issued by the DfE:

- Behaviour and discipline in schools: guidance for governing bodies (sets out the DfE expectation that governing bodies provide clear advice and guidance to the Head teacher on which to base the school behaviour policy. In 'maintained'[1] schools, this is the Governors' 'Written statement of behaviour principles'[2] which must be published on the school website alongside the school Behaviour Policy and procedures)
- Behaviour in schools: advice for head teachers and school staff (describes the legal powers and duties that govern behaviour in schools and includes the use of restrictive interventions and the use of reasonable force)
- Equality Act 2010: advice for schools
- the school's public sector equality duty set out in section 149 of the Equality Act 2010.
- EYFS Statutory framework for group and school-based providers
- Keeping Children Safe in Education
- Mental health and behaviour in schools
- Mobile Phones in Schools
- Restrictive interventions, including use of reasonable force, in schools
- Searching, screening and confiscation: guidance for schools
- Suspension and permanent exclusion from maintained schools, academies and PRUs in England, including pupil movement - Guidance for schools
- Working together to safeguard children
- Reducing the need for restraint and restrictive intervention (special education settings only)

These procedures should be read in conjunction with the following school policies and procedures:

- Overarching Safeguarding Statement (where available – not a statutory document)
- Child Protection Policy and procedures
- Behaviour Policy and procedures
- Code of Conduct for staff and other adults
- Health and Safety Policy and procedures/arrangements
- Equality Policy/Objectives
- Special Educational Needs and Disabilities (SEND) Policy/Information Report
- Supporting Pupils at School with Medical Conditions Policy and procedures

[1] 'Maintained' schools are those with Community, Voluntary Controlled, Aided and Foundation status and Pupil Referral Units

[2] Academy Trusts, Independent schools and Free schools are not required to produce a 'written statement of behaviour principles' but such settings must have a Behaviour Policy and procedures agreed by the Governing Board.

- Off Site Visits procedures

2. Terminology

For clarity, these procedures use the following definitions:

Child/Pupil: For the purposes of these procedures a child, young person, pupil, or student is referred to as a 'child' or a 'pupil' and they are normally under 18 years of age.

Parent: A child's birth parents or anyone who has parental responsibility (which includes the Local Authority where it has a care order in respect of the child) and any person (for example, a foster carer) with whom the child lives (Education Act 1996).

Restrictive intervention: a means to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil. This guidance uses 'restrictive interventions' as the umbrella term to describe both physical and non-physical actions aimed to restrain pupils in different ways.

Reasonable force: a term used in legislation which includes physical restrictive interventions. All members of school staff have the legal power to use reasonable force in limited circumstances[3]. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.

Significant incident[4]: any incident where the use of force goes beyond appropriate physical contact between pupils and staff as described in Section 15 (Other physical contact with pupils). This includes when physical force is used to implement a non-physical restrictive intervention.

Seclusion: a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, securing the place so that the pupil cannot leave it, blocking, or making them believe they will be punished if they try to leave.

Restraint: a term used in legislation referring to a non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil's arms to their sides, securing the pupil to a fixed or heavy object or removing a pupil's auxiliary aid that they usually use to help them move e.g. crutches, would all be considered forms of restraint.

The various restrictive interventions above are defined for completeness and are not to be construed as an endorsement or otherwise for their use in this school.

3. Objectives

The key objective of this document is to outline the school's procedures on restrictive interventions including the use of reasonable force to control or restrain pupils.

We recognise that school staff have a legal power to use force and that the lawful use of this power will provide a defence of any related criminal prosecution or other legal action where it can be demonstrated that the use restrictive interventions or force was reasonable in the circumstances.

Restrictive interventions or reasonable force will only be used as a last resort after de-escalation techniques have failed. School staff are made aware that they will have to justify their actions if they ever use restrictive interventions or reasonable force in the course of their duties.

It is clear in our Behaviour Policy and procedures and in communications to parents and pupils when restrictive interventions or force might be used – this will reduce the likelihood of complaints being made when interventions or reasonable force has been properly used.

[3] Section 93 of the Education and Inspections Act 2006 and section 550ZA(3) of the Education Act 1996

[4] 'Significant incident' is in reference to section 93A of the Education and Inspections Act 2006 which requires schools to record and report significant incidents of use of force to parents and others with parental responsibility for the child.

4. Background: what the law says

Section 93 of the Education and Inspections Act, 2006, provides the legal power for any member of the school staff to use reasonable force in certain circumstances to prevent or stop a pupil from:

- causing injury to themselves or others;
- committing a criminal offence (this applies to children under the age of 10 who can now be held responsible for their actions even though they are below prosecution age);
- damaging property;
- causing disorder among pupils at the school, whether during a teaching session or otherwise.

Employers (LA, Governors, or Academy Trust Board) have a duty Under the Health and Safety at Work etc. Act, 1974, to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees. We will, therefore, carry out risk assessments to ensure that staff who regularly work alongside pupils where the use of reasonable force and/or other restrictive interventions may be required can do so as safely as possible[5].

The legal power given to school staff may only be used where the pupil and the member of staff are on the school premises or they are elsewhere and the member of staff has lawful control or charge of the pupil concerned, for example, on an off-site visit.

Where a pupil has a disability, we have a legal obligation under the Equality Act 2010 to support pupils with reasonable adjustments, which in turn may reduce the need for restrictive interventions or force, making sure they can benefit from what the school offers. Examples of reasonable adjustments are included in Section 10 below.

The Human Rights Act 1998 requires the school to ensure that disciplinary actions such as restrictive interventions and reasonable force are legal, necessary and proportionate. Staff in the school must act reasonably and avoid discrimination.

The Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025 set out the requirements for the recording and reporting of incidents where restrictive interventions, force or seclusion is used on a pupil.

5. Reducing the need for restrictive intervention or force

In order to minimise the need to use any form of restrictive intervention or force, staff will attempt to use other techniques such as diversion or diffusion to de-escalate and manage the situation. Where possible, before using force and depending on the circumstances staff will:

- engage the pupil in a calm measured tone, setting out how the pupil could choose to modify their behaviour;
- distract the pupil: for example, when pupils are fighting, by shouting or blowing a whistle;
- if an angry pupil has moved away: decide whether they are a risk to themselves and others before deciding to follow/detain;
- remove other pupils who might be at risk;
- warn the pupil that force might be necessary;
- summon assistance;
- use the minimum amount of force necessary;
- request Police assistance, if appropriate.

Any force will be proportionate to the level of risk and will be reduced at the earliest possible opportunity.

Staff will not, as far as possible, use force unless or until another responsible adult is present to support, observe and call for assistance. We may consider a pre-determined alerting procedure. This procedure can be used for many issues not just the need for restrictive intervention. Phones and walkie talkies are available in each classroom.

[5] Health and Safety: responsibilities and duties for schools

6. When the use of restrictive interventions or reasonable force might be appropriate

The use of restrictive intervention or reasonable force is a relatively rare occurrence in the school. The judgement on whether to use restrictive interventions or force should depend on the circumstance of the case or information about the individual concerned.

Examples of situations that particularly call for judgement of this kind include action to:

- remove disruptive children from the classroom where they have refused to follow an instruction to do so;
- prevent a pupil from behaving in such a way that seriously disrupts a lesson;
- prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground; and restrain a pupil at risk of harming themselves through physical outbursts;
- prevent a pupil committing deliberate damage to property;
- prevent a pupil from causing injury or damage, e.g. by accident, or rough play; pushing and shoving in a crowded situation or by misuse of dangerous materials or objects.

In circumstances where a pupil who is intent on leaving the school other than at an authorised time, it would only be justifiable to prevent this if allowing a pupil to leave:

- may result in serious risks to a pupil's safety (taking account of age and understanding) to the safety of other pupils or staff or of damage to property;
- leads to behaviour that prejudices good order and discipline, such as disrupting other classes.

In the above examples the use of force is likely to be construed as reasonable (and therefore lawful) if it was clear that the behaviour was ***sufficiently dangerous and disruptive*** to warrant restrictive intervention of the degree applied and could not realistically be dealt with by any other means.

7. Determining when the use of restrictive interventions or reasonable force is appropriate

There will be times when school staff may need to use restrictive interventions including the use of force, and they are aware that this option may be available to them depending on the individual circumstances of each situation. The decision on whether to physically intervene is down to the professional judgement of the staff member. A person will not be considered to have used corporal punishment (and therefore will not have committed an offence) if restrictive intervention was taken to avert immediate danger of personal injury to any person (including the child) or to manage a child's behaviour if absolutely necessary. Decisions on whether the precise circumstances of an incident justify the use of force must be reasonable. Typically, such decisions are made quickly, with little time for reflection.

To make this assessment, staff will consider the following:

Is intervention or use of force necessary?

In making this decision, staff should consider whether there are other more effective, less restrictive ways to manage the situation.

- Does the seriousness of the incident, the effect of injury, damage or disorder justify the use of force?
- What are the relative risks to self or others associated with the use of force compared with other strategies?
- Would de-escalation or distraction help?
- Can we ask the pupil to undertake a different task in a different area of the classroom?
- Would removal from the classroom altogether diffuse the situation e.g. transferring the pupil to another classroom or sending them on an errand in school?

- Is restrictive intervention likely to be successful to reduce the risks or would its use escalate the situation further leading to more harm than the behaviour itself?
- Would introducing other staff de-escalate the situation to an acceptable level without the need for restrictive intervention or would this potentially inflame the situation?

Is the proposed intervention proportionate in the circumstance?

Having made the decision to intervene, staff should:

- always use the least amount of force or least restrictive intervention necessary for the least amount of time required to reduce the relevant risks;
- consider whether the intervention itself is escalating the situation. Where this is the case, staff should reconsider their approach and attempt an alternative strategy;
- consider the personal circumstances of the pupil such as medical conditions, special educational needs or other vulnerabilities, their characteristics such as age and size, and must consider relevant equality implications under the Equality Act 2010.

Has the pupil's welfare been considered?

Staff should always consider the impact on the pupil's overall welfare, balanced against any actions taken. For example, pupils who have experienced an adverse life event, with diagnosed or undiagnosed medical conditions or sensory impairments, past trauma or neglect, communication difficulties, or other needs, may find the use of restrictive interventions particularly distressing.

- Staff should seek to maintain respect for a pupil's dignity. This may include, where possible, considering the location and environment where any intervention is used, such as in front of their peers.
- Where possible, staff should clearly and calmly communicate to the pupil what is happening, why, and explain what the pupil needs to do.
- For pupils with difficulties with speech, language and communication, or with English as an additional language, verbal and/or non-verbal strategies should be used to ensure the pupil understands what is happening and has adequate time to process information and respond.
- Staff should seek to understand how the pupil is feeling and use this information to determine whether the restrictive intervention should be, or continue to be, applied, reduced or stopped.

Where a pupil has an agreed Behaviour Management Plan (BMP), this should clearly identify the type of restrictive intervention and the circumstances when interventions will be used. Where pupils have the capacity to understand the intervention outlined in the BMP, the intervention should be explained to them at a time when they are calm and not in crisis so that the intervention does not come as a surprise to them should it be required.

8. Unacceptable use of restrictive interventions or force

It is illegal to use force as a punishment. This would fall within the definition of corporal punishment, abolished by section 548 of the Education Act 1996. A person will not be considered to have used corporal punishment (and therefore will not have committed an offence) if physical intervention was taken to avert immediate danger of personal injury to any person (including the child) or to manage a child's behaviour if absolutely necessary.

Pupils should not be restrained in a way that affects their airway, breathing or circulation, for example, by covering the mouth and/or nose, or applying pressure to the neck region or abdomen. The use of force can be dangerous, particularly where it occurs on the ground. If a pupil is unintentionally held on the ground, staff should release their holds or re-position into a safer alternative or standing position as quickly as possible.

Where appropriate, the pupil should receive a medical assessment and treatment for any injuries as soon as possible. For any form of restraint, including seated and standing, there is a risk of physical and psychological harm, and it should be avoided where possible.

The following are **not** acceptable in **any** circumstance:

- holding a pupil around the neck, or the collar/tie or in any other way that might restrict the pupil's ability to breathe;
- pushing the pupil's head downwards, or sitting, kneeling or resting on the pupil;
- pushing or holding the pupil on the floor either in a sitting or lying position;
- slapping, punching or kicking a pupil;
- twisting or forcing a limb; forcing a limb against the joint or behind a back;
- tripping up a pupil;
- pulling ears and generally pulling hair;
- touching or holding in any way that might be interpreted as sexually inappropriate conduct.

In addition, the following are considered to have unacceptable risk when used on a child or young person and are **not** permitted:

- the 'seated double embrace' which involves two members of staff forcing a person into a sitting position and leaning them forward, while a third monitors breathing;
- the 'double basket hold' which involves holding a person's arms across their chest;
- the 'nose distraction technique' which involves a sharp upward jab under the nose.

Staff will avoid acting in a way that might reasonably be expected to cause injury. Any force should be limited and removed as soon as possible.

9. Seclusion

Seclusion is a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving. Seclusion will only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. In such circumstances, the pupil is not acting with intent. Seclusion will never be implemented by staff through threat of punishment.

Where seclusion is deemed to be necessary in the presenting circumstances, the place to which the pupil is confined will be safe and not feel threatening or intimidating to the pupil. The pupil will be supervised at all times during the period of seclusion. As soon as the immediate risk of harm has reduced, the pupil will be allowed to leave.

An incident involving the use of seclusion must be recorded and reported in accordance with the procedures outlined in Sections 12 and 13 below.

Seclusion is not a disciplinary response to deliberate or wilful misbehaviour. There are disciplinary measures that are similar, such as removal from the classroom and our Behaviour Policy outlines the circumstances when such disciplinary measures would be used.

10. Pupils with special educational needs and/or disabilities

We recognise that some children and young people with SEND may react to distressing or confusing situations by displaying behaviours which may be harmful to themselves and others. Triggers may include pain, sensory overload, unfamiliar situations or environments or feelings of fear and anxiety. In particular, pupils who are non-verbal or find verbal communication challenging may express their needs, discomfort or confusion through actions and challenging behaviour. This can lead to pupils with SEND being disproportionately subject to the use of restrictive interventions.

We will seek to understand the underlying triggers of challenging behaviour so that we can provide proactive support, create an inclusive environment and consider the impact of school policies on pupils with SEND. Under the Equality Act 2010 we have a legal duty to support pupils with disabilities and other special educational needs by making reasonable adjustments, which in turn may reduce the need for restrictive interventions or force. These reasonable adjustments could include:

- **tailored changes to rules** - allowing children to enter school early/late to avoid crowds, modifications to breaktime rules allowing use of quiet areas;
- **amendments to policies** - using timeout or 'break' cards, using restorative work instead of standard sanctions and modifying uniform policies;

- **alterations to the environment** – removing stimuli that may cause distress, specified or allocated seating, provision of sensory tools (e.g. noise-cancelling headphones, fidget toys or allowing movement breaks), modified breaktimes, provision of quiet, calm or sensory-friendly spaces;
- **additional support and structure** – changing body language, facial expression and/or tone of voice, the use of distraction techniques to redirect their attention to something familiar, implementing visual timetables, supporting the pupil to express their emotions before getting overwhelmed, providing clear, written instructions and allowing time for the instructions to be processed, breaking up assignments into manageable chunks.

We will communicate with those staff who know the individual pupil well, with external professionals e.g. the virtual school Head, social workers or external behaviour specialists who are involved with the child and with parents to help identify and manage risk such as trigger points when challenging behaviour is more likely to occur and develop proactive strategies to reduce the likelihood of restrictive interventions being used.

All staff should adopt a positive approach to improving behaviour to reward effort and build self-esteem. Staff will work in partnership with those who know the child to:

- find out why the child behaves as he/she does;
- understand the factors that influence a child's behaviour;
- identify early warning signs that indicate foreseeable behaviours are developing.

This approach will help to ensure that early and preventative intervention is the norm. It should reduce the incidence of extreme behaviour and assist in ensuring that the use of restrictive intervention is rare.

If a child's behaviour deteriorates so that he/she is a danger to himself or others it may be necessary to use restrictive interventions or reasonable force to prevent them hurting themselves or others. These interventions would be emergency measures or interventions if all other routes have been exhausted.

11. Implementation and use of Behaviour Management Plans (BMPs)

The term 'risk' refers to any circumstances which could lead to adverse or harmful outcomes for the child or others.

Risk assessment and management is a process that helps staff to consider risk issues, to act reasonably and to learn from everyday practice. The Behaviour Management Plan (BMP) is to all intents and purposes a 'Risk assessment' outlining appropriate controls to reduce the risk of harm to both the child and others.

Whenever it is foreseeable that a pupil might require a restrictive intervention, a BMP must be put in place which identifies the benefits and risks associated with the application of different intervention techniques with the pupil. Assessing and managing risk is central to the process of deciding whether to use restrictive interventions or force, ensuring that it is both **reasonable** and **proportionate** to the circumstances.

Where it is known that a pupil is likely to present severe behaviour difficulties, a formal assessment (BMP) of the risks involved will assist staff in judging the benefits and risks of any proposed intervention for staff, the pupil concerned and others. The BMP must be completed by a competent person who has sufficient knowledge about the pupil and his/her behaviour to enable them to make objective decisions on the appropriate control measures to utilise.

Risk reduction options will be considered such as situations that may provoke difficult behaviour, preventative strategies and de-escalation strategies that are most likely to work, what is likely to trigger an unacceptable reaction and specific strategies and techniques agreed by staff and parents which will be used if necessary and an agreed BMP and, where necessary, a 'Positive Handling Plan' (PHP) produced.

It is important that the BMP includes all situations where the pupil is in the care of the school for example, home to school transport (where transport is arranged by the LA or the school), off-site visits and activities which take place off the school site e.g. curricular swimming or sports events. Once complete, the BMP must cover all eventualities where dealing with the challenging behaviour may arise.

Once agreed, the BMP and PHP will be shared with all those responsible for implementing or monitoring the impact of the plan including:

- the child (where he/she has the appropriate level of understanding);
- his/her parents;
- school staff and other adults working in the school on a need to know basis;
- other professionals involved with the child.

The BMP and, where required, the PHP will be agreed by parents and reviewed termly and following any significant incident so that changes can be made based on evidence of what has worked and what has not worked in practice for the individual pupil. A completed (example) risk assessment or Behaviour Management Plan template is available from the KAHub along with a model Blank BMP. This model Behaviour Management Plan incorporates, where required, the individual's Positive Handling Plan. The BMP must be signed and dated by the assessor.

12. Recording and reporting significant incidents

The school does not require parental consent to use force on a pupil. The school has a statutory duty to record and report to parents in writing each *significant* incident in which a member of staff uses force on a pupil as part of the schools duty under section 93A (Education and Inspections Act 2006)[6].

Incidents which result in the use of force on a pupil will be recorded in writing as soon as practicable after the event. The staff member(s) involved are responsible for recording the event and they will endeavour to do this no later than the same day. The requirement to record incidents applies even if the use of restrictive interventions in certain circumstances is agreed with parents as part of the pupil's Behaviour Management Plan.

The member of staff involved must report the event to the Head teacher/DSL or other nominated senior leader and make a written record of the event using CPOMS and 'Record of Restrictive Intervention or use of force' form if deemed necessary.

In addition to the above, it is a statutory requirement for the school to report **each** significant use of force to the parents (or the LA where the child is cared for) in writing e.g. via email or online messaging system. We will endeavour to do this the same day but in any event, as soon as reasonably practicable.

The exception to the requirement to report is where it appears to the staff member that reporting to the parent would be likely to result in serious harm to the pupil. In such instances, the staff member must report the incident to any parent(s) who it can be reported to without resulting in significant harm or, if there are none, to the Cumberland CASS - Tel: 0333 240 1727) within whose area the pupils normally lives.

The requirement to report to parents applies even if the use of restrictive interventions in certain circumstances is agreed with parents as part of a pupil's BMP. A report of the incident made to parents should include the following details as a minimum:

- time, date, location and approximate duration of the intervention;
- brief account of why the intervention was assessed as necessary in that instance;
- brief account of what type of force was applied, and the degree of force;
- details of any physical injuries sustained, if applicable.

A follow-up discussion with the parents will be considered (where appropriate) as best practice including:

- any behavioural triggers or warning signs of an impending incident;
- whether any agreed behaviour support plans were followed;
- what de-escalation strategies were used and how effective they were;
- what might be done differently in the future.

Any issues arising from the discussion, will be used to amend any existing BMP or to create a BMP where one doesn't currently exist.

[6] Section 93A of the Education and Inspections Act 2006 and Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025

13. Recording and reporting the use of seclusion and non-force related restraint

We have a legal duty under the Schools (Recording and Reporting of Seclusion and Restraint) Regulations 2025.[7] to ensure that we record incidents of non-disciplinary seclusion or restraint that may occur with or without direct physical contact for example the removal of a walking aid. The legal duty to record such incidents follows the same procedure as outlined in Section 12 above. The requirement to record applies even if the use of non-disciplinary seclusion or restraint in certain circumstances is agreed with parents as part of a pupil's BMP.

In the case of incidents involving non-disciplinary seclusion or restraint, we will provide information about the incident to parents as soon as practicable after the incident and will endeavour to inform parents no later than the same day. The same exceptions to reporting to parents apply as outlined in Section 12 above.

Where a non-disciplinary seclusion or restraint incident also constitutes a significant use of force, the same information does not need to be recorded twice. However, if a non-disciplinary seclusion or restraint incident **does not** constitute a significant incident of use of force, for example, the removal of a walking aid, this must be recorded and reported to parents under the procedures outlined in this Section and Section 12 above.

We will use the 'Record of Restrictive Intervention or use of force' if we reach level 4 'Maximum priority' and CPOMS for levels 1-3 for recording and, where necessary, report to parents. See appendix. This document will also be uploaded to CPOMS.

14.Records transfer and retention

The following section has been formulated following guidance issued by the Institute of Records Management: https://irms.org.uk/schools-toolkit/records-of-restrictive-interventions/.

A record of a restrictive intervention incident is, simultaneously, two distinct records:

- **A record forming part of the child's educational and safeguarding file.** An incident of force, seclusion or restraint/immobilisation is, by its nature, a notable incident involving the child. It therefore forms part of the pupil record and will be treated accordingly. This means it must travel with the child when they move to a new educational setting, in the same way as other education and child protection records.
- **An institutional record belonging to the school.** Independently of its status as part of the child's file, the record also forms part of our own governance and management records. Governing bodies and proprietors are required to take all reasonable steps to ensure that their school's recording and reporting procedures are complied with so that we can regularly review and interrogate data on restrictive interventions at an institutional level. This analysis, covering patterns, trends, disproportionality in relation to SEND or protected characteristics, and the effectiveness of support measures, cannot be carried out unless there is an effective way to review such records.

The practical implication of this dual nature is that incident records are required to be stored in two places i.e. the school's institutional incident log and the individual pupil's education or safeguarding record.

a. The institutional incident log

Completed incident record forms will be retained in a dedicated incident log at school level. This is our school's institutional record. It provides the information that governing bodies/proprietors need to discharge their oversight responsibilities and compliance, and that inspection bodies may wish to examine. It enables us to analyse patterns over time, to identify any disproportionate use of restrictive interventions, and to evidence the effectiveness (or otherwise) of our policies and support strategies. This record will be stored securely.

b. Transfer of records when a pupil moves school

As with all education and safeguarding records, incident records forming part of a child's file must be transferred to the child's new school. Records of this kind are likely to be relevant to the new school's

[7] Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.

safeguarding and behaviour support arrangements. We will take care to ensure that this information is communicated appropriately as part of the transition process, subject to compliance with the School Admissions Code 2021.

c. Record retention

The regulations and DfE guidance do not prescribe a specific retention period for incident records. We will therefore make a documented, risk-led decision and record it in our retention schedule.

Records forming part of the child's safeguarding file will be treated consistently with other safeguarding records. Where this school is the 'last known school' for that pupil, these records will be retained until the pupil reaches the age of 25 before review prior to destruction although this may be longer in order to comply with our statutory duties in relation to child protection files.

The school's own institutional incident log is a governance and management record. There is no specific legislative provision on how long these records must be kept. However using the analogy with accident records involving children and given the risk profile of personal injury claims that may arise where incidents result in injury, we will retain the institutional incident log in line with our practice on accident records. These records will be stored securely either in hard copy or electronically until the youngest child has reached their 25th birthday.

15. Post incident measures

We will follow our standard procedure of investigating/evaluation of the incident, including seeking first aid or professional medical support for all injured parties and reporting relevant injuries as appropriate.

We will hold a follow-up conversation(s) to facilitate reflection, learning and to support pupil and staff wellbeing. This conversation will be framed as part of the overall debriefing process and look to understand what happened during the incident and why, based on separate reflections from both the staff and pupils involved, as well as to repair and rebuild relationships through dialogue.

This process should ideally be facilitated by a staff member who was not involved in the incident and may also benefit from the presence of an additional person to ensure impartiality and support. Engaging in this process will enable us to foster a culture of continuous improvement. We will continue to monitor both pupil and staff wellbeing and provide additional support if needed.

Any pupil who witnesses an incident of restrictive intervention where a peer may have been injured or become distressed with also be provided with reassurance and/or appropriate support where necessary.

If the reason for the incident was the pupil's behaviour, then sanctions, including exclusion, will be considered in line with the Behaviour Policy and procedures.

16. Other physical contact with pupils

We do not have a 'no contact' policy and will not grant any requests by parents or staff members not to use reasonable force and/or other restrictive interventions where these are reasonable in the circumstances to fully protect pupils. Whilst the school does not encourage staff to touch pupils unless it is necessary, there are occasions when physical contact with a pupil is proper and necessary. Examples of occasions when physical contact is generally appropriate include:

- to give first aid;
- to guide or escort pupils, such as holding the hand of a pupil at the front/back of the line when going to assembly, when walking together around the school or on a school trip, or when helping a pupil to a space they have chosen to access to self-regulate;
- to comfort a distressed pupil;
- to congratulate or praise a pupil, for example a pat on the back or a handshake;
- to demonstrate how to use a musical instrument;
- to demonstrate exercises or techniques during PE lessons or sports coaching.

The above list is not exhaustive.

In assessing whether physical contact is appropriate in a given situation, the member of staff will use their judgement and have regard to:

- the school's Child Protection (or any other relevant) policy;
- the applicable circumstances, such as whether there are other adults present;
- the individual pupil's age;
- any other material factors, including but not limited to whether:
    - the pupil has SEND or other vulnerabilities;
    - any alternative strategies that do not include physical contact can be used.

17. Use of reasonable force to search pupils

Head teachers and **staff they authorise** have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may have a prohibited item.

The following items are what are termed 'Prohibited or illegal Items' and their presence on school premises, or if found on an individual pupil, will lead to the highest sanctions and consequences:

- Knives and weapons *(Further guidance is available in KAHSC Safety Series G14 – Knives, Offensive Weapons and other inappropriate items)*
- Controlled drugs
- Alcohol
- Fireworks
- Tobacco and cigarette papers
- Pornographic images (including those found on electronic devices)
- Stolen items
- Any article that the member of staff (or other authorised person) reasonably suspects has been, or is likely to be, used:

    i) to commit an offence;
    ii) to cause personal injury to, or damage to the property of, any person (including the pupil).

Authorised staff can use such force as is reasonable given the circumstances when conducting a search for 'prohibited or illegal items'. Such force **cannot** be used to search for other items which are banned under the school rules.

Further information and more detailed advice and guidance on this issue can be found in the School Behaviour Policy and procedures and DfE advice 'Searching, Screening and Confiscation – Advice for schools'.

18. Staff training

All staff will receive training on the implementation of these procedures. This will include training on any restraint techniques which must not be used because they are known to present an unacceptable risk when used on children and young people. Where required, some staff will receive additional training on the appropriate techniques which may be used to physically restrain a pupil which are outlined in an individual BMP or PHP. The training will be to an approved nationally acceptable level and will be regularly refreshed.

On-going training is provided for relevant staff when required i.e. Team Teach and PRICE training. Team Teach and PRICE training provides training in positive handling strategies (with an emphasis on de-escalation but including restrictive intervention techniques) to better support those who display challenging behaviour. It takes a whole setting holistic approach to behaviour management.

Once the individual BMP and control measures have been agreed and communicated to those who work with and support the pupil, consideration should be given to the ability of staff to implement the measures. Successful implementation will be dependent upon staff competence and expertise. It is important to determine what level of training may be required and by whom.

Where it is apparent that there are staff with significant training needs, implementation of the control measures required will be modified until the relevant training has been provided. In some circumstances, staff training may well be required as a matter of urgency so that implementation can take place without delay. We will also ensure that there are more individuals trained in positive handling techniques in the school than are generally required in order that absences can be covered.

Early discussions with receiving schools will take place as a pupil moves through the educational system so that accommodation needs, resources and training in particular control measures and strategies can be anticipated and undertaken prior to transfer.

19. Governor/Trust board monitoring

It is the responsibility of the Governing Body/Trust Board to take all reasonable steps to ensure that these procedures for recording and reporting the use of force, seclusion and restraint are complied with.

It follows that the Governing Body/Trust Board will regularly review and interrogate data on the use of restrictive interventions to ensure that we:

- identify and implement improvements to policies and practices, particularly where approaches have been used for some time but have not been effective;
- identify areas of learning and development for school staff, supporting teachers and others to improve understanding and practice;
- understand pupils' repeat patterns and triggers to interrogate the effectiveness of pupil support measures, share this information with teachers who work with those pupils to better support them and, where appropriate, their parents, to establish a behaviour support plan or revise an existing plan;
- identify any disproportionate use of restrictive interventions in relation to pupils who share protected characteristics, have SEN, or other types of vulnerability.

Any analysis will be proportionate and avoid over-interpreting small subgroups of people.

20. Complaints and allegations

Any complaints regarding the use of restrictive interventions will be dealt with in accordance with the school's normal complaints procedure.

If an allegation regarding inappropriate use of force and/or other restrictive interventions is made against a member of staff, the procedures outlined in the school's Child Protection Policy and procedures will be followed. This includes the provisions regarding suspension of staff.

Behaviour Intervention Levels – Quick Guide

1. Low Priority – Prevention

- Keep environment calm.
- Give clear instructions.
- Redirect and support.
- No physical contact.
- Record if needed.

2. Moderate Priority – De-escalation (No Physical Contact)

- Child upset but not unsafe.
- Use calm verbal de-escalation.
- Adjust environment.
- Supervise and redirect.
- Document incident.

3. High Priority – Reasonable Force

- Risk beginning to emerge.
- Use minimal physical guidance only (guiding or steering).
- Move other children away.
- Only trained staff intervene.
- Record on CPOMS + ABC Charts.
- Inform parents unless harmful.

4. Maximum Priority – Emergency

- Immediate danger / serious harm.
- Use least restrictive safe restraint.
- Only trained staff intervene.
- Release child once safe.
- Record this on the 'Record of Restrictive Intervention, Use of Reasonable Force and Seclusion' document (Kym Allan) then upload to CPOMS.
- Inform parents unless harmful.