

EDSTART SCHOOLS

Restrictive Interventions Policy

SAFEGUARDING & WELFARE

Policy owner	EdStart Specialist Education Ltd
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Use of Restrictive Interventions Policy

EdStart Specialist Education Schools Use of Restrictive Interventions Policy (including reasonable force and seclusion)

Last reviewed on: September 2026 Next review due September 2026 by:

EdStart Governance & Compliance Statement This document forms part of the EdStart Schools Trust Governance, Safeguarding and Quality Assurance Framework. It is reviewed termly by senior leaders and Trustees to ensure compliance with the Ofsted Non- Association Independent School Inspection Framework (January 2026), ISS and KCSIE 2026.

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1. Aims and scope EdStart Specialist Education Schools provides alternative provision for young people aged 11–16 across sites in Bolton, Bury, Salford, Oldham, Wirral, and Northern Moor. The majority of our pupils hold Education, Health and Care Plans (EHCPs) and present with complex needs including autism spectrum disorder (ASD), attention deficit hyperactivity disorder (ADHD), and social, emotional and mental health (SEMH) difficulties. Our provision exists to create safe, therapeutic and supportive learning environments for some of the most vulnerable young people in our communities.

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There are times when the use of restrictive interventions, including reasonable force and seclusion, is lawful and necessary to keep people safe. However, we understand that the use of restrictive interventions can have a significant impact on pupils, staff and parents/carers, and may be particularly distressing for pupils with ASD, SEMH difficulties or histories of trauma. In our schools, restrictive interventions are only ever considered as a last resort, once all other prevention and de-escalation strategies have been exhausted.

This policy aims to:

- Minimise the need to use restrictive interventions, through early support, trauma-informed practice, and consistent de-escalation strategies
- Help EdStart staff feel confident in knowing how to use restrictive interventions safely, appropriately and lawfully, when they are necessary
- Clearly set out the steps for recording and reporting incidents of reasonable force, seclusion and restraint in line with the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Protect the safety, wellbeing and dignity of all pupils and staff across all EdStart sites

2. Legislation and guidance This policy is based on the Department for Education (DfE) guidance on restrictive interventions, including the use of reasonable force, in schools. It also meets the requirements of:

- Section 93 of the Education and Inspections Act 2006
- Section 93A of the Education and Inspections Act 2006, inserted by the Apprenticeships, Skills, Children and Learning Act 2009
- Sections 550ZA and 550ZB of the Education Act 1996
- Equality Act 2010
- Health and Safety at Work etc. Act 1974 and associated regulations
- Human Rights Act 1998
- Keeping Children Safe in Education (current edition)
- The Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- DfE guidance on searching, screening and confiscation
- Paragraph 16A of the schedule to The Education (Independent School Standards) Regulations 2014 (inserted by The Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025)

3. Definitions The terms used in this policy are defined as follows, based on the DfE's guidance on restrictive interventions.

Restrictive interventions are used to prevent, restrict or subdue movement of the body or part of the body. This policy uses 'restrictive interventions' as the umbrella term to describe both physical and non-physical actions. Examples in an EdStart context include:

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- Supervised seclusion of a pupil in a calm or wellbeing space, where the pupil is prevented from leaving for their own safety and/or the safety of others
- Passive physical contact, such as a staff member blocking a pupil's path if they are moving towards a hazard, or positioning themselves between pupils to prevent a confrontation

Reasonable force refers to the broad range of actions used by staff that involve a degree of physical contact to restrain pupils, using no more force than is needed for the least amount of time. Examples include:

- A staff member guiding a pupil to a safer area by the arm

- Staff separating pupils involved in a physical altercation
- A staff member restraining a pupil to prevent injury to the pupil or others

Restraint is a form of non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. Examples include:

- A staff member holding a pupil's arms to their sides when the pupil is attempting to harm themselves or others

Seclusion is a non-disciplinary intervention that keeps a pupil confined to a place away from others and prevents them from leaving, for the safety of that pupil and/or others. This could be through physical obstruction or by making the pupil believe that they will be punished if they leave. See section 3.2 for further detail.

A significant incident is any incident where the use of force goes beyond appropriate physical contact between a member of staff and a pupil, including when physical force is used to implement a non-physical restrictive intervention.

3.1 Appropriate physical contact with pupils EdStart does not operate a 'no contact' policy. We do not grant requests by parents/carers or staff members to exclude the use of reasonable force and/or other restrictive interventions in all circumstances.

There are circumstances where it is appropriate for staff to have physical contact with pupils which does not give rise to questions over the use of force. Examples include:

- Providing first aid
- Guiding or escorting a pupil within school premises or on educational visits
- Comforting a pupil who is distressed
- Appropriate congratulatory contact, such as a handshake or pat on the back
- Demonstrating exercises or techniques during PE or sport

When assessing whether physical contact is appropriate, staff should use professional judgement and consider EdStart's child protection and safeguarding policy, the specific circumstances (including whether other adults are present), and factors such as the pupil's age, SEND needs, and whether alternative strategies are available.

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3.2 Seclusion EdStart only uses seclusion as a safety measure when a pupil is experiencing high levels of emotional or behavioural dysregulation. Given that many of our pupils have SEMH difficulties, ASD or histories of trauma, we are particularly mindful of the potential impact of seclusion and always seek to make the experience as calm and supportive as possible.

Seclusion is not used as a threat or punishment and is not a disciplinary response to deliberate or wilful misbehaviour. Please see our behaviour policy for our approach to misbehaviour.

During seclusion:

- The pupil will be in a safe, calm space that does not feel threatening or intimidating (e.g. a designated wellbeing or de-escalation room)
- The pupil will be supervised at all times by at least one member of staff
- As soon as the immediate risk of harm has reduced, the pupil will be allowed to leave

Any seclusion incident will be recorded and reported in accordance with section 12 of this policy.

4. Roles and responsibilities

4.1 The governing board The governing board is responsible for:

- Reviewing and approving this policy
- Ensuring that procedures are in place for recording and reporting each significant incident involving force, seclusion incident, and restraint incident
- Taking all reasonable steps to ensure those procedures are followed
- Regularly reviewing and interrogating data on the use of restrictive interventions across EdStart sites
- Supporting and challenging school leaders to identify where changes may be needed, including any disproportionate use in relation to pupils with SEND or other protected characteristics

4.2 The Executive Headteacher / Director of Education The Executive Headteacher and Director of Education are jointly responsible for:

- Overall implementation and oversight of this policy across the EdStart network
- Ensuring that appropriate, high-quality training in preventative strategies and the safe and lawful use of restrictive interventions is provided to relevant staff
- Ensuring adequate staffing levels to support positive behaviour management across all sites
- Monitoring incidents involving restrictive interventions, including regular cross-site review to identify patterns and refine practice
- Ensuring compliance with recording and reporting requirements

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- Authorising staff to search a pupil or their belongings where there are reasonable grounds to suspect a prohibited or banned item
- Dealing with complaints about the use of restrictive interventions in accordance with EdStart's complaints policy
- Following Keeping Children Safe in Education if an allegation of inappropriate use of force is made against a member of staff

4.3 Site Headteachers / Leads Each site headteacher or lead is responsible for:

- Day-to-day implementation of this policy at their site
- Ensuring all staff at their site are familiar with its requirements
- Ensuring incidents are recorded promptly and accurately
- Escalating patterns of concern to the Executive Headteacher or Director of Education

4.4 All staff All members of staff are responsible for:

- Reading and understanding this policy and any linked policies
- Using de-escalation techniques and positive behaviour management strategies to minimise and prevent the need for restrictive interventions
- Accurately recording every seclusion, restraint and significant incident involving force that they are involved in
- Reporting these incidents to the Designated Safeguarding Lead (DSL)
- Recording any injuries that occur and following EdStart's health and safety policy
- Participating in training on preventative strategies and the lawful use of restrictive interventions as relevant to their role
- Engaging in debrief conversations following any incident involving restrictive intervention

4.5 Designated Safeguarding Lead (DSL) The DSL is responsible for:

- Reporting every seclusion, restraint and significant incident involving force to each parent/carer of the pupil involved
- Keeping records securely and in accordance with safeguarding and data protection procedures
- Contacting the local authority in cases where informing a pupil's parent/carer would put that child at risk of significant harm (see section 12.2)

4.6 Special Educational Needs Co-ordinator (SENCO) Given the nature of EdStart's cohort, the SENCO role is central to this policy. The SENCO is responsible for:

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- Working with pupils, parents/carers and staff to develop and review behaviour support plans and risk assessments for pupils where there is an increased likelihood of restrictive intervention being needed
- Ensuring staff are aware of individual pupil needs and associated behaviour support strategies
- Working with staff to identify and manage risk, including known trigger points
- Advising on reasonable adjustments for pupils with disabilities
- Participating in the review of incidents involving any pupil with SEND
- Contributing to staff training on SEND and behaviour management

5. Acceptable uses of force All EdStart staff have a legal power to use reasonable force in certain situations. Staff can use reasonable force to prevent or stop a pupil from:

- Hurting themselves or others
- Committing a criminal offence
- Damaging property
- Causing disorder

Given the complex needs of our pupils, some staff — particularly those in direct support roles or working with pupils who display more frequent challenging behaviour — are more likely to need to exercise this power. EdStart will ensure all such staff are adequately trained and that risk assessments are in place where necessary (see section 11).

Any significant incident involving the use of force will be recorded and reported in accordance with section 12.

6. Unacceptable uses of force It is illegal to use force on a pupil as a punishment. EdStart staff never use force as a sanction, threat or deterrent.

The following uses of force are never acceptable:

- Using force for the purpose of punishment
- Restraining a pupil in a way that affects their airway, breathing or circulation — for example by covering their nose and/or mouth or applying pressure to their neck or abdomen
- Using force on the ground. If a pupil is unintentionally held on the ground, staff should release their hold or move to a safer position as quickly as possible

7. Using reasonable force to search pupils The Executive Headteacher, site headteacher/lead, and any member of staff authorised by them have a statutory power to search a pupil or their belongings if they have reasonable grounds to

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suspect the pupil may have a prohibited item (as listed in the DfE's searching, screening and confiscation guidance) or an item banned under EdStart's school rules.

Reasonable force can be used to search for prohibited items such as knives, weapons, stolen items or illegal drugs. Reasonable force cannot be used to search for items banned only under school rules (such as mobile phones or vapes).

The decision to use reasonable force in a search must be made carefully, on a case-by-case basis, taking into account the level of risk to pupils and staff. Please see EdStart's behaviour policy for further guidance on searches.

8. Prevention and de-escalation strategies EdStart's whole-school approach to minimising restrictive interventions is grounded in trauma-informed practice and a recognition of the complex needs of our pupils. Our whole-school approach includes:

- Consideration of how the school environment and timetabling can support all pupils to feel safe and achieve
- Sharing best practice for behaviour management across sites, including in communal spaces
- Training staff in effective communication strategies, including appropriate tone of voice, empathy and non-verbal de-escalation
- Development of strong, consistent staff-pupil relationships built on trust and mutual respect
- Recording and analysing incident data to inform improvement planning

Our individual approaches include:

- Working closely with parents/carers to understand and support individual pupils
- Development of behaviour support plans that include personalised de-escalation strategies
- Making reasonable adjustments for pupils with disabilities or SEND
- Strategies informed by each pupil's Pupil Passport and EHCP

8.1 De-escalation when a situation arises When a staff member is faced with a situation where a restrictive intervention may become necessary, they should consider de-escalation techniques first, wherever possible. Techniques may include:

- Open, non-threatening body language and awareness of the pupil's personal space
- Moving the pupil away from an 'audience' or from the immediate trigger environment
- Using empathy and active listening — helping the pupil feel heard and understood
- Distraction techniques and offering choice to restore a sense of control
- Offering access to a calm space or sensory resource for the pupil to self-regulate
- Verbal cues delivered calmly, clearly and without escalation

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9. Deciding when the use of restrictive interventions is appropriate

9.1 Necessity and proportionality The decision to use restrictive interventions is always a matter of professional judgement, based on individual circumstances. Staff should always consider whether de-escalation or other alternatives remain available. However, there may be situations where restrictive intervention is the only way to reduce the risk of harm.

When assessing whether a restrictive intervention is required, staff should consider:

- Is it necessary? Are there other, less restrictive ways to manage the situation? Is the intervention likely to reduce risk, or could it escalate things further?
- Is it proportionate? Staff must use the least amount of force, the least restrictive intervention, for the least amount of time. If the intervention is escalating the situation, staff should reconsider. Individual factors including the pupil's age, size, SEND needs and medical conditions must be considered.

9.2 Pupil and staff welfare The safety and wellbeing of the pupil is always the primary consideration. EdStart staff are aware that many of our pupils have experienced adverse childhood experiences, trauma, neglect, or have unmet sensory or communication needs. Restrictive interventions can be particularly distressing in these contexts.

Staff should always aim to maintain respect for a pupil's dignity during any intervention, including giving careful thought to the location, who is present, and the pupil's likely experience. Wherever possible, staff should calmly explain to the pupil what is happening and why, and allow time for the pupil to process and respond.

Following any use of restrictive intervention, EdStart will:

- Evaluate the incident to understand what happened, its impact, and how future incidents might be avoided
- Ensure each pupil and staff member involved receives appropriate support, including medical assessment if needed
- Facilitate a follow-up conversation with the pupil and staff involved as part of the debriefing process — ideally led by a staff member who was not part of the incident
- Continue to monitor wellbeing and provide additional support as needed
- Offer support to any witnesses where appropriate

10. Considerations for pupils with SEND EdStart's entire provision is designed around the needs of pupils with SEND. We understand that pupils with ASD, SEMH difficulties, ADHD and other needs may respond to distressing or confusing situations in ways that could put themselves or others at risk. Pupils who have difficulty communicating verbally may express distress through their behaviour.

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EdStart is committed to understanding the triggers and warning signs for each individual pupil, and to providing a genuinely inclusive, therapeutic environment. We will carry out risk assessments for pupils where we identify an increased likelihood of needing to use restrictive interventions, and will fulfil our duty under the Equality Act 2010 to make reasonable adjustments for pupils with disabilities.

Individual de-escalation and prevention strategies will be developed with the pupil, their parents/carers and any relevant professionals. These strategies may include:

- Removing stimuli that may be causing distress
- Adjusting staff communication style — including body language, facial expressions and tone of voice
- Supporting the pupil to express emotions before becoming overwhelmed
- Engaging the pupil in activities to support emotional regulation
- Using familiar objects or activities to redirect the pupil's attention
- Providing access to sensory resources or a designated calm space

Where appropriate, an individual behaviour support plan will be created and reviewed regularly with the pupil and parents/carers. The plan will:

- Outline environmental adjustments and known triggers
- Explain the best ways to communicate with the pupil
- Specify, where relevant, when increased physical contact may be appropriate, documented clearly and agreed with all parties

11. Training and risk assessments EdStart ensures that all staff who are likely to need to use reasonable force and/or other restrictive interventions receive adequate training in their safe and lawful use, as well as in preventative and de-escalation strategies. Training is selected and delivered with reference to the complex needs of our pupils.

EdStart also fulfils its duty under health and safety legislation to ensure the welfare of staff. Risk assessments are carried out for staff who regularly work alongside pupils where the use of restrictive interventions may be required, taking account of individual pupil needs, staff roles, and site-specific factors.

12. Recording and reporting arrangements EdStart has a legal duty to record and report all:

- Significant incidents involving force
- Seclusion incidents
- Restraint incidents

12.1 Recording incidents

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Staff must record incidents in writing as soon as possible after the event, and should endeavour to do so on the same day. This applies even where the use of restrictive interventions is agreed as part of a pupil's behaviour support plan. Records are submitted to the DSL and stored securely on EdStart's safeguarding management system.

For significant incidents involving force, the record will include:

- The names of the pupil and staff members directly involved
- Any relevant needs or circumstances of the pupil, including SEND status and SEN status code
- The time, date, location and approximate duration of the intervention
- What led up to the incident, including any known or potential triggers
- Any preventative or de-escalation strategies used prior to the intervention
- The type and degree of reasonable force used
- Details of any physical injuries sustained
- A brief explanation of why using force was assessed as necessary
- Details of any support provided after the incident

For seclusion incidents and restraint incidents, the record will include:

- The names of the pupil and staff members directly involved
- Any relevant needs or circumstances of the pupil, including SEND status and SEN status code
- The time, date, location and approximate duration of the intervention
- A brief explanation of why the intervention was assessed as necessary
- Details of any physical injuries sustained
- Details of any support provided after the incident

Note: if a seclusion or restraint incident also constitutes a significant incident involving force, it will be recorded as a significant incident only and does not need to be recorded twice.

12.2 Reporting incidents to parents/carers EdStart will inform parents/carers about an incident as soon as possible after it occurs, and will endeavour to do so on the same day. Reports are made by the DSL or a delegated member of staff, by telephone followed by written confirmation. This applies even where the use of restrictive interventions forms part of a pupil's behaviour support plan.

There are two exceptions to immediate parental notification:

- If the pupil is 20 years old or older
- If a member of staff believes that notifying the pupil's parents/carers would be likely to result in significant harm to that pupil. In these cases, EdStart will report to any parent/carer for whom it is safe to do so or, if there are none, to the local authority where the pupil ordinarily resides

When reporting significant incidents involving force to parents/carers, we will include:

- The time, date, location and approximate duration of the intervention

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- A brief explanation of why the intervention was assessed as necessary
- A short description of the type and degree of force used
- Details of any physical injuries sustained

When reporting seclusion or restraint incidents to parents/carers, we will provide written information about the incident. Where a seclusion or restraint incident also constitutes a significant incident involving force, it will be reported as a significant incident only.

Where appropriate, EdStart will invite parents/carers to a follow-up conversation about the incident, covering behavioural triggers, whether agreed behaviour support plans were followed, what de-escalation strategies were used and their effectiveness, and what might be done differently in future.

12.3 Reporting incidents to the local authority In cases where it has been assessed that an incident should be reported to the local authority (as outlined in section 12.2), the report will include all information that would normally be shared with parents/carers, together with the reasons why direct parental notification was not appropriate.

In cases where a pupil is the subject of a care order under section 31 of the Children Act 1989 or is being accommodated under section 20 of the Children Act 1989, EdStart will report the incident to the relevant local authority in addition to the parents/carers, unless it is deemed unsafe to do so.

13. Complaints and allegations Any complaints about the use of restrictive interventions will be handled through EdStart's complaints policy, available from the Director of Education and on the EdStart website.

EdStart takes any allegation of inappropriate use of force and/or other restrictive interventions very seriously. Allegations will be dealt with in line with the statutory safeguarding guidance Keeping Children Safe in Education.

14. Monitoring and review This policy will be reviewed annually by the Director of Education and approved at each review by the governing board.

Incident data will be reviewed at least termly by the Director of Education and Executive Headteacher, and presented to governors as part of the school's safeguarding and behaviour reporting cycle.

15. Links with other policies

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This policy links to the following EdStart policies and procedures:

- Behaviour policy
- Child protection and safeguarding policy
- Complaints policy
- Health and safety policy
- SEND policy
- Pupil Passport framework

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