Restrictive Intervention & Reasonable Force Policy

Contents

Policy Statement 2
Aims and Objectives 2
Definitions 3
Use of restrictive intervention and reasonable force 3
Training and Risk Assessment 5
Consideration of pupils with SEND 6
Recording and Reporting 6
Supporting Pupils and Families 7
Local Governing Body 8
Complaints and allegations 8
Policy Review 8

Policy Statement

Embley recognises its duty of care for all pupils and, in line with the *Independent Schools Standards Regulations (ISSRs)(Part 3*), is committed to safeguarding and promoting the welfare of all pupils. We aim to create an environment where pupils feel secure and supported and where restrictive interventions, including the use of reasonable force, are used only when lawful and necessary, only for the shortest possible time, and only to keep individuals and the wider school community safe. We acknowledge the risks of psychological and physical harm when such interventions are used, and our staff understand that such interventions are to be avoided where at all possible. Therefore, we will always seek to employ preventative strategies and to de-escalate situations without the use of restrictive intervention or use of force, and our staff will never use force as a punishment.

Where there are significant incidents of the use of reasonable force, restraint, seclusion or non-force restrictive interventions, the School will record and report such incidents in line with the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025 and CPOMS.

This policy was developed having regard to the following legislation and guidance:

- the Education and Inspections Act 2006, especially sections 93 and 93A
- the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- the Education (Independent School Standards) Regulations 2014 (with a focus on section 16A)
- Searching, screening and confiscation in schools (2014)
- the Health and Safety at Work etc. Act 1974 and associated regulations
- the Human Rights Act 1998
- the Equality Act 2010

This policy should be read in conjunction with Embley's:

- Child Protection (Safeguarding) Policy
- Behaviour and Discipline Policy
- SEND Policy
- Equal Opportunity Policy
- Anti-Bullying Policy
- Staff Code of Conduct

Aims and Objectives

1.1. Aims

The aim of this policy is to set out Embley's approach to the use and reporting of restrictive interventions and use of reasonable force such that we can ensure a safe working and learning environment for all staff and pupils.

1.2. Objectives

The objectives of this policy are to:

- prevent serious harm, significant damage to property, or serious disruption
- provide clarity for staff on lawful, safe, and proportionate use of restrictive interventions
- ensure statutory recording and reporting requirements are met
- ensure governance oversight of patterns, trends, and disproportionality.

Definitions

a. **Reasonable force:** means using no more force than is necessary for the least amount of time.
b. **Restraint:** refers to an 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 or removing a pupil's crutches or other mobility aid would both be considered forms of restraint.
c. **Restrictive intervention:** a physical or non-physical action designed to restrain a pupil such as to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil.
d. **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, blocking, or making them believe they will be punished if they try to leave.
e. **Significant incident:** any incident where the use of force, restraint, seclusion, or non-force restrictive interventions goes beyond appropriate physical contact between pupils and staff (see section 4 of this policy), including when physical force is used to implement a non-physical restrictive intervention.
f. **Parent:** in this document the term 'parent' is used to refer to a parent, carer, guardian, or anyone with legal responsibility for the pupil.

Use of restrictive intervention and reasonable force

1.3. Whole School Approach

Embley seeks to minimise the need to use restrictive interventions through prevention and de-escalation, paying particular attention to:

- consideration of how the school and classroom environment can support all pupils to achieve and thrive
- giving pupils appropriate time, space, and strategies to calm down before their behaviour escalates
- sharing best practice for whole-class behaviour management, and for managing communal spaces such as corridors and playgrounds
- training staff in effective communication strategies, such as using appropriate tone of voice and empathy to aid de-escalation
- development of working staff-pupil relationships and trust
- recording and analysing data on the use of restrictive interventions to inform improvement planning.

Embley will also work closely with parents to put in place appropriate strategies to support individual pupils based on their identified needs.

1.4. Authorised Persons

The following people are authorised to use restrictive intervention and reasonable force in appropriate circumstances:

- All trained teaching and support staff

Such people have a *power*, not a *duty*, to use force in certain circumstances, but at all times retain a duty of care for pupils which may necessitate the use of restrictive intervention and reasonable force.
Implementation of the Physical Restraint Policy is the responsibility of Leah Goodey in the Senior School and Sheina Gibb in the Prep School, including EYFS.

1.5. Appropriate Circumstances

Restrictive intervention and reasonable force should always be used as a last resort, but may be used by authorised people in School to prevent or stop a pupil from:

- causing injury to themselves or others
- committing a criminal offence
- damaging property
- prejudicing the maintenance of good order and discipline among pupils, whether on the school premises or elsewhere when the member of the staff has lawful control or charge of the pupil(s) concerned.

In assessing whether restrictive intervention or reasonable force are appropriate, the member of staff should also use their professional judgement and consider:

- the pupil's age, SEND, and known vulnerabilities
- proportionality of the intervention
- whether the intervention protects the pupil's dignity.

Pupils will never be deliberately restrained in a way that affects their airway, breathing or circulation, for example, by covering their mouth or applying pressure to the throat, neck, or abdomen.

1.6. Seclusion as a restrictive intervention

Seclusion, as used in this policy, refers to a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving. It will usually only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation.

The place to which a pupil is secluded will be safe and is intended not to feel threatening or intimidating to the pupil. The pupil will be supervised at all times during the period of seclusion and, as soon as the immediate risk of harm has reduced, the pupil will be allowed to leave.

An incident involving the use of seclusion will be recorded and reported in accordance with the procedures outlined in section 7 of this policy.

Seclusion, in this sense, is different from a disciplinary response to deliberate or wilful misbehaviour whereby removal from the classroom may be used in line with School's Behaviour Policy.

1.7. Other contact with pupils

The School recognises that there are circumstances when it is appropriate for staff to have some physical contact with pupils which does not give rise to any question over the use of reasonable force and other restrictive interventions. 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 Prep 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

In the majority of cases, explicit consent for such physical contact should be sought from the pupil.

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

- the School's *Child protection and Safeguarding* policy
- whether there are other adults present
- the individual pupil's age
- whether the pupil has SEND or other vulnerabilities
- whether any alternative strategies that do not include physical contact can be used.

Training and Risk Assessment

Embley will provide appropriate training for staff on what is appropriate physical contact between pupils and staff as well as the use of restrictive intervention and reasonable force.

Such training may include information about preventative and de-escalation strategies, understanding of individual needs, and the use of restrictive interventions, including how to judge when it is appropriate to use restrictive interventions, including in situations where quick decisions are needed, and how to assess whether a particular response is reasonable under pressure.

Embley recognises that staff training is a critical component of preventing the need for restrictive interventions and ensuring that, where they are used, they are applied safely, lawfully and proportionately.

In line with the April 2026 Department for Education guidance, staff who are likely to work in situations where restrictive interventions will receive appropriate training in behaviour support, prevention and de-escalation strategies, and the safe and lawful use of reasonable force and other restrictive interventions.

Training will reflect the principles of this guidance and will support staff to assess necessity and proportionality, understand risks to physical and psychological wellbeing, recognise the impact of trauma and SEND, and make defensible professional judgements, including in situations where decisions must be taken quickly.

Embley will ensure that training needs are informed by its cohort of children, patterns and trends in incidents, and risk assessments.

As an employer, Embley will take reasonably practicable steps to ensure the health, safety and welfare of staff, including providing refresher training, access to advice and support, and additional guidance where staff regularly work with children who present a higher level of risk. Therefore, risk assessments will be conducted 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.

Any member of staff who believes they require specific training or a risk assessment for the use of restrictive intervention or reasonable force should speak with Leah Goodey for the Senior School and Sheina Gibb for the Prep School and EYFS.

Consideration of pupils with SEND

Embley acknowledges that SEND pupils may react to distressing or confusing situations by displaying behaviours which may be harmful to themselves and others and that this could potentially lead to pupils with SEND being disproportionately subject to the use of restrictive interventions and use of reasonable force.

In line with our SEND Policy, and the *Equality Act 2010*, we will seek to make reasonable adjustments for pupils with SEND by working with the pupil and their parents to help identify and manage trigger points, when challenging behaviour is more likely to occur, and to develop proactive prevention and de-escalation to reduce the likelihood of restrictive interventions being required. Such information will be set out in the pupil's Individual Education Plan and reviewed regularly, including 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.

Recording and Reporting

1.8. Recording incidents

Embley will record and report any significant incidents of the use reasonable force, restraint, seclusion, or non-force restrictive interventions using CPOMS.

Incidents must be recorded in writing as soon as practicable after the event by the staff member(s) involved and they should endeavour to do this no later than the same day. The record will include:

- name(s) of pupil(s) and staff directly involved
- any relevant needs or circumstances of the pupil, including whether the pupil involved has an identified special educational need or disability
- time, date, location, and approximate duration of the intervention
- brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, and (where relevant) what type of reasonable force was applied, the degree of force, and details of any physical injuries sustained
- brief account of why the use of force was assessed as necessary in that instance
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts

This information will be logged on CPOMS under the Safeguarding Intervention category - Restrictive Intervention subcategory – as soon as practicable after the event. Staff should endeavour to complete records no later than the same day.

In circumstances where a restraint incident also constitutes a significant use of force, the same information does not need to be reported twice, and Embley will follow the reporting procedure for significant use of force incidents under section 93A of the Education and Inspections Act 2006.

1.9. Reporting incidents

Embley will report any incidents to parents in writing as soon as practicable after the event and should endeavour to do this no later than the same day.

This report will include:

- 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.

Embley does not have to report to parents any incidents where it appears to the staff member that doing so would be likely to result in serious harm to the pupil. In this instance, the staff member must report the incident to any parent(s) to whom it can be reported without resulting in significant harm or, if there are none, to the local authority within whose area the pupil is ordinarily resident.

Embley also does not have to report to parents any incidents where the following:

- the pupil is aged 20 or over.
- it appears that informing a particular parent would be likely to result in serious harm to the child. In such cases, the incident will be reported to any parent to whom it can safely be reported, or, where this is not possible, to the relevant local authority

Any decision not to report to the parents will be taken by Designated Safeguarding Lead in consultation with the Headmaster.

2.0. Post-incident support and review

Following any restrictive intervention, Embley will ensure that appropriate and timely actions are taken to safeguard the physical and emotional wellbeing of all those involved, to understand what happened and why, and to reduce the likelihood of future incidents.

Supporting Pupils and Families

Embley values and accepts the positive role and contribution parents can make and seeks to work in full co-operation with them, recognising and respecting their roles and responsibilities.

Where a pupil has been involved in a significant incident of the use reasonable force, restraint, seclusion or non-force restrictive interventions, and a report has been made to parents, Embley will offer a follow-up discussion about the incident to review:

- 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

Embley may use this information to amend any existing Individual Education Plan as needed.

Local Governing Body

The Local Governing Body [LGB] is responsible for taking all reasonable steps to ensure that Embley complies with its stated procedures for recording and reporting the use of force, seclusion, and restraint.

The LGB will also periodically review and engage in proportionate interrogation of any data on restrictive interventions to ensure school leaders:

- 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 specific departments and teachers 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.

Complaints and allegations

Any complaints raised in relation to the use of restrictive interventions will be managed in accordance with Embley's complaints procedure.

Where an allegation is made that a member of staff has used restrictive interventions inappropriately, unlawfully or in a way that may have placed a child at risk, the matter will be managed in line with Keeping Children Safe in Education, the Allegations Against Staff and Low Level Concerns Policy and the Staff Discipline Policy.

14.3 Learning arising from complaints and allegations will be used to inform training, policy review and preventative practice.

Policy Review

This policy will be reviewed annually. It will be monitored by Leah Goodey and updated and revised if necessary, during the annual cycle.

Version Number	11.1
Reason for Version Change	Updated guidance by United Learning
Name of owner / author	Leah Goodey
Name of individual/department responsible	United Learning Independent Schools
Target Audience	Public
Date Authorised	9 June 2026
Date Issued	8 June 2026
Where available	United Learning Hub, Network, School Website
Review date:	June 2027 or as events, ISI regulations or legislation require